

LIDDELL BATTERY AND BAYSWATER ANCILLARY WORKS

INDEPENDENT ENVIRONMENTAL
AUDIT

for AGL Macquarie Pty Limited

4 August 2023



DOCUMENT CONTROL

Document Status

| Version | Description | Reviewed By | Approved By | Date Issued |
|---------|---------------------------------|-------------|-------------|-------------|
| 01 | Independent Environmental Audit | DW | JB | 04/08/23 |
| | | | | |
| | | | | |
| | | | | |

Document Details

| | |
|-----------------------|--|
| Project Name | Liddell Battery and Bayswater Ancillary Works |
| Document Title | Independent Environmental Audit |
| Client | AGL Macquarie Pty Limited |
| Client Address | Locked Bag 14120 MCMC, Melbourne VIC 8001 |
| Author | James Bailey & Associates Pty Ltd |
| Author Address | 6/127-129 John Street, Singleton NSW 2330 |
| Our Reference | 230804 Liddell Battery and Bayswater Ancillary Works IEA |

LIMITATIONS OF REPORT

In preparing this Independent Environmental Audit on behalf of AGL Macquarie Pty Limited, James Bailey and Associates has assessed all activities appropriate and necessary to evaluate the environmental status of the site during the audit period. James Bailey and Associates has addressed all technical matters which might reasonably be considered to be relevant to such an audit conducted to standards which apply in New South Wales. Based on discussions with appropriate staff and a review of available documentation, it is James Bailey and Associates' opinion that the potential critical environmental issues associated with the site and operations are those discussed in this report. However, James Bailey and Associates can only advise on the basis of the information available to them and therefore cannot dismiss absolutely the possibility that parts of the site, or adjacent properties, may give rise to additional issues.

The conclusions presented in this report are professional opinions based solely upon James Bailey and Associates' interpretation of the documentation reviewed, interviews and conversations with personnel knowledgeable about the site and other available information, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated.

This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation, or to draw conclusions as to whether any particular circumstances constitute a breach of relevant legislation.

CONTENTS

| | |
|---|-----------|
| 1. INTRODUCTION | 1 |
| 1.1 Background | 1 |
| 1.2 Audit Team | 1 |
| 1.3 Audit Objectives | 1 |
| 1.4 Audit Scope | 1 |
| 1.5 Audit Period..... | 2 |
| 2. AUDIT METHODOLOGY | 4 |
| 2.1 Overview | 4 |
| 2.2 IEA Preparation..... | 4 |
| 2.3 Compliance Evaluation | 4 |
| 2.4 Site Inspection | 5 |
| 2.4.1 Opening Meeting..... | 5 |
| 2.4.2 Site Overview and Orientation Session | 5 |
| 2.4.3 IEA Interviews..... | 5 |
| 2.4.4 Focused Site Inspection | 5 |
| 2.4.5 Site Documentation Review | 5 |
| 2.4.6 Follow Up Auditing | 5 |
| 2.4.7 Exit Briefing | 5 |
| 2.5 Audit Consultation..... | 6 |
| 2.6 Compliance Status Descriptors | 6 |
| 3. AUDIT FINDINGS | 8 |
| 3.1 Approval and Document List..... | 8 |
| 3.2 Compliance Performance..... | 8 |
| 3.3 Summary of Agency Notices and Orders..... | 8 |
| 3.4 Actions from Previous Audit | 8 |
| 3.5 Non-Compliances During the Audit Period | 8 |
| 3.6 Environmental Performance | 15 |
| 3.6.1 Site Inspection Summary | 15 |
| 3.6.2 Environmental Management Documents | 16 |
| 3.6.3 Waste Management | 16 |
| 3.6.4 Operation of Plant and Equipment | 16 |
| 3.6.5 Air Quality | 16 |
| 3.6.6 Aboriginal Heritage | 17 |
| 3.6.7 Environmental Incidents | 17 |
| 3.6.8 Environmental Complaints | 17 |
| 3.6.9 Environmental Impact Comparison..... | 17 |
| 4. RECOMMENDATIONS..... | 19 |

TABLES

| | | |
|---------|---|----|
| Table 1 | SSD 8889679 IEA Requirements | 2 |
| Table 2 | Feedback from Regulatory Consultation | 6 |
| Table 3 | Summary of Compliance..... | 8 |
| Table 4 | Status of Actions Arising from Previous IEA | 9 |
| Table 5 | IEA Non-Compliances | 14 |
| Table 6 | IEA Recommendations | 19 |

FIGURES

| | | |
|----------|---------------------------------|---|
| Figure 1 | SSD 8889679 Project Layout..... | 3 |
|----------|---------------------------------|---|

APPENDICES

| | |
|------------|---------------------------------------|
| Appendix A | Endorsement of IEA Team |
| Appendix B | IEA Declaration |
| Appendix C | IEA Compliance Tables |
| Appendix D | Stakeholder Engagement Correspondence |
| Appendix E | IEA Site Visit Agenda |
| Appendix F | Site Inspection Plates |

1. INTRODUCTION

1.1 BACKGROUND

James Bailey & Associates (JBA) has been commissioned by AGL Macquarie Pty Limited (AGL) to conduct the second construction phase Independent Environmental Audit (IEA) for the Liddell Battery and Bayswater Ancillary Works Project (SSD 8889679).

AGL owns and operates the Bayswater Power Station (Bayswater), Liddell Power Station (Liddell), Hunter Valley Gas Turbines and associated ancillary infrastructure systems. Liddell and Bayswater are located approximately 25 kilometres (km) north west of Singleton, 15 km south east of Muswellbrook and 165 km north west of Sydney. The Project is located within the Singleton and Muswellbrook Local Government Areas (LGAs) and located within an area dominated by mining and power generation.

State Significant Development (SSD) 8889679 provides for the following activities:

- Construction and operation of a Battery Energy Storage System with a capacity of up to 500 MW and 2 GWh;
- Decoupling works to facilitate the separation of the Bayswater Power Station from the Liddell Power Station; and
- Upgrades to ancillary infrastructure required for the ongoing operation of the Bayswater Power Station.

SSD 889679 was approved subject to conditions on the 8 March 2022 by the Director Resources Assessments in accordance with Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). **Figure 1** shows the layout of the Project as approved under SSD 889679.

The IEA has been conducted generally in accordance with the NSW DPIE 'Independent Audit Post Approval Requirements May 2020' (IEA Guidelines).

1.2 AUDIT TEAM

The IEA was completed by Dorian Walsh (Certified Auditor Certificate Number: 201881) and Tegan Brown of JBA. No specialist sub-consultants were required to assist with the IEA.

A copy of the Department of Planning and Environment (DPE) endorsement of the IEA team is included in **Appendix A**. The Independent Environmental Audit Report Declaration for this IEA is included as **Appendix B**.

1.3 AUDIT OBJECTIVES

The IEA assesses AGL's activities during the audit period (see **Section 1.5**) and compliance with key regulatory approvals for the Project. The IEA assessed the status of conditions and commitments from:

- SSD 8889679; and
- SSD 8889679 management plans, strategies and programs.

1.4 AUDIT SCOPE

The IEA scope is defined under Schedule 2, Conditions C13 - 18 of SSD 8889679 which is reproduced below in **Table 1**.

1.5 AUDIT PERIOD

The IEA covers the period from 23 December 2022 to 4 July 2023, the date of the audit site visit (the audit period).

Table 1 SSD 8889679 IEA Requirements

| Condition | Requirement | Report Section |
|---------------------------------|---|--|
| Schedule 2 Condition C13 | Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020, or its latest version). | This IEA report |
| Schedule 2 Condition C14 | Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit. | Section 1.2 and Appendix A |
| Schedule 2 Condition C15 | The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Compliance Reporting Post Approval Requirements (2020, or its latest version), upon giving at least 4 weeks' notice (or timing) to the Applicant of the date upon which the audit must be commenced. | N/A; no requests made by DPE to change IEA frequency |
| Schedule 2 Condition C16 | In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020, or its latest version), the Applicant must: | Note only |
| Schedule 2 Condition C16 (a) | review and respond to each Independent Audit Report prepared under condition C13 of this approval, or condition C15 where notice is given by the Planning Secretary; | This IEA report; AGL to complete response to DPE |
| Schedule 2 Condition C16 (b) | submit the response to the Planning Secretary; and | N/A; AGL to complete |
| Schedule 2 Condition C16 (c) | make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary. | N/A; AGL to complete |
| Schedule 2 Condition C17 | Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection, as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary. | N/A; AGL to complete |
| Schedule 2 Condition C18 | Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020, or its latest version), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance. | N/A |



Figure 1 SSD 8889679 Project Layout

2. AUDIT METHODOLOGY

2.1 OVERVIEW

This IEA was undertaken in accordance with the requirements of SSD 888g67g (see **Section 1.4**) and the IEA Guidelines. **Appendix A** includes a copy of DPE endorsement for the IEA team (see **Section 1.2**) and confirmation over audit requirements.

The compliance status of AGL activities during the audit period was determined by assessment of key approval documents regulating site activities (see **Section 3.1**) and a desktop review of all plans, strategies, programs, monitoring data and correspondence relevant to the audit period. The desktop review was used as a basis for this IEA report and identified potential compliance issues that were verified during the Project site inspection and in interviews with key AGL personnel.

The audit methodology also included consultation with NSW DPE, Environment Protection Authority (EPA), Muswellbrook Shire Council (MSC) and Singleton Council to seek any specific environmental issues that should be a focus of the IEA (see **Section 2.5**).

2.2 IEA PREPARATION

Preparation of the IEA involved:

- Submission of an information request to AGL for the provision of evidence to verify the compliance status of AGL Project activities during the audit period;
- Engagement with key regulatory agencies for the Project regarding any specific issues that should be a particular focus of the IEA;
- Submission of an audit agenda to AGL (see **Appendix E**) and confirmation over the scope of the site inspection component of the IEA;
- Desktop review of documentation provided by AGL to determine the compliance status of approval and licencing conditions, identify good site practice and opportunities for improvement, in accordance with the requirements of the IEA Guidelines; and
- Preparation of compliance tables and protocols for the site inspection, including a checklist of specific regulatory requirements obtained from documents provided.

2.3 COMPLIANCE EVALUATION

The IEA consisted of a detailed desktop review of approval documentation and a site inspection. The findings of this IEA were based on verifiable evidence collected by:

- Review of documentation provided by AGL (including document reference, revision numbers, dates and authors);
- Interviews with key site personnel; and
- Inspection of the Liddell Battery and Bayswater Ancillary Works site, activities and processes on 4 July 2023. It is noted that only Stage 1 of the Project had commenced at the time of audit, with selected images taken during the site inspection included as **Appendix F**.

Hardiksinh Chavda was the primary contact for the audit and was present during the audit site inspection. A list of the key documentation reviewed for the IEA is found in **Section 3.1**. The evidence that was used to determine the compliance status with respect to each condition has been documented in the tables provided in **Appendix C**, along with relevant observations, notes and recommended opportunities for improvement.

2.4 SITE INSPECTION

A physical site inspection of SSD 8889679 construction activities completed during the audit period was conducted on 4 July 2023 and undertaken to ensure that all aspects of environmental management and performance of the Project were reviewed.

At the time of audit, AGL had commenced construction of the Decoupling Works for Liddell Power Station (Project Stage 1). Development of other activities approved under SSD 8889679 had not commenced during the audit period.

2.4.1 Opening Meeting

The IEA site inspection commenced with an opening meeting; attendees included Dorian Walsh (JBA), Tegan Brown (JBA), Hardiksinh Chavda (AGL), and Bill Henderson (AGL) and Leigh Conway (PBE). The briefing included clarification of the audit objectives, scope, resources required and the methodology of the IEA.

2.4.2 Site Overview and Orientation Session

An orientation session was conducted by AGL site personnel to provide JBA with a general overview of the Project during the audit period, an indication of the environmental setting, near neighbours, safety and emergency requirements and known environmental issues.

2.4.3 IEA Interviews

The IEA included interviews with key AGL and AGL contract personnel involved with the management and operation of the Project. The IEA interviews during the site inspection were conducted to assist with verifying the compliance status of the Project. AGL and Project personnel interviewed as part of the IEA included:

- Hardiksinh Chavda (AGL Environment Advisor);
- Bill Henderson (Site Co-ordinator, HV Decoupling Project); and
- Leigh Conway (Site Manager, PBE).

2.4.4 Focused Site Inspection

A focused site inspection was conducted following the initial site overview and opening meeting. The purpose of the site inspection was to review specific operation and environmental aspects of the Project and to assess AGL environmental management systems and performance in detail.

2.4.5 Site Documentation Review

Relevant site documentation was reviewed with AGL personnel during the site inspection interviews to verify compliance. Key documents reviewed included SSD 8889679, monitoring results, correspondence with regulatory agencies, Environmental Management Plans and procedures.

2.4.6 Follow Up Auditing

Follow up interviews and document reviews were conducted to clarify any outstanding compliance issues to be resolved prior to inclusion in the final IEA report.

2.4.7 Exit Briefing

An exit briefing was conducted prior to JBA departure from the site. Attendees of exit briefing included Dorian Walsh, Tegan Brown, and Hardiksinh Chavda. The exit meeting included findings of the preliminary audit, recommendations and explanation of actions required by AGL and by JBA to complete the audit process required under the IEA Guidelines.

2.5 AUDIT CONSULTATION

Correspondence was sent to the DPE, EPA, MSC and Singleton Council requesting their input into the scope of the IEA. Responses were received from MSC and Singleton Council (see **Appendix D**), with comments provided in **Table 2**.

2.6 COMPLIANCE STATUS DESCRIPTORS

The compliance status of each condition reviewed during the IEA was assessed based on evidence provided and determined in accordance with the descriptors provided in the IEA Guidelines. No other terms have been used to describe the compliance status of conditions within this IEA.

Table 2 Feedback from Regulatory Consultation

| Comment | Response |
|---|---|
| Muswellbrook Shire Council | |
| A copy of the Proponent’s ‘Response to Audit Findings’ for the May IEA is not available on AGL’s website and/or DPE’s major projects website. | JBA communicated this to AGL during the site component of the IEA. A copy of AGL’s response to the findings of the previous IEA was subsequently made available on the Project website. A summary of the status of actions arising from the previous audit is also included in Section 3.4 . |
| The Complaints Register on AGL’s website is still not working (this was raised during the May IEA) | JBA communicated this to AGL during the site component of the IEA. JBA has recommended that AGL put a procedure in place to regularly review and update the SSD 8889679 Complaints Register (see Section 4). |
| Please indicate the timing of the next audit | The Audit Guidelines require that the next Project audit is completed within six months of the date of the site inspection of this IEA (i.e. 4 July 2023), unless DPE agree otherwise. |
| Singleton Council | |
| The conditions of approval for SSD 8889679, requires the retention of Council imposed conditions as specified in Part D. Council would like to be informed of any contamination that arises due to the implementation of these conditions. | Comments on AGL compliance with the Singleton Council approvals listed in Part D of SSD 8889679 are included in Appendix C , with identified non-compliances and recommendations noted in Section 3 and Section 4 . AGL have developed an EMS for the SSD 8889679, which includes an associated Contamination Management Plan. AGL did not identify any additional site contamination issues for the Project during the audit period. |
| Additionally, the conditions of approval for SSD 8889679, require the Applicant to create and Environmental Management Strategy to keep the community, including the Council, informed of the operation and environmental performance of the development. | AGL have prepared an EMS for the Project, which was approved by DPE on 31 August 2022. A copy of the Project EMS is available on the AGL website. Comments on AGL compliance with the requirements of the EMS are included in SSD 8889679 Schedule 2, Condition C1 of Appendix C , with identified non-compliances and recommendations noted in Section 3 and Section 4 . |

| Comment | Response |
|---|---|
| <p>Council would expect that the audit will include evidence to support the compliance status of these conditions of approval, and of interest to Council, evidence to support the following:</p> <ul style="list-style-type: none"> Whether the various rehabilitation management and closure planning objectives/ plans/ strategies required under the various consents align to local, regional and State strategic land use planning documents, including whether these documents incorporate final land use outcomes consistent with these strategic land use planning documents. | <p>Comments on AGL compliance with the requirements of the EMS are included in SSD 8889679 Schedule 2, Condition C1 of Appendix C, with identified non-compliances and recommendations noted in Section 3 and Section 4.</p> <p>Schedule 2, Condition B28 of SSD 8889679 requires that the Project is rehabilitated to the satisfaction of DPE and provides associated rehabilitation objectives for the Project. Decommissioning and rehabilitation works required for SSD 8889679 have not commenced at the time of audit.</p> |

3. AUDIT FINDINGS

3.1 APPROVAL AND DOCUMENT LIST

AGL documentation for the IEA was sighted during a detailed desktop review and the audit site inspection of 22 December 2022. Approvals and documents assessed during the audit were related to:

- SSD 8889679 approval conditions;
- SSD 8889679 Statement of Commitments;
- SSD 8889679 environmental management plans and procedures;
- AGL environmental monitoring data;
- AGL correspondence with regulatory agencies and other records of consultation; and
- AGL response to the findings and recommendations in the previous IEA.

The tables included in **Appendix C** discuss the documentation that was used to determine compliance with the conditions of SSD 8889679 assessed during the IEA.

3.2 COMPLIANCE PERFORMANCE

Table 3 provides a summary of compliance for key AGL approvals and licensing during the audit period. A description of each identified non-compliance is provided in **Section 3.5** and **Appendix C**.

Table 3 Summary of Compliance

| Document | C | NC | NT | Note | Total |
|---|----|----|----|------|-------|
| SSD 8889679 | 31 | 7 | 26 | 5 | 69 |
| SSD 8889679 Statement of Commitments | 38 | 11 | 19 | - | 68 |

3.3 SUMMARY OF AGENCY NOTICES AND ORDERS

No notices, orders, penalty notices or prosecutions in relation to SSD 8889679 were issued to AGL during the audit period.

3.4 ACTIONS FROM PREVIOUS AUDIT

A summary of the actions arising from the previous SSD 8889679 IEA (JBA, 2023) is provided in **Table 4**. Actions that have not been completed by AGL at the time of this audit have been retained in **Section 3.5** and **Section 4** below.

3.5 NON-COMPLIANCES DURING THE AUDIT PERIOD

Table 5 lists the non-compliances identified during the audit period. Recommendations made in relation to these non-compliances are provided in **Section 4**, with further context provided in **Appendix C**.

