

# LIDDELL BATTERY AND BAYSWATER ANCILLARY WORKS

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INDEPENDENT ENVIRONMENTAL  
AUDIT

*for AGL Macquarie Pty Limited*

*7 November 2024*



## DOCUMENT CONTROL

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### Document Status

Version	Description	Reviewed By	Approved By	Date Issued
01	Independent Environmental Audit	DW	JB	07/11/2024

### Document Details

<b>Project Name</b>	Liddell Battery and Bayswater Ancillary Works
<b>Document Title</b>	Independent Environmental Audit
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<b>Our Reference</b>	241107 Liddell Battery and Bayswater Ancillary Works IEA

## LIMITATIONS OF REPORT

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In preparing this Independent Environmental Audit on behalf of AGL Macquarie Pty Limited, James Bailey & Associates Pty Ltd has assessed all activities appropriate and necessary to evaluate the environmental status of the site during the audit period. James Bailey & Associates Pty Ltd 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 & Associates Pty Ltd' opinion that the potential critical environmental issues associated with the site and operations are those discussed in this report. However, James Bailey & Associates Pty Ltd 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 & Associates Pty Ltd 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.

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# 1. INTRODUCTION

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## 1.1 BACKGROUND

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

AGLM 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 Alexander Holz of JBA. No specialist sub-consultants were required to assist with the IEA.

A copy of the Department of Planning and Environment (now DPHI) 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 AGLM'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**.

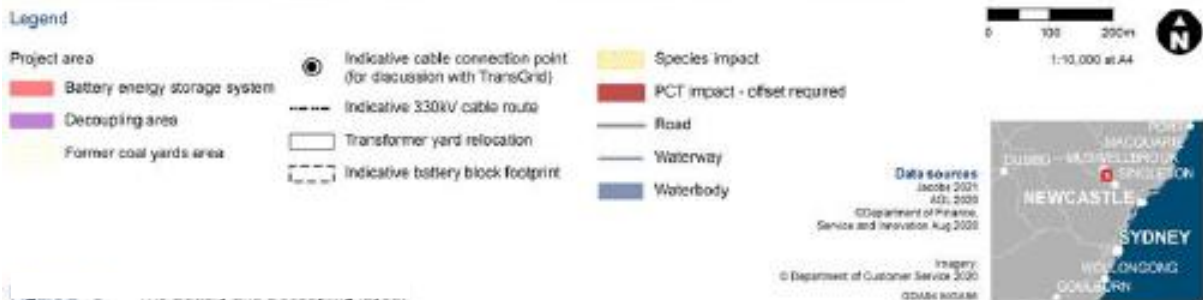
## 1.5 AUDIT PERIOD

The IEA covers the period from 17 January 2024 to 23 August 2024 (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.	<b>Section 1.2</b> and <b>Appendix A</b>
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 DPHI 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; AGLM to complete response to DPHI
Schedule 2 Condition C16 (b)	submit the response to the Planning Secretary; and	N/A; AGLM 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; AGLM 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; AGLM 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

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### 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 DPHI endorsement for the IEA team (see **Section 1.2**) and confirmation over audit requirements.

The compliance status of AGLM 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 AGLM personnel.

The audit methodology also included consultation with NSW DPHI, 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 AGLM for the provision of evidence to verify the compliance status of AGLM 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 AGLM (see **Appendix E**) and confirmation over the scope of the site inspection component of the IEA;
- Desktop review of documentation provided by AGLM 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 AGLM (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 15 July 2024. It is noted that only Stage 1 (Liddell Decoupler Transformer Year) and Stage 2 (solar array demolition works) of the Project had commenced at the time of audit, with selected images taken during the site inspection included as **Appendix F**.

Ed Boucaut (AGLM Senior Manager, Environment) 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 Stage 1 and Stage 2 development sites was conducted on 15 July 2024 and undertaken to ensure that all aspects of environmental management and performance of the Project were reviewed.

At the time of audit, AGLM had:

- Completed construction of the Transformer Yard for the Liddell Power Station Decoupling Works (SSD 8889679 Stage 1);
- Completed demolition of the existing solar array site which is required prior to the development the Battery Energy Storage System (BESS) (SSD 8889679 Stage 2); and
- Commenced clearing works required to allow construction of the BESS.

Development of the 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), Alexander Holz (JBA), Ed Boucaut (AGLM Senior Manager, Environment), and John Moore (AGLM Site Manager, Energy Hubs). 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 AGLM 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 AGLM and AGLM 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. AGLM personnel interviewed as part of the IEA included:

- Ed Boucaut (AGLM Senior Manager, Environment);
- John Moore (AGLM Site Manager, Energy Hubs); and
- Hardiksinh Chavda (AGLM Environment Advisor).

### **2.4.4 Focused Site Inspection**

A focused site inspection on 15 July 2024 was completed to review specific operation and environmental aspects of the Project and to assess AGLM environmental management systems and performance in detail.

### **2.4.5 Site Documentation Review**

Relevant site documentation was reviewed with AGLM 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, Alexander Holz, and Ed Boucaut. The exit meeting included findings of the preliminary audit, recommendations and explanation of actions required by AGLM and by JBA to complete the audit process required under the IEA Guidelines.

## 2.5 AUDIT CONSULTATION

Correspondence was sent to the DPHI, EPA, MSC and Singleton Council requesting their input into the scope of the IEA. Responses were received from MSC and EPA (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
<b>Muswellbrook Shire Council</b>	
I would be interested to know that appropriate erosion and sediment controls were in place as were measures to limit site contamination as a result of decoupling activities.	Comments on water management, erosion / sediment controls and waste management are discussed in <b>Section 3</b> . Non-compliances and recommendations are included in <b>Table 5</b> and <b>Table 6</b> .
<b>EPA</b>	
<p>Thank you for your email received on request on 9 August 2024 requesting input from the NSW Environment Protection Authority (EPA) on the Independent Environmental Audit of the Liddell Battery and Ancillary Works Project (SSD-8889679).</p> <p>The EPA encourages the preparation and implementation of audits, strategies, programs and plans. They are useful tools for industry to determine how they will meet their statutory obligations and designated environmental objectives.</p> <p>As a regulatory authority, however, the EPA does not review or comment on these documents.</p>	Note only.

## 3. AUDIT FINDINGS

### 3.1 APPROVAL AND DOCUMENT LIST

AGLM documentation for the IEA was sighted during a detailed desktop review and the audit site inspection of 15 July 2024. 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;
- AGLM environmental monitoring data;
- AGLM correspondence with regulatory agencies and other records of consultation; and
- AGLM 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 AGLM 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	11	22	5	69
SSD 8889679 Statement of Commitments	55	2	11	-	68

### 3.3 SUMMARY OF AGENCY NOTICES AND ORDERS

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

### 3.4 ACTIONS FROM PREVIOUS AUDIT

A summary of the actions arising from the previous SSD 8889679 IEA (JBA, April 2024) is provided in **Table 4**. Actions that have not been completed by AGLM 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	AGLM Proposed Completion Date	Current IEA Status
<b>SSD 8889679 Non-Compliances &amp; Recommendations</b>			
Schedule 2, Condition B15	It is recommended that AGLM complete retreatment of the residual exposed areas of Stage 1 where the initial cover crop seeding was not successful, to minimise exposed areas that could result in dust generation as far as practicable.	Ongoing	Compliant. Viewed AGLM correspondence which confirms that follow-up seeding of residual exposed areas within Project Stage 1 has been completed. See <b>Appendix C</b> for further details.
Schedule 2, Condition 25, Condition B26	It is recommended that erosion and sediment controls around the Stage 1 stockpile are reinstated.	19/05/2024	Compliant Viewed AGLM correspondence which confirms that reinstatement of erosion and sediment controls for Project Stage 1 has been completed. See <b>Appendix C</b> for further details.
Schedule 2, Condition B26	It is recommended that stockpile locations and dates of establishment for each stockpile are recorded in an updated ESCP for Stage 1.	17/05/2024	Not Compliant. Evidence was not available at the time of audit to confirm that residual topsoil stockpile locations for Stage 1 of the project had been documented. See <b>Appendix C</b> for further details.
Schedule 2, Conditions C1	It is recommended that the Stage 1 and Stage 2 EMS documents are reviewed and updated to include plan(s) showing the locations of monitoring to be carried out under the conditions of SSD 8889679.	22/08/2024	Not Compliant. The Stage 1 and 2 EMS does not include a clear plan depicting the locations of monitoring to be carried out under the conditions of SSD 8889679. A recommendation has been provided in <b>Table 6</b> .
Schedule 2, Conditions C8	It is recommended that AGLM implement a process to ensure that Compliance Reports are prepared for the Project in accordance with DPE (2020) <i>Compliance Reporting Post Approval Requirements</i> .	Not Triggered	Compliance Reporting was not required during the audit period. See <b>Appendix C</b> for further detail.
Schedule 2, Condition C17	It is recommended that the AGLM response to the findings of this IEA provides comment on all identified non-compliances and improvement recommendations.	Complete	Compliant. See <b>Appendix C</b> for further detail.
Schedule 2, Condition C19	It is recommended that responses to IEA reports available on the AGLM website indicate which audit they relate to.	Ongoing	Compliant. See <b>Appendix C</b> for further detail. A further recommendation has been provided in <b>Table 6</b> .
Schedule 2, Condition D3	It is recommended that AGLM retains evidence that confirms that the development of the Ravensworth Coal Unloader	Ongoing	Not Compliant. Evidence was not available at the time of the audit to confirm that the development of the Ravensworth Coal Unloader Facility

Ref	Previous IEA Findings	AGLM Proposed Completion Date	Current IEA Status
	Facility has been carried out in accordance with the HLA <i>Envirosciences Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i> prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.		was undertaken generally in accordance with DA 20_98. It is noted that AGLM have commenced the process to surrender DA 20_98 during the audit period. See <b>Appendix C</b> for further detail.
Schedule 2, Condition D4	It is recommended that AGLM 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.	Completed	Not Compliant. Evidence was not available at the time of the audit to confirm consultation between AGLM and the Rail Access Corporation. It is noted that AGLM have commenced the process to surrender DA 20_98 during the audit period. See <b>Appendix C</b> for further detail.
Schedule 2, Condition D6	It is recommended that AGLM 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.	30/06/2024	Not Compliant. Evidence was not available at the time of the audit to confirm that the development of the Coal/Rail Unloader Augmentation is undertaken generally in accordance with DA 401_2000. It is noted that AGLM have commenced the process to surrender DA 401_2000 during the audit period. See <b>Appendix C</b> for further detail.
<b>SSD 8889679 EIS Commitments Non-Compliances and Recommendations</b>			
HR5	It is recommended that a refuelling area for Stage 2 is delineated and communicated to the Project contractor.	As required	Not Compliant. A designated refuelling area had not been set up for Stage 2 works at the time of audit. See <b>Appendix C</b> for further detail. A recommendation has been provided in <b>Table 6</b> .
AQ2	It is recommended that AGLM document the implementation of control measures for Project Stage 2 loading and unloading activities.	As required	Compliant. See <b>Appendix C</b> for further detail.
AQ6, BIO15, V5	It is recommended that exposed surfaces on stockpiles no longer required for Stage 1 construction are reseeded where previous treatment was not successful, to minimise exposed areas as far as practicable.	Ongoing	Compliant. Viewed AGLM correspondence which confirms that follow-up seeding of residual exposed areas within Project Stage 1 has been completed. See <b>Appendix C</b> for further detail.

Ref	Previous IEA Findings	AGLM Proposed Completion Date	Current IEA Status
BIO5	It is recommended that material stockpiled during Stage 1 of the Project is delineated in the field and the location recorded.	Ongoing	Not Compliant. Evidence was not available at the time of the audit to confirm residual topsoil stockpile locations for Stage 1 of the project had been documented. See <b>Appendix C</b> for further detail.
BIO10	<p>It is recommended that during the clearing works for future stages of the Project, weeds will be disposed of and managed appropriately to stop the spread of existing weed species and records are retained.</p> <p>Areas of weed infestation (primarily galenia and other exotics) were observed within the Stage 2 footprint. It is recommended that treatment of these areas is undertaken and monitored, with evidence of weed treatment and disposal retained.</p>	Ongoing / As required	Compliant. Project contractors had implemented procedures for the monitoring and treatment of weed species. See <b>Appendix C</b> for further detail. An associated recommendation has been provided in <b>Table 6</b> .
V3	It is recommended that the consideration of non-reflective surfaces is documented in the design phase for the development of infrastructure for Stage 2 and future elements of the Project.	Ongoing	Compliant. See <b>Appendix C</b> for further detail.
V5	<p>It is recommended that AGLM consider the need for mitigation tree and shrub planting for Stage 1 to visually integrate the Project within the surrounding landscape and document the findings of this review.</p> <p>It is recommended that AGLM complete a review of the full footprint and extent of Stage 2 facilities to confirm whether additional mitigation plantings will be required in future.</p>	Prior to completion of the BESS	Not Triggered. Construction of the BESS was not completed during the audit period. See <b>Appendix C</b> for further detail.
V6	It is recommended that AGLM retains records of water used for Project dust suppression.	Completed	Compliant. The Stage 2 project water register records water use during construction works, including volumes used for dust suppression. See <b>Appendix C</b> for further detail.
WR02	It is recommended that all cleared vegetation is either mulched onsite for reuse or used to create habitat piles, with weeds and pathogens managed according to		Not included in response letter.

Ref	Previous IEA Findings	AGLM Proposed Completion Date	Current IEA Status
	requirements under the NSW <i>Biosecurity Act 2015</i> .		
W3	It is recommended that regular inspections and maintenance are completed on all Stage 1 erosion and sediment controls prior to disturbed areas being stabilised with vegetation cover.	Ongoing	Compliant. Daily inspections of Stage 2 erosion and sediment controls are carried out, with corrective actions recorded. See <b>Appendix C</b> for further detail.
W4	It is recommended that Project erosion and sediment controls are regularly inspected and maintained if required.	Completed	Compliant. Daily inspections of Stage 2 erosion and sediment controls are carried out, with corrective actions recorded. See <b>Appendix C</b> for further detail.
SE1	It is recommended that updates on the Project are provided via the AGLM website and that community dialogue meeting minutes are available.	Completed	Compliant. Project information is available on the AGLM website and has been discussed at Community Dialogue meetings. See <b>Appendix C</b> for further detail.
SE2	It is recommended that evidence is retained to confirm the use of local suppliers, labour and businesses in the provision of goods and services is considered in the tender process for future construction phases of the Project.	N/A	Compliant. See <b>Appendix C</b> for further detail.
CL1	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 EMS.	08/07/2024	Compliant. See <b>Appendix C</b> for further detail.

**Table 5 IEA Non-Compliances**

Ref	Non-Compliance
<b>SSD 8889679</b>	
Schedule 2, Condition A2	Non-compliances (NC) with SSD 8889679 conditions were identified during this IEA.
Schedule 2, Condition A10	Evidence that Stage 2 demolition work was completed in accordance with AS 2601-2001 was not available at the time of audit.
Schedule 2, Condition B8	Records to demonstrate DPHI approval of the revised BMP was not available at the time of audit.
Schedule 2, Condition B12	Evidence to confirm that verification noise monitoring described in Section 8 of the Liddell Power Station Battery Energy Storage System Construction Noise Management Sub Plan dated 5 April 2024 (NMP) was not available at the time of audit.



Ref	Non-Compliance
Schedule 2, Condition B26	An Erosion and Sediment Control Plan (ESCP) documenting stockpile locations for the Project was not in place during the previous audit, as required under Section 5.1 of the Soil and Water Management Plan.
Schedule 2, Condition B27	Waste management records from the removal of the steam pipe from the Stage 1 area during the audit period were not available at the time of audit.
	Records to confirm the management of the potentially contaminated material that was being assessed at the time of the previous audit was not available.
Schedule 2, Condition C1	The Stage 1 EMS does not include a clear plan depicting the locations of monitoring to be carried out under the conditions of SSD 8889679.
Schedule 2, Condition C19	The revised ACHMP, BMP, EMS and EMS sub-plans were not publicly available on the AGLM website at the time of audit.
	The project complaints register available on the AGLM website was not current at the time of audit.
Schedule 2, Condition D3	It was recommended during the previous IEA that AGLM 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 Schedule 2, Condition A5 of SSD 8889679. This information was not available at the time of audit.
Schedule 2, Condition D4	It was recommended during the last IEA that AGLM 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. This information was not available at the time of audit.
Schedule 2, Condition D6	It was recommended during the previous IEA that AGLM 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. This information was not available at the time of audit.
<b>SSD 8889679 EIS Commitments</b>	
HR5	Evidence was not available at the time of audit to confirm a designated refuelling area and procedures had been established for Stage 2 works (see <b>Plate 4</b> ). It is recommended that a suitable area is delineated and communicated to the Stage 2 project contractors.
BIO5	It was recommended during the previous IEA that material stockpiled during Stage 1 of the Project is delineated in the field and the location recorded. This information was not available at the time of audit.

## 3.6 ENVIRONMENTAL PERFORMANCE

### 3.6.1 Site Inspection Summary

The site inspection of 15 July 2024 included a review of the Project site, focussing on the Stage 2 ('Area 2: Solar array Area') development sites, as shown on **Figure 1**. Development of Stage 1 had concluded at the time of the previous audit period and other stages of the SSD 8889679 Project had not commenced. Selected images taken during the site inspection are included as **Appendix F**.

The site inspection found that the BESS site is being maintained well, with clear delineation of project work areas in the field to ensure disturbance is within approved areas. The site inspection also confirmed that erosion and sediment controls were in place to manage runoff from the site. Documents provided by Project contractors confirmed that a process has been implemented for the daily review of environmental performance on site.

It was observed during the site inspection that a designated area for refuelling of mobile equipment requiring for Stage 2 construction work has not been set up (see **Plate 4**). This is inconsistent with a commitment made in the SSD 8889679 EIS and a recommendation to establish a refuel area was made (see **Table 6**).

The site inspection also confirmed low dust emissions from exposed areas and that plant drop heights were appropriate to reduce dust emissions (see **Plate 9** and **Plate 13**).

### 3.6.2 Environmental Management Documents

The adequacy of AGLM environmental management documents for the Project and the implementation of these plans was reviewed as a component of this IEA. The review of the environmental management documentation found that AGLM is generally operating in accordance with the environmental procedures and systems required under SSD 8889679.

#### *Stage 1*

AGLM advised that works within the Stage 1 area during the audit period were solely related to removal of a 20-30m section a steam required to allow access to the Stage 2 work areas. This had not previously been anticipated and was communicated to DPHI, with this removal work to be conducted in accordance with relevant Stage 1 Management Plans. Further details on the removal of the steam pipe are present in **Appendix C**. No additional activities occurred within the Stage 1 area during the audit period.

#### *Stage 2*

Key AGLM personnel confirmed during the site inspection that the Environmental Management Strategy (EMS) and associated sub plans for Stage 2 had been revised to consider an additional stockpile area located within Area 1 of the Stage 2 Project area (see **Figure 1**). A desktop review confirmed that these changes had been approved via a letter from DPHI dated 26 June 2024. Management Plans reviewed for Stage 2 included the approved BESS EMS, Soil and Water Management Sub Plan, Noise Management Sub Plan, Air Quality Management Sub Plan, Contamination Management Sub Plan, Waste Management Sub Plan and Traffic Management Sub Plan. Non-compliances identified in relation to the implementation of Project management plans are listed in **Table 5**.

### 3.6.3 Waste Management

Schedule 2, Condition C1 (e) of SSD 8889679 requires AGLM to prepare an EMS for the Project, including a sub plan for waste management. The desktop review confirmed that a Stage 1 and Stage 2 Waste Management Plan has been prepared and approved by the DPHI.

The Waste Management Plans identify the key waste issues and management controls for the Project. The site inspection confirmed the active construction areas for Stage 2 were generally well-managed, with waste materials being contained within the designated boundaries of the Project construction area and in available waste bins. However, records to confirm the tracking and appropriate disposal of project waste were not available at the time of audit, which included a stockpile of potentially contaminated material which was under investigation by AGLM at the time of the previous IEA.

As noted in **Table 5**, it is recommended that AGLM retain records for the management and tracking of relevant Project waste, in accordance with the Waste Management Plan (sub plan to the Project EMS).

### **3.6.4 Erosion and Sediment Control**

The site inspection confirmed that appropriate controls are generally in place at the Stage 1 and Stage 2 sites, including the areas of Stage 2 where active operations were underway at the time of audit.

#### ***Stage 1***

A recommendation was provided during the previous audit to maintain sediment fencing around the residual topsoil stockpile in the Stage 1 project area. The site inspection confirmed that sediment fencing and erosion measures required further maintenance, which have subsequently been resolved by AGLM (see **Appendix C**).

#### ***Stage 2***

Discussions with key AGLM personnel confirmed that sediment fences were in place for Stage 2 of the Project and that any run off from Project sediment dams following a significant rain event would be captured in Lake Liddell. The site inspection confirmed that sediment and erosion controls are generally in place for the Project laydown and construction areas and around the Stage 2 disturbance boundary. These controls were being implemented to a high standard at the time of audit and records provided by the Project contractors indicated that erosion and sediment controls are inspected daily, with any maintenance works tracked for action.

### **3.6.5 Water Management**

A recommendation was made during the previous audit that AGLM should retain records of water usage for the Project, which was verified to have been implemented at the time of audit. Review of the Project water register confirmed that the majority of water usage during the Stage 2 construction phase has been from operation of a water cart used for dust suppression purposes.

The desktop review also confirmed that there has been a Water Management Sub Plan developed for Stage 2 of the Project. Review of daily inspection records provided by the Project contractor confirms that water usage and water management controls are generally consistent with those assessed in the Project EIS.

### **3.6.6 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.

Interviews with key AGLM personnel during the site inspection noted that contractors working on Stage 2 of the Project complete site inductions which cover safe operation of plant and equipment. A desktop review of maintenance reports verified that plant and equipment are appropriately assessed prior to mobilisation to site (including completion of weed / seed inspections) and managed during Project operation to ensure they are maintained as required. A register of all Project personnel is also maintained by Project contractors and AGLM to ensure that all operators are appropriately trained and competent.

Equipment observed during the site inspection was observed to be operating effectively to minimise dust emissions.

### **3.6.7 Air Quality**

#### ***Stage 1***

A recommendation was made during the previous audit to improve cover cropping for the residual Stage 1 stockpile. Review of AGLM records confirmed that this issue has subsequently been resolved.

## **Stage 2**

An Air Quality Management Sub Plan has been developed for Stage 2 of the Project and the controls identified in the plan were found to be implemented effectively during the IEA site inspection. No elevated dust was observed from exposed areas of from material stockpiled within the Stage 2 project construction area (see **Plate 1** and **Plate 13**). The site inspection also confirmed that drop heights for the loading of trucks were appropriate and did not promote increased dust emissions (see **Plate 9**).

No offensive odours were detected on the Stage 2 site during the IEA site inspection.

Discussions with AGLM key personnel confirmed that no complaints have been received during the audit period in relation to air quality impacts from Stage 2 Project construction works.

### **3.6.8 Aboriginal Heritage**

Key AGLM personnel identified during the site inspection that the project ACHMP had been revised to consider all works proposed for Stage 2. This revised ACHMP was sighted and verified, however an approval letter from DPHI endorsing the updated plan was not available at the time of audit (see **Table 6**).

Discussions with Project contractors during the audit inspections confirmed a good awareness of heritage management requirements for the Project, including procedures to be followed in the event of any unanticipated heritage items being identified..

### **3.6.9 Environmental Incidents**

No environmental incidents requiring notification to regulatory agencies were recorded during the audit period for Stage 1 or Stage 2.

### **3.6.10 Environmental Complaints**

Discussions with AGLM employees found that no community complaints were received regarding Stage 1 or Stage 2 Project activities during the audit period. It was noted that the complaints register available on the AGLM website should be updated on a monthly basis, even if no complaints are received (see **Table 6**).

### **3.6.11 Environmental Impact Comparison**

#### **Stage 1**

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. The previous audit confirmed that a Stage 1 Waste Management Plan was developed for the Project and that waste was managed under contract and disposed of appropriately at a licenced waste facilities. Key AGLM personnel confirmed that a section of steam pipe located within the Decoupling Area was subject to removal to allow access to the BESS site, however no information was provided to verify that waste had been appropriately disposed of (see **Table 6**).

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. It is recommended that the relevant controls to minimise exposed areas and manage sediment flows within the Stage 1 area are maintained until these areas are stabilised (see **Table 6**).

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

## **Stage 2**

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. It was identified via a water tracking register that dust suppression occurs on site via the use of a water cart and it is recommended that a water cart is retained during all Project clearing and construction work (see **Table 6**). The site inspection also confirmed that plant drop heights used for the loading of trucks were at an appropriate level and did not promote excess 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. Discussions with key AGLM personnel confirmed that the Stage 2 works 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. Maintenance records for plant and equipment associated with Stage 2 of the Project and a sign-in registry were sighted during the desktop review as described in **Appendix C**. To verify the validity of noise predictions made in the EIS, it is recommended that noise modelling of construction activities is undertaken, consistent with the Project Noise Management Plan (see **Table 6**).

The EIS notes that special waste including asbestos waste is a likely waste stream resulting from the Project. The desktop review for the previous audit confirmed that asbestos was identified within two samples of stockpiled and residual soils associated with Stage 2. No further information was provided during the audit period to confirm the management measures enacted to address the identified asbestos materials. A recommendation has been provided in **Table 6**.

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 site inspection confirmed that Stage 2 works at the time of the audit are limited in scale, with minimal views available from public roads.

It is also noted that SSD 8889679 was modified during the audit period on 27/02/24 (Modification 1), to revise the staging of biodiversity offset credits required for the Project. The modified conditions of SSD 8889679 require that AGLM provides written evidence of the retirement of the appropriate number of biodiversity credits to DPHI prior to the commencement of construction for each Stage of the Project. A review of correspondence between AGLM and DPHI (and attached letter from the NSW Biodiversity Conservation Trust) in April 2024 confirms that the credits required for Project Stage 5 (including those areas impacted during the audit period) have been retired.

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 AGLM 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 AGLM’s general environmental performance, are provided in **Table 6**.

**Table 6 IEA Recommendations**

Ref	Recommendation Description
<b>SSD 8889679</b>	
Schedule 2, Condition A7	It is recommended that the revised EMS and sub-plans approved in June 2024 are made available on the AGLM website.
Schedule 2, Condition A10	It is recommended that evidence is retained to demonstrate that all project demolition work is carried out in accordance with AS 2601-2001.
Schedule 2, Condition B4	It is recommended that a suitable refuelling area for project equipment is delineated and communicated to the Stage 2 project contractors.
Schedule 2, Condition B8	It is recommended that AGLM seek DPHI approval of the May 2024 BMP (or latest version).
Schedule 2, Condition B12	It is recommended that monitoring is completed to confirm that construction noise is consistent with Environmental Assessment predictions.
Schedule 2, Condition B15	It is recommended that a water cart is retained to assist with dust suppression from exposed areas during future clearing and construction work.
Schedule 2, Condition B26	It is recommended that stockpile locations and dates of establishment for each stockpile are recorded in an updated ESCP for Stage 1.
Schedule 2, Condition B27	It is recommended that waste classification and tracking information for Project construction work is documented and retained in accordance with the approved Waste Management Plans and EPA guidelines.
	It is recommended that AGLM maintain records for the monitoring and management of potentially contaminated waste material, in accordance with EPA requirements and the AGLM site procedure.
Schedule 2, Condition C1	It is recommended that plans showing all monitoring locations representative of SSD 8889679 are added to the Stage 1 and Stage 2 EMS documents.
Schedule 2, Condition C17	It is recommended that the AGLM response to the findings of this IEA provides comment on all identified non-compliances and improvement recommendations.
Schedule 2, Condition C19	It is recommended that the complaints register is updated on a monthly basis and published on the project website.
Schedule 2, Condition D3	It is recommended that AGLM retains evidence that confirms that the development of the Ravensworth Coal Unloader Facility has been carried out in accordance with the HLA Envirosciences <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i> prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.

Ref	Recommendation Description
Schedule 2, Condition D4	It is recommended that AGLM 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 AGLM 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.
<b>SSD 8889679 EIS Commitments</b>	
HR5	It is recommended that a suitable refuelling area for project equipment is delineated and communicated to the Stage 2 project contractors.
AQ3, AQ6	It is recommended that a water cart is retained for future stages of the Project involving disturbance and construction work.
BIO5	It was recommended during the previous IEA that material stockpiled during Stage 1 of the Project is delineated in the field and the location recorded.
BIO8	It is recommended that AGLM maintain a register of all weed treatment works undertaken for the Project, including the location, treatment methods and person(s) completing the work.
BIO10	It is recommended that treatment of these areas is undertaken and monitored, with evidence of weed treatment and disposal retained.
V5	It is recommended that AGLM complete a review of the full footprint and extent of Stage 2 facilities to confirm whether additional mitigation plantings will be required in future prior to the completion of BESS construction.
WR02	It is recommended that all cleared vegetation is either mulched onsite for reuse or used to create habitat piles, with weeds and pathogens managed according to requirements under the NSW Biosecurity Act 2015.
W4	It is recommended that erosion and sediment controls are regularly inspected and maintained if required.

**APPENDIX A**  
**ENDORSEMENT OF IEA TEAM**



NSW Planning ref: SSD-8889679-PA-64

Hamid Shilani  
Project Director  
AGL Macquarie Limited  
Gadigal Country  
Level 24, 200 George St  
SYDNEY NSW 2000

06/08/2024

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Sent via the Major Projects Portal only

Subject: Liddell Battery and Bayswater Ancillary Works - Independent Auditor proposal

Dear Mr Shilani

I refer to your letters submitted to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 17 and 26 July 2024 requesting the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct the next Independent Audit of the Liddell Battery and Bayswater Ancillary Works, as required by Schedule 2, Condition C14 of development consent SSD-8889679 as modified (the consent).

NSW Planning has reviewed your nomination for an additional assisting auditor and based on the information you have provided is satisfied that the proposed audit team is suitably qualified, experienced, and independent.

In accordance with Schedule 2, Condition C14 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team to undertake independent environmental audits for the pre-construction and construction phases of the development while they remain independent of the development:

- Dorian Walsh (Lead Auditor)
- Tegan Brown (Assisting Auditor)
- Alexander Holz (Assisting Auditor)

Any additional or alternate auditors or audit team members must be agreed to by the Planning Secretary in separate correspondence.