Table 4 Status of Actions Arising from Previous IEA

| Ref | Previous IEA Findings | AGL Proposed Completion Date | 2023 IEA Status |
|--|--|--|--|
| SSD 8889679 Non-Compliances & Recommendations | | | |
| Schedule 2, Condition A2(a) | Non-compliances with SSD 9697 conditions were identified during this IEA and described below and in Appendix C. | N/A; AGL completion noted against each condition below | See below. |
| Schedule 2, Condition A12(a) | It is recommended that maintenance records for all project plant and equipment is retained to confirm these activities are being carried out. | Ongoing | Ongoing. Examples of Project vehicle inspection and maintenance records were viewed at the time of audit. |
| Schedule 2, Condition A12(b) | It is recommended that project SWMS are signed and dated prior to starting the job and that signed copies are retained. | Ongoing | Ongoing. Examples of completed Project Safe Work Method Statement (SWMS) were viewed at the time of audit. |
| Schedule 2, Condition B12(a) | It is recommended that AGL commission construction noise monitoring for the project, in accordance with Section 7 of the approved NMP. It is also recommended that noise generated by construction for the project is managed in accordance with the Interim Construction Noise Guideline (DECC, 2009), or its latest version and evidence is retained. | Prior to Stage 2 of the Project | Complete. AGL commissioned a noise modelling review for Project Stage 1 which confirms construction noise management limits would not be exceeded at receiver locations. |
| Schedule 2, Condition B12(b) | It is recommended that reasonable and feasible steps to minimise noise from construction and operational activities is implemented and evidence is retained. | Prior to Stage 2 of the Project | Not complete. AGL have committed to updating the Project Noise Mgt Plan prior to Stage 2 of the Project. |
| Schedule 2, Condition B13 | It is recommended that the sign in / sign out register is implemented on site and completed copies are retained to confirm compliance with approved construction hours. | Ongoing | Ongoing. Examples from the Project sign in / sign out register were viewed during the audit site visit. |
| Schedule 2, Conditions C1(d), C19(a)(viii), C19(a)(viii) | It is recommended that the project complaints register is regularly updated and made available on the AGL website. | Ongoing | Not compliant. The Project complaints register was not available on the AGL website was not available at the time of audit (see Section 3.5 and Section 4). |
| Schedule 2, Condition C1(d) | Evidence that non-compliances are being entered into AGL 'myHSE' system was not available at the time of the audit. It is recommended that AGL enter any | Ongoing | Ongoing. AGL systems are being used to track IEA actions and non-compliances. |

| Ref | Previous IEA Findings | AGL Proposed Completion Date | 2023 IEA Status |
|---------------------------|---|------------------------------|--|
| | non-compliances into myHSE and records are retained. | | |
| Schedule 2, Condition C5 | It is recommended that AGL notify DPE of the non-compliances identified in this audit report within seven days of the document date. | May 2023 | Complete. AGL notified DPE of the non-compliances identified in the previous IEA report on 05/05/23. |
| Schedule 2, Condition C14 | It is recommended that AGL obtains an endorsement letter for the proposed independent audit team from the DPE prior to next audit. | May 2023 | Complete; see Appendix A. |
| Schedule 2, Condition C17 | It is recommended that AGL submit this IEA report and their response to DPE as soon as possible following completion of this audit report. | 05/05/23 | Complete. AGL provided a copy of the previous IEA report to DPE on 05/05/23. |
| Schedule 2, Condition C19 | It is recommended that all project information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) noted in Schedule 2, Condition C19 are made publicly available on the AGL website. | Ongoing | Not compliant. The Project complaints register and response to previous IEA report was not available on the AGL website was not available at the time of audit (see Section 3.5 and Section 4). |
| Schedule 2, Condition D1 | It is recommended that AGL retains evidence to confirm that the development of the Low Pressure Pump Station Stabilisation was undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the GHD Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report prior to surrender of the DA 8.2018.273.2 under Schedule 2, Condition A5 of SSD 8889679. | 03/11/23 | Ongoing. Viewed AGL response to DPE on the surrender of development consents required under SSD 8889679 dated 7 September 2021. The document provides a summary of the compliance status of DA 8.2018.273.2. At the time of audit, AGL are preparing compliance information for the surrender of consents required under the Conditions of SSD 8889679. |
| Schedule 2, Condition D3 | It is recommended that AGL retains evidence that confirms that the development of the Ravensworth Coal Unloader Facility has been carried out in accordance with the HLA Envirosciences Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement prior to surrender of the DA 20_98 under | 03/11/23 | Ongoing. Viewed AGL response to DPE on the surrender of development consents required under SSD 8889679 dated 7 September 2021. The document provides a summary of the compliance status of DA 20_98. At the time of audit, AGL are preparing compliance information for the surrender of consents required under the Conditions of SSD 8889679. |

| Ref | Previous IEA Findings | AGL Proposed Completion Date | 2023 IEA Status |
|--|--|------------------------------|--|
| | Schedule 2, Condition A5 of SSD 8889679. | | |
| Schedule 2, Condition D4 | It is recommended that AGL retain evidence that confirms consultation with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push- pull trains onto and off the Main Northern Line prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679. | 04/08/2023 | Not complete. AGL have committed to sourcing evidence of consultation between the Ravensworth Coal Unloader operator and rail operators. |
| Schedule 2, Condition D6 | It is recommended that AGL retain evidence that confirms the development of the Coal/Rail Unloader Augmentation is carried out generally in accordance with the development application and accompanying plans prior to surrender of the DA 401_2000 under Schedule 2, Condition A5 of SSD 8889679. | 03/11/23 | Ongoing. Viewed AGL response to DPE on the surrender of development consents required under SSD 8889679 dated 7 September 2021. The document provides a summary of the compliance status of DA 401_2000. At the time of audit, AGL are preparing compliance information for the surrender of consents required under the Conditions of SSD 8889679. |
| SSD 8889679 EIS Commitments Non-Compliances and Recommendations | | | |
| HR2 | No evidence was available at the time of the audit that confirms design and selection of all electrical equipment is to minimise EMF levels and comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels. | Ongoing | Not compliant. AGL have committed to implementing these measures as relevant to future stages of the Project. |
| HR3 | Evidence that a Management of Change Process was completed for the project was not available at the time of audit. | 03/11/23 | Ongoing. AGL have commenced a Management of Change process for Project Stage 1, which will be completed following the completion of construction. |
| HR6 | No evidence was available at the time of the audit to confirm that all staff have been trained the use of the spill kits in place at the project construction area. | Ongoing | Not compliant. Evidence to demonstrate the all Project personnel have been trained in spill response was not available at the time of audit (see Section 3.5 and Section 4). |
| AQ2 | Evidence was not available at the time of the audit to confirm dust mitigation controls are implemented during the loading and unloading of materials. | As required | Not compliant. Evidence to demonstrate the use of dust mitigation controls during Project loading and unloading activities (see Section 3.5 and Section 4). |

| Ref | Previous IEA Findings | AGL Proposed Completion Date | 2023 IEA Status |
|-------|--|---------------------------------|--|
| AQ3 | No evidence was available at the time of the audit to confirm that regular watering of unsealed haulage routes and regular inspection and removal of debris from plant and equipment is occurring for the project. | As required | Complete. Viewed Project records to confirm the availability of water cart and water trailer during the audit period to minimise dust emissions. |
| AQ5 | Evidence was not available at the time of the audit to confirm that management of cumulative dust impacts has been considered between AGL and WOAOW project team. | As required | Ongoing. AGL have committed to liaison with the WOAOW team during future stages of the Project. |
| AQ6 | Evidence was not available at the time of the audit to confirm that watering stockpiles and exposed surfaces is being undertaken for the project. | As required | Complete. Viewed Project records to confirm the availability of water cart and water trailer during the audit period to minimise dust emissions. |
| TT1 | The Traffic Management Plan notes that the haulage contractor will prepare and implement a CTMP for oversized overmass vehicle movements, which was not available at the time of the audit. | As required | Ongoing. No oversized overmass (OSOM) vehicle movements were required during the audit period. |
| TT2 | Copies of oversized vehicle permits were not available at the time of the audit. | As required | Ongoing. No OSOM vehicle movements were required during the audit period. |
| BIO8 | No evidence was available at the time of the audit that confirmed machinery or personnel avoid entering areas of significant weed infestations. | Ongoing | Not compliant. Evidence was not available at the time of the audit that confirm machinery or personnel avoided entering areas of significant weed infestations (see Section 3.5 and Section 4). |
| BIO9 | Evidence of weed control for the project was not available at the time of the audit. | Ongoing | Ongoing. Examples of contract weed treatment activity reports and invoices for the Project site during the audit period were available. |
| BIO10 | The EMS notes that the CEMP will detail the procedures for management of weeds on the development site, however a copy of the CEMP was not available at the time of the audit | Prior to Stage 2 of the Project | Not complete. AGL have committed to updating the Project CEMP prior to the commencement of Project Stage 2. |
| BIO11 | Evidence was not available at the time of the audit to confirm that vehicle and machinery hygiene measures have been applied during construction. | Prior to Stage 2 of the Project | Ongoing. Viewed examples of Project communications requiring vehicles to be washed down prior to leaving site. AGL have committed to formalising this procedure prior |

| Ref | Previous IEA Findings | AGL Proposed Completion Date | 2023 IEA Status |
|-------|--|---------------------------------|--|
| | | | to the commencement of Project Stage 2. |
| Bio12 | The EMS notes the CEMP will provide a protocol for construction vehicles driving to and from site to prevent the spread or introduction diseases, however a copy of the CEMP was not available at the time of the audit. | Prior to Stage 2 of the Project | Not compliant. A copy of the CEMP was not available at the time of the audit (see Section 3.5 and Section 4). AGL have committed to updating the Project CEMP prior to the commencement of Project Stage 2. |
| V1 | Detailed designs for the project were not available at the time of the audit to confirm that retention and enhancement of existing landscape features (areas of scrub, individual trees) was considered. | As required | Ongoing. Viewed detailed designs for Project Stage 1, which consider construction areas and existing topography and vegetation. |
| V2 | Detailed designs that confirm colour proposed for permanent infrastructure were not available at the time of the audit. | As required | Ongoing. Project infrastructure constructed at the time of audit was clad in suitable colours to minimise visual effects. |
| V3 | Detailed designs that confirm the consideration of minimal use of reflective surfaces was not available at the time of the audit. | As required | Ongoing. Project infrastructure constructed at the time of audit does not have any large reflective surfaces. |
| V6 | Evidence was not available at the time of the audit to confirm that spraying with water or covering of stockpiles to reduce dust emissions is occurring. | As required | Ongoing. Project stockpiles viewed during the audit site inspection were observed to be maintained to minimise dust emissions. |
| SE3 | Evidence was not available at the time of audit to confirm that consultation has occurred with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities. | As required | Not compliant. Evidence was not available at the time of audit to confirm that consultation has occurred with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities (see Section 3.5 and Section 4). |
| I2 | No evidence was available at the time of the audit to confirm that AGL has consulted with Ausgrid regarding continued supply as a result of the project. | Prior to Stage 2 of the Project | Not compliant. No evidence was available at the time of the audit to confirm that AGLM has consulted with Ausgrid regarding continued supply as a result of the Project (see Section 3.5 and Section 4). |
| CL1 | A process to review and update management measures if any other development commences in proximity to the Project is not included in any management plan for the Project. | Prior to Stage 2 of the Project | Not compliant. A process to review and update management measures if any other development commences in proximity to the Project is not included in any |

| Ref | Previous IEA Findings | AGL Proposed Completion Date | 2023 IEA Status |
|--|--|---------------------------------|---|
| | | | management plan for the Project (see Section 3.5 and Section 4). |
| SSD 8889679 EIS General Improvement Recommendations | | | |
| HR2 | It is recommended that AGL documents the design and selection process to ensure all electrical equipment considers EMF levels and complies with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels. | Prior to Stage 2 of the Project | Ongoing. AGL have committed to the consideration of EMF and of ICNIRP compliant equipment during the design process for Project Stage 2. |
| HR3 | It is recommended that a Management of Change process is completed for the project, in accordance with the relevant AGL Standard. | 03/11/23 | Ongoing. AGL have commenced a Management of Change process for Project Stage 1, which will be completed following the completion of construction. |
| HR6 | It is recommended that all project staff will be made aware of the location of the spill kit and trained in its use, with training records retained. | 07/07/23 | Not compliant. Evidence to demonstrate the all Project personnel have been trained in spill response was not available at the time of audit (see Section 3.5 and Section 4). |

Table 5 IEA Non-Compliances

| Ref | Non-Compliance |
|------------------------------------|--|
| SSD 8889679 | |
| Schedule 2, Condition A2 | Non-compliances with SSD 8889679 conditions were identified during this IEA and described below and in Appendix C . |
| Schedule 2, Condition B26(e) | An up-to-date Erosion and Sediment Control Plan (ESCP) documenting stockpile locations for the Project was not in place at the time of audit, as required under Section 5.1 of the Soil and Water Management Plan. |
| Schedule 2, Condition C1(d) | A current copy of the complaints register was not available on the AGL website at the time of the audit. |
| Schedule 2, Condition C19(a)(vii) | A general complaints register dated 27 March 2023 was sighted on the AGL website, however the link to the current SSD 8889679 was not working at the time of the audit. |
| Schedule 2, Condition C19(a)(viii) | The AGL response to the previous IEA report (JBA, 2023) was not published on the website at the time of audit. |
| Schedule 2, Condition C19(b) | See non-compliances noted against Schedule 2, Condition C19(a) above. |
| Schedule 2, Condition D4 | No evidence was available at the time of the audit to confirm AGL has liaised with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line. |
| SSD 8889679 EIS Commitments | |
| HR2 | No evidence was available at the time of the audit that confirms design and |

| Ref | Non-Compliance |
|-------|--|
| | selection of all electrical equipment is to minimise EMF levels and comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels. |
| HR6 | No evidence was available at the time of the audit to confirm that all Project staff have been trained spill response. |
| AQ2 | Evidence was not available at the time of the audit to confirm dust mitigation controls are implemented during the loading and unloading of materials. |
| AQ5 | Evidence was not available at the time of the audit to confirm that management of cumulative dust impacts has been considered between AGL and WOAOW project team. |
| BIO8 | Evidence was not available at the time of the audit that confirm machinery or personnel avoided entering areas of significant weed infestations. |
| BIO10 | Evidence of weed disposal and management was not available at the time of the audit. |
| BIO10 | The EMS notes that the CEMP will detail the procedures for management of weeds on the development site, however a copy of the CEMP was not available at the time of the audit. |
| BIO12 | The EMS notes the CEMP will provide a protocol for construction vehicles driving to and from site to prevent the spread or introduction diseases, however a copy of the CEMP was not available at the time of the audit. |
| W3 | Erosion and sediment controls were not in place for all temporary stockpiles established for the Project. |
| SE3 | Evidence was not available at the time of audit to confirm that consultation has occurred with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities. |
| I2 | No evidence was available at the time of the audit to confirm that AGLM has consulted with Ausgrid regarding continued supply as a result of the Project. |
| CL1 | A process to review and update management measures if any other development commences in proximity to the Project is not included in any management plan for the Project. |

3.6 ENVIRONMENTAL PERFORMANCE

3.6.1 Site Inspection Summary

The site inspection of 4 July 2023 included a review of the site of the Decoupling Works component of SSD 8889679, as shown on **Figure 1**. Development of other Stages of the SSD 8889679 Project had not commenced during the audit period. Selected images taken during the site inspection are included as **Appendix F**.

The site inspection found that the Decoupling Works construction site is being maintained well, with clear delineation of project work areas in the field. Waste generated from the project is being segregated into separate skip bins for removal from site. Waste management for the Project is further described in **Section 3.6.3**. Erosion and sediment controls in place to manage runoff from disturbed areas were found to be being implemented generally in accordance with the approved Project plans, with the exception of a stockpile area established during the current audit period (see **Section 3.5**).

Chemicals being used for the Project were observed to be stored in appropriate bunded areas within the site laydown area at the time of audit, with suitable equipment to respond to any spills also available and signposted for use by Project personnel. This included portable fire extinguishers and fire blankets which are tagged six monthly and availability of a watercart and/or water trailer during the audit period.

3.6.2 Environmental Management Documents

The adequacy of AGL environmental management documents for the Project and the implementation of these plans was reviewed as a component of this IEA.

In general, the review of the environmental management documentation found that AGL is operating in accordance with the environmental procedures and systems required under SSD 8889679. Management plans reviewed included the approved SSD 8889679 EMS and sub-plans, Aboriginal Cultural Heritage Management Plan (ACHMP), Air Quality Management Plan (AQMP), Construction Noise Management Plan, Contamination Management Plan, Soil and Water Management Plan, Traffic Management Plan and Waste Management Plan.

Non-compliances identified in relation to Project management plans are listed in **Table 5**.

3.6.3 Waste Management

Schedule 2, Condition C1 (e) of SSD 8889679 requires AGL to prepare an EMS including a waste management subplan. The desktop review confirmed that a Waste Management Plan has been prepared and approved by the DPE. The Waste Management Plan identifies the key waste issues that require control to manage Project waste impacts.

The site inspection found that limited volumes of chemicals and hydrocarbons required for the Project were being appropriately stored in a bunded area at the time of the audit. No chemicals for the project were observed to be outside of bunded areas during the site inspection.

Segregated skip bins were sighted at the time of the site inspection for general waste, recycling, timber and scrap metal.

Emergency spill kits were also available at the Project laydown area at the time of the site inspection.

3.6.4 Operation of Plant and Equipment

Schedule 2, Condition A12 of SSD 8889679 requires all plant and equipment used on site, or in connection with the development, to be maintained in a proper and efficient condition and operated in a proper and efficient manner.

During the site inspection, selected copies of PBE (Project construction contractor) toolbox talks and vehicle pre-start checks were sighted. These inspections were found to record any critical faults and or minor maintenance issues to be repaired at the next scheduled service. The site inspection also confirmed that PBE are completing SWMS for Project-related jobs.

The desktop review and interviews with key AGL personnel also confirmed that contractors working on the project complete site inductions which cover safe operation of plant and equipment.

3.6.5 Air Quality

The desktop review confirmed that AGL has prepared an AQMP to identify the potential impacts of the Project construction and detail the controls to be implemented to minimise construction air quality impacts.

No air quality issues were identified at the site during the IEA. The site inspection confirmed that roads were well maintained, however it is recommended that 40 km/hr speed signage is reinstated at all entry points to the Project construction area to reduce the potential for dust emissions (see **Section 4**). No elevated dust was observed from material stockpiled within the project construction area.

No offensive odours were detected on site during the IEA site inspection.

Discussions with AGL key personnel confirmed that no complaints have been received during the audit period in relation to air quality impacts from Project construction works.

3.6.6 Aboriginal Heritage

The desktop review confirmed that AGL has developed an ACHMP for the Decoupling Works component of the Project, which has been approved by the DPE. The ACHMP was prepared in consultation with Heritage NSW and Registered Aboriginal Parties (RAPs), as required under Schedule 1, Condition B22 of SSD 8889679.

The ACHMP has been developed to provide protocols to assist AGL personnel and on-site contractors in managing the identified Aboriginal heritage values of the ACHMP area. Interviews with key AGL personnel and the site inspection confirmed that the boundary of SSD 8889679 construction works remains flagged in the field to prevent any disturbance outside the approved Project footprint.

Section 3 of the ACHMP describes management of Aboriginal cultural heritage values including unanticipated finds protocols for Aboriginal objects, places and human skeletal remains. Discussions with key AGL personnel confirmed that there have been no unexpected finds of heritage items during the audit period.

3.6.7 Environmental Incidents

No environmental incidents requiring notification to regulatory agencies were recorded during the audit period.

3.6.8 Environmental Complaints

Discussions with AGL employees found that no community complaints were received regarding Project activities during the audit period.

3.6.9 Environmental Impact Comparison

A desktop review of the Environmental Impact Statement (EIS) prepared to support SSD 8889679 was completed as part of the IEA to compare AGL documentation and monitoring data for the audit period. A comparison with observed impacts was also undertaken during the site inspection, which found that the site project has been operating generally in accordance with the conditions of SSD 8889679.

The Project EIS noted that during the construction phase of the project, the primary air quality risk would be dust generated from site clearing, materials excavation, handling, transport and placement, as well as from wind erosion of stored materials and exposed surfaces resulting in impacts at surrounding sensitive receivers. The desktop review and site inspection confirmed that adequate mitigation measures have been put in place to minimise the risks of dust emissions.

The EIS also noted that construction would require the use of heavy machinery, which can generate high noise and vibration levels at nearby receivers. The desktop review confirmed that a Construction Noise Management Plan has been developed and implemented by AGL. Discussions with key AGL personnel confirmed that the Decoupling Works completed during the audit period are only completed during approved operation hours and that all plant and equipment for the project are regularly maintained and operated by appropriately qualified personnel. During the site inspection a PBE sign in / sign out register was sighted, which record Project personnel start and finish times each day. AGL also commissioned a review of construction noise levels during the audit period to confirm that Project activities would not result in noise compliance issues against the requirements of SSD 8889679.

It is noted within the project EIS that two asbestos samples were associated with the existing ash pipeline. AGL have confirmed that the Decoupling Works would have minimal interaction with the ash pipeline and that the risk of disturbance of known areas of contamination is considered unlikely for the current stage of the project. However, the EIS noted that occupational hygiene controls will be implemented as a precaution to mitigate potential construction worker exposure to asbestos. The desktop review confirmed that AGL have developed and implemented Contamination Management Plan for the project as a sub-plan to the project EMS.

AGL also operate under a site-wide Asbestos Management Procedure which outlines responsibilities, procedures / protocols and systems for effective management of asbestos and asbestos containing material and the minimisation of health risks associated with the presence of asbestos. Discussions with Project personnel confirmed that no asbestos has been identified during the audit period.

The EIS also notes that during construction, the majority of the Project components are largely screened by existing vegetation and topography and are typical of existing infrastructure from publicly accessible locations. Therefore visual impacts during construction would be limited to AGLM personnel and contractors, and construction personnel. The EIS describes construction visual impacts as clearing of vegetation and stockpiling of debris from construction activities. Discussions with key AGL personnel confirmed that no clearing of vegetation has occurred during the audit period. The site inspection confirmed that the visual appearance of the project blends in as far as possible with the surrounding landscape and that all Project infrastructure developed to the date of audit is clad in suitable colours.

The EIS describes standard construction waste as an expected impact due to Decoupling Works, including spoil from cut and fill activities, green waste from clearing activities, general construction waste and sewage. Discussions with key AGL personnel confirmed that waste is managed under contract and disposed of appropriately at a licenced waste facilities. The site inspection confirmed that waste streams generated during Project construction activities are being segregated into separate skip bins. Copies of Remondis service docket were sighted during the IEA site inspection.

The potential impacts to water quality and hydrology listed within the EIS as a result of construction activities include removal of vegetation, general earthworks, including stripping of topsoil and excavation, stockpiling of topsoil and vegetation leading to the discharge of sediment-laden water, transportation of cut and/or fill materials and the movement of heavy vehicles across exposed earth, potential for spills, concreting works resulting in concrete dust, concrete slurries or washout water entering downstream waterways. The site inspection confirmed that adequate mitigation measures have been put in place for Project construction areas, however additional controls are recommended to capture any flows of sediment from Project stockpiles established during the audit period (see **Section 3.5** and **Section 4**).

The review of SSD 8889679 EIS commitments completed for this IEA is detailed in **Appendix C**.

4. RECOMMENDATIONS

A summary of the non-compliances with AGL licences and approvals identified during the audit period is provided in **Table 5**. Recommendations made to respond to these non-compliances, as well as opportunities identified to improve AGL's general environmental performance, are provided in **Table 6**.