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

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Should you wish to discuss the matter further, please contact Jennifer Sage, Senior Compliance Officer on 02 6575 3420 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)



Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters  
Team Leader  
Compliance

As nominee of the Planning Secretary

**APPENDIX B**  
**IEA DECLARATION**

Independent Environmental Audit Report Declaration	
<b>Project Name:</b>	Bayswater Power Station, Liddell Power Station
<b>Consent No.:</b>	SSD 8889679
<b>Description of Project:</b>	Liddell Battery and Bayswater Ancillary Works (SSD 8889679)
<b>Project Address:</b>	Off New England Highway, Muswellbrook NSW 2333
<b>Proponent</b>	AGL Macquarie Pty Limited
<b>Proponent Address:</b>	Level 24, 200 George Street, Sydney NSW 2000
<b>Title of Audit:</b>	AGL Macquarie Independent Environmental Audit
<b>Date:</b>	28 June 2024
<b>Declaration</b>	<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> <ol style="list-style-type: none"> <li>i. the audit will be undertaken in accordance with relevant condition(s) of consent and the <i>Independent Audit Compliance Requirements</i> (Department 2020);</li> <li>ii. the findings of the audit will be reported truthfully, accurately and completely;</li> <li>iii. I will exercise due diligence and professional judgement in conducting the audit;</li> <li>iv. I will act professionally, objectively and in an unbiased manner;</li> <li>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;</li> <li>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;</li> <li>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</li> <li>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.</li> </ol> <p><u>Notes:</u></p> <p>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</p> <p>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).</p>
<b>Name of Auditors:</b>	Dorian Walsh Alexander Holz
<b>Signature:</b>	 
<b>Auditor Qualification</b>	Auditor for Environmental Management, EMS and Compliance Audits. Exemplar Global No. 201881
<b>Company:</b>	James Bailey & Associates
<b>Company Address:</b>	6/127-129 John Street, Singleton NSW 2330

**APPENDIX C**  
**IEA COMPLIANCE TABLES**

**Table C1 Project Approval SSD 8889679**

*Red type represents the February 2024 Modification (SSD 8889679 MOD1)*

Cond	Project Approval SSD 8889679	Status	Evidence
<b>SCHEDULE 2: PART A - ADMINISTRATIVE CONDITIONS</b>			
<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>			
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 AGLM records and inspection of SSD 8889679 Project site found that reasonable and feasible controls are in place to minimise the potential for material environmental impacts from site operations.  AGLM environmental controls for the project are discussed under relevant conditions below.
<b>TERMS OF CONSENT</b>			
A2	The development may only be carried out: (a) in compliance with the conditions of this consent	NC	<b>Non-compliances (NC) with SSD 8889679 conditions were identified during this IEA.</b>  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	EB (pers comms) confirmed that no written directions have been made by Department of Planning, Housing and infrastructure (DPHI) during the audit period.
	(c) generally in accordance with the EIS; and	C	A review of AGLM documentation found that the development 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

Cond	Project Approval SSD 8889679	Status	Evidence
			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: (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	C	Directions from DPHI (previously DPE) on documentation required under SSD 8889679 are noted against the relevant conditions below.
	(b) the implementation of any actions or measures contained in any such document referred to in paragraph (a).	C	EB (pers comms) confirmed no directions from the Secretary were made during the audit period.
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.	C	EB confirmed no inconsistencies were identified by AGLM during the audit period.
<b>SURRENDER OF EXISTING CONSENTS</b>			
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:	C	The previous IEA confirmed that AGLM have commenced the process to surrender the required consents, with the date of surrender extended to 15 February 2024, in consultation with DPHI.  EB (pers comms) noted that a further extension of time has been sought for the surrender while AGLM progress with the consent surrender process with the relevant Councils. Viewed DPHI letter dated 17 September 2024 approving an extension of time for the surrender of existing consents related to SSD 8889679 to 31 October 2024.  Also sighted copies of AGLM:

Cond	Project Approval SSD 8889679	Status	Evidence
			<ul style="list-style-type: none"> <li>Letter dated 13 October 2024 notifying Muswellbrook Shire Council (MSC) that AGLM is formally surrendering MSC consents 8/2016, 74/2018, 54_86 and 114_2016; and</li> <li>Letter dated 13 November 2023 notifying MSC that AGLM is formally surrendering MSC consents 138/93, 12/2017, 89/2017 and 12/2018.</li> </ul>
(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.
(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.
	<p><b>Note:</b> 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&amp;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.</p>	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	EB (pers comms) confirmed that the Project is operating under SSD 8889679 conditions.
<b>STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS</b>			



Cond	Project Approval SSD 8889679	Status	Evidence
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>	NT	<p>EB (pers comms) confirmed that there were no applications for staging or combining management documents in the current audit period.</p> <p>Sighted AGLM Letter dated 12 October 2022 published on the AGLM website. The letter requests permission from the Planning Secretary to stage management plans for SSD 8889679 into Stage 1 (Decoupling Works), Stage 2 (the Battery, Bayswater Ancillary Works and Consolidated Consents) and Stage 3 (Bayswater Ancillary Works and Consolidated Consents).</p> <p>Sighted copy of DPHI letter dated 18 October 2022 approving the requested staging of management plans.</p> <p>Sighted DPHI letter dated 26 June 2024 approving the revision of EMS to include the demolition of a former coal yard for stockpiling purposes.</p>
	<p>(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</p>	NT	<p>EB (pers comms) confirmed that no Project strategy, plan or program has been combined.</p>
	<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>	C	<p><b>Stage 1</b></p> <p>No changes to Stage 1 Management Plans occurred during the audit period. Management plans are available on the AGLM website.</p> <p><b>Stage 2</b></p> <p>EB (pers comms) noted that the Stage 2 EMS and associated sub plans were revised to include allowance for an additional stockpile area.</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>Sighted DPHI approval letter dated 26 June 2024, approving the updated EMS. Sighted revised EMS and sub-plans for spoil stockpile updates. The compliance status of these documents is discussed against the relevant conditions below.</p> <p><b>It is recommended that the revised EMS and sub-plans approved in June 2024 are made available on the AGLM website.</b> It is noted that AGLM have subsequently updated the Project website in response to this recommendation.</p>
<b>NOTIFICATION OF COMMENCEMENT</b>			
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	<p><b>Stage 1</b></p> <p>EB (pers comms) noted that a section of pipeline in the Stage 1 (Decoupling Works) area was identified as being situated across an access road. AGLM notified DPHI on the requirement to remove a section of steampipe from the Decoupling Area via letter dated 27 June 2024.</p> <p>Sighted AGLM letter SSD-8889679-Mod 1: Notification of Removal of Steam Pipe-Liddell Battery Project dated 27 June 2024 notifying DPHI that AGL will remove a 20-30m length of steam pipe to gain access to the Liddell BESS site for construction. The letter indicates that the removal activities would commence on 3 July 2024 using the approved Decoupling Management Plans (Stage 1). <b>Stage 2</b></p> <p>Viewed DPHI letter dated 14 June 2024, which notes the Department is satisfied that AGLM have met the notification requirements for the commencement of</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>construction of the Liddell BESS. Sighted copy of AGLM SSD- 8889679: Notification of commencement of construction and request to defer Independent Environmental Audit dated 7 July 2023. The letter also provides notification to DPHI that construction of the battery energy storage system (BESS) for Stage 2 will commence on or soon after Monday 17 July 2023, with only demolition of existing infrastructure to be completed at this stage. The letter also seeks to provide further notification to DPHI when construction work for the development of the BESS is to start. EB (pers comms) confirmed that construction of the BESS commenced on 18 July 2024.</p>
	(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;	C	See Schedule 2, Condition A8 above.
	(d) construction of the decoupling works;	C	See Schedule 2, Condition A8 above.
	(e) construction of the Bayswater ancillary works; and	NT	EB (pers comms) confirmed that construction of the Bayswater ancillary works has not occurred within the audit period.
	(f) decommissioning.	NT	EB (pers comms) confirmed that decommissioning has not occurred within the audit period.
<b>STRUCTURAL ADEQUACY</b>			
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	NT	The previous audit deemed that the Stage 1 construction certificates were compliant.

Cond	Project Approval SSD 8889679	Status	Evidence
	Australia.		EB (pers comms) noted that construction certificates for Stage 2 have not been sought at the time of audit.
	<p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the development.</li> </ul>	NT	See Schedule 2, Condition A9 above.
<b>DEMOLITION</b>			
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.	NC	<p><b>Stage 1</b></p> <p>See Schedule 2, Condition A8 above.</p> <p>EB confirmed that the removal of steam pipe within the Decoupling Area (Stage 1) was completed in accordance with the broader demolition contract.</p> <p><b>Stage 2</b></p> <p>Evidence that Stage 2 demolition work was completed in accordance with AS 2601-2001 was not available at the time of audit. It is recommended that evidence is retained to demonstrate that all project demolition work is carried out in accordance with AS 2601-2001.</p>
<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>			
A11	Unless the Applicant and the applicable authority agree otherwise, the Applicant must:	NT	EB (pers comms) confirmed no issues for the Project have been identified.
	<p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</p> <p>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.</p>	NT	See Schedule 2, Condition A11 (a) above.
<b>OPERATION OF PLANT AND EQUIPMENT</b>			

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><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> Viewed examples of completed Enerven 'Plant / Equipment Approval Form' documents completed for project equipment mobilised to site, including for a Dozer, Grader and Roller dated 16/09/24. Forms document condition of equipment, servicing history and results of weed/seed inspections.</p> <p>Also viewed examples of completed Robson prestart inspections for project equipment, including from 8 July, 23 September and 3 October 2024.</p>
	<p>(b) operated in a proper and efficient manner.</p>	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that there is a Delta Group site induction to work within the Stage 2 work area. Contractor Construction Environmental Management Plan (CEMP) documents for the project also note the need for all plant and equipment is to be operated by authorised and competently trained workers. Viewed a copy of the Liddell Bess Project Training Matrix. The matrix records competencies (including for equipment operations) held by all project staff and contractors.</p>
<b>SCHEDULE 2: PART B - GENERAL ENVIRONMENTAL CONDITIONS</b>			
<b>BATTERIES</b>			

Cond	Project Approval SSD 8889679	Status	Evidence
<b>Battery Storage Restriction</b>			
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><b>Note:</b> <i>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	EB (pers comms) confirmed that construction of the BESS was not completed during the audit period (see <b>Plate 1, Plate 3</b> and <b>Plate 8</b> ).
<b>HAZARDS</b>			
<b>Fire Safety Study</b>			
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> <ul style="list-style-type: none"> <li>(i) Department's <i>Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline</i>;</li> <li>(ii) NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and</li> </ul>	C	<p>EB (pers comms) noted AGLM requested staging of the project Fire Safety Study prior to battery installation.</p> <p>Sighted DPHI letter dated 5 April 2024 approving the staging of the project Fire Safety Study, with the document to be prepared at least three months prior to the installation of the BESS batteries or otherwise agreed by the Planning Secretary.</p> <p>Sighted the Fire Safety Study, Liddell Batter Energy Storage System prepared by Planager, dated 15/08/24. Section 9 of the Fire Safety Study outlines the status of design versus the findings and recommendations in the preliminary hazard analysis.</p> <p>Viewed DPHI letter dated 5 April 2024 which approves the staging of the Fire Safety Study for Stage 2. The letter requires that the Fire Safety Study is prepared and approved by DPHI and Fire and Rescue NSW at least three months prior to the installation of the BESS batteries.</p>

Cond	Project Approval SSD 8889679	Status	Evidence
	(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.	C	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. EB confirmed that no actions during the audit period triggered the requirements for measures outlined in Section 5 of the Fire Safety Study to be implemented.
<b>Storage and Handling of Dangerous Goods</b>			
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><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (per comms) noted that Fluence bring in small volumes of fuel daily. EB (per comms) confirmed no material volumes are stored on site and that contractors have access to 'Chemalert' &amp; 'chem watch'. Sighted appropriate dangerous goods cabinets for fuel storage during the site visit.</p> <p>Sighted Liddell Power Station Battery Energy Storage System Contamination Management Sub Plan dated 16 May 2024. Section 5 details environmental management measures implemented to minimise potential contamination impacts from the BESS Project. The sub plan notes that the internal bunding and environmental controls for the storage and management of all chemicals, fuels and oils used on-site (including dangerous and hazardous material) will be in accordance with applicable guidelines</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>including Australian Standards and the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i>. Small volumes of chemicals on site at the time of inspection were found to be stored appropriately.</p> <p><b>Evidence was not available at the time of audit to confirm that a designated refuelling area and associated procedures had been established for Stage 2 works (see Plate 4). It is recommended that a suitable refuelling area is delineated and communicated to the Stage 2 project contractors.</b></p>
	<p>(b) the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> 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.
<b>Emergency Plan</b>			
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	EB (pers comms) confirmed that commissioning of the BESS 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.



Cond	Project Approval SSD 8889679	Status	Evidence
	(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: <ul style="list-style-type: none"> <li>(i) there is a fire on-site or in the vicinity of the site;</li> <li>(ii) there are any activities on site that would have the potential to ignite surrounding vegetation; or</li> <li>(iii) there are any proposed activities to be carried out during a bushfire danger period; and</li> </ul>	NT	See Schedule 2, Condition B5 (a) above.
	(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.
<b>BIODIVERSITY</b>			
<b>Vegetation clearance</b>			
B7	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	C	<p><b>Stage 1</b> Deemed compliant in previous audit.</p> <p><b>Stage 2</b> EB (pers comms) noted that the Project disturbance boundary has been surveyed and flagged in the field. Sighted SLR document AGL Liddell BESS -</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>Demarcation of Site Work Area (BESS Siteo) dated 16 July 2024. The document indicates that the approved disturbance boundary for the BESS Site is generally in alignment with the approved disturbance area. The document also indicates that the previous site inspection conducted SLR on 16 July 2024 confirmed via aerial imagery that the placement of boundary stakes is generally within the approved disturbance area.</p> <p>Sighted Fluence CEMP (Liddell BESS) dated 30 April 2024. Section 9.2 confirms 'no go' zones are considered in contractor documentation. Section 9.2 outlines that 'no go' zones will be designated to prevent unnecessary encroachment into adjacent fauna habitat and are to be set out based on the limit of works identified in the detailed design.</p> <p>Sighted examples of daily Fluence Liddell BESS HSE Environmental Inspection Checklists completed during June – October 2024. Criteria within the checklist include a requirement to confirm that 'no-go' zones are clearly marked around site (flagging) and within the DA boundaries. Comments made in the completed checklists that were viewed confirmed that 'no-go' zones remained in place.</p> <p>Sighted boundary flagging during site inspection, see <b>Plate 2, Plate 5</b> and <b>Plate 6</b>. Clearing did not appear to extend beyond the boundary of the pre-construction work area required for the BESS.</p>

Cond	Project Approval SSD 8889679	Status	Evidence
<b>Biodiversity Management Plan</b>			
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> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s;</p>	NC	<p><b>Stage 1</b> Deemed compliant in previous audit.</p> <p><b>Stage 2</b> EB (per comms) confirmed that Biodiversity Management Plan (BMP) was revised in May 2024 to include activities relating to an additional stockpile laydown area. <b>Records to demonstrate DPHI approval of the revised BMP was not available at the time of audit. It is recommended that AGLM seek DPHI approval of the May 2024 BMP (or latest version).</b></p> <p>Section 1.5 of the BMP indicates that a suitably qualified expert prepared the document.</p>
	(b) be prepared in consultation with the BCS;	C	Section 6 in the revised BMP dated 16 May 2024 notes that ALGM have corresponded with various stakeholders including the Biodiversity, Conservation and Science Directorate (BCS).
	(c) describe the short, medium and long-term measures to be undertaken to manage vegetation and fauna habitat on the site;	C	Section 5.0 of the BMP describes the short, medium and long-term measures to be undertaken to manage vegetation and fauna habitat on site.
	<p>(d) describe measures to be implemented within the site to minimise:</p> <p>(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;</p> <p>(ii) impacts on fauna, including undertaking pre-clearance surveys and maximising the salvage of resources for habitat enhancement;</p> <p>(iii) impacts on threatened flora and fauna species or ecological communities within the development</p>	C	<p>(i) Table 3. Management Measures BO1, BO2 and BO16.</p> <p>(ii) Table 3. Management Measures BO3 and BO4.</p> <p>(iii) Table 3. All Management Measures.</p>

Cond	Project Approval SSD 8889679	Status	Evidence
	<p>footprint and its surrounds;</p> <p>(iv) the spread of weeds and fungal pathogens;</p> <p>(v) the generation and dispersion of sediment to watercourses; and</p> <p>(vi) light spill from night works; and</p>		<p>(iv) Table 3. Management Measures BO8 to BO12.</p> <p>(v) Table 3. Management Measures BO14 and BO15.</p> <p>(vi) Table 3. Management Measures BO13</p> <p>Section 7 of the Fluence CEMP identifies environmental objectives and targets. Sections 9.1 to 9.3 refers to measures for biodiversity, flora and fauna and biosecurity measures.</p> <p>Sighted Fluence Regulatory Compliance Management Plan dated 31 May 2024. Table 4 Compliance Monitoring outlines the biodiversity monitoring requirements for Weed and Pathogens.</p> <p>Sighted the Fluence CEMP for the project dated 30 April 2024. Sighted AGLM letter Engineering Procure Construct Contract (Liddell Bess) -Principal's approval for Commencement of Land Clearing in Area A dated 8 July 2024. The letter highlights the approval of the contractor's request to commence clearing of land in Area A following the requirements of implementing controls as outlined in the contractor's Construction Environmental Management Plan.</p> <p>Viewed examples of completed Fluence Liddell BESS HSE Environmental Inspection Checklists (see Condition B7 above). The forms document daily checks of 'no-go' zone delineation, erosion and sediment controls, water management, waste management, weed controls and</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			inspections of work areas for presence of fauna.
	(e) include a program to monitor, evaluate and report on the effectiveness of the measures.	C	<p>Section 7.1 of the BMP outlines the Project monitoring and reporting requirements during construction.</p> <p>Sighted Fluence CEMP dated 30 April 2024. Section 11.1 Environmental Inspections and Monitoring details that routine inspections will be undertaken of the Project area to ensure the adequacy and effectiveness of environmental performance and compliance of the Project.</p> <p>Sighted Fluence Regulatory Compliance Management Plan dated 31 May 2024. Section 9 Environmental Monitoring and Review details that all aspects of the LIBESS Environmental Management Plans and the WHSE Risk Register shall be monitored and reviewed at regular intervals to ensure continuing suitability, adequacy and effectiveness of all controls identified for managing hazards and risks. Table 4 details the monitoring controls implemented for Biodiversity.</p> <p>Sighted Enerven Liddell Batter Energy Storage System Progressive Erosion &amp; Sediment Control Plans: Stage 1: Clearing &amp; Grubbing and Topsoil stripping dated 13 May 2024.</p> <p>See Condition B8(d) above for summary of daily inspections, which include aspects to confirm that measures to minimise biodiversity impacts are being implemented.</p>

Cond	Project Approval SSD 8889679	Status	Evidence
B9	The Applicant must implement the Biodiversity Management Plan approved by the Planning Secretary.	C	See Schedule 2, Condition B8 above.
<b>Biodiversity Offsets</b>			
B10	The Applicant must retire the biodiversity credits for Offset Stages 1, 2, 3, 4 and 5 as specified in Table 1 below, prior to commencing native vegetation clearing in those stages. The retirement of credits must be carried out in accordance with the Biodiversity Offsets Scheme of the BC Act. <b>Written evidence of the retirement of these credits must be provided to the Department prior to commencing construction activity in each stage.</b>	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> Sighted AGLM letter to DPHI dated 19/04/24 notifying the Department of the retirement of the biodiversity credits for Offset Stages 5. Also sighted Biodiversity Conservation Trust (BCT) statement dated 09/04/24 confirming the payment into the Biodiversity Conservation Fund of an offset obligation for credits identified for Project Stage 5 (see Schedule 2, Condition B11 below).</p> <p>Sighted AGLM letter Engineer Procure Construct Contract (Liddell BESS) – Principals approval for commencement of Land clearing in Area A dated 8 July 2024. This confirms that the retirement of credits was completed prior to clearing approval for Stage 2 Area A.</p>
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.	C	EB (pers comms) confirmed that AGLM have not sought to review and update Project ecosystem credit requirements during the audit period, outside of those changes approved under SSD 8889679 MOD 1 in February 2024.

Cond	Project Approval SSD 8889679	Status	Evidence																																																																																		
	<p><b>Table 1: Ecosystem Credit Requirements</b></p> <table border="1"> <thead> <tr> <th rowspan="2">Vegetation Community</th> <th colspan="5">Credits Required</th> <th rowspan="2">Total</th> </tr> <tr> <th>Stage 1</th> <th>Stage 2</th> <th>Stage 3</th> <th>Stage 4</th> <th>Stage 5</th> </tr> </thead> <tbody> <tr> <td colspan="7"><b>Ecosystem credits</b></td> </tr> <tr> <td>Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter – Moderate</td> <td>-</td> <td>-</td> <td>-</td> <td>38</td> <td>-</td> <td>38</td> </tr> <tr> <td>1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter – Rehabilitation</td> <td>-</td> <td>-</td> <td>34</td> <td>128</td> <td>24</td> <td>186</td> </tr> <tr> <td>1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter – Native Grassland</td> <td>-</td> <td>21</td> <td>0</td> <td>1</td> <td>-</td> <td>22</td> </tr> <tr> <td>1731 Swamp Oak - Weeping Grass grassy riparian forest of the Hunter Valley - Moderate-Good</td> <td>-</td> <td>8</td> <td>0</td> <td>9</td> <td>1</td> <td>18</td> </tr> <tr> <td>1692 Bull Oak grassy woodland of the central Hunter Valley – Moderate-Good</td> <td>-</td> <td>37</td> <td>11</td> <td>34</td> <td>-</td> <td>82</td> </tr> <tr> <td>1071 Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin Bioregion - Moderate</td> <td>-</td> <td>1</td> <td>0</td> <td>6</td> <td>-</td> <td>7</td> </tr> <tr> <td colspan="7"><b>Species credits</b></td> </tr> <tr> <td>Southern myotis</td> <td>-</td> <td>44</td> <td>21</td> <td>107</td> <td>24</td> <td>196</td> </tr> <tr> <td>Striped legless lizard</td> <td>1</td> <td>31</td> <td>27</td> <td>202</td> <td>18</td> <td>279</td> </tr> </tbody> </table>	Vegetation Community	Credits Required					Total	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5	<b>Ecosystem credits</b>							Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter – Moderate	-	-	-	38	-	38	1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter – Rehabilitation	-	-	34	128	24	186	1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter – Native Grassland	-	21	0	1	-	22	1731 Swamp Oak - Weeping Grass grassy riparian forest of the Hunter Valley - Moderate-Good	-	8	0	9	1	18	1692 Bull Oak grassy woodland of the central Hunter Valley – Moderate-Good	-	37	11	34	-	82	1071 Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin Bioregion - Moderate	-	1	0	6	-	7	<b>Species credits</b>							Southern myotis	-	44	21	107	24	196	Striped legless lizard	1	31	27	202	18	279		
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	<p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>To identify the surface disturbance areas associated with Offset Stages 1, 2, 3, 4 and 5 in Table 1, refer to the Figure in Appendix 3.</li> <li>The credits in Table 1 were calculated in accordance with Biodiversity Assessment Methodology (BAM) (DPIE, 2020).</li> <li>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</li> </ul>	NT	Note only.																																																																																		

Cond	Project Approval SSD 8889679	Status	Evidence
	<i>Biodiversity Stewardship Site.</i>		
<b>AMENITY</b>			
<b>Noise</b>			
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>	NC	<p><b>Stage 1</b> Deemed compliant in previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that the Fluence contracts are compliant with approved construction hours (i.e. day-only restriction).</p> <p>Sighted Enerven daily sign on sheets dated 19 September, 25 September and 3 October 2024. Daily sign on sheets confirm construction activities are within approved hours.</p> <p><b>Evidence to confirm that verification noise monitoring described in Section 8 of the Liddell Power Station Battery Energy Storage System Construction Noise Management Sub Plan dated 5 April 2024 (NMP) was not available at the time of audit. It is recommended that monitoring is completed to confirm that construction noise is consistent with Environmental Assessment predictions.</b></p> <p>EB (pers comms) confirmed that a noise validation study for the Project has been commissioned but not undertaken at the time of audit.</p>
	(b) take all reasonable and feasible steps to minimise noise from construction and operational activities.	C	<p><b>Stage 1</b> Deemed compliant in previous audit.</p>



Cond	Project Approval SSD 8889679	Status	Evidence
			<p><b>Stage 2</b></p> <p>See Schedule 2, Condition B12 (a) above.</p> <p>Sections 6 and 7 of the Liddell Power Station Battery Energy Storage System Construction Noise Management Sub Plan dated 5 April 2024 (NMP) describe management measures implemented to manage noise levels during construction and decommissioning of the BESS Project.</p> <p>EB (pers comms) noted that Fluence contracts are compliant with approved construction hours (day-only restriction). See Schedule 2, Condition B12 (a) above.</p> <p>No plant or equipment was sighted idling during the site inspection. Sighted Plant Prestart Inspection Checklists dated 8 July, 23 September and 3 October 2024 confirming that plant is adequately inspected prior to operations to confirm no maintenance issues.</p> <p>No noise complaints were received during the audit period.</p>
<b>Hours of construction</b>			
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><b>Stage 1</b></p> <p>Deemed compliant during previous audit.</p> <p><b>Stage 2</b></p> <p>Sighted Fluence CEMP dated 30 April 2024. Section 9.6 Noise &amp; Vibration Management notes that construction noise must be confined to the standard hours outlined as below:</p> <ul style="list-style-type: none"> <li>• Weekdays – 7am to 6pm</li> <li>• Saturdays – 8 am to 1 pm</li> </ul>

Cond	Project Approval SSD 8889679	Status	Evidence
			<ul style="list-style-type: none"> <li>Sundays &amp; Public Holidays – Prohibited.</li> </ul> <p>EB (pers comms) confirmed that construction work at the premises is conducted between approved hours.</p> <p>EB (pers comms) confirmed that a sign in / sign out register is used by employees and contractors for Stage 2 which records arrival and departure times.</p> <p>Examples of the Stage 2 contractor sign in / sign out register were sighted, confirming construction works were being completed in approved day time hours. See Schedule 2, Condition B12 (a) above.</p>
<b>Exceptions to construction hours</b>			
B14	<p>The following activities may be carried out outside the recommended construction hours:</p> <p>(a) construction that causes LAeq<sub>(15minute)</sub> 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	EB (pers comms) confirmed that there have been no activities outside of approved construction hours for Stage 2.
	(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.
<b>Dust and air emissions</b>			
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><b>Stage 1</b></p> <p>Deemed compliant in previous audit.</p> <p>No dust management issues were identified from the completed Stage 1</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>area at the time of audit.</p> <p><b>Stage 2</b></p> <p>EB (pers comms) confirmed that there has been no issues or complaints for odour or dust during the audit period for Stage 2. Sighted complaints register confirmed that no complaints have been received during the audit period.</p> <p>No odour, fume or dust emissions were identified during the audit site inspection. Sighted examples of completed daily Fluence Liddell BESS HSE Environmental Inspection Checklist completed by SLR (see Condition B7 above). Checklist criteria include confirmation that measures within the AQMP are assessed, such as equipment use, dust and traffic controls. Comments and recommendations were provided in the examples reviewed.</p> <p>Sighted a copy of the Liddell Power Station Battery Energy Storage System Air Quality Management Sub Plan dated 05/04/24. Section 6 describes management measures implemented to minimise potential air quality impacts from the BESS Project. Section 7 outlines compliance and reporting procedures including reference to the recommended trigger, action and response plan (TARP) for the construction and decommissioning of the BESS Project.</p> <p><b>It is recommended that a water cart is retained to assist with dust suppression from exposed areas during future clearing and construction work.</b> EB (pers</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			comms) confirmed a water cart has been retained for the Project construction area following the audit site visit, in response to this recommendation.
	(b) eliminate or minimise the risk of spontaneous combustion; and	C	<p>EB (pers comms) confirmed that spontaneous combustion risk for Stage 2 demolition work completed during the audit period was minimal.</p> <p>No spontaneous combustion issues were identified during the audit site inspection of Stage 1 and Stage 2.</p>
	(c) minimise to the greatest extent practicable, dust generating surfaces exposed on the site.	C	<p><b>Stage 1</b></p> <p>It was recommended during the previous audit that AGLM complete retreatment of the residual exposed areas where the initial cover crop seeding was not successful, to minimise exposed areas that could result in dust generation as far as practicable. Viewed 1/11/24 email from Todd Harris (AGLM Project Manager, Capital &amp; Energy Hub Delivery) which confirms that the Stage 1 area has been fully landscaped (including reseeding with native grasses).</p> <p><b>Stage 2</b></p> <p>EB (pers comms) confirmed that disturbed areas for Stage 2 are hydromulched as soon as possible to minimise dust.</p> <p>Sighted Fluence Liddell BESS HSE Environmental Inspection Checklist completed by SLR (see Condition B7). Several of the examples viewed identify that the laydown and BESS areas are clear of dust and that dry areas are proactively</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			managed with water cart application as required.
<b>Visual</b>			
B16	<p>The Applicant must:</p> <p>(a) minimise the off-site visual impacts of the development;</p>	C	<p><b>Stage 1</b> Deemed compliant in previous audit.</p> <p><b>Stage 2</b> See Schedule 2, Condition B13 above. EB (pers comms) noted all current work is completed during the approved day-time construction hours only (no lighting impacts). The site visit confirmed that there are minimal views of project construction areas available from public roads.</p>
	<p>(b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and</p>	C	<p><b>Stage 1</b> The site inspection confirmed that the visual appearance of the Project (Stage 1 and Stage 2 blends in as far as possible with the surrounding landscape, see <b>Plate 1</b>.</p> <p><b>Stage 2</b> No permanent infrastructure has been developed for Stage 2 at the time of audit.</p>
	<p>(c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.</p>	C	<p><b>Stage 1</b> Deemed compliant in previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that only signs for identification and safety purposes (with site contact name and numbers) were used during the audit period. No permanent infrastructure has been</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			developed for Stage 2 at the time of audit.
<b>Lighting</b>			
B17	The Applicant must: (a) minimise the off-site lighting impacts of the development; and	C	<b>Stage 1</b> Deemed compliant during previous audit. No additional lighting for Stage 1 has been installed since the previous IEA. <b>Stage 2</b> EB (pers comms) confirmed that no permanent construction of facilities has been completed for Stage 2.
	(b) ensure that any external lighting associated with the development: <ul style="list-style-type: none"> <li>is installed as low intensity lighting (except where required for safety or emergency purposes);</li> <li>does not shine above the horizontal; and</li> <li>complies with <i>Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version.</li> </ul>	C	See Schedule 2, Condition B17 (a) above.
<b>HERITAGE</b>			
<b>Protection of Heritage Items</b>			
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	<b>Stage 1</b> Deemed compliant during previous audit. <b>Stage 2</b> Sighted Liddell Power Station Battery Energy Storage System Aboriginal Cultural Heritage Management Plan dated 16 May 2024. EB (pers comms) confirmed that all work completed during the audit period was in alignment with the Stage 2 ACHMP and that no previously unknown heritage sites were identified during the audit period.
B19	If any previous unknown Aboriginal object of Aboriginal place is discovered on the site, or suspected to be on	NT	<b>Stage 1</b>