Table 6 IEA Recommendations

| Ref | Recommendation Description |
|--|---|
| SSD 8889679 | |
| Schedule 2, Condition A9 | It is recommended that copies of construction and occupation certificates for the new project buildings and structures required for Stage 1 of the Project are obtained following the completion of construction. |
| Schedule 2, Condition B26(b) | It is recommended that stockpile locations and dates of establishment for each stockpile are recorded in an updated ESCP. |
| Schedule 2, Condition B26(b) | It is also recommended that erosion and sediment controls are maintained for the stockpile of material excavated from the project construction area (see Plate 13 of Appendix F). |
| Schedule 2, Conditions B27(b) | It is recommended that AGL ensure Project waste is recorded and classified generally in accordance with the EPA Waste Classification Guidelines. |
| Schedule 2, Conditions B27(c) | It is recommended that AGL retains copies of records from the Project waste contractor for disposal of waste at licenced facilities located off site. |
| Schedule 2, Condition C5 | It is recommended that AGL notify DPE of the non-compliances identified in this audit report within seven days of the document date. |
| Schedule 2, Condition C17 | It is recommended that AGL submit this IEA report and their response to DPE as soon as possible following completion of this audit report. |
| Schedule 2, Condition C1(d), Schedule 2, Condition C19(a)(vii), Schedule 2, Condition C19(b) | It is recommended that the complaints register for SSD 8889679 is updated on the AGL website each month, even in the event that no Project-specific complaints are received. |
| Schedule 2, Condition C19(a)(viii), Schedule 2, Condition C19(b) | The AGL response to the previous IEA report (JBA, 2023) was not published on the website at the time of audit. It is recommended that this document is published. |
| Schedule 2, Condition C19(a) | It is recommended that all information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) noted in Schedule 2, Condition C19 are made publicly available on the AGL website. |
| Schedule 2, Condition D4 | It is recommended that AGL retain evidence that confirms consultation with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679. |
| Schedule 2, Condition D6 | It is recommended that AGL retain evidence that confirms the development of the Coal/Rail Unloader Augmentation is carried out generally in accordance with the development application and accompanying plans prior to surrender of the DA 401_2000 under Schedule 2, Condition A5 of SSD 8889679. |

| Ref | Recommendation Description |
|------------------------------------|--|
| SSD 8889679 EIS Commitments | |
| HR2 | It is recommended that AGL documents the design and selection process to ensure all electrical equipment considers EMF levels and complies with ICNIRP reference levels. |
| HR6 | It is recommended that all Project personnel will be trained in spill response, with training records retained. |
| AQ2 | It is recommended that AGL document the implementation of control measures for Project loading and unloading activities during construction. |
| AQ3 | It is recommended that AGL retains evidence that regular inspection and removal of debris from plant and equipment prior to leaving site is occurring for the Project. |
| AQ5 | It is recommended that activities are coordinated between the Project and the WOAOW project team to limit the potential for cumulative dust impacts during future stages of the development where possible. |
| TT3 | It is recommended that 40 km/hr speed signage is reinstated for internal roads accessing the Project work area (see Plate 9 of Appendix F). |
| BIO5 | It is recommended that material stockpiled during Stage 1 of the Project is delineated in the field. |
| BIO8 | It is recommended that AGL ensures that where possible, machinery or personnel avoid entering areas of significant weed infestations during future stages of the Project. |
| BIO10 | It is recommended that during the clearing works for future stages of the Project, weeds will be disposed and managed appropriately to stop the spread of existing weed species and records are retained. |
| BIO11 | It is recommended that AGL ensures vehicle and machinery hygiene measures are applied during construction works for future Stages of the Project. |
| BIO12 | It is recommended that documentation for future Stages of the Project is updated to include a protocol for construction vehicles driving to and from construction areas to prevent the spread or introduction pathogens on site. |
| V1 | It is recommended that AGL retain copies of detailed designs for future stages of the Project that confirms retention and enhancement of existing landscape features. |
| V3 | It is recommended that the consideration of non-reflective surfaces is documented in the design phase for the development of infrastructure in future stages of the Project. |
| V5 | It is recommended that AGL consider mitigation tree and shrub planting to visually integrate the Project within the surrounding landscape and document the findings of this review. |
| V6 | It is recommended that AGL retains records of water used for Project dust suppression. |
| W3 | It is recommended that erosion and sediment controls are maintained for the stockpile of material excavated from the Project construction area (see Plate 13 of Appendix F). |

| Ref | Recommendation Description |
|-----------------|--|
| SE ₃ | It is recommended that AGL consults with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities. |
| I ₂ | It is recommended that AGLM document consultation with Ausgrid regarding continued supply. |
| CL ₁ | It is recommended that a process to review and update management measures if any other development commences in proximity to the Project is included within the Project EMS. |

APPENDIX A
ENDORSEMENT OF IEA TEAM

Department of Planning and Environment

James McNamara
Senior Environment Advisor
AGL Macquarie Pty Limited
Wonnarua Country

Sent via Major Projects Portal only

08/05/2023

Dear Mr McNamara

Liddell Battery and Bayswater Ancillary Works (SSD-8889679)
Independent Environmental Auditor Proposal

I refer to your request (SSD-8889679-PA-13) submitted to the Department of Planning and Environment (the department) on 2 May 2023 for the Planning Secretary's approval of suitably qualified persons to carry out an Independent Environmental Audit for the Liddell Battery and Bayswater Ancillary Works development.

The department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment of the auditors from James Bailey & Associates listed below, to prepare the Independent Environmental Auditor for the construction phase of the development.

In accordance with Schedule 2 Condition C14 of SSD-8889679 (the consent) and the *Independent Audit Post Approval Requirements* (2020), the Secretary has agreed to the following audit team:

- Dorian Walsh, Principal Environmental Scientist – Lead Auditor
- Tegan Brown, Environmental Scientist – Audit Assistant.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

Please ensure that any future requests for approval by the Secretary of auditors or technical experts is submitted at least two weeks prior to the planned audit commencement, to allow for appropriate consideration of the request by the department. The audit must not commence until the proposed auditor and/or audit team has been agreed to in writing by the Secretary, consistent with the *Independent Audit Post Approval Requirements* (Section 3.1) and Schedule 2 Condition C14 of the consent.

Should you wish to discuss this matter, please contact Jennifer Sage, Senior Compliance Officer on 0400 245 170 or compliance@planning.nsw.gov.au



Yours sincerely



Heidi Watters
Team Leader Northern
Compliance

As nominee of the Planning Secretary

APPENDIX B
IEA DECLARATION

| Independent Environmental Audit Report Declaration | |
|--|--|
| Project Name: | Bayswater Power Station, Liddell Power Station |
| Consent No.: | SSD 8889679 |
| Description of Project: | Liddell Battery and Bayswater Ancillary Works (SSD 8889679) |
| Project Address: | Off New England Highway, Muswellbrook NSW, 2333 |
| Proponent | AGL Macquarie Pty Limited |
| Proponent Address: | 200 Level 24, George Street, Sydney NSW, 2000 |
| Title of Audit: | AGL Macquarie Independent Environmental Audit |
| Date: | 28/04/2023 |
| Declaration | <p>I declare that I will undertake the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:</p> <ul style="list-style-type: none"> i. the audit will be undertaken in accordance with relevant condition(s) of consent and the <i>Independent Audit Compliance Requirements</i> (Department 2020); ii. the findings of the audit will be reported truthfully, accurately and completely; iii. I will exercise due diligence and professional judgement in conducting the audit; iv. I will act professionally, objectively and in an unbiased manner; v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child; vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child; vii. neither I nor my employer have provided consultancy services for the audited project that is subject to this audit except as otherwise declared to the Department prior to the audit; and viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so. <p>Notes:</p> <ul style="list-style-type: none"> a) Under section 10.6 of the <i>Environmental Planning and Assessment Act 1979</i> a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and b) The <i>Crimes Act 1900</i> contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both). |
| Name of Auditors: | Dorian Walsh Tegan Brown |
| Signature: |   |
| Auditor Qualification | Auditor for Environmental Management, EMS and Compliance Audits. Exemplar Global No. 201881 |
| Company: | James Bailey & Associates |
| Company Address: | 6/127-129 John Street, Singleton NSW 2330 |

APPENDIX C
IEA COMPLIANCE TABLES

Table 1 Project Approval SSD 8889679

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|---|---|-----------|--|
| SCHEDULE 2: PART A - ADMINISTRATIVE CONDITIONS | | | |
| OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT | | | |
| A1 | In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development. | C | A review of AGL records and inspection of the project site found that reasonable and feasible controls are in place to minimise the potential for material environmental impacts from site operations. Comments on AGL environmental controls are provided under the relevant conditions below. |
| TERMS OF CONSENT | | | |
| A2 | The development may only be carried out: (a) in compliance with the conditions of this consent | NC | Non-compliances (NC) with SSD 8889679 conditions were identified during this IEA. Findings and recommendations in relation to each non-compliance are provided against the relevant conditions below. |
| | (b) in accordance with all written directions of the Planning Secretary | C | HC (pers comms) confirmed that no written directions have been made by DPE. |
| | (c) generally in accordance with the EIS, and | C | A review of AGL documentation found that the project is being carried out generally in accordance with the EIS. |
| | (d) generally in accordance with the Development Layout. | C | The site layout is generally consistent with the general development layout shown in Appendix 1 of SSD 8889679. |
| | <i>Note: The general layout of the development is shown in Appendix 1.</i> | NT | Note only. |
| A3 | Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: | NT | HC (pers comms) confirmed the Planning Secretary has not made any written |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|---------------------------------------|--|--------|---|
| | (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and | | directions in relation to the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under SSD 8889679. |
| | (b) the implementation of any actions or measures contained in any such document referred to in paragraph (a). | NT | HC (pers comms) confirmed that the Planning Secretary has not made any written directions in relation to the implementation of any actions or measures contained in documents referred to in Schedule 2, Condition A3 (a). |
| A4 | The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and the document/s listed in condition A2(b). In the event of an inconsistency, ambiguity or conflict between any of the document/s listed in condition A2(b), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict. | NT | HC confirmed no inconsistencies were identified during the audit period. |
| SURRENDER OF EXISTING CONSENTS | | | |
| A5 | At a time determined by the Secretary, being no later than 12 months after the date of commencement of development, or other timeframe agreed by the Planning Secretary in writing, the following development consents are to be surrendered in accordance with section 68 of the EP&A Regulation: | NT | HC (pers comms) confirmed that 12 months has not elapsed since the commencement of SSD 8889679. As such, the existing development consents referred to in Schedule 2, Condition A5 have not been surrendered at the time of audit. HC noted that AGL have commenced the process to surrender the required consents. |
| | (a) 8/2016 (MSC) | NT | See Schedule 2, Condition A5 above. |
| | (b) 74/2018 (MSC) | NT | See Schedule 2, Condition A5 above. |
| | (c) 8.2018.273.1 (SC) | NT | See Schedule 2, Condition A5 above. |
| | (d) 8.2018.23.1 (SC) | NT | See Schedule 2, Condition A5 above. |
| | (e) 8.2018.23.2 | NT | See Schedule 2, Condition A5 above. |
| | (f) 54_86 (MSC) | NT | See Schedule 2, Condition A5 above. |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|--|---|--------|---|
| | (g) 29_98 (SC) | NT | See Schedule 2, Condition A5 above. |
| | (h) 114_2016 (MSC) | NT | See Schedule 2, Condition A5 above. |
| | (i) 223_2004 | NT | See Schedule 2, Condition A5 above. |
| | (j) 401_2000 (SC) | NT | See Schedule 2, Condition A5 above. |
| | (k) 460_2001 (SC) | NT | See Schedule 2, Condition A5 above. |
| | <i>Note: Condition A5 does not extend to the surrender of construction or occupation certificates for existing and proposed building works under former Part 4A or Part 6 of the EP&A Act (as Part 6 applies from 1 September 2018). The surrender required by this condition A5 should not be understood to mean that works legally constructed under a valid consent or approval can no longer be legally maintained or used.</i> | NT | Note only. |
| A6 | Upon the date of commencement of development under this consent, and before the surrender of the existing development consents specified in condition 5, the conditions of this consent prevail to the extent of any inconsistency. | C | HC (pers comms) confirmed that the project is operating under SSD 8889679 conditions. |
| STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS | | | |
| A7 | <p>With the approval of the Planning Secretary, the Applicant may:</p> <p>(a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</p> | C | <p>Sighted AGL Letter dated 12 August 2022 made publicly available on the AGL website. The letter requests permission from the Planning Secretary to stage management plans for SSD 8889679 into Stage 1 (Decoupling Works) and Stage 2 (The Battery, Bayswater Ancillary Works and Consolidated Consents).</p> <p>Sighted copy of DPE letter dated 23 August 2022 approving the requested staging of management plans.</p> <p>All construction works completed during the audit period were related to Stage 1 (Decoupling Works) of the project.</p> <p>HC (pers comms) confirmed that no further requests were made to DPE for the staging of project documents during the audit period.</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|-------------------------------------|--|--------|--|
| | (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and | NT | HC (pers comms) confirmed that no project strategy, plan or program has been combined. |
| | <p>(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</p> <p>If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.</p> <p>If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.</p> | NT | HC (pers comms) confirmed that no project strategy, plan or program has been updated. |
| NOTIFICATION OF COMMENCEMENT | | | |
| A8 | A8. At least two weeks prior to the commencement of the following activities, the Applicant must notify the Department in writing of the date of: | C | Sighted copy of AGL Notification of commencement of Stage 1 Decoupling Works letter to DPE, dated 12 August 2022. The letter notes that pre-construction activities and physical works are scheduled to commence 1 September 2022. |
| | (a) physical commencement of the development; | C | See Schedule 2, Condition A8 above. |
| | (b) pre-construction activities; | C | See Schedule 2, Condition A8 above. |
| | (c) construction of the battery energy storage system; | NT | HC (pers comms) confirmed that construction of the battery energy storage system has not commenced within the audit period. |
| | (d) construction of the decoupling works; | C | See Schedule 2, Condition A8 above. |
| | (e) construction of the Bayswater ancillary works; and | NT | HC (pers comms) confirmed that construction of the Bayswater ancillary works has not occurred within the audit period. |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|--|--|--------|--|
| | (f) decommissioning. | NT | HC (pers comms) confirmed that decommissioning has not occurred within the audit period. |
| STRUCTURAL ADEQUACY | | | |
| A9 | The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia. | NT | BH (pers comms) confirmed that a switchroom and control room have been constructed during the audit period (see Plate 11). It is recommended that copies of construction and occupation certificates for the new project buildings and structures required for Stage 1 of the Project are obtained following the completion of construction. |
| | Notes: <ul style="list-style-type: none"> Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development. | NT | See Schedule 2, Condition A9 above. |
| DEMOLITION | | | |
| A10 | The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version. | NT | HC (pers comms) confirmed that there has been no demolition works on site during the audit period. |
| PROTECTION OF PUBLIC INFRASTRUCTURE | | | |
| A11 | Unless the Applicant and the applicable authority agree otherwise, the Applicant must: | NT | HC (pers comms) confirmed no issues for the project have been identified in relation to damage to public infrastructure. |
| | (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent. | NT | See Schedule 2, Condition A11 (a) above. |
| OPERATION OF PLANT AND EQUIPMENT | | | |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|------|---|--------|--|
| A12 | <p>The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> | C | <p>HC (pers comms) confirmed that plant and equipment used on site is serviced regularly.</p> <p>Viewed copy of project Water Cart daily pre-start inspection dated 5 June 2023 which notes no critical faults found although left hand rear mudguard was loose (see Plate 10).</p> <p>Sighted copy of Water Cart pre-start inspection dated 20 February 2023 which notes no critical faults.</p> <p>Sighted copy of FCS service report for plant serial number FCS 055 dated 7 February 2023.</p> |
| | <p>(b) operated in a proper and efficient manner.</p> | C | <p>Sighted a copy of Safe Work Method Statement (SWMS) dated 27 June 2023 which has been signed off for all operators.</p> <p>Sighted PBE Hot Work Permit dated 18 June 2023 which notes all equipment used must comply with site and or legislative inspection requirements and has been signed before and after completion of work.</p> <p>Sighted copy of the PBE Plant and Machinery Onsite Management Procedure dated 20 May 2021. The procedure describes safe working practices to manage the risk of plant in the workplace at PBE construction sites.</p> <p>Sighted a copy of the PBE Light Vehicle Onsite Management Procedure dated 20 May 2021. The procedure provides guidance for personnel who are required to operate road registered light vehicles on</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|--|--|--------|--|
| | | | PBE construction worksites. |
| SCHEDULE 2: PART B - GENERAL ENVIRONMENTAL CONDITIONS | | | |
| BATTERIES | | | |
| Battery Storage Restriction | | | |
| B1 | <p>The battery energy storage system or systems associated with the development must not exceed a total delivery capacity of 500 MW or a storage capacity of 2 GWh.</p> <p><i>Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage system in the future.</i></p> | NT | HC (pers comms) confirmed that development of the battery works have not commenced during the audit period. |
| HAZARDS | | | |
| Fire Safety Study | | | |
| B2 | <p>B2. Prior to commencing construction of the battery energy storage system, the Applicant must prepare a Fire Safety Study for the development, to the satisfaction of FRNSW and the Planning Secretary. The study must:</p> <p>(a) be consistent with the:</p> <p>(i) Department's <i>Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline</i>;</p> <p>(ii) NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and</p> | NT | HC (pers comms) confirmed that the Fire Safety Study is not relevant to this stage of the project. Construction of the battery energy storage system has not commenced during the audit period. |
| | <p>(b) describe the final design of the battery energy storage system and verify that the final design is consistent with all findings and recommendations in the Preliminary Hazard Analysis dated 25 March 2021.</p> | NT | See Schedule 2, Condition B2(a) above. |
| B3 | The Applicant must implement the measures described in the Fire Safety Study approved by the Planning Secretary. | NT | See Schedule 2, Condition B2(a) above. |
| Storage and Handling of Dangerous Goods | | | |
| B4 | <p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> | C | <p>A spill kit was available at the project construction site, see Plate 8.</p> <p>A bunded diesel storage area was also available at the time of the site inspection as well as a chemical storage cabinet, see Plate 1 and Plate 2.</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|-----------------------|---|--------|---|
| | <p>(b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids.</p> <p>In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p> | C | See Schedule 2, Condition B4(a) above. |
| Emergency Plan | | | |
| B5 | <p>Prior to commissioning the battery energy storage system, the Applicant must prepare a comprehensive Emergency Plan and detailed emergency procedures for the battery energy storage system in consultation with FRNSW and the NSW RFS.</p> <p>(a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent);</p> | NT | HC (pers comms) confirmed that commissioning of the battery energy storage system has not occurred during the audit period. |
| | (b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; | NT | See Schedule 2, Condition B5 (a) above. |
| | (c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site; | NT | See Schedule 2, Condition B5 (a) above. |
| | (d) list works that should not be carried out during a total fire ban; | NT | See Schedule 2, Condition B5 (a) above. |
| | (e) include availability of fire suppression equipment, access, and water; | NT | See Schedule 2, Condition B5 (a) above. |
| | (f) include procedures for the storage and maintenance of any flammable materials; | NT | See Schedule 2, Condition B5 (a) above. |
| | (g) notification of the local RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation proposed to be carried out during a bushfire danger period to ensure whether conditions are appropriate | NT | See Schedule 2, Condition B5 (a) above. |
| | (h) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency; | NT | See Schedule 2, Condition B5 (a) above. |
| | (i) include location of hazards (physical, chemical, and electrical) that may impact on firefighting operations and procedures to manage identified hazards during firefighting operations; | NT | See Schedule 2, Condition B5 (a) above. |
| | (j) include details of the location, management, and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone; | NT | See Schedule 2, Condition B5 (a) above. |
| | (k) include bushfire emergency management planning; and | NT | See Schedule 2, Condition B5 (a) above. |
| | (l) include details of the how RFS would be notified, and procedures that would be implemented, in the event that: | NT | See Schedule 2, Condition B5 (a) above. |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|-------------------------------------|---|--------|---|
| | <ul style="list-style-type: none"> (i) there is a fire on-site or in the vicinity of the site; (ii) there are any activities on site that would have the potential to ignite surrounding vegetation; or (iii) there are any proposed activities to be carried out during a bushfire danger period; and | | |
| | (m) include details on how the battery storage facility and sub-systems can be safely isolated in an emergency. | NT | See Schedule 2, Condition B5 (a) above. |
| B6 | The Applicant must implement the Emergency Plan for the duration of the development, provide a copy of the plan to the local Fire Control Centre and keep two copies of the plan on-site in a prominent position adjacent to the site entry point at all times. | NT | See Schedule 2, Condition B5 (a) above. |
| BIODIVERSITY | | | |
| Vegetation clearance | | | |
| B7 | The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS. | C | Sighted AGL Ground and Vegetation Disturbance Approval Application Form (Permit 95) for LDDL Decoupling Project dated 30 August 2022. The permit was reviewed signed off by AGL Macquarie Environment Team Leader and the AGL project manager. The form notes that project disturbance must be carried out in accordance with all approval management plans and SSD 8889679 conditions. |
| Biodiversity Management Plan | | | |
| B8 | <p>Prior to commencement of native vegetation clearance, unless otherwise agreed by the Secretary, the Applicant must prepare a Biodiversity Management Plan to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced biodiversity expert/s; | NT | Sighted AGL letter to DPE dated 12 August 2022. The letter requested consideration on Schedule 2, Condition B8 of SSD 8886979 and noted that the Biodiversity Management Plan is not required for project Stage 1 (Decoupling Works) as the clearing of native vegetation is not required for this stage. The letter also notes that should native clearing be required for future stages a Biodiversity Management |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|-----------------------------|---|--------|--|
| | | | Plan will be prepared and submitted to the Department for review and approval. Sighted DPE letter dated 23 August 2022 that approves the staging or project plans and notes the Biodiversity Management Plan is not required for Stage 1 as no clearing of native vegetation is required for that stage of the project. |
| | (b) be prepared in consultation with the BCS; | NT | See Schedule 2, Condition B8 (a) above. |
| | (c) describe the short, medium and long-term measures to be undertaken to manage vegetation and fauna habitat on the site; | NT | See Schedule 2, Condition B8 (a) above. |
| | (d) describe measures to be implemented within the site to minimise: <ul style="list-style-type: none"> (i) the amount of clearing, including investigation of design options to minimise disturbance of native vegetation for the battery energy storage system and decoupling works; (ii) impacts on fauna, including undertaking pre-clearance surveys and maximising the salvage of resources for habitat enhancement; (iii) impacts on threatened flora and fauna species or ecological communities within the development footprint and its surrounds; (iv) the spread of weeds and fungal pathogens; (v) the generation and dispersion of sediment to watercourses; and (vi) light spill from night works; and | NT | See Schedule 2, Condition B8 (a) above. |
| | (e) include a program to monitor, evaluate and report on the effectiveness of the measures. | NT | See Schedule 2, Condition B8 (a) above. |
| B9 | The Applicant must implement the Biodiversity Management Plan approved by the Planning Secretary. | NT | See Schedule 2, Condition B8 (a) above. |
| Biodiversity Offsets | | | |
| B10 | The Applicant must retire the biodiversity credits for Offset Stages 1, 2 and 3 as specified in Table 1 below, prior to commencing vegetation clearing in those stages. The retirement of credits must be carried out in accordance with the Biodiversity Offsets Scheme of the BC Act. | C | Sighted Biodiversity Conservation Trust statement dated 28 April 2022 confirming payment into the Biodiversity Conservation Fund for an offset obligation for biodiversity credit type 10211 – <i>Delma impar</i> (Striped Legless Lizard) required for the current Stage of the project. |

| Cond | Project Approval SSD 8889679 | Status | Evidence | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|-----------------------------------|--|----------------------|--------------------|--|--------------------|----------------------|----------------------|----------------------|----------------------|--------------------------------------|--|--|--|--|--|---|----------------|----------------|----------------|-----------------|-----------------|---|----------------|----------------|-----------------|------------------|------------------|---|----------------|-----------------|----------------|----------------|-----------------|--|----------------|----------------|----------------|-----------------|-----------------|--|----------------|-----------------|-----------------|-----------------|-----------------|---|----------------|----------------|----------------|----------------|----------------|------------------------------------|--|--|--|--|--|------------------------------|----------------|-----------------|-----------------|------------------|------------------|-------------------------------------|----------------|-----------------|-----------------|------------------|------------------|--|--|
| B11 | The Applicant may review and update the ecosystem and species credit requirements in Table 1 to reflect the final construction footprint and resulting extent and type of plant community types to be cleared. Amendments to the ecosystem and species credit requirements must be undertaken in consultation with BCS and approved by the Planning Secretary prior to the commencement of construction of the relevant offset stage. | NT | HC (pers comms) confirmed that AGL have not sought to review and update ecosystem credit requirements during the audit period. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <p>Table 1: Ecosystem Credit Requirements^a</p> <table border="1"> <thead> <tr> <th rowspan="2">Vegetation Community^a</th> <th colspan="4">Credits Required^a</th> <th rowspan="2">Total^a</th> </tr> <tr> <th>Stage-1^a</th> <th>Stage-2^a</th> <th>Stage-3^a</th> <th>Stage-4^a</th> </tr> </thead> <tbody> <tr> <td>Ecosystem credits^a</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Narrow-leaved Ironbark^b - Grey Box grassy woodland of the central and upper Hunter -^c Moderate^a</td> <td>-^a</td> <td>-^a</td> <td>-^a</td> <td>38^a</td> <td>38^a</td> </tr> <tr> <td>1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter -^c Rehabilitation^a</td> <td>-^a</td> <td>-^a</td> <td>34^a</td> <td>152^a</td> <td>186^a</td> </tr> <tr> <td>1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter -^c Native Grassland^a</td> <td>-^a</td> <td>21^a</td> <td>0^a</td> <td>1^a</td> <td>22^a</td> </tr> <tr> <td>1731 Swamp Oak - Weeping Grass grassy riparian forest of the Hunter Valley -^c Moderate-Good^a</td> <td>-^a</td> <td>8^a</td> <td>0^a</td> <td>10^a</td> <td>18^a</td> </tr> <tr> <td>1692 Bull Oak grassy woodland of the central Hunter Valley -^c Moderate-Good^a</td> <td>-^a</td> <td>37^a</td> <td>11^a</td> <td>34^a</td> <td>82^a</td> </tr> <tr> <td>1071 Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin^b Bioregion - Moderate^a</td> <td>-^a</td> <td>1^a</td> <td>0^a</td> <td>6^a</td> <td>7^a</td> </tr> <tr> <td>Species credits^a</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Southern myotis^a</td> <td>-^a</td> <td>44^a</td> <td>21^a</td> <td>131^a</td> <td>196^a</td> </tr> <tr> <td>Striped legless lizard^a</td> <td>1^a</td> <td>31^a</td> <td>27^a</td> <td>220^a</td> <td>279^a</td> </tr> </tbody> </table> | Vegetation Community ^a | Credits Required ^a | | | | Total ^a | Stage-1 ^a | Stage-2 ^a | Stage-3 ^a | Stage-4 ^a | Ecosystem credits^a | | | | | | Narrow-leaved Ironbark ^b - Grey Box grassy woodland of the central and upper Hunter - ^c Moderate ^a | - ^a | - ^a | - ^a | 38 ^a | 38 ^a | 1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - ^c Rehabilitation ^a | - ^a | - ^a | 34 ^a | 152 ^a | 186 ^a | 1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - ^c Native Grassland ^a | - ^a | 21 ^a | 0 ^a | 1 ^a | 22 ^a | 1731 Swamp Oak - Weeping Grass grassy riparian forest of the Hunter Valley - ^c Moderate-Good ^a | - ^a | 8 ^a | 0 ^a | 10 ^a | 18 ^a | 1692 Bull Oak grassy woodland of the central Hunter Valley - ^c Moderate-Good ^a | - ^a | 37 ^a | 11 ^a | 34 ^a | 82 ^a | 1071 Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin ^b Bioregion - Moderate ^a | - ^a | 1 ^a | 0 ^a | 6 ^a | 7 ^a | Species credits^a | | | | | | Southern myotis ^a | - ^a | 44 ^a | 21 ^a | 131 ^a | 196 ^a | Striped legless lizard ^a | 1 ^a | 31 ^a | 27 ^a | 220 ^a | 279 ^a | | |
| Vegetation Community ^a | Credits Required ^a | | | | Total ^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Stage-1 ^a | Stage-2 ^a | Stage-3 ^a | Stage-4 ^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ecosystem credits^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Narrow-leaved Ironbark ^b - Grey Box grassy woodland of the central and upper Hunter - ^c Moderate ^a | - ^a | - ^a | - ^a | 38 ^a | 38 ^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - ^c Rehabilitation ^a | - ^a | - ^a | 34 ^a | 152 ^a | 186 ^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - ^c Native Grassland ^a | - ^a | 21 ^a | 0 ^a | 1 ^a | 22 ^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1731 Swamp Oak - Weeping Grass grassy riparian forest of the Hunter Valley - ^c Moderate-Good ^a | - ^a | 8 ^a | 0 ^a | 10 ^a | 18 ^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1692 Bull Oak grassy woodland of the central Hunter Valley - ^c Moderate-Good ^a | - ^a | 37 ^a | 11 ^a | 34 ^a | 82 ^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1071 Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin ^b Bioregion - Moderate ^a | - ^a | 1 ^a | 0 ^a | 6 ^a | 7 ^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Species credits^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Southern myotis ^a | - ^a | 44 ^a | 21 ^a | 131 ^a | 196 ^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Striped legless lizard ^a | 1 ^a | 31 ^a | 27 ^a | 220 ^a | 279 ^a | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <p>Notes:</p> <ul style="list-style-type: none"> To identify the surface disturbance areas associated with Offset Stages 1, 2, 3 and 4 in Table 1, refer to the Figure in Appendix 3. The credits in Table 1 were calculated in accordance with Biodiversity Assessment Methodology (BAM) | NT | Note only. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|----------------|--|--------|--|
| | <p>(DPIE, 2020).</p> <ul style="list-style-type: none"> The available credit retirement options for the development include purchase and retirement of open market available biodiversity credits, payment into the Biodiversity Conservation Fund or establishment of a Biodiversity Stewardship Site. | | |
| AMENITY | | | |
| Noise | | | |
| B12 | <p>The Applicant must:</p> <p>(a) ensure that noise generated by any construction is managed in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version; and</p> | C | <p>HC (pers comms) confirmed that construction works for the project are only completed during the standard work hours recommended within the <i>Interim Construction Noise Guideline</i>.</p> <p>Section 3.1 of the approved sub-plan Liddell Decoupling Works – Construction Noise Management Plan (NMP) dated 22 August 2022 (see Schedule 2, Condition C1) notes that project construction works for Stage 1 are not predicted to exceed standard hours, evening hours, or night-time noise management levels.</p> <p>Sighted sign in sign out register during the site visit that is in place to record the times of personnel arriving and leaving site.</p> <p>Sighted Jacobs <i>Decoupling Out of Hours Civil Construction Works Noise Assessment</i> dated 17 May 2023. The modelling assessment concluded that project noise levels at all non-residential receivers would not exceed the Noise Management Levels during construction works thus condition B14 (a) could be met without the need for any specific additional controls.</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|------------------------------|---|--------|--|
| | (b) take all reasonable and feasible steps to minimise noise from construction and operational activities. | C | <p>Sighted Liddell Decoupling Works – Construction Noise Management Plan dated 22 August 2022. Section 5.2 of the Noise Management Plan describes noise mitigation measures.</p> <p>HC (pers comms) confirmed that decoupling works are only completed during approved operation hours.</p> <p>Sighted PBE sign in, sign out register that records personnel start and finish times.</p> <p>HC (pers comms) confirmed that all plant and equipment for the project are maintained and operated in accordance with manufacturers specifications.</p> <p>Viewed copies of pre-start inspections for project equipment completed during February and June 2023. No plant or equipment was left idling during the site inspection.</p> |
| Hours of construction | | | |
| B13 | All construction work at the premises must be conducted between 7 am and 6 pm Monday to Friday and between 8 am and 1 pm Saturdays and at no time on Sundays and public holidays, unless an out of hours protocol is included within an approved Construction Environment Management Plan or the Planning Secretary agrees otherwise. | C | <p>HC (pers comms) confirmed that construction work at the premises is conducted between the approved hours of Schedule 2, Condition B13.</p> <p>Sighted a copy of the PBE Site Management Plan, version B, dated October 2022. The Plan describes that decoupling works will be undertaken during standard construction hours defined as:</p> <ul style="list-style-type: none"> • 7:00am to 6:00pm Monday to Friday inclusive; • 8:00am to 1:00pm on Saturday; and |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|---|---|--------|---|
| | | | <ul style="list-style-type: none"> At no time on Sunday or Public Holidays. <p>A PBE sign in / sign out register was sighted for the project during the site inspection which recorded arrival and departure times of personnel.</p> |
| Exceptions to construction hours | | | |
| B14 | <p>The following activities may be carried out outside the recommended construction hours:</p> <p>(a) construction that causes LAeq_(15minute) noise levels that are:</p> <p>(i) no more than 5 dB above Rating Background Level at any residence in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009); and</p> <p>(ii) no more than the Noise Management Levels specified in Table 3 of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) at other sensitive land uses; or</p> | NT | HC (pers comms) confirmed that there have been no activities outside of approved construction hours. |
| | (b) Decoupling works required to be completed during station outages; or | NT | See Schedule 2, Condition B14 (a) above. |
| | (c) for the delivery of materials required by the police or other authorities for safety reasons; or | NT | See Schedule 2, Condition B14 (a) above. |
| | (d) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm. | NT | See Schedule 2, Condition B14 (a) above. |
| Dust and air emissions | | | |
| B15 | <p>The Applicant must take all reasonable and feasible steps to:</p> <p>(a) minimise odour, fume and dust emissions of the development;</p> | C | <p>No odour, fume or dust emissions were identified during the audit site inspection.</p> <p>The site inspection confirmed that speed limit signage is in place on leaving site and engines and equipment are switched off when not in use (see Plate 9).</p> <p>HC (pers comms) confirmed that no complaints have been received for the project in relation to odour, fume or dust emissions during the audit period.</p> <p>BH (pers comms) noted that tool box talks are completed with site personnel which focus on dust mitigation measures.</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|------|---|--------|---|
| | | | <p>Sighted PBE Site Management Plan dated October 2022 which notes that where possible all PBE workers, contractors and visitors will take reasonable steps to minimise odour, fume and dust emissions.</p> <p>The PBE Site Management Plan also lists odour, fume and dust emissions control measures for the project including provision of a water cart for dust suppression, regular visual inspections of work areas, any stockpile heights will have a maximum height designed to reduce potential wind mobilisation, speed restrictions and signage to be put in place, wash down facilities will be made available (Vacuum truck, water cart hose or similar) prior to vehicles leaving site under muddy conditions, all construction and maintenance equipment and vehicles are to be operated and maintained to the manufacturer's specifications, and be regularly serviced, engines & equipment to be switched off when not in use and limit the quantity of chemical products stored on site to the extent practical.</p> <p>Viewed pre-start inspection record for a watercart used for the project dated 5 June 2023 for plant rego Xo25NM.</p> <p>Sighted FCS service report for equipment serial number FCS 055 dated 7 February 2023.</p> |
| | (b) eliminate or minimise the risk of spontaneous combustion; and | C | <p>Sighted PBE Site Management Plan dated October 2022 which notes where possible all PBE workers, contractors & visitors shall take reasonable steps to eliminate or</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|-----------------|---|--------|--|
| | | | <p>minimise the risk of spontaneous combustion.</p> <p>No odour, fume or dust emissions were identified during the audit site inspection.</p> |
| | (c) minimise to the greatest extent practicable, dust generating surfaces exposed on the site. | C | The site inspection confirmed that exposed disturbance was minimised to those areas required for project construction activities. |
| Visual | | | |
| B16 | The Applicant must: (a) minimise the off-site visual impacts of the development; | C | <p>HC (pers comms) noted all work is completed during approved day time construction hours only.</p> <p>The site inspection confirmed that project works at the time of the audit are limited in scale, with minimal views available from public roads.</p> |
| | (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and | C | <p>Sighted PBE correspondence dated 25 January 2023 confirming that project buildings will be clad in "Pale Eucalypt". Colorbond.</p> <p>The site inspection confirmed that the visual appearance of the project blends in as far as possible with the surrounding landscape, see Plate 11.</p> |
| | (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes. | C | The site inspection confirmed that there has been no mounting of any advertising signs or logos on site, except where required for identification or safety purposes. |
| Lighting | | | |
| B17 | The Applicant must: (a) minimise the off-site lighting impacts of the development; and | C | HC (pers comms) noted that all work is completed during approved day time construction hours. |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|-------------------------------------|--|--------|---|
| | | | The site inspection confirmed that project works at the time of the audit are limited in scale, with minimal views available from public roads. |
| | (b) ensure that any external lighting associated with the development: <ul style="list-style-type: none"> • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; and • complies with <i>Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version. | C | The audit site inspection confirmed that there is external lighting on the exterior of the switch room and control room buildings, see Plate 11 . Sighted extract from project tender specification which notes that all equipment, components and materials shall be in accordance with the most recent editions, revisions and amendments of Standards and Codes including AS 1158 lighting for public places and roads. |
| HERITAGE | | | |
| Protection of Heritage Items | | | |
| B18 | The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items located outside the development footprint. | C | HC (pers comms) confirmed that known heritage sites are located outside of the development footprint will not be impacted as part of Stage 1 of the Project. The Liddell Power Station Decoupling Works Aboriginal Cultural Heritage Management Plan (ACHMP) dated 22 August 2022 describes the procedure for sites outside the development footprint. Section 3.7 notes that other known sites are a sufficient distance away from the ACHMP Area so as not to represent an impact risk and the construction footprint will be demarcated or communicated to contractors to ensure no disturbance outside of the approved area. |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|--|---|--------|--|
| B19 | <p>If any previous unknown Aboriginal object of Aboriginal place is discovered on the site, or suspected to be on the site:</p> <ul style="list-style-type: none"> (a) all work in the immediate vicinity of the object or place must cease immediately; (b) a 10m buffer area around the object or place must be cordoned off; and (c) Heritage NSW must be contacted immediately. | NT | <p>Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which notes that no previously recorded Aboriginal objects or places have been identified within the ACHMP area.</p> <p>BH (pers comms) confirmed that no new heritage sites have been identified during project construction and that the AGL site induction covers unexpected finds procedures.</p> <p>Sighted PBE site familiarisation that describes cultural and Aboriginal artifacts management. The site familiarisation notes that work must cease and the area to be barricaded by 10m to prevent any damage or loss to the discovered site.</p> |
| B20 | <p>Work in the immediate vicinity may only recommence if:</p> <ul style="list-style-type: none"> (a) the potential Aboriginal object is confirmed by Heritage NSW, in consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal place; (b) the Cultural Heritage Management Plan is revised to include the Aboriginal object and appropriate measures in respect of it; or (c) the Planning Secretary is satisfied with the measures to be implemented in respect of the Aboriginal object and makes a written direction in that regard. | NT | <p>Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which notes that no previously recorded Aboriginal objects or places have been identified within the ACHMP area.</p> <p>HC (pers comms) confirmed that sites identified in the EIS are not relevant to Stage 1 of the project.</p> |
| B21 | <p>The Applicant must ensure that all known Aboriginal objects or Aboriginal places on the site and within any offset areas are properly recorded, those records are kept up to date and are reported to the Aboriginal Heritage Information Management System (AHIMS).</p> | NT | <p>Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which notes that no previously recorded Aboriginal objects or places have been identified within the ACHMP area.</p> |
| Cultural Heritage Management Plan | | | |
| B22 | <p>B22. The Applicant must prepare an Aboriginal Cultural Heritage Management Plan for the development. The plan must</p> <ul style="list-style-type: none"> (a) be prepared by suitably qualified and experienced persons approved by the Secretary; | C | <p>Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which was prepared by AECOM Australia</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|------|---|--------|---|
| | | | Pty Ltd. Sighted DPE letter dated 13 February 2023 endorsing Geordie Oakes (of AECOM) as a suitably qualified and experienced person to prepare the project ACHMP under Condition B22 of SSD 8889679. |
| | (b) be prepared in consultation with Registered Aboriginal Parties and Heritage NSW; | C | Sighted DPE letter dated 31 August 2022 which notes the ACHMP has been prepared in consultation with RAPs and Heritage NSW. NSW and Registered Aboriginal Parties and contains the information required by the conditions of approval. |
| | (c) be submitted to the Planning Secretary for approval prior to carrying out construction under this consent; | C | Sighted AGL notification of commencement letter dated 12 August 2022 which notes pre-construction activities and physical works are scheduled to commence on the Stage 1 Decoupling Works on 1 September 2022. The letter also notes that the ACHMP was lodged on the 8 July 2022. DPE approved the ACHMP via letter dated 31 August 2022. |
| | (d) describe the measures to be implemented on the site to: <ul style="list-style-type: none"> (i) comply with the heritage-related operating conditions of this consent; (ii) ensure all workers receive suitable Aboriginal cultural heritage inductions prior to carrying out any activities which may cause impacts to Aboriginal objects or Aboriginal places, and that suitable records are kept of these inductions; (iii) protect, monitor and/or manage identified Aboriginal objects and Aboriginal places (including investigation of design options to avoid disturbance of Aboriginal objects) in accordance with the commitments made in the document/s listed in condition A2(c); (iv) protect Aboriginal objects and Aboriginal places located outside the approved disturbance area from impacts of the development; | C | <ul style="list-style-type: none"> (i) Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022. (ii) Section 8 of the ACHMP describes training and inductions. Section 8 notes general Aboriginal cultural heritage management training is provided to all AGL employees and contractors through the site induction process at Liddell Power Station. Employees and |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|------|--|--------|---|
| | <ul style="list-style-type: none"> (v) manage the discovery of suspected human remains and any new Aboriginal objects or Aboriginal places, including provisions for burials, over the life of the development; (vi) maintain and manage reasonable access for relevant Aboriginal stakeholders to Aboriginal objects and Aboriginal places (outside of the approved disturbance area); and (vii) facilitate ongoing consultation and involvement of Registered Aboriginal Parties in the conservation and management of Aboriginal cultural heritage on the site; and (viii) include a strategy for the care, control and storage of Aboriginal objects salvaged on the site, both during the life of the development and in the long term. | | <p>contractors will also be made aware of their legal responsibilities under the <i>NP&W Act 1974</i>.</p> <ul style="list-style-type: none"> (iii) Section 3 of the ACHMP describes Management of Aboriginal Cultural Heritage Values. (iv) Section 3.7 describes management of sites outside the Development Footprint. (v) Section 3.3 of the ACHMP describes Unanticipated Finds Protocol including Aboriginal Objects/Places and Human Skeletal Remains. (vi) Section 3.6 of the ACHMP describes Care and Control of Salvaged Objects. Section 3.6 notes Aboriginal community members may wish to access sites for appropriate cultural purposes (e.g. education and ceremony). AGL will facilitate reasonable access upon request and reasonable access will be subject to Bayswater Power Station's operational requirements. (vii) Section 4.5 of the ACHMP describes ongoing RAP consultation. HC (pers comms) confirmed that no consultation with RAPs has been required during the audit period. (viii) Section 3.6 of the ACHMP describes Care and Control of |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|-----------------------|--|--------|--|
| | | | <p>Salvaged Objects. Section 3.6 notes a long-term management strategy has not yet been established by Liddell Power Station or the RAPs. As such, salvaged Aboriginal objects will remain in the temporary storage location until a decision is made. Any decisions regarding the long-term management of Aboriginal objects will be made in consultation with RAPs and Heritage NSW. A long-term management strategy will be prepared prior to power station closure.</p> |
| B23 | The Applicant must implement the Aboriginal Cultural Heritage Management Plan approved by the Planning Secretary. | C | See comments in Schedule 2, Condition B22 above. |
| SOIL AND WATER | | | |
| Water Supply | | | |
| B24 | <p>The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.</p> <p>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.</p> | C | <p>Sighted Liddell Decoupling Works Soil and Water Management Plan dated 22 August 2022.</p> <p>Section 3.2.5 of the Soil and Water Management Plan describes Water Supply and AGL Hunter River Water Allocations, which are sufficient to meet the demand for the Stage 1 construction works during the audit period.</p> <p>The site inspection confirmed that water is available from a stand pipe at the top of the construction area, see Plate 12. The hydrant is connected to the wider AGL site water system.</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|-----------------------------|--|--------|--|
| Water Pollution | | | |
| B25 | The Applicant must ensure that all surface discharges from the development comply with all relevant provisions of the POEO Act, including any discharge limits (both volume and quality) set for the development in any EPL. | C | <p>HC (pers comms) confirmed any sediment water from the construction area is captured in the existing Liddell site water management system.</p> <p>The site inspection confirmed that sediment controls are in place at the project site, see Plate 4 and Plate 5.</p> <p>The site inspection also noted that all chemicals for the project are contained and stored in appropriate bunding, see Plate 2.</p> <p>During the site inspection a spill kit was observed to be available at the project laydown area, see Plate 8.</p> |
| Operating Conditions | | | |
| B26 | <p>The Applicant must:</p> <p>(a) ensure the development is designed, constructed and maintained to minimise impacts on surface water, flooding and groundwater at the site;</p> | C | <p>HC and BH (pers comms) confirmed any sediment water from the construction area is captured in the existing Liddell site water management system.</p> <p>Sighted Liddell Decoupling Works Soil and Water Management Plan dated 22 August 2022.</p> <p>Section 3.2.4 of the Soil and Water Management Plan notes that the Project is not located on land that is mapped under the Singleton LEP as being susceptible to flooding. No mapping for flood prone land is available under the Muswellbrook LEP.</p> <p>The Battery and Decoupling footprints are elevated above the maximum water level of Lake Liddell and away from drainage lines.</p> <p>Section 4.2.2 of the Soil and Water</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|------|--|------------------|--|
| | | | <p>Management Plan notes indirect impacts to the groundwater environment during construction may occur because of potential spills or leaks of hazardous materials occurring during construction and migrating to the water table. Potential spills or leaks may include oils, lubricants and fuels used by construction plant.</p> <p>The site inspection confirmed that sediment and erosion controls are in place for the project laydown and construction areas, see Plate 5 and Plate 10.</p> <p>All chemicals used for the project were stored in bunding at the time of the site inspection, see Plate 2.</p> <p>A spill kit was available on site at the time of the site inspection, see Plate 8.</p> |
| | <p>(b) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual, or its latest version;</p> | <p>NC</p> | <p>Sighted PBE toolbox talk dated 4 July 2023 that notes discussions were held in regard to inspecting sediment fences and monitoring them throughout the day.</p> <p>Sighted PBE toolbox talk dated 28 March 2023 which notes sediment run off on the eastern end of pad and the need for installation of hay bales and sediment fencing.</p> <p>Erosion and sediment controls were observed to be in place for the project laydown and construction areas during the audit site inspection (refer to Plate 4 and Plate 5).</p> <p>An up-to-date Erosion and Sediment Control Plan (ESCP) documenting stockpile locations for the Project was not in place at the time of audit, as</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|--------------|--|--------|---|
| | | | <p>required under Section 5.1 of the Soil and Water Management Plan. It is recommended that stockpile locations and dates of establishment for each stockpile are recorded in an updated ESCP.</p> <p>It is also recommended that erosion and sediment controls are maintained for the stockpile of material excavated from the project construction area (see Plate 13).</p> |
| | (c) ensure the battery energy storage system and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and | NT | HC (pers comms) confirmed that development of the battery energy storage system and ancillary infrastructure has not commenced at the time of audit. |
| | (d) ensure all works are undertaken in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i> (NRAR, 2018), or its latest version unless DPE Water agrees otherwise. | NT | See Schedule 2, Condition B26 (c) above. |
| WASTE | | | |
| B27 | <p>The Applicant must:</p> <p>(a) take all reasonable steps to minimise the waste generated by the development;</p> | C | <p>Sighted the Liddell Decoupling Works Waste Management Plan dated 22 August 2022. The Waste Management Plan identifies the key waste issues that require control to manage project waste impacts.</p> <p>Section 3.3 of the Waste Management Plan notes materials with minimal packaging requirements should be used, removal of packaging should occur offsite by suppliers, and fabrication of parts should be conducted offsite.</p> <p>The site inspection confirmed that waste is being segregated into separate skip bins (see Plate 6). Viewed examples of Remondis invoices dated 31 May 2023 and 31 March 2023 for sewage pump out and</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|------|---|--------|---|
| | (b) classify all waste in accordance with the <i>Waste Classification Guidelines</i> (EPA, 2014); | C | <p>emptying of project skip bins.</p> <p>HC (pers comms) confirmed that waste is required to be managed in accordance with the Waste Management Plan.</p> <p>BH (pers comms) confirmed that Remondis is contracted for routine emptying of bins and sewage for the project.</p> <p>Sighted Remondis invoices dated 31 May 2023 and 31 March 2023 for sewage pump out and emptying of project skip bins.</p> <p>HC (pers comms) confirmed that no asbestos has been identified during the audit period and that personnel work under the AGL Asbestos procedure.</p> <p>No evidence was available at the time of the audit to determine that waste materials generated by the project are recorded, classified and monitored against the EPA Waste Classification Guidelines.</p> <p>It is recommended that AGL ensure Project waste is recorded and classified generally in accordance with the EPA Waste Classification Guidelines.</p> |
| | (c) dispose of all waste at appropriately licensed waste facilities or as expressly permitted in an applicable EPL; and | C | <p>HC (pers comms) confirmed that project waste is disposed of appropriately at a licenced waste facility.</p> <p>The site inspection confirmed that waste is being segregated into separate skip bins (see Plate 6). Viewed examples of June 2023 receipts for Remondis disposal of putrescible and scrap steel waste at offsite waste facilities in Muswellbrook.</p> <p>It is recommended that AGL retains copies of records from the project waste</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence | | | | | | |
|--|---|----------|--|---|---|-----------|---|--|--|
| | | | contractor. | | | | | | |
| | (d) manage any asbestos or asbestos-contaminated materials identified during construction and operation of the development in accordance with the requirements under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> . | NT | HC (pers comms) confirmed that there has been no unexpected asbestos identified during the audit period. Viewed a copy of the AGL Asbestos Management Procedure, AGLM-HSE-PRO-007.10.01 which outlines responsibilities, procedures/ protocols and systems for effective management of asbestos and asbestos containing material and the minimisation of health risks associated with the presence of asbestos. | | | | | | |
| DECOMMISSIONING AND REHABILITATION | | | | | | | | | |
| B28 | The Applicant must rehabilitate the development to the satisfaction of the Planning Secretary. The rehabilitation must comply with the objectives in Table 2. | NT | HC (pers comms) confirmed that no rehabilitation has been undertaken during the audit period. | | | | | | |
| | <p><i>Table 2: Rehabilitation Objectives</i></p> <table border="1"> <thead> <tr> <th>Features</th> <th>Objectives</th> </tr> </thead> <tbody> <tr> <td>All areas of the site affected by the development</td> <td> <ul style="list-style-type: none"> → Safe, stable and non-polluting → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise → Minimise the visual impact of any above-ground ancillary infrastructure agreed to be retained for an alternative use </td> </tr> <tr> <td>Community</td> <td> <ul style="list-style-type: none"> → Ensure public safety at all times </td> </tr> </tbody> </table> | Features | Objectives | All areas of the site affected by the development | <ul style="list-style-type: none"> → Safe, stable and non-polluting → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise → Minimise the visual impact of any above-ground ancillary infrastructure agreed to be retained for an alternative use | Community | <ul style="list-style-type: none"> → Ensure public safety at all times | | |
| Features | Objectives | | | | | | | | |
| All areas of the site affected by the development | <ul style="list-style-type: none"> → Safe, stable and non-polluting → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise → Minimise the visual impact of any above-ground ancillary infrastructure agreed to be retained for an alternative use | | | | | | | | |
| Community | <ul style="list-style-type: none"> → Ensure public safety at all times | | | | | | | | |
| SCHEDULE 2: PART C – ENVIRONMENTAL MANAGEMENT AND REPORTING | | | | | | | | | |
| ENVIRONMENTAL MANAGEMENT | | | | | | | | | |
| Environmental Management Strategy | | | | | | | | | |
| C1 | Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: <p>(a) provide the strategic framework for environmental management of the development;</p> | C | Sighted AGL Liddell Environmental Management Strategy (EMS) dated 22 August 2022 which provides the strategic framework of the Project. DPE approved the project EMS and sub-plans via letter | | | | | | |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|------|---|-----------|---|
| | | | dated 31 August 2022. |
| | (b) identify the statutory approvals that apply to the development; | C | Section 3 of the EMS describes the Statutory Requirements that apply to the development. |
| | (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; | C | Section 7.3 of the EMS outlines proposed key roles and responsibilities for both AGLM, contractors and sub-contractors working on all stages of the project. |
| | (d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and | NC | (i) Section 6.2 of the EMS describes Stakeholder Consultation. AGLM maintains a community reference group known as the AGL Community Dialogue Group which meets quarterly. Sighted Community Dialogue Group meeting minutes dated 23 June 2022 and 3 March 2022. (ii) Section 6.3 of the EMS describes Complaint and Enquiry Management. The EMS notes that complaints will be recorded in the Community Complaints Register AGLM-HSE-REG-008.09.2. HC (pers comms) confirmed no issues have been raised by regulatory agencies or the local community during audit period. A current copy of the complaints register was not available on the AGL website at the time of the audit. It is recommended that the project complaints register is regularly updated and made available on the AGL website. |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|------|--|--------|--|
| | | | <p>(iii) Section 6.3 of the EMS describes dispute management.</p> <p>(iv) Section 7.7 of the EMS describes compliance management. Section 7.7.1 notes that Environmental incidents and hazards (non-conformances and non-compliances) shall be entered into myHSE and managed in accordance with the Incident, Near Miss and Hazard Management Procedure AGL-HSE-PRO-012.1. An Action Management record raised by HC dated 19 June 2023 in response to the previous IEA was sighted. The action records action source, site, action owner, action required and the due date.</p> <p>(v) Section 7.5 of the EMS describes Incident and emergency management. Section 7.5.2 notes each Contractor strategy or management plan will detail an emergency response plan that will deal with the management of incidents that constitute an emergency.</p> |
| | <p>(e) include:</p> <p>(i) the following subplans:</p> <ul style="list-style-type: none"> • soil, stormwater, water quality, flood and spoil management; • construction and decommissioning noise, including an out-of-hours works protocol; • air quality management; • contamination, including an unexpected finds protocol | C | <p>(i) Sighted Liddell Decoupling Works EMS sub-plans dated 22 August 2022, including:</p> <ul style="list-style-type: none"> - Soil and Water Management Plan; - Construction Noise Management Plan, which includes |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|---|---|--------|---|
| | <ul style="list-style-type: none"> • waste management; and • traffic. <p>(ii) references to any strategies, plans and programs approved under the conditions of this approval; and</p> <p>(iii) a clear plan depicting monitoring to be carried out under the conditions of this approval.</p> | | <p>an out of hours work protocol;</p> <ul style="list-style-type: none"> - Air Quality Management Plan; - Contamination Management Plan, which includes an accidental discovery protocol for unexpected finds; - Waste Management Plan; and - Traffic Management Plan. <p>(ii) Planned Strategies, Plans and Programs for the approval of DPE are listed in Section 1.2, Table 1 of the EMS.</p> <p>(iii) Appendix B of the EMS provides a plan depicting monitoring to be carried out under the conditions of this approval.</p> |
| C2 | Applicant must implement the Environmental Management Strategy approved by the Planning Secretary. | C | See Schedule 2, Condition C1 above. |
| Revision of Strategies, Plans and Programs | | | |
| C3 | Within 3 months, unless the Planning Secretary agrees otherwise, of: | NT | HC (pers comms) confirmed there have been no submissions of incident reports in relation to the project. |
| | (a) the submission of an incident report under condition C4 below; | | |
| | (b) the submission of an audit report under condition C13 below; and | NT | Sighted DPE email confirming AGL has lodged an updated ACHMP for review on the 7 July 2023. |
| | (c) the approval of any modification to the conditions of this consent; or | NT | No modifications to SSD 8889679 have been approved by DPE. |
| | (d) a direction of the Secretary under condition A3 of Schedule 2; the Applicant must review and, if necessary, revise the studies, strategies or plans required under the conditions of consent to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary. | NT | HC (pers comm) confirmed there have been no written directions made by the Secretary regarding project plans, strategies and programs. |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|--|---|--------|---|
| | <i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i> | NT | Note only. |
| COMPLIANCE | | | |
| Incident Notification, Reporting and Response | | | |
| C4 | The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 4. | NT | HC (pers comms) confirmed no notifiable incidents have been identified in relation to the project during the audit period. |
| Non-Compliance Notification | | | |
| C5 | The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance. | C | HC (pers comms) confirmed no non-compliances were identified by AGL during the audit period. It is recommended that AGL notify DPE of the non-compliances identified in this audit report within seven days of the document date. |
| C6 | A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. | NT | See Schedule 2, Condition C5 above. |
| C7 | A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance. | NT | See Schedule 2, Conditions C4 and C5 above. |
| Compliance Reporting | | | |
| C8 | Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Requirements outlined in the Compliance Reporting Post Approval Requirements (2020). | NT | A 52-week period has not elapsed from the date of commencement and as such, the requirement for a project Compliance Report has not been triggered. |
| C9 | Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed to by the | NT | See Schedule 2, Condition C8 above. |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|--|---|--------|---|
| | Planning Secretary. | | |
| C10 | The Applicant must make each Compliance Report publicly available within 60 days of submitting it to the Planning Secretary, unless otherwise agreed by the Planning Secretary. | NT | See Schedule 2, Condition C8 above. |
| C11 | Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020, or its latest version), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance. | NT | See Schedule 2, Condition C8 above. |
| NOTIFICATIONS | | | |
| Notification of Department | | | |
| C12 | <p>Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p> | C | Sighted AGL notification of commencement letter to DPE dated 12 August 2022 which notes pre-construction activities and physical works are scheduled to commence on the Stage 1 Decoupling Works on 1 September 2022. |
| INDEPENDENT ENVIRONMENTAL AUDIT | | | |
| C13 | Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020, or its latest version). | C | This IEA (see Appendix A) |
| C14 | Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit. | C | DPE endorsement letter dated 8 May 2023 approved the appointment of James Bailey & Associates to prepare the IEA for the Liddell Battery and Bayswater Ancillary Works. |
| C15 | The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Compliance Reporting Post Approval Requirements (2020, or its latest version), upon giving at least 4 weeks' notice (or timing) to the Applicant of the date upon which the audit must be commenced. | NT | Noted. |
| C16 | In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020, or its latest version), the Applicant must: | C | <ul style="list-style-type: none"> a) AGL to review and respond to this IEA. b) AGL to respond to this IEA. c) AGL to make this IEA and response |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|------------------------------|--|-----------|---|
| | (a) review and respond to each Independent Audit Report prepared under condition C13 of this approval, or condition C15 where notice is given by the Planning Secretary; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary. | | publicly available. |
| C17 | Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection, as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary. | C | HC (pers comm) stated that the previous construction IEA for SSD 8889679 was submitted to DPE on 5 May 2023. It is recommended that AGL submit this IEA report and their response to DPE as soon as possible following completion of this audit report. |
| C18 | Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020, or its latest version), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance. | NT | There have been no requests made by AGL to cease ongoing independent operational audit requirements. |
| ACCESS TO INFORMATION | | | |
| C19 | The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent; (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (vi) how complaints about the development can be made; (vii) a complaints register; (viii) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (ix) any other matter required by the Planning Secretary; and | NC | (i) The EIS is publicly available on the AGL website. (ii) Development Consent SSD 8889679 is available on the AGL website. (iii) Development Consent SSD 8889679 is available on the AGL website. (iv) The ACHMP, EMS and EMS sub-plans (see Schedule 2, Condition C1) are publicly available on the AGL website. (v) Stage 1 and Stage 2 of the project are outlined on the AGL website. (vi) Complaints and Enquiries hotline |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|--|---|--------|--|
| | | | <p>number, email address and postal address are available on the AGL website.</p> <p>(vii) A general complaints register dated 27 March 2023 was sighted on the website, however the link to the current SSD 8889679 was not working at the time of the audit. It is recommended that the complaints register for SSD 8889679 is updated on the AGL website each month, even in the event that no project-specific complaints are received.</p> <p>(viii) The AGL response to the previous IEA report (JBA, 2023) was not published on the website at the time of audit. It is recommended that this document is published.</p> <p>(ix) Nil other matters required by the Planning Secretary.</p> <p>It is recommended that all information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) noted in Schedule 2, Condition C19 are made publicly available on the AGL website.</p> |
| | (b) keep this information up to date. | NC | See Schedule 2, Condition C19(a) above. |
| SCHEDULE 2: PART D – CONDITIONS EXTRACTED FROM CONSENTS REFERRED TO IN CONDITION A5 | | | |
| | Note: For the avoidance of doubt, a consent listed in condition A5 will be surrendered and cease to operate from the date on which a valid notice is served on the consent authority pursuant to cl 97 of the EP&A | NT | Note only. |