Cond	Project Approval SSD 8889679	Status	Evidence
	<p>the site:</p> <ul style="list-style-type: none"> <li>(a) all work in the immediate vicinity of the object or place must cease immediately;</li> <li>(b) a 10m buffer area around the object or place must be cordoned off; and</li> <li>(c) Heritage NSW must be contacted immediately.</li> </ul>		<p>Deemed not triggered in previous audit. EB (pers comms) noted that no previously unknown heritage items were identified during Stage 1 works during the audit period (Schedule 2, Condition A8 above).</p> <p><b>Stage 2</b></p> <p>EB (pers comms) confirmed that no new heritage sites have been identified during Stage 2 works and that the AGLM site induction provided to all contractors covers unexpected finds procedures.</p>
B20	<p>Work in the immediate vicinity may only recommence if:</p> <ul style="list-style-type: none"> <li>(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;</li> <li>(b) the Cultural Heritage Management Plan is revised to include the Aboriginal object and appropriate measures in respect of it; or</li> <li>(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.</li> </ul>	NT	<p><b>Stage 1</b></p> <p>See Schedule 2, Condition B19 above.</p> <p><b>Stage 2</b></p> <p>See Schedule 2, Condition B19 above.</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>EB (pers comms) confirmed that this has not been triggered during the audit period for Stage 2.</p>
<b>Cultural Heritage Management Plan</b>			
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"> <li>(a) be prepared by suitably qualified and experienced persons approved by the Secretary;</li> </ul>	C	<p><b>Stage 1</b></p> <p>Deemed compliant during previous audit.</p> <p><b>Stage 2</b></p> <p>Viewed Liddell Power Station BESS Aboriginal Cultural Heritage Management Plan (ACHMP) dated 28 June 2023 and DPHI letter dated 05/07/23 approving the document.</p> <p>Sighted Fluence Construction Environmental Management Plan (CEMP)</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			dated 30 April 2024 and Regulatory Compliance Management Plan dated 31 May 2024. Both plans refer to the ACHMP requirements for any unanticipated heritage items identified during construction.
	(b) be prepared in consultation with Registered Aboriginal Parties and Heritage NSW;	C	<p><b>Stage 1</b> Deemed compliant in previous audit.</p> <p><b>Stage 2</b> Section 5.4 of the ACHMP outlines RAP consultation undertaken for the document. EB (pers comms) noted that the ACHMP revision for Stage 2 did not trigger for further consultation with RAPs or Heritage NSW.</p>
	(c) be submitted to the Planning Secretary for approval prior to carrying out construction under this consent;	C	<p><b>Stage 1</b> Deemed compliant in previous audit.</p> <p><b>Stage 2</b> Sighted DPHI letter dated 05/07/23 approving the Stage 2 ACHMP.</p>
	(d) describe the measures to be implemented on the site to: <ul style="list-style-type: none"> <li>(i) comply with the heritage-related operating conditions of this consent;</li> <li>(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;</li> <li>(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);</li> <li>(iv) protect Aboriginal objects and Aboriginal places located outside the approved disturbance area from impacts of the development;</li> <li>(v) manage the discovery of suspected human remains and any new Aboriginal objects or Aboriginal</li> </ul>	C	<p><b>Stage 1</b> See Schedule 2, Condition A8 above. AGLM were required to re-implement the Stage 1 ACHMP for the removal of a steampipe. EB (pers comms) indicated that no unanticipated finds were identified during these works.</p> <p><b>Stage 2</b> (i) Sighted copy of Liddell Power Station Battery Energy Storage</p>



Cond	Project Approval SSD 8889679	Status	Evidence
	<p>places, including provisions for burials, over the life of the development;</p> <p>(vi) maintain and manage reasonable access for relevant Aboriginal stakeholders to Aboriginal objects and Aboriginal places (outside of the approved disturbance area); and</p> <p>(vii) facilitate ongoing consultation and involvement of Registered Aboriginal Parties in the conservation and management of Aboriginal cultural heritage on the site; and</p> <p>(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>		<p>System ACHMP dated 16 May 2024.</p> <p>(ii) Section 9 of the Stage 2 ACHMP describes training and inductions noting that generic Aboriginal cultural heritage management training is provided to all employees and contractors through the site induction process at Liddell Power Station.</p> <p>(iii) Section 4 of the Stage 2 ACHMP describes management of Aboriginal Cultural Heritage Values.</p> <p>(iv) Section 4.7 of the Stage 2 ACHMP describes management for sites outside the development footprint noting that a number of Aboriginal sites are located outside the ACHMP area but within the Liddell Power Station site. It is noted that other known sites are a sufficient distance away from the ACHMP area so as not to represent an impact risk.</p> <p>(v) Section 4.3 of the Stage 2 ACHMP describes an unanticipated finds protocol.</p> <p>(vi) Section 4.6 of the Stage 2 ACHMP describes care and control of salvaged objects.</p> <p>(vii) Section 5.5 of the Stage 2 ACHMP describes ongoing RAP consultation.</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			(viii) Section 4.6 of the Stage 2 ACHMP notes that should any Aboriginal objects/ places be identified within the ACHMP and approved for salvage; they would be moved as soon as practicable to the temporary storage location within the Bayswater Power Station Administration Building. The ACHMP notes that a long-term management strategy has not yet been established by AGLM or the RAPs. Salvaged Aboriginal objects would remain in the temporary storage location until a decision is made.
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.
<b>SOIL AND WATER</b>			
<b>Water Supply</b>			
B24	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. <i>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.</i>	C	<b>Stage 1</b> Deemed compliant in previous audit <b>Stage 2</b> EB (pers comms) confirmed that the Liddell Power Station Battery Energy Storage System Soil and Water Management Sub Plan had been revised with the EMS and other Sub Plans to reflect the requirement for an additional stockpile area. Sighted DPFI letter dated 26 June 2024 confirmed the approval of the EMS revision for Stage 2 of the

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>Project.</p> <p>EB (pers comms) confirmed that the main water demand for Stage 2 work to the time of audit is for water cart dust suppression, but these volumes has been well within capacity during the audit period.</p> <p>EB (pers comms) confirmed that the AGL Annual Reporting demonstrates there are adequate water supplies for Stage 2, given the relatively small demand for dust suppression requirements.</p> <p>Sighted extract from Water Tracking Register – Liddell BESS for the period 11 July 2024 to 9 October 2024. The register tracks volumes of water sourced for the project.</p>
<b>Water Pollution</b>			
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><b>Stage 1</b></p> <p>Viewed 1/11/24 email from Todd Harris (AGLM Project Manager, Capital &amp; Energy Hub Delivery) which confirms that erosion and sediment controls have been installed for the Stage 1 area. <b>Stage 2</b></p> <p>EB (pers comms) confirmed that no discharges have been recorded during the audit period for Stage 2.</p> <p>Sighted Enerven Liddell Battery Energy Storage System Progressive Erosion &amp; Sediment Control Plans: Stage 1: Clearing &amp; Grubbing and Topsoil stripping dated 13 May 2024 confirming that the ESCP has been reinstated. The ESCP considers requirements for erosion and sediment</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>control, contamination and stabilisation for the BESS Stage 1 area. The Stage 1 ESCP also outlines the requirements for monitoring, reporting, inspection and maintenance. Sighted HSE Site Inspection Checklist dated 4 July 2024 confirming that stockpiles are appropriately managed and that sediment controls are in place.</p> <p>Also viewed examples of daily Fluence Liddell BESS HSE Environmental Inspection Checklists completed by SLR (see Condition B7 above). Checklists confirm that sediment fencing around the site are assessed and maintained in an appropriate manner. The checklists also confirm that recommended repairs to sediment fences have been actioned.</p> <p>EB (pers comms) confirmed there is regular repair and maintenance of the sediment fences around Stage 2 work areas.</p> <p>The audit site inspection verified that sediment fencing remains in place (see <b>Plate 6</b> and <b>Plate 7</b>).</p>
<b>Operating Conditions</b>			
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><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> Sighted erosion and sediment control measures during the site inspection, see <b>Plate 2</b> and <b>Plate 5</b>.</p> <p>Sighted a copy of the Stage 2 Liddell Power Station Batter Storage System Soil and Water Management Sub Plan dated</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>16 May 2024. Section 4.4 of the plan notes that the Project is not located in a flood prone area under the <i>Singleton Local Environment Plan 2013</i> or <i>Muswellbrook Local Environmental Plan 2009</i>. It is also noted that the Project footprint would be located on land that is above the maximum water level of Lake Liddell and away from drainage lines.</p> <p>See Schedule 2, Condition B25 above. Examples of daily Fluence Liddell BESS HSE Environmental Inspection Checklists. Checklists confirm that potential construction impacts to water resources are managed appropriately.</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><b>NC</b></p>	<p><b>Stage 1</b></p> <p>Viewed 1/11/24 email from Todd Harris (AGLM Project Manager, Capital &amp; Energy Hub Delivery) which confirms that erosion and sediment controls have been installed for the remaining Stage 1 stockpile.</p> <p><b>An Erosion and Sediment Control Plan (ESCP) documenting stockpile locations for the Project was not in place during the previous audit, as 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 for Stage 1.</b></p> <p><b>Stage 2</b></p> <p>Sighted Indicative Erosion and Sediment Control Plan (ESCP) in Appendix A of the Soil and Water Management Sub Plan for</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>Stage 2 dated 16 May 2024 which states that the objective of the ESCP is to ensure that appropriate procedures are in place to minimise soil erosion and potential discharge of sediment to downstream waters during construction. Stockpiles are shown on the Liddell Bess Erosion and Sediment Control Plan Area 1 and Area 2 figures respectively.</p> <p>Sighted erosion and sediment control measures during the site inspection. See Schedule 2, Condition B26(a) above.</p>
	(c) ensure the battery energy storage system and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and	C	<p><b>Stage 1</b> N/A</p> <p><b>Stage 2</b> Sighted a copy of the Liddell Power Station Battery Energy Storage System Soil and Water Management Sub Plan dated 16 May 2024. Table 4 of the plan includes management measures for soil and water.</p> <p>Sighted copy of the Liddell Battery Energy Storage System Primary Erosion and Sediment Control Plan dated April 2024. See Schedule 2, Condition B26(a) and (b) above.</p>
	(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 <b>Water Group</b> agrees otherwise.		See Schedule 2, Condition B26 (c) above.
<b>WASTE</b>			
B27	<p>The Applicant must:</p> <p>(a) take all reasonable steps to minimise the waste generated by the development;</p>	NC	EB (pers comms) confirmed that there are waste management plans for both stages of the Project.

Cond	Project Approval SSD 8889679	Status	Evidence
			<p><b>Stage 1</b> Waste management records from the removal of the steam pipe from the Stage 1 area during the audit period were not available at the time of audit.</p> <p><b>Stage 2</b> Sighted a copy of the Fluence Regulatory Compliance Management Plan dated 31 May 2024. Section 9.7 in the Fluence CEMP dated 30 April 2024 provides an overview of waste management controls for construction activities to minimise the generation of waste. Sighted a copy of the Liddell Power Station Battery Energy Storage System Waste Management Sub Plan dated 16 June 2024. Section 5 provides an overview of environmental management measures to address waste and resource consumption during construction. <b>It is recommended that waste classification and tracking information for Project construction work is documented and retained in accordance with the approved Waste Management Plans and EPA guidelines.</b></p>
	(b) classify all waste in accordance with the <i>Waste Classification Guidelines</i> (EPA, 2014);	NC	<p><b>Stage 1</b> See Schedule 2, Condition B27(a) above.</p> <p><b>Stage 2</b> See Schedule 2, Condition B27(a) above.</p>
	(c) dispose of all waste at appropriately licensed waste facilities or as expressly permitted in an applicable EPL; and	C	<p><b>Stage 1</b> Deemed compliant during previous audit</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p><b>Stage 2</b></p> <p>EB (pers comms) confirmed that all Stage 2 waste had been disposed of at a licenced waste facility, with the exception of a residual waste stockpile with asbestos material that was under investigation at the time of audit.</p> <p>EB (pers comms) confirmed that the assessment of the residual stockpile of potential assessment had been sampled with results expected toward the end of 2024. EB noted that there has been no indication of contamination.</p> <p>See Schedule 2, Condition B27(a) and B27(b) above.</p>
	<p>(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>.</p>	<p><b>NC</b></p>	<p><b>Stage 1</b></p> <p>Deemed compliant during previous audit.</p> <p><b>Stage 2</b></p> <p><b>Records to confirm the management of the potentially contaminated material that was being assessed at the time of the previous audit was not available. It is recommended that AGLM maintain records for the monitoring and management of this material, in accordance with EPA requirements and the AGLM site procedure.</b></p> <p>EB (pers comms) noted no evidence of additional asbestos contamination was identified on site during the current audit period.</p>
<p><b>DECOMMISSIONING AND REHABILITATION</b></p>			
<p>B28</p>	<p>The Applicant must rehabilitate the development to the satisfaction of the Planning Secretary.</p>	<p>C</p>	<p><b>Stage 1</b></p>



Cond	Project Approval SSD 8889679	Status	Evidence						
	<p>The rehabilitation must comply with the objectives in Table 2.</p> <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<sup>a</sup></td> <td> <ul style="list-style-type: none"> <li>• → Safe, stable and non-polluting<sup>b</sup></li> <li>• → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise<sup>b</sup></li> <li>• → Minimise the visual impact of any above-ground ancillary infrastructure agreed to be retained for an alternative use<sup>a</sup></li> </ul> </td> </tr> <tr> <td>Community<sup>a</sup></td> <td>• → Ensure public safety at all times<sup>a</sup></td> </tr> </tbody> </table>	Features	Objectives	All areas of the site affected by the development <sup>a</sup>	<ul style="list-style-type: none"> <li>• → Safe, stable and non-polluting<sup>b</sup></li> <li>• → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise<sup>b</sup></li> <li>• → Minimise the visual impact of any above-ground ancillary infrastructure agreed to be retained for an alternative use<sup>a</sup></li> </ul>	Community <sup>a</sup>	• → Ensure public safety at all times <sup>a</sup>		<p>EB (pers comms) noted that temporary rehabilitation areas for Stage 1 had been addressed in light of temporary cover and stockpiling issues recommended during the previous IEA.</p> <p><b>Stage 2</b></p> <p>EB (pers comms) noted that this condition has not been triggered for Stage 2.</p>
Features	Objectives								
All areas of the site affected by the development <sup>a</sup>	<ul style="list-style-type: none"> <li>• → Safe, stable and non-polluting<sup>b</sup></li> <li>• → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise<sup>b</sup></li> <li>• → Minimise the visual impact of any above-ground ancillary infrastructure agreed to be retained for an alternative use<sup>a</sup></li> </ul>								
Community <sup>a</sup>	• → Ensure public safety at all times <sup>a</sup>								
<b>SCHEDULE 2: PART C – ENVIRONMENTAL MANAGEMENT AND REPORTING</b>									
<b>ENVIRONMENTAL MANAGEMENT</b>									
<b>Environmental Management Strategy</b>									
C1	<p>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> <p>(a) provide the strategic framework for environmental management of the development;</p>	C	<p><b>Stage 1</b></p> <p>Deemed compliant during previous audit. No changes have been made to the AGLM Liddell Environmental Management Strategy (EMS) dated 22 August 2022 (Stage 1 EMS) and sub plans during the audit period.</p> <p><b>Stage 2</b></p> <p>Sighted copy of Liddell Power Station Battery Energy Storage System EMS (Stage 2 EMS) dated 16 May 2024. The Stage 2 EMS was approved on 26 June 2024 as per sighted DPHI approval letter.</p>						
	<p>(b) identify the statutory approvals that apply to the development;</p>		<p>Section 3 of the EMS for both Stage 1 and Stage 2 describes the statutory approvals that apply to the development.</p>						
	<p>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p>	C	<p><b>Stage 1</b></p> <p>See Schedule 2, Condition C1(a) above.</p> <p><b>Stage 2</b></p> <p>Section 4.3 of the Stage 2 EMS describes</p>						