| Cond | Project Approval SSD 8889679 | Status | Evidence | | | | | | |
|---|---|---------------|---|------|---|-----|---------------|--|--|
| | <i>Regulation. The conditions listed in this Part D are drawn from the consents listed in condition A5 but form part of this consent from the date of this consent.</i> | | | | | | | | |
| CONDITIONS FROM DA 8.2018.273.2 - LOW PRESSURE PUMP STABILISATION (SINGLETON COUNCIL) | | | | | | | | | |
| D1 | The development of the Low Pressure Pump Station Stabilisation is to be undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the following document: | C | <p>Viewed AGL correspondence to DPE dated 7 September 2021 which summarises the status of EIS commitments for the consents required to be surrendered under the conditions of SSD 8889679, including DA 8.2018.273.2.</p> <p>HC (pers comms) confirmed that AGL are currently going through the process of surrendering DA 8.2018.273.2 and AGL maintenance records sheet 'Newdell Unloader Workorder since Jan 2022' dated 25 July 2023.</p> <p>It is recommended that AGL retains evidence to confirm that the development of the Low Pressure Pump Station Stabilisation was undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the GHD Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report prior to surrender of the DA 8.2018.273.2 under Schedule 2, Condition A5 of SSD 8889679.</p> | | | | | | |
| | <table border="1"> <thead> <tr> <th>Title</th> <th>Written-By</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report</td> <td>GHD</td> <td>December 2018</td> </tr> </tbody> </table> | Title | Written-By | Date | Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report | GHD | December 2018 | | |
| Title | Written-By | Date | | | | | | | |
| Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report | GHD | December 2018 | | | | | | | |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|---|---|--------|---|
| D2 | Site Contamination Issued During Construction - Should any new information come to light during demolition or construction works which has the potential to alter previous conclusions about site contamination, the Planning Secretary must be immediately notified by the applicant, and works must cease. Works must not recommence on site until approval is granted by the Planning Secretary. | NT | <p>HC (pers comms) confirmed that there has been no new information come to light during demolition or construction works which has the potential to alter previous conclusions about site contamination.</p> <p>Sighted Liddell Battery and Bayswater Ancillary Works Contamination Assessment dated 18 March 2021 prepared by Jacobs. The assessment notes that the elevated hydrocarbon concentrations present in the decoupling area unlikely to constrain the project development.</p> |
| CONDITIONS FROM DA 20_98 - DEVELOPMENT OF RAVENSWORTH COAL UNLOADER FACILITY (SINGLETON COUNCIL) | | | |
| D3 | The development of the Ravensworth Coal Unloader Facility must be carried out in accordance with the following document: | C | <p>Viewed AGL correspondence to DPE dated 7 September 2021 which summarises the status of EIS commitments for the consents required to be surrendered under the conditions of SSD 8889679, including DA 20_98.</p> <p>HC noted that the operation of the Ravensworth Coal Unloader Facility is managed by Aurizon. Viewed a copy of the Antiene and Newdell: Operational Environmental Management Plan dated 18 October 2022 and AGL maintenance records sheet 'Newdell Unloader Workorder since Jan 2022' dated 25 July 2023.</p> <p>It is recommended that AGL retains evidence that confirms that the development of the Ravensworth Coal Unloader Facility has been carried out in accordance with the HLA Envirosciences Proposed Macquarie Generation Rail</p> |

| Cond | Project Approval SSD 8889679 | Status | Evidence | | | | | | |
|---|--|---------------|---|------|---|-----------------------------------|---------------|--|--|
| | | | <i>Project at Ravensworth Environmental Impact Statement</i> prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679. | | | | | | |
| | <table border="1"> <thead> <tr> <th>Title</th> <th>Written-By</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td><i>Proposed Macquarie-Generation-Rail-Project-at-Ravensworth-Environmental-Impact-Statement</i></td> <td>HLA- Envirosciences</td> <td>December-1997</td> </tr> </tbody> </table> | Title | Written-By | Date | <i>Proposed Macquarie-Generation-Rail-Project-at-Ravensworth-Environmental-Impact-Statement</i> | HLA- Envirosciences | December-1997 | | |
| Title | Written-By | Date | | | | | | | |
| <i>Proposed Macquarie-Generation-Rail-Project-at-Ravensworth-Environmental-Impact-Statement</i> | HLA- Envirosciences | December-1997 | | | | | | | |
| D4 | The applicant is to liaise with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line. | NC | <p>HC noted that the operation of the Ravensworth Coal Unloader Facility is managed by Aurizon. Viewed a copy of the Antiene and Newdell: Operational Environmental Management Plan dated 18 October 2022 and AGL maintenance records sheet 'Newdell Unloader Workorder since Jan 2022' dated 25 July 2023.</p> <p>No evidence was available at the time of the audit to confirm AGL has liaised with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line.</p> <p>It is recommended that AGL retain evidence that confirms consultation with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.</p> | | | | | | |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|--|---|--------|---|
| BIODIVERSITY CONSERVATION DIVISION | | | |
| D5 | <p>(a) The applicant is to prepare and implement a site Environmental Management Plan for the Ravensworth Coal Unloader Facility relating to:</p> <ul style="list-style-type: none"> (i) Locations and designs for clean and contaminated water pathways, with detailed design drawings for all sediment basins. (ii) Segregated pathways and storage facilities for clean and contaminated stormwater runoff, with segregated reuse priority for contaminated water. (iii) A commitment not to allow any excess contaminated runoff to enter Bowmans Creek, and a suitable monitoring programme to demonstrate that no excess contaminated water leaves the site. (iv) A maintenance schedule for the pollution traps identifying cleaning periods and methods of disposal. (v) A maintenance schedule for the sediment ponds identifying cleansing periods and methods of disposal. <p>(b) The applicant is to demonstrate a commitment to maintaining final drainage lines in a stable condition.</p> | C | Viewed the Aurizon 'Antiene and Newdell: Operational Environmental Management Plan' dated 18 October 2022. The document identifies controls and maintenance requirements for the management of the AGLM Newdell coal unloading facility by Aurizon (the previous Ravensworth Coal Unloader Facility). |
| CONDITIONS FROM DA 401_2000 - COAL/RAIL UNLOADER AUGMENTATION (SINGLETON COUNCIL) | | | |

| Cond | Project Approval SSD 8889679 | Status | Evidence | | | | | | |
|---|---|-------------|--|------|---|-------------------------------|-------------|--|--|
| D6 | APPROVAL IN ACCORDANCE WITH PLANS - The development of the Coal/Rail Unloader Augmentation must be carried out generally in accordance with the development application and accompanying plans described as described in the following document: | C | <p>Viewed AGL correspondence to DPE dated 7 September 2021 which summarises the status of EIS commitments for the consents required to be surrendered under the conditions of SSD 8889679, including DA 401_2000.</p> <p>HC noted that the Ravensworth Coal Unloader Facility is managed by Aurizon. Viewed a copy of the Antiene and Newdell: Operational Environmental Management Plan dated 18 October 2022 and AGL maintenance records sheet 'Newdell Unloader Workorder since Jan 2022' dated 25 July 2023.</p> <p>It is recommended that AGL retain evidence that confirms the development of the Coal/Rail Unloader Augmentation is carried out generally in accordance with the development application and accompanying plans prior to surrender of the DA 401_2000 under Schedule 2, Condition A5 of SSD 8889679.</p> | | | | | | |
| | <table border="1"> <thead> <tr> <th data-bbox="277 967 624 1011">Title</th> <th data-bbox="624 967 862 1011">Written-By</th> <th data-bbox="862 967 1294 1011">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="277 1011 624 1134"><i>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</i></td> <td data-bbox="624 1011 862 1134">HLA- <u>Envirosciences</u></td> <td data-bbox="862 1011 1294 1134">August 2000</td> </tr> </tbody> </table> | Title | Written-By | Date | <i>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</i> | HLA- <u>Envirosciences</u> | August 2000 | | |
| Title | Written-By | Date | | | | | | | |
| <i>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</i> | HLA- <u>Envirosciences</u> | August 2000 | | | | | | | |

| Cond | Project Approval SSD 8889679 | Status | Evidence |
|--|--|--------|--|
| APPENDIX 4 – INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS | | | |
| WRITTEN INCIDENT NOTIFICATION REQUIREMENTS | | | |
| B1 | A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition 7 of Schedule 4 or, having given such notification, subsequently forms the view that an incident has not occurred. | NT | HC (pers comms) confirmed there no notifiable incidents related to the project occurred during the audit period. |
| B2 | Written notification of an incident must: (a) identify the development and application number; (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); (c) identify how the incident was detected; (d) identify when the applicant became aware of the incident; (e) identify any actual or potential non-compliance with conditions of consent; (f) describe what immediate steps were taken in relation to the incident; (g) identify further action(s) that will be taken in relation to the incident; and (h) identify a project contact for further communication regarding the incident. | NT | See comment in Appendix 4, Condition B1. |
| B3 | Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested. | NT | See comment in Appendix 4, Condition B1. |
| B4 | The Incident Report must include: (a) a summary of the incident; (b) outcomes of an incident investigation, including identification of the cause of the incident; (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) details of any communication with other stakeholders regarding the incident. | NT | See comment in Appendix 4, Condition B1. |