Cond	Project Approval SSD 8889679	Status	Evidence
			roles and responsibilities of AGLM key personnel and contractors.
	<p>(d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> <li>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>(ii) receive, handle, respond to, and record complaints;</li> <li>(iii) resolve any disputes that may arise;</li> <li>(iv) respond to any non-compliance;</li> <li>(v) respond to emergencies; and</li> </ul>	C	<p><b>Stage 1</b> See Schedule 2, Condition C1(a) above.</p> <p><b>Stage 2</b></p> <ul style="list-style-type: none"> <li>(i) Section 5 of the Stage 2 EMS describes Community and Stakeholder Consultation. AGLM maintains a community reference group known as the AGLM Community Dialogue Group which meets quarterly. Sighted Community Dialogue Group meeting presentation dated 28 February 2024. The presentation provided an overview of the Liddell BESS Project, key project details and the local content and workforce targets for the Liddell BESS.</li> <li>(ii) Section 5.3 of the Stage 2 EMS describes complaints handling. Sighted copy of the Stage 2 complaints registers on the AGLM website up. No complaints have been recorded.</li> <li>(iii) Section 5.3 of the Stage 2 EMS addresses dispute resolution.</li> <li>(iv) Section 4.5 of the Stage 2 EMS outlines incident and emergency management.</li> </ul>
	<p>(e) include:</p> <ul style="list-style-type: none"> <li>(i) the following subplans:</li> </ul>	NC	<p><b>Stage 1</b></p> <ul style="list-style-type: none"> <li>(i) Deemed compliant in previous audit.</li> </ul>

Cond	Project Approval SSD 8889679	Status	Evidence
	<ul style="list-style-type: none"> <li>• soil, stormwater, water quality, flood and spoil management;</li> <li>• construction and decommissioning noise, including an out-of-hours works protocol;</li> <li>• air quality management;</li> <li>• contamination, including an unexpected finds protocol</li> <li>• waste management; and</li> <li>• traffic.</li> </ul> <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>(ii) Deemed compliant in previous audit.</p> <p>(iii) <b>The Stage 1 EMS does not include a clear plan depicting the locations of monitoring to be carried out under the conditions of SSD 8889679.</b></p> <p><b>Stage 2</b></p> <p>(iv) Sighted sub plans for Stage 2, including: Air Quality Management Sub Plan; Contamination Management Sub Plan; Construction Noise Sub Plan; Soil and Water Management Sub Plan; Traffic Management Sub Plan; and Waste Management Sub Plan.</p> <p>(v) Strategies, plans and programs approved under the conditions of this approval are identified in Section 6 of the stage 2 EMS. Section 6.1 provides an overview of Aboriginal Cultural Heritage Management Plan; Section 6.2 outlines the Biodiversity Management Plan and Section 6.3 outlines the Subplans which support the EMS.</p> <p>(vi) Table 10 in Section 8.1 Monitoring outlines the specific construction monitoring from each sub plan. <b>The Stage 2 EMS does not include a clear plan depicting the locations of monitoring to be carried out under the conditions of SSD</b></p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p><b>8889679.</b> It is recommended that plans showing all monitoring locations representative of SSD 8889679 are added to the Stage 1 and Stage 2 EMS.</p>
C2	Applicant must implement the Environmental Management Strategy approved by the Planning Secretary.	C	See Schedule 2, Condition C1 above.
<b>Revision of Strategies, Plans and Programs</b>			
C3	<p>Within 3 months, unless the Planning Secretary agrees otherwise, of:</p> <p>(a) the submission of an incident report under condition C4 below;</p>	NT	EB (pers comms) confirmed that there have been no submissions of incident reports in relation to the Project.
	(b) the submission of an audit report under condition C13 below; and	NT	<p><b>Stage 1</b> EB (pers comms) confirmed that AGLM has completed a review of management plans following the previous IEA and no updates were required.</p> <p><b>Stage 2</b> EB (pers comms) noted that an internal review of management plans was completed after last audit based on recommendation(s) made. EB noted that no amendment to the EMS and sub- plans for Stage 2 were required following the previous IEA.</p>
	(c) the approval of any modification to the conditions of this consent; or	C	Modification 1 Revised Offset Staging was approved by DPHI 27 February 2024. This Modification sought administrative changes to amend the staging for the retirement of Project biodiversity credits. The project EMS and BMP were both revised on 16 May 2024, within three months of the determination of SSD 8889679 Modification 1.

Cond	Project Approval SSD 8889679	Status	Evidence
	<p>(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.</p> <p>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.</p>	NT	EB (pers comm) confirmed there have been no written directions made by the Secretary regarding Project plans, strategies and programs.
	<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.
<b>COMPLIANCE</b>			
<b>Incident Notification, Reporting and Response</b>			
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	EB (pers comms) confirmed that no incidents occurred during the audit period.
<b>Non-Compliance Notification</b>			
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	<p><b>Stage 1</b></p> <p>EB (pers comms) confirmed an IEA response submission was made after the previous IEA.</p> <p>Sighted copy of SSD 8889679 – Stage 1 &amp; 2 Liddell Decoupling Works – IEA Response Letter dated 22 April 2024 that notes a response from AGLM to the IEA recommendations within seven days.</p> <p><b>Stage 2</b></p> <p>EB (pers comms) confirmed not triggered for Stage 2 (i.e. no non-compliances have been identified).</p>
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	NT	See Schedule 2, Condition C5 above.

Cond	Project Approval SSD 8889679	Status	Evidence
	the non-compliance.		
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, Condition C5 above.
<b>Compliance Reporting</b>			
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	EB (pers comms) confirmed that Compliance Reports were not required during the audit period.
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 Planning Secretary.	NT	See Schedule 2, Condition C8 above.
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.
<b>NOTIFICATIONS</b>			
<b>Notification of Department</b>			
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	<p><b>Stage 1</b></p> <p>Sighted AGLM letter dated 27 June 2024 notifying the Department of the requirement to remove a Steam Pipe located within the Decoupling area (Stage 1). The letter indicates that the activity is to commence on 3 July 2024 and will be completed under the approved Decoupling Management Plans.</p> <p><b>Stage 2</b></p> <p>Viewed DPHI letter to AGLM dated 14/06/24. The DPHI letter refers to an</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			earlier letter lodged by AGLM under Schedule 2, Condition A8 and states that the Department are satisfied that notification requirements for the construction of the BESS have been met (Project Stage 2).
<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>			
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 <b>Appendix A</b> ).
C14	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	C	Sighted copy of DPHI endorsement letter dated 6 August 2024 which notes that NSW Planning has reviewed the auditor nominations and based on the information provided by AGLM, is satisfied that the proposed audit team is suitably qualified, experienced, and independent.
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: <ul style="list-style-type: none"> <li>(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;</li> <li>(b) submit the response to the Planning Secretary; and</li> <li>(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.</li> </ul>	C	<ul style="list-style-type: none"> <li>a) AGLM to review and respond to this IEA.</li> <li>b) AGLM to respond to this IEA.</li> <li>c) AGLM to make this IEA and response publicly available.</li> </ul>
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	Sighted DPHI letter Subject: Liddell Battery and Bayswater Ancillary Works – Notification of construction (BESS) dated 14 June 2024. The letter notes that AGLM has submitted the previous audit for the

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>period 5 July 2023 to 16 January 2024.</p> <p><b>It is recommended that the AGLM response to the findings of this IEA provides comment on all identified non-compliances and improvement recommendations.</b></p> <p>Sighted SSD8889779 – Stage 1&amp;2 Liddell Decoupling Works – IEA Response Letter dated 22 April 2024 which provides comments regarding previous IEA improvements and recommendations.</p>
C18	<p>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.</p>	NT	<p>EB (pers comms) confirmed that there have been no requests made by AGLM to cease ongoing independent operational audit requirements.</p>
<b>ACCESS TO INFORMATION</b>			
C19	<p>The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> <li>(i) the EIS;</li> <li>(ii) the final layout plans for the development;</li> <li>(iii) current statutory approvals for the development;</li> <li>(iv) approved strategies, plans or programs required under the conditions of this consent;</li> <li>(v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;</li> <li>(vi) how complaints about the development can be made;</li> <li>(vii) a complaints register;</li> <li>(viii) any independent environmental audit, and the Applicant’s response to the recommendations in any audit; and</li> <li>(ix) any other matter required by the Planning Secretary; and</li> </ul>	NC	<ul style="list-style-type: none"> <li>(i) The EIS is publicly available on the AGLM website.</li> <li>(ii) Development Consent SSD 8889679 is available on the AGLM website.</li> <li>(iii) Development Consent SSD 8889679 is available on the AGLM website.</li> <li>(iv) <b>The revised ACHMP, BMP, EMS and EMS sub-plans (see Schedule 2, Condition C1) were not publicly available on the AGLM website at the time of audit.</b> It is noted that this non-compliance has subsequently been addressed by AGLM.</li> </ul>



Cond	Project Approval SSD 8889679	Status	Evidence
			<p>(v) Stage 1 and Stage 2 of the Project are outlined on the AGLM website.</p> <p>(vi) Complaints and Enquiries hotline number, email address and postal address are available on the AGLM website.</p> <p>(vii) <b>Complaints registers for both Stage 1 and Stage 2 sighted on the AGLM website. The complaints registers were dated May 2024. It is recommended that the complaints register is updated and published on the website.</b></p> <p>(viii) The AGL response to the previous SSD 8889679 IEA report was published on the AGLM website. The AGLM website shows that the previous IEA recommendation has been implemented. The AGLM now indicates which IEA the response corresponds to.</p> <p>(ix) EB (pers comms) confirmed nil other matters required by the Planning Secretary during the audit period.</p>
	(b) keep this information up to date.	NC	See Schedule 2, Condition C19(a) above.
<b>SCHEDULE 2: PART D – CONDITIONS EXTRACTED FROM CONSENTS REFERRED TO IN CONDITION A5</b>			
	<p><b>Note:</b> 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&amp;A 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.</p>	NT	<b>Note only</b>

Cond	Project Approval SSD 8889679	Status	Evidence						
<b>CONDITIONS FROM DA 8.2018.273.2 - LOW PRESSURE PUMP STATION STABILISATION (SINGLETON COUNCIL)</b>									
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	EB (pers comms) noted an additional extension of time has been requested for the surrender of consents out from the previously approved date of 15 of February 2024. Sighted DPHI letter dated 17 September 2024, which provides approval for an extension of time from the previously granted date of 31 August 2024 to 31 October 2024.						
	<table border="1"> <thead> <tr> <th>Title</th> <th>Written-By</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td><del>Bayswater-Low-Pressure-Pump-Stabilisation-Biodiversity-Development-Assessment-Report</del></td> <td>GHD</td> <td>December-2018</td> </tr> </tbody> </table>	Title	Written-By	Date	<del>Bayswater-Low-Pressure-Pump-Stabilisation-Biodiversity-Development-Assessment-Report</del>	GHD	December-2018		
Title	Written-By	Date							
<del>Bayswater-Low-Pressure-Pump-Stabilisation-Biodiversity-Development-Assessment-Report</del>	GHD	December-2018							
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.	C	EB (pers comms) confirmed that there has been no new information from demolition or construction works which has the potential to alter previous conclusions about site contamination.						
<b>CONDITIONS FROM DA 20_98 - DEVELOPMENT OF RAVENSWORTH COAL UNLOADER FACILITY (SINGLETON COUNCIL)</b>									
D3	The development of the Ravensworth Coal Unloader Facility must be carried out in accordance with the following document:	NC	It was recommended during the previous IEA that AGLM retains evidence that confirms that the development of the Ravensworth Coal Unloader Facility has been carried out in accordance with the HLA Envirosciences <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i> prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD						
	<table border="1"> <thead> <tr> <th>Title</th> <th>Written-By</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td><del>Proposed-Macquarie-Generation-Rail-Project-at-Ravensworth-Environmental-Impact-Statement</del></td> <td>HLA-Envirosciences</td> <td>December-1997</td> </tr> </tbody> </table>	Title	Written-By	Date	<del>Proposed-Macquarie-Generation-Rail-Project-at-Ravensworth-Environmental-Impact-Statement</del>	HLA-Envirosciences	December-1997		
Title	Written-By	Date							
<del>Proposed-Macquarie-Generation-Rail-Project-at-Ravensworth-Environmental-Impact-Statement</del>	HLA-Envirosciences	December-1997							

Cond	Project Approval SSD 8889679	Status	Evidence
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	8889679.  It was recommended during the last IEA that AGLM 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.
<b>BIODIVERSITY CONSERVATION DIVISION</b>			
D5	(a) The applicant is to prepare and implement a site Environmental Management Plan for the Ravensworth Coal Unloader Facility relating to: <ul style="list-style-type: none"> <li>(i) Locations and designs for clean and contaminated water pathways, with detailed design drawings for all sediment basins.</li> <li>(ii) Segregated pathways and storage facilities for clean and contaminated stormwater runoff, with segregated reuse priority for contaminated water.</li> <li>(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.</li> <li>(iv) A maintenance schedule for the pollution traps identifying cleaning periods and methods of disposal.</li> <li>(v) A maintenance schedule for the sediment ponds identifying cleansing periods and methods of disposal.</li> </ul> (b) The applicant is to demonstrate a commitment to maintaining final drainage lines in a stable condition.	C	Deemed compliant during previous audit.
<b>CONDITIONS FROM DA 401_2000 - COAL/RAIL UNLOADER AUGMENTATION (SINGLETON COUNCIL)</b>			

Cond	Project Approval SSD 8889679	Status	Evidence						
D6	<p>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:</p> <table border="1" data-bbox="259 352 1279 520"> <thead> <tr> <th data-bbox="259 352 607 400">Title</th> <th data-bbox="607 352 846 400">Written-By</th> <th data-bbox="846 352 1279 400">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="259 400 607 520"><i>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</i></td> <td data-bbox="607 400 846 520">HLA - Envirosciences</td> <td data-bbox="846 400 1279 520">August 2000</td> </tr> </tbody> </table>	Title	Written-By	Date	<i>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</i>	HLA - Envirosciences	August 2000	NC	<p>It was recommended during the previous IEA that AGLM 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>
Title	Written-By	Date							
<i>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</i>	HLA - Envirosciences	August 2000							

Cond	Project Approval SSD 8889679	Status	Evidence
<b>APPENDIX 4 – INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS</b>			
<b>WRITTEN INCIDENT NOTIFICATION REQUIREMENTS</b>			
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	EB (pers comms) confirmed there were no notifiable incidents related to the Project occurred during the audit period.
B2	Written notification of an incident must: <ul style="list-style-type: none"> <li>(a) identify the development and application number;</li> <li>(b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);</li> <li>(c) identify how the incident was detected;</li> <li>(d) identify when the applicant became aware of the incident;</li> <li>(e) identify any actual or potential non-compliance with conditions of consent;</li> <li>(f) describe what immediate steps were taken in relation to the incident;</li> <li>(g) identify further action(s) that will be taken in relation to the incident; and</li> <li>(h) identify a project contact for further communication regarding the incident.</li> </ul>	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: <ul style="list-style-type: none"> <li>(a) a summary of the incident;</li> <li>(b) outcomes of an incident investigation, including identification of the cause of the incident;</li> <li>(c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and</li> <li>(d) details of any communication with other stakeholders regarding the incident.</li> </ul>	NT	See comment in Appendix 4, Condition B1.