Table 2 **RTS Updated Mitigation Measures (Jacobs, 2021)**

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|------------------------|---|--------------------------|--------|--|
| Hazard and risk | | | | |
| HR1 | <p>During detailed design for the Project:</p> <ul style="list-style-type: none"> • A detailed bushfire threat assessment will be conducted for the Project, including establishment of an APZ, in consultation with the RFS • The separation distance between infrastructure within the Battery will be determined in accordance with applicable Codes and Standards and manufacturer's recommendations so that the preferred strategy of allowing a fire in one Battery enclosure or inverter to burn without the risk of propagating to other infrastructure can be maintained without the need for external firefighting • The separation distance within the Battery will be determined in accordance with applicable Codes and Standards and manufacturer's recommendations to allow safe escape in case of a fire • The need for active firefighting requirements at the Battery will be determined in consultation with RFS, FRNSW and the DPIE. Detailed fire fighting response and any need for fire water containment will be assessed and reported (e.g. in the format of a Fire Safety Study) post development approval, for review by DPIE, Fire rescue NSW and the RFS. The FSS will be developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper No. 2 – Fire Safety Study Guidelines (HIPAP No. 2) • The health and safety associated with EMF on the site and the potential exposure to EMF will be considered for AGLM staff and contractors as part of AGLM's obligations for their health and wellbeing under the Work Health and Safety Regulations 2011 (NSW) • Measures to prevent a leak occurring from the brine pipeline, the emergency diesel generators and at the Battery, and for secondary containment should a leak occur, will be included as part of the detailed design of the Project. The likelihood of a significant loss of containment event associated with this Project (Level 4) will be designed to Rare in accordance with AGL's Risk Management and Assessment Standard • The PHA be progressed to a FHA once the design of the development has been finalised. Commitments identified in the PHA will be integrated into the management for the Project. • The register of commitments (Appendix 1 of the PHA (Planager Pty Ltd, 2021)) will be integrated into the management for the Project. This includes integration of 84 individual commitments, including for the design, installation and maintenance of the Battery | Detailed design | NT | <p>Sighted AGL letter to DPE dated 12 August 2022 which notes that a Fire Safety Study is not required for Stage 1 of the Project (Decoupling Works) and that a Fire Safety Study will be undertaken prior to commencing construction of the battery energy storage system.</p> <p>HC (pers comms) confirmed that the battery and brine pipeline works have not commenced during the audit period.</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|---|--------------------------|--------|---|
| | automatic shutdown system on exceedance of safe limits; installation of deflagration venting and fire protection inside the Battery enclosures; design of the brine pipeline, waste oil facility, emergency diesel generators and the Battery such that the risk of pollution from a release is reduced to ALARP; installation of protective barriers, including at the transformers; and application of a rigorous and formal management of change process for the Project, including detailed hazard identification and risk assessment processes. | | | |
| HR2 | Design and selection of all electrical equipment is to minimise EMF levels and comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels | Detailed design | NC | <p>No evidence was available at the time of the audit that confirms design and selection of all electrical equipment is to minimise EMF levels and comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels.</p> <p>It is recommended that AGL documents the design and selection process to ensure all electrical equipment considers EMF levels and complies with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels.</p> |
| HR3 | Risks associated with the Project will be managed through a Management of Change process. AGLM implements an Asset Change Management Standard, and any major change (defined as a change that has major implications to the strength, stability, operation and design of the asset and/or health and safety of employees) must undergo a detailed risk assessment using the AGL Risk Management and Assessment Standard to assess the risks that may be introduced by the proposed change. This will be undertaken for all Project components and appropriate controls implemented to reduce the risk to an acceptable level. | Prior to construction | C | <p>Copies of the AGL Management of Change Standard version 1.2, dated 27 April 2021 and Integrated Energy Management of Change Process Flowchart were sighted.</p> <p>Section 25.3 of the PBE</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|--------------------------|--------|---|
| | | | | <p>Project Execution Plan dated September 2022 notes that Change Management processes will be used for Project control scope and variations with AGL.</p> <p>A copy of PBE Construction Risk Assessment Register dated 5 October 2022 was sighted for the construction of the 330/33kV Substation.</p> |
| HR4 | Storage and management of dangerous goods and hazardous materials (if required) will occur in a safe, secure location consistent with the requirements of applicable Australian Standards. | Construction / operation | C | <p>No evidence of large volumes of dangerous goods or hazardous chemicals was observed during the audit site inspection.</p> <p>During the site inspection all chemicals on site were stored in adequate bunding, see Plate 2.</p> |
| HR5 | Refuelling will take place in a designated area within the works area, away from ignition sources and trees or vegetation and with appropriate controls to prevent any spills coming into contact with the ground. | Construction / operation | C | <p>HC (pers comms) confirmed that all contractor vehicles are taken off site for refuelling.</p> <p>Sighted the PBE (Project contractor) Site Management Plan dated October 2022 which notes all fuelling maintenance and servicing of vehicles will be done away from any environmentally sensitive area. If refuelling cannot be done away from site,</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|---------------------------------|------------------|--|
| | | | | <p>consideration should be given to the location (i.e., away from a water course) and spill kits must be readily available.</p> <p>The site inspection confirmed that spill kits are available in construction areas, see Plate 8.</p> |
| HR6 | <p>Appropriately stocked emergency spill kits will be available at all work areas at all times. All staff will be made aware of the location of the spill kit and trained in its use.</p> | <p>Construction / operation</p> | <p>NC</p> | <p>The site inspection confirmed that a spill kit is available at the site laydown area, see Plate 8. No evidence was available at the time of the audit to confirm that all Project staff have been trained spill response.</p> <p>It is recommended that all Project personnel will be trained in spill response, with training records retained.</p> |
| HR7 | <p>Temporary construction compounds will be maintained in a tidy and orderly manner to minimise potential fuel loads in the event that any construction compounds are affected by fire.</p> | <p>Construction</p> | <p>C</p> | <p>The audit site inspection confirmed that Project construction areas are being maintained in a tidy and orderly manner, see Plate 5 and Plate 6.</p> |
| HR8 | <p>Construction activities involving flammable materials and ignition sources (for example, welding) will be proactively managed to ensure that the potential for fire is effectively minimised. High risk construction activities, such as welding and metal work, would be subject to a risk assessment on total fire ban days and restricted or ceased as appropriate. Construction</p> | <p>Construction</p> | <p>C</p> | <p>HC (pers comms) confirmed that designated smoking areas are available on site.</p> <p>HC (pers comms) confirmed</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|--------------------|---|--------------------------|--------|---|
| | personnel will be inducted into the requirement to safely dispose of cigarette butts. | | | <p>that AGL have a hot work procedure and a hot work checklist that is to be completed prior to any hot work on site.</p> <p>Sighted AGLM Hot Work Checklist AGLM-HSE-FRM-007.04.01 and AGL Hot Work Procedure AGLM-HSE-PRO-007.04. The Hot Work Procedure describes the systems and equipment required to be used where personnel must perform hot work tasks, including the identification and assessment of risks and the type of controls that must be in place to ensure that the work is conducted safely.</p> <p>Sighted PBE Hot Work Permit template Document No. 62090-20 dated 18 May 2023 which has been signed on and off by personnel completing hot work.</p> |
| HR9 | An emergency response plan for the Battery would be prepared for the Project and provided to the Local Emergency Management Committee. | Construction / operation | NT | HC (pers comms) confirmed that this is not relevant to the current stage of the Project. |
| Air Quality | | | | |
| AQ1 | <p>The following will be undertaken to manage fugitive emissions from stored chemicals:</p> <ul style="list-style-type: none"> Limiting the quantity of chemical products stored at the site to the extent practical | Construction / operation | C | Sighted Liddell Decoupling Works Air Quality Management Plan (AQMP) |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|--------------------------|-----------|--|
| | <ul style="list-style-type: none"> Ensure that all storage tanks are fitted with the appropriate controls in-line with the Protection of the Environment Operations (Clean Air) Regulation 2010. | | | <p>dated 22 August 2022 which describes control measures for fugitive emissions from stored chemicals as limiting the quantity of chemical products stored at the site to the extent practical and ensuring that all storage tanks are fitted with the appropriate controls in-line with the Protection of the Environment Operations (Clean Air) Regulation 2010. The audit site inspection confirmed that there were limited volumes of chemical products stored at the Project construction area.</p> |
| AQ2 | <p>During loading and unloading of materials, the following will be undertaken:</p> <ul style="list-style-type: none"> Water sprays as applicable Minimising drop heights Reviewing and where necessary modifying or suspending activities during dry and windy weather and elevated background air quality conditions. | Construction | NC | <p>HC (pers comms) confirmed that regular visual inspection of work areas are completed to determine if additional dust suppression controls are required.</p> <p>Section 4 of the AQMP outlines controls to minimise dust emissions during Project construction work.</p> <p>Evidence was not available at the time of the audit to confirm dust mitigation controls are implemented during the loading and unloading of materials.</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|--------------------------|--------|--|
| | | | | <p>It is recommended that AGL document the implementation of control measures for Project loading and unloading activities.</p> |
| AQ3 | <p>While hauling materials in trucks, the following will be undertaken:</p> <ul style="list-style-type: none"> • Regular watering of unsealed haulage routes • Regular inspection and removal of debris from plant and equipment to avoid the tracking of materials on to the adjacent road network. | Construction | C | <p>The AQMP notes source specific control measures shall be routinely implemented (e.g. water spraying roads for dust suppression of traffic movements). The AQMP also notes that wash down facilities will be made available prior to vehicles leaving site to minimise mud and silt transfer offsite. Further measures may also be included to reduce the impact of mud and silt such as a rattle grid.</p> <p>Viewed pre-start inspection records for a watercart dated 5 June 2023. HC (pers comms) noted that that a water trailer is now used for dust suppression following the completion of Project excavation work.</p> <p>It is recommended that AGL retains evidence that regular inspection and removal of debris from plant and equipment prior</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|---|--------------------------|-----------|--|
| | | | | to leaving site is occurring for the Project. |
| AQ4 | <p>The following will be undertaken to manage exhaust emissions from plant and equipment:</p> <ul style="list-style-type: none"> • Inspecting all plant and equipment before it is used on-site • Ensuring that all vehicles, plant, and equipment are operated in a proper and efficient manner • Switching off all vehicles, plant and equipment when not in use for extended periods • Avoiding the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable. | Construction | C | <p>HC (pers comms) confirmed that pre-start checks for equipment are undertaken before use.</p> <p>The AQMP notes all construction and maintenance equipment and vehicles are to be operated and maintained to the manufacturer's specifications and be regularly service to minimise exhaust emissions. The AQMP also notes that Engines and equipment should be switched off when not in use and where reasonable and feasible, low emission plant and equipment should be adopted and used on site.</p> <p>The site inspection confirmed that all vehicles, plant and equipment were switched off when not in use for extended periods.</p> |
| AQ5 | Activities will be coordinated between the Project and the WOAOW project to limit the potential for cumulative dust impacts where possible. | Construction | NC | Section 4 of the AQMP notes activities will be coordinated between the Decoupling works and the Bayswater WOAOW Project to limit the potential for |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|--------------------------|--------|---|
| | | | | <p>cumulative dust impacts where possible. While the potential for cumulative dust emissions due to Stage 1 of the Project is not significant, evidence was not available at the time of the audit to confirm that management of cumulative dust impacts has been considered between AGL and WOAOW project team.</p> <p>It is recommended that activities are coordinated between the Project and the WOAOW project team to limit the potential for cumulative dust impacts during future stages of the development where possible.</p> |
| AO6 | <p>The following will be undertaken to manage wind erosion from stockpiles and exposed surfaces:</p> <ul style="list-style-type: none"> • Watering stockpiles and exposed surfaces • Progressive rehabilitation of exposed surfaces (as feasible) where no longer required for construction. | Construction | C | <p>Section 4 of the AQMP notes that stockpiles of soils across the Project will be managed to reduce dust emission including spraying with water or covering.</p> <p>Viewed pre-start inspection records for a watercart used for the Project by FCS, completed 5 June 2023.</p> <p>No evidence of dust emissions from stockpiles and exposed surfaces was</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|----------------------------|---|--------------------------|--------|---|
| | | | | observed during the audit site inspection (see Plate 4 and Plate 5). |
| Greenhouse gases | | | | |
| GHG1 | The CEMP will include requirements for identification and minimise greenhouse gases (GHG) during construction. | Construction | C | BH (pers comms) confirmed that reduced idling and use of modern / efficient equipment are mitigation measures to minimise GHG during construction. Section 4 of the AQMP includes control measures for minimising GHG emissions during construction. |
| Noise and vibration | | | | |
| NV1 | The CEMP would identify Project construction activities with the potential to have noise impacts and the controls required to avoid, minimise and mitigate these impacts. The standard techniques for controlling noise impacts during construction are presented in the Interim Construction Noise Guideline (ICNG). During construction relevant standard measures as outlined in Section 6 of the ICNG will be implemented. | Construction | C | Sighted copy of the Liddell Decoupling Works - Construction Noise Management Plan (NMP) dated 22 August 2022. Section 5 of the NMP provides details of the mitigation and management measures proposed to address potential noise impacts resulting from the Project. Section 3.1 of the NMP notes that the ICNG was used to determine construction Noise Management Levels for the Project which are to |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|------------------------------|---|-----------------------------------|--------|--|
| | | | | act as noise criteria for the construction and decommissioning phase of works. |
| Traffic and transport | | | | |
| TT1 | <p>The haulage contractor will prepare and implement a Construction Traffic Management Plan (CTMP) for oversized overmass vehicle movements, which will include:</p> <ul style="list-style-type: none"> • Identification of the routes • Measures to provide an escort for the loads • Times of transporting to minimise impacts on the road network • Communication of strategy and liaising with emergency services and police. | Pre-construction and construction | C | <p>Sighted Liddell Decoupling Works - Traffic Management Plan dated 22 August 2022 which provides an oversized overmass vehicle route map.</p> <p>Sighted email dated 19 June 2023 addressed to AGLM employees and contractors informing of concrete trucks being escorted on site and entering onto the substation construction area. The email states that personnel should be aware of the additional vehicle movements on the day and where possible use alternate site access to reduce vehicle interactions.</p> <p>Email from BH dated 26 July 2023 states that no Project deliveries meeting oversized overmass (OSOM) criteria were required during the reporting period, so no permits or plans were required.</p> |
| TT2 | An oversized vehicle permit will be sought for all oversized overmass (OSOM) movements where required. The OSOM movements would be in accordance with the permit requirements | Pre-construction and | NT | Email from BH dated 26 July 2023 states that no Project deliveries meeting OSOM |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|---------------------|--|-----------------------------------|--------|--|
| | and be outside of peak traffic periods where possible. | construction | | criteria were required during the reporting period, so no permits were required. |
| TT3 | The CEMP and general site induction will inform construction and operational personnel of the risk of collisions, particularly with animals during rain or periods of low light. | Pre-construction and construction | C | <p>The AGL Liddell Environmental Management Strategy (EMS) dated 22 August 2022, notes that speed limits within the Project area would be limited to 40 km/hr to minimise the risk of vehicle collision with fauna.</p> <p>HC (pers comms) confirmed that the site induction for construction and operational personnel informs of the risk of collisions and includes a 40 km site speed limit.</p> <p>It is recommended that 40 km/hr speed signage is reinstated for internal roads accessing the Project work area (see Plate 9).</p> |
| Biodiversity | | | | |
| BIO | Future detailed design phase will increase retainment of native vegetation. | Pre-construction | NT | HC (pers comms) confirmed that this is not relevant at this stage of Project. |
| BIO1 | Exclusion zones, or 'No-Go' zones, will be mapped in CEMP and mapping made available to all construction personnel. | Pre-construction | C | HC (pers comms) confirmed that the location of No-Go zones are communicated during site inductions. The EMS also notes that mitigation measures |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|------|--|--|--------|--|
| | | | | <p>including the installation of appropriate signage such as 'No Go Zone' or 'Environmental Protection Area' will be implemented.</p> <p>The site inspection confirmed that flagging is being used to identify the Project construction boundary and 'No-Go' zones have been implemented.</p> <p>Sighted copy of PBE site familiarisation Job Register Number 62090 which records the name of the person completing the induction, induction date, and company name.</p> |
| BIO2 | Woody debris (logs and mulch) produced during vegetation clearing will be re-spread over any cleared areas to protect the soil surface from erosion and to aid habitat restoration where appropriate. | During construction | NT | HC (pers comms) confirmed that native vegetation clearing has not occurred during the audit period. |
| BIO3 | <p>An inspection of native vegetation to be impacted (within the construction footprint) will be conducted by an ecologist immediately prior to vegetation clearing works (to confirm absence of fauna species). A Spotter/Catcher ecologist must supervise vegetation clearing. In the unlikely event that fauna is present, works will cease until animals can be captured and removed from the construction footprint. Construction crews will be made aware that any native fauna species encountered must be allowed to leave site without being harassed.</p> <p>Trenches / holes will be inspected each morning and any trapped fauna removed or provide a mechanism for fauna to escape.</p> | Immediately prior to vegetation clearing / During construction | NT | HC (pers comms) confirmed that this is not relevant as Stage 1 of the Project does not involve any clearing of native vegetation. |
| BIO4 | Vehicle movements on newly formed access tracks or construction zones will be limited to 20km/h speed limit to reduce the risk of vehicle strike to fauna. | During construction | NT | HC (pers comms) confirmed that there are no newly formed access tracks for the |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|------|---|--------------------------|--------|---|
| | | | | Project. No new access tracks were sighted during site inspection. |
| BIO5 | Where native vegetation is removed topsoil is to be retained from excavation areas within construction footprint (where possible). Topsoil stockpiles will be delineated and protected from machinery compaction and contamination during construction. Following construction and infill, topsoil will be re-spread over impacted native vegetation areas (to retain native seedbank and assist with natural revegetation). Avoid stockpiling in the vicinity of drainage lines. | During construction | C | HC (pers comms) confirmed that native vegetation clearing has not been required for the current stage of the Project. It is recommended that material stockpiled during Stage 1 of the Project is delineated in the field. |
| BIO6 | Accurately and clearly mark out the limits of the construction footprint (only where native vegetation exists). No activities including parking and turning of vehicles and plant/ equipment will occur beyond the construction footprint. The Construction footprint will be demarcated prior to commencement of works in areas where native vegetation exists. | During construction | C | The audit site inspection confirmed that flagging has been used to clearly mark out the limits of the construction footprint, see Plate 4 and Plate 5 . |
| BIO7 | Materials, plant, equipment, work vehicles and soil/rock stockpiles to be placed to avoid damage to surrounding vegetation and will be outside tree drip-lines. Construction workers and vehicles will not access areas beyond delineated construction footprints. | During construction | C | The EMS notes that materials, plant, equipment, work vehicles and soil/rock stockpiles will be placed to avoid damage to surrounding vegetation and outside tree drip-lines. Construction workers and vehicles will not access areas beyond the delineated development site. The audit site inspection confirmed that flagging has been used to clearly mark out the limits of the |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|------|--|---|-----------|--|
| | | | | <p>construction footprint, see Plate 4 and Plate 5.</p> <p>No construction workers or vehicles were identified in areas beyond delineated construction footprint during the audit site inspection.</p> |
| BIO8 | <p>Where possible, avoid entering areas of significant weed infestations with machinery or personnel. Weed infestations are predominantly located in the Exotic grassland areas, or the PCT 1691 'regrowth' areas mapped within the development site (Figure 5-2).</p> | During construction | NC | <p>It is noted that the construction and laydown areas for Stage 1 of the Project are generally located in previously disturbed areas, however evidence was not available at the time of the audit that confirm machinery or personnel avoided entering areas of significant weed infestations.</p> <p>It is recommended that AGL ensures that where possible, machinery or personnel avoid entering areas of significant weed infestations during future stages of the Project.</p> |
| BIO9 | <p>If required, weed control will be undertaken by suitably qualified and/or experienced personnel. This may include:</p> <ul style="list-style-type: none"> • Manual weed removal in preference to herbicides. • Replacing non-target species removed/killed as a result of weed control activities. • Protecting Non-target species from spray drift. | Pre-construction or during construction | C | <p>HC (pers comms) confirmed that weed control for the AGL site is managed under contract.</p> <p>The EMS notes that weed control will be undertaken by suitably qualified and / or</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-------|--|----------------------------|------------------|--|
| | <ul style="list-style-type: none"> Using only herbicides registered for use within or near waterways for the specific target weed. Not applying herbicide if it is raining or if rain is expected. Mixing and loading herbicides and cleaning equipment away from waterways and drains. The CEMP will detail the procedures for management of weeds on the development site (which will be in accordance with the requirements of the Biosecurity Act 2015). | | | <p>experienced personnel as required.</p> <p>Sighted copy of Enright Land Management tax invoices dated 17 March 2023 and 28 April 2023 for weed management including weed spraying around Liddell station, brush-cutting, mowing, weed spraying and removal of Pampas Grass.</p> |
| BIO10 | <p>During the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species.</p> | <p>During construction</p> | <p>NC</p> | <p>It is noted that the construction and laydown areas for Stage 1 of the Project are generally located in previously disturbed areas, however evidence of weed disposal and management was not available at the time of the audit.</p> <p>The EMS notes that the CEMP will detail the procedures for management of weeds on the development site, however a copy of the CEMP was not available at the time of the audit.</p> <p>It is recommended that during the clearing works for future stages of the Project, weeds will be</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-------|---|--------------------------|--------|---|
| | | | | disposed and managed appropriately to stop the spread of existing weed species and records are retained. |
| BIO11 | Ensure vehicle and machinery hygiene measures are applied during construction and operation. Vehicle washdowns may be required for removal of mud and plant materials. | During construction | C | <p>The AQMP notes wash down facilities will be made available prior to vehicles leaving site to minimise mud and silt transfer offsite. Further measures may also be included to reduce the impact of mud and silt such as a rattle grid.</p> <p>Viewed contract service reports and PBT Toolbox talk dated 28 March 2023 noting that all vehicles must be washed down before leaving site.</p> <p>It is recommended that AGL ensures vehicle and machinery hygiene measures are applied during construction works for future Stages of the Project.</p> |
| BIO12 | Pathogen management measures will be implemented to prevent introduction and spread of amphibian chytrid fungus, <i>Phytophthora cinnamomi</i> and Exotic Rust Fungi. The CEMP will provide a protocol for construction vehicles driving to and from site to prevent the spread or introduction diseases. | During construction | NC | The EMS notes pathogen management measures will be established to prevent introduction and spread of amphibian chytrid fungus, <i>Phytophthora cinnamomi</i> and Exotic Rust Fungi. The |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-------|---|--------------------------|--------|---|
| | | | | <p>EMS notes the CEMP will provide a protocol for construction vehicles driving to and from site to prevent the spread or introduction diseases, however a copy of the CEMP was not available at the time of the audit.</p> <p>It is recommended that documentation for future Stages of the Project is updated to include a protocol for construction vehicles driving to and from construction areas to prevent the spread or introduction pathogens on site.</p> |
| BIO13 | Avoid excessive noise and vibration during construction activity. Construction activities to be carried out during diurnal hours. | During construction | C | <p>No excessive noise or vibration was identified during the audit site inspection.</p> <p>The audit site inspection confirmed that plant and equipment were switched off when not in use.</p> <p>HC (pers comms) confirmed that work is limited to standard hours of construction.</p> <p>HC (pers comms) confirmed that there has been no complaints received during</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-------------------------------|--|---|--------|--|
| | | | | the audit period in relation to noise and vibration. Section 5 of the NMP provides details of the mitigation and management measures proposed to address potential noise impacts resulting from the Project. |
| BIO14 | Erosion and sediment controls will remain in place until all rehabilitation has been completed. Drainage lines will be protected from runoff and stockpiling of spoil. | During construction | C | The audit site inspection confirmed that erosion and sediment controls are in place at the Project site. |
| BIO15 | Revegetation of slopes or exposed soil areas will be undertaken as soon as possible, in accordance with the CEMP. Landscaping of exposed surfaces using native indigenous species only. Soil loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder). | During construction / post construction | NT | HC and BH (pers comms) stated revegetation of slopes or exposed soil areas is not required for Stage 1 of the Project. No rehabilitation has occurred during the audit period. |
| BIO16 | Future detailed design phase will enhance retainment of native vegetation. Patches of native vegetation which are located near larger patches of native vegetation will be prioritised for retainment. | Pre-construction | NT | HC (pers comms) confirmed that there are no patches of remnant vegetation in proximity to construction work undertaken during the audit period. |
| Land and contamination | | | | |
| L01 | The internal bunding and environmental controls for hazardous substances management suitable for the Battery and transformers will be in accordance with applicable guidelines. | Detailed design | NT | HC (pers comms) confirmed that this is not relevant to the current stage of the Project. |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|---|--------------------------|--------|---|
| Lo2 | <p>Potential contamination-related impacts associated with the Project will be managed by the implementation of a CEMP that includes (but not limited to):</p> <ul style="list-style-type: none"> • An unexpected finds protocol for the appropriate assessment and management of encountered contamination to mitigate impacts to the development • Procedures to ensure that all material excavated during the construction of the development is appropriately assessed and classified before being disposed of in accordance with environmental laws • Specific control measures to mitigate impacts to soil, water, air, noise, traffic, structures and clear protocols for measurement of affected media and validation of results during construction of the development. | Construction | C | <p>The EMS notes the strategy for managing potential contamination related impacts for the Project is provided in the Contamination Management Subplan. Sighted Liddell Decoupling Works - Contamination Management Plan dated 22 August 2022 which provides an accidental discovery protocol for Unexpected Finds.</p> <p>Section 5.3 of the Contamination Management Plan also notes where potential contamination finds are not applicable for potential reuse as backfill they will be classified and disposed of at a lawful place in accordance with the <i>NSW EPA Waste Classification Guidelines 2014</i> and the <i>Liddell Battery Decoupling Works Waste Management Plan</i>.</p> <p>Section 5.1 of the Contamination Management Plan provides specific contamination control measures.</p> |
| Lo3 | The Asbestos Management Procedure would be updated as required to provide appropriate | Construction / | C | Viewed a copy of the AGL |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|----------------------------|--|--------------------------|--------|--|
| | control measures during the construction phase (as well as the operational phase if maintenance activities are required) to mitigate any risks of worker exposure to airborne asbestos fibers during work activities. | operation | | Asbestos Management Procedure, AGLM-HSE-PRO-007.10.01 which outlines responsibilities, procedures / protocols and systems for effective management of asbestos and asbestos containing material and the minimisation of health risks associated with the presence of asbestos. Next review date for the Asbestos Management Procedure is noted as 20 August 2023. |
| Lo4 | Detailed design of each Project component would consider and address geotechnical stability risks in accordance with applicable design standards. | Detailed design | C | Viewed the Geotechnical Investigation – Liddell Power Station dated 11 March 2022, prepared by Construction Sciences. The Construction Sciences report assesses the Project site and provides geotechnical recommendations. |
| Aboriginal heritage | | | | |
| AH1 | A Cultural Heritage Management Plan (CHMP) will be developed. It will include the methodologies developed in the ACHAR (Section 11.1, 11.2 and 11.3 of the ACHAR). It will specify that Project works will be restricted to the disturbance site. It will include provisions to ensure workers are made aware of cultural heritage places and their value, for example through Project inductions. The CHMP will include provisions to guard against indirect impact to the Aboriginal sites near the development site. The CHMP will also include a detailed methodology for the salvage and long-term management of any Aboriginal objects that may be impacted by the proposed works. | Pre-construction | C | Sighted Liddell Power Station Decoupling Works Aboriginal Cultural Heritage Management Plan (ACHMP) dated 22 August 2022. Section 3.7 of the ACHMP notes that the construction footprint will be demarcated |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|-----------------------------------|--------------------------|--------|---|
| | | | | <p>or communicated to contractors to ensure no disturbance outside of the approved area.</p> <p>HC (pers comms) confirmed that site inductions cover Aboriginal cultural heritage management.</p> <p>Section 8.0 of the ACHMP notes generic Aboriginal cultural heritage management training is provided to all employees and contractors through the site induction process at Liddell Power Station. Employees and contractors will also be made aware of their legal responsibilities under the NP&W Act 1974.</p> <p>HC (pers comms) confirmed that other known sites are a sufficient distance away from the ACHMP area so as not to represent an impact risk.</p> <p>Section 3.7 of the ACHMP notes that a number of Aboriginal sites are located outside the ACHMP area but within the Liddell Power Station site. These sites are not to be impacted as part of the decoupling component of the Project. Management</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|---|--|--------|--|
| | | | | <p>of these sites will be included in separate ACHMPs developed for other components of the Project.</p> <p>The audit site inspection confirmed flagging is used to identify the Project boundary and ensure no disturbance outside of the approved area, see Plate 4 and Plate 5.</p> |
| AH2 | <p>If repair or maintenance works on the Liddell to Jerrys Plains High Pressure Pipeline are required, the area of works will be subject to surface collection in accordance with Section 11 of the ACHAR (Appendix F) of impacted sites. The sites that maybe impacted include:</p> <ul style="list-style-type: none"> • Liddell Jerrys Plains Pipeline AS1 (37-2-6280) • Liddell Jerrys Plains Pipeline IF2 (37-2-6281) • Liddell Jerrys Plains Pipeline AS3 (37-2-6279) • Liddell Jerrys Plains Pipeline IF4 (37-2-6291) • Liddell Jerrys Plains Pipeline AS5 (37-2-6290) • Liddell Jerrys Plains Pipeline AS6 (37-2-6289) • Liddell Jerrys Plains Pipeline IF7 (37-2-6287) • Liddell Jerrys Plains Pipeline IF8 (37-2-6288) • Liddell Jerrys Plains Pipeline AS9 (37-2-6286) • Liddell Jerrys Plains Pipeline AS10 • BAYS ASo6 (37-2-6145). <p>If no works are required in the vicinity of a site, the site will be conserved.</p> | Pre-construction | NT | <p>HC (pers comms) confirmed that maintenance works on the Liddell to Jerrys Plains High Pressure Pipeline are not relevant to this stage of the Project.</p> |
| AH3 | <p>If practicable, the design and construction of the Brine Pipeline will avoid the two recorded site areas (Liddell Pipeline AS1 (37-2-6285) and Liddell Pipeline AS2 (37-2-6282)).</p> <p>The sites will be protected with high visibility fencing. If impact cannot be avoided, the sites will be salvaged through surface collection.</p> | Design, pre-construction, construction | NT | <p>HC (pers comms) confirmed that the design and construction of the Brine Pipeline is not relevant to</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|---------------------------------------|--|----------------------------|--------|---|
| | | | | this stage of the Project. |
| AH4 | During any works on the Liddell M1 Conveyor the site (Liddell M1 Conveyor AS1 (37-2-6284)) will be conserved and protected by high visibility exclusion fencing to prevent impact. | Construction | NT | HC (pers comms) confirmed that works on the Liddell M1 Conveyor are not relevant to this stage of the Project. |
| AH5 | The Unanticipated Finds Protocol in the ACHAR will be followed for any previously unidentified Aboriginal heritage objects found during the works. | Construction and operation | NT | HC (pers comms) confirmed that there has been no unidentified Aboriginal heritage objects found during the audit period. Section 3.3 of the ACHMP describes the Unanticipated Finds Protocol. |
| Non-Aboriginal heritage | | | | |
| NAH1 | Should any historical archaeological remains be discovered during construction, all works will stop, the area cordoned off and a heritage professional engaged to examine and advise on the significance of the archaeological finds. If deemed to be of significance, under section 146 (s146) of the Heritage Act, a s146 form would be submitted to notify the Heritage Council of the discovery of relics. Further investigation may be required, and appropriate management will be agreed through consultation with Heritage NSW. | Construction | NT | HC (pers comms) confirmed that there has been no historical archaeological remains discovered during the audit period. |
| NAH2 | In the unlikely event that human remains are uncovered, all work must cease immediately in the vicinity of the remains and the area cordoned off. The local NSW Police must be notified, who would make an initial assessment as to whether the remains are part of a crime scene, or Aboriginal remains. If the remains are thought to be Aboriginal, Heritage NSW must be contacted as per AH4. | Construction | NT | HC (pers comms) confirmed that no human remains have been uncovered during the audit period. Section 3.3.2 of the ACHMP describes the unanticipated finds protocol for human skeletal remains. |
| Landscape character and visual | | | | |
| V1 | Retention and enhancement of existing landscape features (areas of scrub, individual trees) will | Design | C | Viewed AGL project design |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|--------------------------|--------|---|
| | be considered where feasible. | | | <p>plan 'Liddell 330/30kV Transition Substation Civil Substation Site Road Plan' reference LD 843230_01, which considers the landform requirements for Project Stage 1. It is noted that the construction and laydown areas for Stage 1 of the Project are generally located in previously disturbed areas.</p> <p>It is recommended that AGL retain copies of detailed designs for future stages of the Project that confirms retention and enhancement of existing landscape features.</p> <p>The EMS notes the visual and lighting mitigation measures including the retention and enhancement of existing landscape features (areas of scrub, individual trees) will be considered where feasible.</p> |
| V2 | <p>Colour of proposed structures and built form will be considered in a suitable muted palette to visually integrate the Project within the landscape where possible.</p> <p>Where a muted palette is not possible, such as for the battery enclosures, AGLM will consider the use of vegetation screen instead.</p> | Design | C | <p>The EMS notes the visual and lighting mitigation measures including the colour of proposed structures and built form will be considered in a suitable muted palette to visually integrate the Project within</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|--------------------------|--------|---|
| | | | | <p>the landscape where possible.</p> <p>Detailed designs that confirm colour proposed for permanent infrastructure were sighted for the switchroom and control room buildings. Design drawings notes the external colours being used include Mangrove Green and Surfmist.</p> <p>Sighted PBE correspondence dated 25 January 2023 confirming that project buildings will be clad in Colorbond "Pale Eucalypt".</p> <p>The site inspection confirmed that the visual appearance of the Project blends in as far as possible with the surrounding landscape, see Plate 11.</p> |
| V3 | Where possible, consider minimal use of reflective surfaces to avoid drawing attention to the site within views due to reflective glare. | Design | C | <p>The EMS notes visual and lighting mitigation measures including where possible, considering minimal use of reflective surfaces to avoid drawing attention to the site within views due to reflective glare.</p> <p>The site inspection confirmed that the visual</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|---|--------------------------|--------|---|
| | | | | <p>appearance of the Project blends in as far as possible with the surrounding landscape, see Plate 11. No large reflective surfaces were observed.</p> <p>It is recommended that the consideration of non-reflective surfaces is documented in the design phase for the development of infrastructure in future stages of the Project.</p> |
| V4 | Limit the area of disturbance during construction where possible. | Construction | C | <p>The EMS notes the management and mitigation measure of limiting the area of disturbance during construction where possible. The EMS also notes that there will be no vegetation clearance outside of disturbance area outlined in EIS.</p> <p>The audit site inspection confirmed flagging is used to identify the Project boundary and ensure no disturbance outside of the approved area, see Plate 4 and Plate 5.</p> |
| V5 | Mitigation tree and shrub planting will be considered to visually integrate the Project within the surrounding landscape. | Construction | NT | The EMS states that mitigation tree and shrub planting will be considered to visually integrate the |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|---|--------------------------|--------|---|
| | | | | <p>Project within the surrounding landscape. No supplementary tree plantings occurred during the audit period.</p> <p>It is recommended that AGL consider mitigation tree and shrub planting to visually integrate the Project within the surrounding landscape and document the findings of this review.</p> |
| V6 | <ul style="list-style-type: none"> • All construction plant, equipment, waste and excess materials will be contained within the designated boundaries of the work site and will be removed from the site following the completion of construction • Stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality • On completion of the work disturbed areas will be stabilised and rehabilitated. | Construction | C | <p>The site inspection confirmed that all construction plant, equipment, waste and excess materials are being contained within the designated boundaries of the Project construction area, see Plate 6.</p> <p>The EMS notes stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality. The Strategy also notes that on completion of the work disturbed areas will be stabilised and rehabilitated.</p> <p>No dust plumes were</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|--------------|---|--------------------------|--------|--|
| | | | | <p>identified during the audit site inspection (see Plate 4 and Plate 5).</p> <p>The AQMP notes stockpiles of soils across the Project will be managed to reduce dust emission including spraying with water or covering. Viewed pre-start inspection records for a watercart used for the Project by FCS, completed 5 June 2023.</p> <p>It is recommended that AGL retains records of water used for Project dust suppression.</p> |
| Waste | | | | |
| WR01 | <p>A Waste Management Plan will be developed for the Project with the following criteria:</p> <ul style="list-style-type: none"> • A hierarchical waste management approach will be used, from the most preferable (reduce, reuse or recycle wastes) to the least preferable (disposal) to prioritise waste management strategies to avoid waste generation • The plans will promote the use of materials with minimal packaging requirements, removal of packaging offsite by suppliers and fabrication of parts offsite • Where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or disposal) by licensed contractors • All waste types will be separated at source for recycling • A licensed service provider will be appointed to collect waste during construction and operation • Each waste type will be classified for transport to ensure correct handling. • Any waste that cannot be recovered or recycled will be disposed of at a suitably authorised or licensed treatment or disposal facility | Detailed design | C | <p>Sighted Liddell Decoupling Works - Waste Management Plan dated 22 August 2022.</p> <p>Section 3.3 of the Waste Management Plan notes a hierarchical waste management approach will be used, from the most preferable (reduce, reuse or recycle wastes) to the least preferable (disposal) to prioritise waste management strategies to avoid waste generation.</p> <p>Section 3.3 of the Waste Management Plan notes</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|--------------------------|--------|---|
| | <p>where it will be treated and disposed of according to its classification.</p> | | | <p>materials with minimal packaging requirements should be used, removal of packaging should occur offsite by suppliers, and fabrication of parts should be conducted offsite.</p> <p>Section 3.3 of the Waste Management Plan notes where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or disposal) by licensed contractors.</p> <p>Section 3.3 of the Waste Management Plan notes all waste types are to be separated at the source for recycling.</p> <p>The audit site inspection confirmed that segregated waste skip bins are available on site, site Plate 6.</p> <p>Section 3.3 of the Waste Management Plan notes that:</p> <ul style="list-style-type: none"> • A licenced service provider will be appointed to collect waste during construction and operation. |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|--|---|--------------------------|--------|---|
| | | | | <ul style="list-style-type: none"> Each waste type will be classified for transport to ensure correct handling. Any waste that cannot be recovered or recycled will be disposed of to a suitably authorised or licensed treatment or disposal facility where it will be treated and disposed of according to its classification. <p>HC (pers comms) confirmed that Project waste is removed from site by Remondis and taken to a licenced facility. Viewed examples of June 2023 receipts for Remondis disposal of putrescible and scrap steel waste at offsite waste facilities in Muswellbrook.</p> |
| WR02 | Cleared vegetation will be either mulched for onsite reuse or used to create habitat piles, noting that any weeds and pathogens will be managed according to requirements under the <i>NSW Biosecurity Act 2015</i> . | Construction | NT | HC (pers comms) confirmed that there has been no vegetation clearing during the audit period. |
| Water (surface water and groundwater) | | | | |
| W1 | The specific requirements for water quality controls will be confirmed as the detailed design develops and prior to commencement of construction of each Project component, to ensure the objectives of the Project are achieved. | Pre-construction | C | Sighted Liddell Decoupling Works - Soil and Water Management Plan dated 22 August 2022. Section 4.2.1 of the Soil and |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|-----------------------------------|--------|--|
| | | | | <p>Water Management Plan describes the potential impacts to water quality during construction.</p> <p>Section 5.1 of the Soil and Water Management Plan describes water control measures.</p> <p>HC (pers comms) confirmed that no discharges have occurred on site and sediment controls have been implemented for development work.</p> <p>The site inspection confirmed that water quality control measures are in place, see Plate 5 and Plate 13.</p> |
| W2 | <p>The following measures will be undertaken to manage activities in proximity to waterways:</p> <ul style="list-style-type: none"> • The design and implementation of works within waterfront land would be undertaken in accordance with Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018) • Implementing practices to minimise disturbance of banks and undertake bank stabilization • Appropriate drainage features will be incorporated into the design of the Project components by a suitably qualified and experienced professional. All Project components will be designed and constructed in accordance with relevant guidelines. | Pre-construction and construction | NT | <p>HC and BH (pers comms) confirmed that construction work undertaken during the audit period has not been undertaken in proximity to natural drainage lines or waterways.</p> |
| W3 | <p>Stockpiles would be managed to minimise the potential for mobilisation and transport of dust, sediment and leachate in runoff. This would include:</p> <ul style="list-style-type: none"> • Minimising the number of stockpiles, area used for stockpiles, and time that they are left exposed • Locating stockpiles away from drainage lines, waterways and areas where they may be susceptible to wind erosion | Construction | NC | <p>HC (pers comms) confirmed that no additional stockpiles are required for Stage 1 of the Project.</p> <p>Sighted copy of the PBE Site Management Plan dated October 2022 which notes</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|--------------------------|--------|--|
| | <ul style="list-style-type: none"> Stabilising stockpiles, establishing appropriate sediment controls and suppressing dust as required. | | | <p>where possible any surface run-off will be diverted away from disturbed soil & stockpiles and ensure location of spoil is away from drainage lines with installed sediment fencing on the down slope of stockpiles, re-use topsoil where possible and stockpile separately.</p> <p>The site audit confirmed that erosion and sediment controls are in place for Project construction areas, however erosion and sediment controls were not in place for all temporary stockpiles, see Plate 5, Plate 10 and Plate 13. It is recommended that erosion and sediment controls are maintained for the stockpile of material excavated from the Project construction area (see Plate 13).</p> |
| W4 | <p>Erosion and sediment control measures will be implemented and maintained at all work sites in accordance with the principles and requirements in Managing Urban Stormwater – Soils and Construction, Volume 1 (Landcom, 2004) and Volume 2D commonly referred to as the “Blue Book” where appropriate. Additionally, any water collected from worksites will be treated and discharged (where able) to avoid any potential contamination or local storm water impacts. Measures will be designed in accordance with the relevant guideline where appropriate.</p> | Construction | C | <p>The site inspection confirmed that sediment and erosion control measures have been implemented and are being maintained within Project construction areas, see Plate 4 and Plate 5.</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|--|-----------------------------|--------|---|
| W5 | Water use during construction will be minimised where possible and measures to reduce water use will be applied. | Construction | C | <p>HC (pers comms) confirmed that there is no major water demand for this stage of the Project.</p> <p>Section 4.2.1 of the Liddell Decoupling Works - Soil and Water Management Plan notes that during construction, water would be required for activities such as dust suppression, drilling, concrete works and revegetation. Water would be sourced from existing onsite sources in accordance with existing water allocations. No new potable water connections would be required, and no surface water would be abstracted during construction of the Project.</p> |
| W6 | The Bayswater site operational water quality monitoring program will be updated and implemented as required. | Pre-operation and operation | C | <p>The EMS notes that surface discharges must comply with volume and quality limits set in the site Environment Protection Licence.</p> <p>Sighted monthly data summary for the monitoring period of June 2022 which notes there were no non-compliances identified with EPL conditions.</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|----------------------------|--|--------------------------|--------|---|
| | | | | Sighted monthly data summary for the monitoring period of August 2022 which notes there were no non compliances identified with EPL conditions. |
| Social and economic | | | | |
| SE1 | AGLM will keep the community and stakeholders updated on the Project via the existing community engagement forum and AGL website | Pre-construction | C | <p>HC (pers comms) confirmed that the community and stakeholders are updated on the Project via Community Dialogue meetings.</p> <p>The AGL website provides a Project overview and copies of environmental approvals and management documents.</p> <p>Sighted Community Dialogue Group Presentation dated 29 September 2020 which notes the construction and operation of Battery and auxiliaries substation to support the connection of the battery project and facilitate decoupling of the Liddell and Bayswater electrical infrastructure.</p> <p>Sighted Community Dialogue Group meeting presentation dated 22 March 2022 which notes the approval of the Liddell</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----|---|--------------------------|--------|--|
| | | | | <p>Battery and Bayswater Ancillary Works Project which requires 'decoupling' work required for Liddell's closure and Bayswater's ongoing operation.</p> <p>Sighted Community Dialogue Group meeting presentation dated 27 July 2022 which notes the Liddell Power Station Decoupling Project.</p> |
| SE2 | Identify opportunities to maximise the use of local suppliers, labour and businesses in the provision of goods and services for construction. | Construction | C | <p>HC (pers comms) confirmed that AGL use local sub-contractors to perform Project work.</p> <p>Sighted examples of tax invoices from local suppliers during the audit period, including Shaddock real estate in Singleton dated 24 March 2023, TLE Electrical in Muswellbrook dated 4 April 2023 and AEE Services in Merriwa for delivery of potable water.</p> |
| SE3 | Consultation with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities. | Construction | NC | <p>HC (pers comms) confirmed there have been no complaints in regard to Project traffic impacts on local tourist activities.</p> <p>Evidence was not available at the time of audit to confirm that consultation</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-----------------------|--|--------------------------|--------|--|
| | | | | <p>has occurred with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.</p> <p>It is recommended that AGL consults with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.</p> |
| Infrastructure | | | | |
| I1 | AGLM will continue to consult with TransGrid and ETMC regarding any perceived impacts on the Liddell switchyard. | Pre-construction | C | <p>HC (pers comms) confirmed that AGLM will continue to consult with TransGrid and ETMC regarding any perceived impacts on the Liddell switchyard.</p> <p>AGL subsequently provided the Liddell 330kV Substation Safety in Design Report LD1-600023 dated 12 April 2023, as prepared by TransGrid. The report documents the TransGrid safety in design and risk assessment process for the Liddell Decoupling Project.</p> |

| Ref | Environmental management measures | Timing (Jacobs, 2021) | Status | Evidence |
|-------------------|--|---------------------------------|--------|--|
| I2 | AGLM will consult with Ausgrid as the network provider responsible for other onsite supply regarding continued supply. | Pre-construction / construction | NC | <p>No evidence was available at the time of the audit to confirm that AGLM has consulted with Ausgrid regarding continued supply as a result of the Project.</p> <p>It is recommended that AGLM document consultation with Ausgrid regarding continued supply.</p> |
| Cumulative | | | | |
| CL1 | The CEMP will include a process to review and update management measures if any other development commences in proximity to the Project. | Pre-construction | NC | <p>A process to review and update management measures if any other development commences in proximity to the Project is not included in any management plan for the Project.</p> <p>It is recommended that a process to review and update management measures if any other development commences in proximity to the Project is included within the Project EMS.</p> |

APPENDIX D
STAKEHOLDER ENGAGEMENT
CORRESPONDENCE



Ms Tegan Brown
Environmental Scientist
James Bailey & Associates
6/127-129 John Street
SINGLETON NSW 2330

By email: tbrown@baileyassociates.com.au

6 July 2023

Dear Ms Brown

I refer to your email dated 23 June 2023 to the Environment Protection Authority (EPA) requesting information as part of an Independent Environmental Audit of the Liddell Battery and Ancillary Works Project (SSD-8889679).

The EPA encourages the preparation of audits, strategies, programs and plans. They are useful tools for industry to ensure that it meets the environmental objectives specified in conditions of Environment Protection Licences. As a regulatory authority, however, the EPA does not review or comment on these documents.

If you have any further questions about this issue, please contact Adam Plant, Senior Operations Officer, on 4908 6809.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Gallagher', written over a light blue horizontal line.

KAREN GALLAGHER
Unit Head - Regulatory Operations
Environment Protection Authority

From: [Theresa Folpp](#)
To: [Tegan Anne Brown](#)
Cc: [Sharon Pope](#); [Dorian Walsh](#)
Subject: RE: Liddell Battery and Ancillary Works Project SSD 8889679 Audit - Consultation
Date: Tuesday, 4 July 2023 9:35:04 AM
Attachments: [image001.png](#)
[image002.png](#)

[WARNING] This email originated from outside of the organisation.

Hi Tegan,

Thank you for the opportunity to provide input to the Liddell Battery and Ancillary Works Project IEA.

Following on from Staff comments made as part of the May IEA, could you please respond to the following:

- A copy of the Proponent's 'Response to Audit Findings' for the May IEA is not available on AGL's website and/or DPE's major projects website;
- The Complaints Register on AGL's website is still not working (this was raised during the May IEA); and
- Please indicate the timing of the next audit.

Regards,
Theresa



Muswellbrook Shire Council | Theresa Folpp | Development Compliance Officer |

T: 02 6549 3700 **E:** theresa.folpp@muswellbrook.nsw.gov.au | www.muswellbrook.nsw.gov.au |

*I respectfully acknowledge the local Aboriginal people who are the Traditional Owners and Custodians of the land on which I work
Please consider the environment before printing this email*

4 July 2023

Our Ref: 23/44493

Tegan Brown

Lead Auditor

James Bailey & Associates

6/127-129 John Street

Singleton NSW 2330

Dear Mr Walsh

RE: Liddell Battery and Ancillary Works Project - Second Construction Audit 2023 - Independent Environmental Audit – Consultation– Singleton Council

I refer to your email request dated 23 June 2023 requesting comment from Council on the Liddell Battery and Ancillary Works Independent Environmental Audit. This letter forms Council's feedback in relation to that request.

The conditions of approval for SSD 8889679, requires the retention of Council imposed conditions as specified in Part D. Council would like to be informed of any contamination that arises due to the implementation of these conditions.

Additionally, the conditions of approval for SSD 8889679, require the Applicant to create and Environmental Management Strategy to keep the community, including the Council, informed of the operation and environmental performance of the development.

Council would expect that the audit will include evidence to support the compliance status of these conditions of approval, and of interest to Council, evidence to support the following:

- Whether the various rehabilitation management and closure planning objectives/ plans/ strategies required under the various consents align to local, regional and State strategic land use planning documents, including whether these documents incorporate final land use outcomes consistent with these strategic land use planning documents.

I would like to thank you for the opportunity to provide comment on scope for the Liddell Battery and Ancillary Works Independent Environmental Audit (Second Construction Phase). Should you have any questions or comments, please contact Benjamin Pogson, Senior Development Planner on 02 6578 7290.

Yours faithfully



Benjamin Pogson

Senior Development Planner

APPENDIX E
IEA SITE VISIT AGENDA

AGL Macquarie
Department of Planning & Environment
Phase 2 Construction Independent Environmental Audit for
Bayswater Power Station Upgrade Project (SSD 8889679)

Agenda for Site Visit held
Tuesday 4th July 2023

INVITEES:

| | | |
|------------------------|---------------------------|-----------------------|
| Hardiksinh Chavda (HC) | AGL | Environmental Advisor |
| Dorian Walsh (DW) | James Bailey & Associates | Auditor |
| Tegan Brown (TB) | James Bailey & Associates | Auditor |

Table 1
Audit Agenda Items

| Time | Description | Location | Attendees |
|------------------|---|-----------------|------------------|
| 8:00 – 8:30am | Opening Meeting <ul style="list-style-type: none"> • Inductions / housekeeping (HC) • IEA scope and purpose (DW) • Confidentiality arrangements (DW) • IEA process and timing (DW) • Brief overview of site during construction period (HC) | Meeting Room | HC, DW, TB |
| 8:30am – 12:00pm | Compliance Review <ul style="list-style-type: none"> • SSD 8889679 conditions and statement of commitments • EA, management plan commitments • Site Procedures | Meeting Room | HC, DW, TB |
| 12:00 – 12:30pm | Lunch | | |
| 12:30 - 2:00pm | Site Inspection <ul style="list-style-type: none"> • Review of environmental controls: <ul style="list-style-type: none"> ○ Amenity Management ○ Erosion and sediment controls ○ Heritage management | Field | HC, DW, TB |

| Time | Description | Location | Attendees |
|----------------------|--|--------------|------------|
| | <ul style="list-style-type: none"> ○ Laydown areas and storages. | | |
| 2:00 – 2:30 | <p>Compliance Review (continued)</p> <ul style="list-style-type: none"> • Licencing review • Review of any remaining compliance documents • JBA prepare preliminary findings | Meeting Room | HC, DW, TB |
| 2:30 – 3:00 (TBC) | <p>Close Out Meeting</p> <ul style="list-style-type: none"> • Overview of preliminary findings • Outstanding information requirements • Confirmation of process for audit completion | Meeting Room | HC, DW, TB |

APPENDIX F
SITE INSPECTION PLATES



Plate 1 Bunded generator area at project laydown area



Plate 2 Chemical Storage Cabinet available at project laydown area

PBB
 Weather: 15°
 SHOWERS

Daily Toolbox

Date: 4/7/23
 Time: 6:30
 Site: AGL Macquarie – Liddell Power Station
 Project: 330/33kV Transition Substation
 Job Number: 62090
 Site Contact: Leigh Conway – Site Supervisor – 0438 554 147
 Task: Stage 2 Earthworks

Agenda

The PBE Safe Principles are:

- No. 1 Always isolate energies before commencing work
- No. 2 Always use correct fall preventions devices when working at heights above 1.8m
- No. 3 Always comply with exclusion zones
- No. 4 Always comply with site driving and traffic rules; and drive to conditions
- No. 5 Always arrive at work fit for work
- No. 6 Always use positive communication when approaching heavy equipment
- No. 7 Never work beneath a suspended load
- No. 8 Never enter a confined space unless authorised
- No. 9 Never enter an un-shored trench deeper than 1.5m
- No. 10 Never remove or disable critical safety equipment

Environmental Controls Discussion

- WIND AUDIT
- INSPECT SED FENCES
- MONITOR THROUGHOUT THE DAY

Page 1 of 5

Plate 3 PBE Daily Toolbox Talk for the project



Plate 4 Project boundary flagging and sediment fencing in good condition



Plate 5 Sediment mitigation measures in place for the project construction area



Plate 6 Waste skip bins available at the project laydown area



Plate 7 Tagged portable fire equipment available at project laydown area



Plate 8 Spill kit available at project laydown area



Plate 9 Speed limit signage in place on leaving project area

**MR/HR/HC TIP TRUCK/WATER CART
DAILY PRE-START INSPECTION**

ECS
Farrey Construction Services

2747

| | | |
|--------------------------|----------------------------|------------------------|
| MAKE: <u>FUSO</u> | REGO NUMBER: <u>X025NM</u> | FCS NUMBER: <u>074</u> |
| MODEL: <u>WATER CART</u> | HOURS: <u>1124</u> | DATE: <u>5/6/23</u> |
| SHIFT: <u>DAY</u> | | |

CATEGORY 'A' FAULTS ARE CRITICAL - TIP TRUCK MUST NOT BE OPERATED IF YOU TICK NO TO THE BELOW

| ITEM | CHECK | YES | NO |
|--|---|-------------------------------------|--------------------------|
| ACCESS | Check steps and grab rails in good working condition | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| FIRE PROTECTION | Check fire extinguishers are in place and within inspection dates | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| WHEELS | Inspect wheels and tyre condition (wheel nuts all in place and tight) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| SAFETY SWITCHES | Check all safety switches are in place and functional (emergency stop) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| WARNING SYSTEMS | Check operator warning systems are working (reverse alarms etc.) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| RADIATOR | Check Radiator Condition and fluids | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| HORN | Check operation of horn | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| GROUND CONDITIONS | Check ground conditions in area prior to set up | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2-WAY RADIO | Check that radio can transmit and receive | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| SEAT BELT | Check seat belts are fitted and working properly | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| HYDRAULIC CYLINDER | Check Hydraulic Cylinder for Cracks, leaks etc. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| PROPS, ROPS | Check Truck is fitted and Roll Over Protection | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| BODY STRUCTURE | Check body structure is in good condition | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| CONTROLS | Check controls are clearly labelled and function correctly | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| PARK AND SERVICE BRAKES | Test all braking systems are functioning correctly (Air Brake Systems are Drained of Water) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| TRAILER BRAKES | Check Trailer Air Lines and Brake Controller | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| TRAILER LIGHTS | Check Trailer Lights are functioning | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| HYDRAULICS | Check Hydraulic lines and Rams are not leaking | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| CATEGORY 'B' FAULTS - TIP TRUCK MUST NOT BE OPERATED WITHOUT THE CONSTRUCTION MANAGERS APPROVAL OR DELEGATE | | | |
| GUARDING | Check guarding is in place and in good condition | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| LIGHTING | Check correct operation of headlights, tail lights and clearance lights | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| STRUCTURAL | Inspect body and chassis for cracks, damage and rust | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| FITTINGS | Are fittings in good condition | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| WATER TANK | Check for leaks and level is sufficient for task | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| GAUGES | Check all gauges are working properly | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| HYDRAULIC HOISING | Check hoses for visible leaks or damage | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| CATEGORY 'C' FAULTS - FAULTS TO BE REPAIRED AT NEXT SCHEDULED SERVICE (OPERATOR TO ASSESS PRIOR TO USE) | | | |
| GREASE | Check components are adequately greased and all lines are connected | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| FLUID LEVELS | Check all fluid levels are in specified ranges | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| AIR, FUEL AND FLUID LEAKS | Check for any air, fuel or fluid leaks | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| AIR CONDITIONER | Air-conditioned/heater working | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| CABIN GLASS (WINDOWS/WINDSCREEN) | Check condition of glass in the cabin | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

COMMENTS

LEFT HAND REAR MUDGUARD LOOSE

| | | |
|---------------------------|-------------------------|---------------------|
| NAME: <u>D. HENDERSON</u> | SIGNATURE: <u>D. H.</u> | DATE: <u>5/6/23</u> |
|---------------------------|-------------------------|---------------------|

Jennings Print 4033 5/23

Plate 10 Daily pre-start inspection checklist for project mobile equipment



Plate 11 External lighting on project building



Plate 12 Hydrant used as site water source



Plate 13 Excavated materials stockpile adjacent project construction area