Table C2 RTS Updated Mitigation Measures (Jacobs, 2021)

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
<b>Hazard and risk</b>				
HR1	<p>During detailed design for the Project:</p> <ul style="list-style-type: none"> <li>• A detailed bushfire threat assessment will be conducted for the Project, including establishment of an APZ, in consultation with the RFS</li> <li>• 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</li> <li>• 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</li> <li>• 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)</li> <li>• 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)</li> <li>• 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 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</li> <li>• 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.</li> <li>• 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</li> </ul>	Detailed design	C	<p><b>Stage 1</b> Deemed compliant during previous IEA.</p> <p><b>Stage 2</b> Sighted DPHI letter dated 21 March 2024 requesting approval for the staging of the Fire Safety Study. Sighted DPHI letter dated 5 April 2024 approving the staging of the Fire Safety Study to be prepared to the satisfaction of the Secretary and Fire and Rescue NSW at least three months prior to the installation of the batteries otherwise agreed by the Planning Secretary. EB (pers comms) confirmed that there is no intent to prepare plans until the BESS is ready to be commissioned. See Schedule 2, Condition B2 above.</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	C	EB (pers comms) noted new electrical infrastructure has not been developed for Stage 2 at the time of audit.  Sighted Fluence EPC Design Management Plan dated 17 May 2024. Section 3 details the design review and approval procedures.
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	Sighted Fluence Construction Environmental Management Plan dated 30 April 2024. Section 8 details key project environmental aspects, impacts and risks.  Section 13 of the Fluence CEMP outlines the Management of Change noting that day to day changes is managed through hazard identification and risk assessment processes, with more significant change required to seek the approval of the Project Manager with review by Safety, Environment and / or Quality management.
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	See comments in Schedule 2, B4 and B27 above.  During the site inspection, all chemicals were observed to be

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				stored appropriately.
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	NC	<p><b>Stage 1</b> Not triggered for Stage 1 during the audit period.</p> <p><b>Stage 2</b> <b>Evidence was not available at the time of audit to confirm a designated refuelling area and procedures had been established for Stage 2 works (see Plate 4). It is recommended that a suitable area is delineated and communicated to the Stage 2 project contractors.</b></p>
HR6	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.	Construction / operation	C	<p>EB (pers comms) confirmed that spill kits are available in key areas of the Stage 2 area. Spill kits were observed during the site inspection.</p> <p>Sighted a copy of the Fluence CEMP dated 30 April 2024. Section 9.8 details spill and contamination prevention procedures and outlines that spill kits will be made available around the construction site.</p> <p>Sighted a copy of the Fluence Liddell BESS Emergency Response Plan dated 9 May 2024. Section 8.8 details response procedures required in the event of chemical spills.</p>
HR7	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.	Construction	C	The audit site inspection confirmed that that Stage 1 and Stage 2 Project construction areas are being



Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				maintained in a tidy and orderly manner, see <b>Plate 8</b> .
HR8	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 personnel will be inducted into the requirement to safely dispose of cigarette butts.	Construction	C	Sighted Fluence Permit to Work Procedure document dated 14 June 2024. Section 6 details Hot Works as a task requiring additional permits. Appendix A details an example Permit to Work (PTW) checklist for Hot Work.  EB (pers comms) confirmed that no hot works had been completed during the audit period.
HR9	An emergency response plan for the Battery would be prepared for the Project and provided to the Local Emergency Management Committee.	Construction / operation	C	<b>Stage 1</b> N/A <b>Stage 2</b> Section 4.5 of the Stage 2 EMS describes incident and emergency management procedures and Section 4.5.2 describes emergency response.  Sighted copy of the Fluence Liddell BESS Emergency Response Plan dated 9 May 2024.
<b>Air Quality</b>				
AQ1	The following will be undertaken to manage fugitive emissions from stored chemicals: <ul style="list-style-type: none"> <li>Limiting the quantity of chemical products stored at the site to the extent practical</li> <li>Ensure that all storage tanks are fitted with the appropriate controls in-line with the Protection of the Environment Operations (Clean Air) Regulation 2010.</li> </ul>	Construction / operation	C	<b>Stage 1</b> Deemed compliant in previous audit. <b>Stage 2</b> Section 6 of the Liddell Power Station Battery Energy Storage System Air Quality Management

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>Sub Plan dated 16 May 2024 describes environmental management measures including measures to be undertaken to manage fugitive emissions from stored chemicals.</p> <p>During the site inspection, all chemicals were stored appropriately.</p> <p>See comments in Schedule 2, B4 and B27 above.</p>
AQ2	<p>During loading and unloading of materials, the following will be undertaken:</p> <ul style="list-style-type: none"> <li>• Water sprays as applicable</li> <li>• Minimising drop heights</li> <li>• Reviewing and where necessary modifying or suspending activities during dry and windy weather and elevated background air quality conditions.</li> </ul>	Construction	C	<p><b>Stage 1</b></p> <p>Deemed compliant during previous audit. Stage 1 loading / unloading works had not been completed at the time of audit.</p> <p><b>Stage 2</b></p> <p>Sighted Water Tracking Register – Liddell BESS dated from 11 July 2024 to 9 October 2024. The register notes that water cart plant was on site for construction purposes from 17 July to 24 July 2024, and from 1 September to 30 September 2024.</p> <p>Section 6 of the AQMP details environmental management measures implemented to minimise potential air quality impacts from the BESS Project.</p> <p>Section 9.5 of the Fluence CEMP dated 30 April 2024 details air quality management controls to be</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>implemented to assist in minimising emissions to air from pollutants.</p> <p>Excavator loading trucks with minimal drop heights were observed on site (see <b>Plate 9</b>).</p>
AQ3	<p>While hauling materials in trucks, the following will be undertaken:</p> <ul style="list-style-type: none"> <li>Regular watering of unsealed haulage routes</li> <li>Regular inspection and removal of debris from plant and equipment to avoid the tracking of materials on to the adjacent road network.</li> </ul>	Construction	C	<p><b>Stage 1</b></p> <p>Deemed compliant during previous audit.</p> <p><b>Stage 2</b></p> <p>Sighted example copies of Enerven Plant/Equipment Approval Form for Grader and Dozer plant dated 17 September 2024. The forms document weed/seed inspections of project plant/equipment prior to mobilising to the Project site.</p> <p>Sighted copy of the Liddell Power Station BESS Air Quality Management Sub Plan dated 16 May 2024 which notes while hauling materials in trucks regular watering of unsealed haulage routes will be undertaken and regular inspection and removal of debris from plant and equipment to avoid the tracking of materials onto the adjacent road network.</p> <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</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>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>No water cart was observed for exposed haulage areas during the site visit. However, Water Tracking Register for the period 11 July 2024 to 9 October 2024 confirmed the usage of water cart plant for construction purposes.</p> <p><b>It is recommended that a water cart is retained for future stages of the Project involving disturbance and construction work.</b> EB (pers comms) confirmed a water cart has been retained for the Project construction area following the audit site visit, in response to this recommendation.</p>
AQ4	<p>The following will be undertaken to manage exhaust emissions from plant and equipment:</p> <ul style="list-style-type: none"> <li>• Inspecting all plant and equipment before it is used on-site</li> <li>• Ensuring that all vehicles, plant, and equipment are operated in a proper and efficient manner</li> <li>• Switching off all vehicles, plant and equipment when not in use for extended periods</li> <li>• Avoiding the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable.</li> </ul>	Construction	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that pre-start checks for equipment are undertaken before use.</p> <p>Sighted examples of completed Plant Prestart Inspection Checklists dated 8 July, 23 September and 3 October.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>Section 6 of the Stage 2 AQMP describes environmental management measures including measures to be taken to manage exhaust emissions from plant and equipment.</p> <p>The site inspection confirmed that all vehicles, plant and equipment were switched off when not in use for extended periods.</p>
AQ5	<p>Activities will be coordinated between the Project and the WOAOW project to limit the potential for cumulative dust impacts where possible.</p>	Construction	NT	<p>Section 6 of the AQMP notes that activities will be coordinated between the Decoupling works and the Bayswater WOAOW Project to limit the potential for cumulative dust impacts where reasonable and feasible.</p> <p>EB (pers comms) stated that this commitment is related to Stage 3 of SSD 8889679 and therefore is not yet triggered.</p>
AQ6	<p>The following will be undertaken to manage wind erosion from stockpiles and exposed surfaces:</p> <ul style="list-style-type: none"> <li>• Watering stockpiles and exposed surfaces</li> <li>• Progressive rehabilitation of exposed surfaces (as feasible) where no longer required for construction.</li> </ul>	Construction	C	<p><b>Stage 1</b></p> <p>Viewed 1/11/24 email from Todd Harris (AGLM Project Manager, Capital &amp; Energy Hub Delivery) which confirms that erosion and sediment controls have been installed for the remaining Stage 1 stockpile and that reseedling of exposed areas was completed following the previous IEA.</p> <p><b>Stage 2</b></p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>Section 6 of the Stage 2 AQMP describes environmental management measures including watering stockpiles and exposed surfaces and progressive rehabilitation of exposed surfaces that are no longer required for construction.</p> <p>Sighted Water Tracking Register – Liddell BESS dated from 11 July 2024 to 9 October 2024. The register notes that water cart plant was on site for construction purposes from 17 July to 24 July 2024, and from 1 September to 30 September 2024.</p> <p>Despite limited dust emissions being observed during the site visit, no water cart was sighted and there was no evidence of watering being applied to exposed areas.</p> <p><b>It is recommended that a water cart is retained for future stages of the Project involving disturbance and construction work.</b></p>
<b>Greenhouse gases</b>				
GHG1	The CEMP will include requirements for identification and minimise greenhouse gases (GHG) during construction.	Construction	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> Sighted copy of the Liddell Power Station BESS Air Quality Management Sub Plan dated 16</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>May 2024. Table 3 of the plan notes that switching off all vehicles, plant and equipment will be undertaken when not in use for extended periods to manage exhaust emissions.</p> <p>Section 9.5 of the Fluence CEMP dated 30 April 2024 details air quality management controls including the surviving and maintenance of plant and equipment to reduce unnecessary emissions from exhaust fumes and the avoidance of diesel or petrol-powered generators where practicable.</p> <p>No plant, vehicles or equipment were seen were seen idling during the site inspection.</p> <p>See Condition AQ6 above.</p>
<b>Noise and vibration</b>				
NV <sub>1</sub>	<p>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.</p> <p>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.</p>	Construction	C	<p><b>Stage 1</b></p> <p>Deemed compliant during previous audit.</p> <p><b>Stage 2</b></p> <p>Sighted copy of the Liddell Power Station BESS Construction Noise Management Sub Plan dated 16 May 2024. Section 7 of the plan provides details of mitigation and management measures proposed to address potential noise impacts resulting from the Project.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Section 2.1 of the plan notes that the ICNG is a main noise guideline relevant to the plan.
<b>Traffic and transport</b>				
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"> <li>• Identification of the routes</li> <li>• Measures to provide an escort for the loads</li> <li>• Times of transporting to minimise impacts on the road network</li> <li>• Communication of strategy and liaising with emergency services and police.</li> </ul>	Pre-construction and construction	C	<p>Sighted Liddell Power Station Battery Energy Storage System Traffic Management Sub Plan dated 16 May 2024 which provides an oversized overmass vehicle route map (Figure 5).</p> <p>Section 6.2 identifies site speed limits.</p> <p>Section 6.3 also outlines designated traffic flows of which personnel are required to adhere to flows indicated on a documented traffic map.</p> <p>A documented traffic map is provided in Appendix B of the Traffic Management Plan.</p> <p>Section 7.1 outlines the provision for other users notes that the approved project routes will be altered as required and must cater for all users affected by works around the site including emergency vehicles.</p> <p>Sighted a copy of the Fluence CEMP dated 30 April 2024. Section 9.10 details traffic management control measures implemented to minimise environmental impact.</p>



Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
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 and be outside of peak traffic periods where possible.	Pre-construction and construction	NT	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (pers comms) noted no OSOM movements were required for Stage 2 during the audit period.</p>
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><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that the site induction for construction and operational personnel for Stage 2 informs of the risk of collisions and includes a 40 km site speed limit.</p> <p>Section 9.10 of the Fluence CEMP details traffic management controls implemented to minimise environmental impact.</p> <p>Section 9.10 of the Fluence CEMP details that all workers on site will be informed of the risk of collision with animals, particularly during periods of rain and low light.</p> <p>See Condition TT1 above.</p>
<b>Biodiversity</b>				
BIO	Future detailed design phase will increase retainment of native vegetation.	Pre-construction	C	<p><b>Stage 1</b> The previous audit identified that this was not relevant at this stage of</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>Project.</p> <p><b>Stage 2</b></p> <p>Sighted copy of the approved BESS BMP dated 16 May 2024. Section 5 of the BMP describes biodiversity management measures including that the future detailed design phase will increase the retainment of native vegetation.</p> <p>Table 4 of the Stage 2 BMP notes that further investigation will include a review of completed vegetation surveys and management plans undertaken for Liddell Power Station. The results of these surveys will be correlated with the detailed design to minimise vegetation clearing, with preference for the retention of high value native vegetation and / or vegetation providing habitat for native fauna.</p>
BIO1	Exclusion zones, or 'No-Go' zones, will be mapped in CEMP and mapping made available to all construction personnel.	Pre-construction	C	<p><b>Stage 1</b></p> <p>Deemed compliant in previous audit.</p> <p><b>Stage 2</b></p> <p>EB (pers comms) confirmed that the location of 'no-go' zones are communicated during site inductions and toolbox talks.</p> <p>Section 9.9 of the Fluence CEMP details that no go zones will be checked throughout the duration of</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>the Project to ensure disturbance does not occur. Sighted examples of completed HSE Site Inspection Checklists, including for 4 July 2024 confirming no go zones are monitored by SLR.</p> <p>Sighted evidence of flagging and fencing of Stage 2 Project boundary and 'no-go' zones during the site inspection, see <b>Plate 2</b> and <b>Plate 5</b>.</p>
BIO <sub>2</sub>	<p>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.</p>	During construction	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> Sighted cleared vegetation stockpiles during the Stage 2 site inspection, see <b>Plate 10</b> and <b>Plate 14</b>.</p>
BIO <sub>3</sub>	<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	C	<p><b>Stage 1</b> Deemed compliant in previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that spotter/catcher ecologists supervise Stage 2 vegetation clearing.</p> <p>Sighted copy of SLR letter RE: AGL Liddell BESS – Demarcation of Site Work Area (BESS Site) dated 4 July 2024. The letter confirms that an ecologist is to be present on site during the clearance of Zone A and that a site inspection is to occur on the following day (9 July 2024) by</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>SLR to assess the clearance of vegetation and complete a routine inspection.</p> <p>Sighted Fluence Liddell BESS HSE Environmental Inspection Checklist dated 1 October 2024. The checklist confirmed the relocation of a legless lizard carried out by and ecologist on site in accordance with the BMP procedures for unexpected finds. The Checklists also confirm that trenches and holes were inspected for confirmation of fauna presence.</p>
BIO4	<p>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.</p>	<p>During construction</p>	<p>C</p>	<p>Sighted Fluence Traffic Management Plan dated 4 June 2024 states that any internal roadway and/or access way including the access from the Battery car park to the Battery construction site is 20 km/h (see <b>Plate 11</b>).</p> <p>Sighted examples of completed Fluence Liddell BESS HSE Environmental Inspection Checklists. The Checklists confirm that SLR regularly survey traffic controls implemented on site and that signage around the site is clear, visible and mounted.</p>
BIO5	<p>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</p>	<p>During construction</p>	<p>NC</p>	<p><b>Stage 1</b></p> <p><b>It was recommended during the previous IEA that material stockpiled during Stage 1 of the</b></p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	seedbank and assist with natural revegetation). Avoid stockpiling in the vicinity of drainage lines.			<p><b>Project is delineated in the field and the location recorded.</b></p> <p><b>Stage 2</b></p> <p>Sighted temporary areas of topsoil material stockpiled within the disturbance area for Stage 2 during the site inspection, see <b>Plate 11</b>.</p>
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	<p>The audit site inspection confirmed that flagging has been used to clearly mark out the limits of the construction footprint for Stage 1 and Stage 2, see <b>Plate 3</b> and <b>Plate 13</b>.</p> <p>Sighted copy of SLR letter RE: AGL Liddell BESS – Demarcation of Site Work Area (BESS Site) dated 4 July 2024. The letter confirms that SLR have reviewed the approved disturbance area and concluded that the site work area (BESS site) as delineated with pegs/posts is within the approved area of disturbance.</p>
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	<p><b>Stage 1</b></p> <p>Deemed compliant in previous audit.</p> <p><b>Stage 2</b></p> <p>No construction workers or vehicles were identified in areas beyond delineated construction footprint during the audit site inspection.</p> <p>The audit site inspection confirmed that flagging has been used to</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				clearly mark out the limits of the Stage 2 construction footprint, see <b>Plate 3</b> and <b>Plate 13</b> .
BIO8	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).	During construction	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> Section 9.3 of the Fluence CEMP indicates Biosecurity controls including the requirement for Plant/Equipment Weed &amp; Seed Checklist, the sourcing of materials from licensed facilities, and specific weed controls (i.e. weed removal and herbicides).</p> <p>Section 5.2 of the Liddell Power Station BESS BMP details Biodiversity management actions including the management of weed material and infestation</p> <p>Sighted examples of completed Fluence Liddell BES HSE Environmental Inspection Checklists completed daily by SLR. Checklists include the inspection of weed management on site. Checklists include comments on the performance of weed spraying activities and the management of weeds in accordance with Table 5 of the BMP. SLR provide comments regarding the observation of any new weed infestations that require management.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>Treated areas to be cleared were observed during the site visit (see Plate 12).</p> <p>It is recommended that AGLM maintain a register of all weed treatment works undertaken for the Project, including the location, treatment methods and person(s) completing the work.</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"> <li>• Manual weed removal in preference to herbicides.</li> <li>• Replacing non-target species removed/killed as a result of weed control activities.</li> <li>• Protecting Non-target species from spray drift.</li> <li>• Using only herbicides registered for use within or near waterways for the specific target weed.</li> <li>• Not applying herbicide if it is raining or if rain is expected.</li> <li>• Mixing and loading herbicides and cleaning equipment away from waterways and drains.</li> <li>• 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).</li> </ul>	Pre-construction or during construction	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> See Commitment BIO8 above regarding inspection and management of weed infestations. EB (pers comms) confirmed that weed control for the AGL site is managed under contract. The Stage 2 EMS states that weed control will be undertaken by suitably qualified and / or experienced personnel as required. Section 5.0 of the Stage 2 BMP details that weed control will be undertaken by suitably qualified and / or experienced personnel. The Fluence CEMP also details that specific weed control will be carried out in accordance with the BMP.</p>
BIO10	During the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species.	During construction	C	<p><b>Stage 1</b> Deemed compliant by previous</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				audit. <b>Stage 2</b> Areas of weed infestation (primarily galenia and other exotics) were observed within the Stage 2 footprint (see <b>Plate 12</b> ). <b>It is recommended that treatment of these areas is undertaken and monitored, with evidence of weed treatment and disposal retained.</b>
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	<b>Stage 1</b> Deemed compliant during previous audit. <b>Stage 2</b> BMP dated 16 May 2024 states that vehicles are monitored for the potential for introducing weeds into the site or transporting weeds out of the site. Section 9.3 Biosecurity in the Fluence CEMP details that vehicles, machinery and equipment will be risk assessed to determine the necessary level of inspection using Plant/Equipment Weed & Seed Checklist and wash down as necessary. Sighted examples of completed Fluence Liddell BES HSE Environmental Inspection Checklists completed by SLR. SLR inspect vehicles for weeds and/or pathogens.



Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Sighted Enerven Plant/Equipment Approval Forms dated 11, 12 and 17 September 2024. Approval forms outline the requirement for cleaning plant/equipment prior to mobilising to the Project site and results of weed/seed inspections.
BIO12	Pathogen management measures will be implemented to prevent introduction and spread of amphibian chytrid fungus, Phytophthora cinnamomi 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	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> See Commitment BIO8 above. Sighted HSE checklists completed by SLR confirm that weed and pathogen management is implemented on site.</p> <p>Sighted copy of the Fluence CEMP dated 30 April 2024. Section 9.3 Biosecurity details the controls to ensure that all construction activities prevent the introduction and establishment of new pest plants and animal diseases and minimise the spread of known or existing pest plant and animal diseases.</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>EB (pers comms) confirmed that</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>work is limited to standard hours of construction.</p> <p>EB (pers comms) confirmed that there have been no complaints received during the audit period in relation to noise and vibration.</p> <p>Section 7 of the NMP provides details of the mitigation and management measures proposed to address potential noise impacts resulting from the Project.</p> <p><b>Stage 2</b></p> <p>EB (pers comms) confirmed that there have been no complaints received during the audit period for Stage 2 in relation to noise and vibration. The AGLM 2024 Complaints Register confirms that no complaints have been received.</p>
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	<p>Section 5 of the Liddell Power Station Battery Energy Storage System Soil and Water Management Sub Plan dated 16 May 2024 details that erosion and sediment control measures will be implemented and maintained at all work sites. Table 5 details the Soil and Water management monitoring plan.</p> <p>Sighted Liddell Battery Energy Storage System Primary Erosion and Sediment Control Plan dated 22 April 2024. The audit site inspection confirmed that erosion</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				and sediment controls are in place at the Stage 1 and Stage 2 Project sites to minimise impacts to drainage lines, see <b>Plates 5 – 7</b> .
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	C	<p><b>Stage 1</b></p> <p>Viewed 1/11/24 email from Todd Harris (AGLM Project Manager, Capital &amp; Energy Hub Delivery) which confirms that erosion and sediment controls have been installed for the remaining Stage 1 stockpile and that reseedling of exposed areas was completed following the previous IEA.</p> <p><b>Stage 2</b></p> <p>EB (pers comms) confirmed hydromulch seeding has taken place for Stage 2 to provide a cover crop. Viewed temporary groundcover within the Stage 2 work area, as established to minimise exposed areas.</p>
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	C	<p><b>Stage 1</b></p> <p>Deemed compliant during previous audit period.</p> <p><b>Stage 2</b></p> <p>Sighted boundary flagging and fencing for delineation of disturbance footprint during the site inspection, see <b>Plates 5 – 6</b>.</p>
<b>Land and contamination</b>				
L01	The internal bunding and environmental controls for hazardous substances management	Detailed design	C	Bunding in place for completed

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	suitable for the Battery and transformers will be in accordance with applicable guidelines.			Stage 1 transformers deemed compliant during previous audit. Battery construction for Stage 2 has not been completed at the time of the current audit.
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"> <li>• An unexpected finds protocol for the appropriate assessment and management of encountered contamination to mitigate impacts to the development</li> <li>• 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</li> <li>• 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.</li> </ul>	Construction	C	<p>See SoC Lo1 above.</p> <p>The EMS notes the strategy for managing potential contamination related impacts for the Project is provided in the Contamination Management Subplan.</p> <p>Sighted Liddell Power Station Battery Energy Storage System Contamination Management Sub Plan dated 16 May 2024 which provides an accidental discovery protocol for Unexpected Finds.</p> <p>Table 3, L12 of the Contamination Management Plan also notes that all waste produced as part of the BESS Project 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>Waste Management Plan prepared under the EMS</i>.</p> <p>Section 5 of the Contamination Management Plan provides specific contamination control measures.</p>
Lo3	The Asbestos Management Procedure would be updated as required to provide appropriate 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.	Construction / operation	C	The Contamination Management Sub Plan references the previously sighted Asbestos Management Procedure and the appropriate

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				document for referring to control measure during the construction phase to mitigated risks of worker exposure to airborne asbestos fibre. Section 9.7 of the Fluence CEMP details that hazardous materials including asbestos will be disposed of at an EPA licensed facility, using Waste Transport Certificates when required.
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.
<b>Aboriginal heritage</b>				
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	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> Sighted copy of the updated Stage 2 ACHMP dated 16 May 2024. Section 4.7 of the Stage 2 ACHMP notes that the construction footprint will be demarcated or communicated to contractors to ensure no disturbance outside of the approved area. Section 9 of the Stage 2 ACHMP</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>describes training and inductions and notes that generic Aboriginal cultural heritage management training is provided to all employee and contractors through the site induction process at Liddell Power Station.</p> <p>Section 4.7 of the Stage 2 ACHMP describes procedures for sites outside the development footprint.</p> <p>Section 4.6 of the Stage 2 ACHMP describes care and control of salvaged objects.</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"> <li>• Liddell Jerrys Plains Pipeline AS1 (37-2-6280)</li> <li>• Liddell Jerrys Plains Pipeline IF2 (37-2-6281)</li> <li>• Liddell Jerrys Plains Pipeline AS3 (37-2-6279)</li> <li>• Liddell Jerrys Plains Pipeline IF4 (37-2-6291)</li> <li>• Liddell Jerrys Plains Pipeline AS5 (37-2-6290)</li> <li>• Liddell Jerrys Plains Pipeline AS6 (37-2-6289)</li> <li>• Liddell Jerrys Plains Pipeline IF7 (37-2-6287)</li> <li>• Liddell Jerrys Plains Pipeline IF8 (37-2-6288)</li> <li>• Liddell Jerrys Plains Pipeline AS9 (37-2-6286)</li> <li>• Liddell Jerrys Plains Pipeline AS10</li> <li>• BAYS AS06 (37-2-6145).</li> </ul> <p>If no works are required in the vicinity of a site, the site will be conserved.</p>	Pre-construction	NT	EB (pers comms) confirmed that maintenance works on the Liddell to Jerrys Plains High Pressure Pipeline were not required during the audit period.
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</p>	Design, pre-construction, construction	NT	EB (pers comms) confirmed that the design and construction of the Brine Pipeline is not relevant to the

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	be salvaged through surface collection.			current stages 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	EB (pers comms) confirmed that works on the Liddell M1 Conveyor are not relevant to the current stages 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	EB (pers comms) confirmed that no previously unidentified Aboriginal heritage objects have been found during the audit period. Section 3.3 of the Stage 1 ACHMP and Section 4.3 of the Stage 2 ACHMP describe the Unanticipated Finds Protocol.
<b>Non-Aboriginal heritage</b>				
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	<b>Stage 1</b> Deemed compliant by previous audit. <b>Stage 2</b> EB (pers comms) confirmed that no historical archaeological remains have been 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	<b>Stage 1</b> EB (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. <b>Stage 2</b>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>EB (pers comms) confirmed that no human remains have been uncovered during the audit period. Section 4.3.2 of the Stage 2 ACHMP describes the unanticipated finds protocol for human skeletal remains.</p> <p>Table 9 of the Stage 2 EMS indicates that all work must cease immediately in the vicinity of the remains and the area be cordoned off. The local police are then to be notified, as well as Heritage NW if the remains are believed to be Aboriginal.</p>
<b>Landscape character and visual</b>				
V1	Retention and enhancement of existing landscape features (areas of scrub, individual trees) will be considered where feasible.	Design	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that the site induction and SWMS restricted works to the BESS area and the small vegetation area in the centre will be disturbed under the planned BESS footprint as approved.</p> <p>The site inspection confirmed that the area was flagged to define the approved Stage 2 clearing area, see <b>Plate 13</b>.</p> <p>EB (per comms) confirmed that the cleared area was mostly industrial and solar array.</p>



Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Section 7 of the Stage 2 EMS notes that the retention and enhancement of existing landscape features (areas of scrub, individual trees) will be considered where feasible.
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><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that no infrastructure has been developed for Stage 2 at the time of audit. The Stage 2 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 the landscape where possible.</p> <p>The site inspection confirmed that the visual appearance of the Project (Stage 1 and Stage 2 blends in as far as possible with the surrounding landscape, see <b>Plate 1</b> and <b>Plate 5</b>.</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>See Commitment V2 above. No</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>large reflective surfaces were observed.</p> <p>It was recommended during the previous audit that the consideration of non-reflective surfaces is documented in the design phase for the development of infrastructure for Stage 2 and future elements of the Project.</p> <p>Section 7 of the Stage 2 EMS states that minimal use of reflective surfaces will be considered where reasonable and feasible to avoid drawing attention to the site within views due to reflective glare.</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.</p> <p>The EMS also notes that there will be no vegetation clearance outside of disturbance area outlined in EIS.</p> <p><b>Stage 1</b></p> <p>Deemed compliant during previous audit.</p> <p><b>Stage 2</b></p> <p>Section 7 of the Stage 2 EMS describes other environment management measures such as limiting the area of disturbance during construction where possible.</p> <p>The audit site inspection confirmed flagging is used to identify the</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Stage 2 Project boundary and ensure no disturbance outside of the approved area, see <b>Plate 2, Plate 5</b> and <b>Plate 6</b> .
V5	Mitigation tree and shrub planting will be considered to visually integrate the Project within the surrounding landscape.	Construction	NT	<p><b>Stage 1</b></p> <p>The EMS states that mitigation tree and shrub planting will be considered to visually integrate the Project within the surrounding landscape. No supplementary tree plantings occurred during the audit period.</p> <p>Section 6-5.0 of the Removal of 33kV Yard Infrastructure and Remediation of Site Scope of Works dated 6 December 2023 noted that once surface works have been completed, a spray grass product (i.e. seeded hydromulch) would be applied.</p> <p>It was recommended during the previous audit that AGLM consider the need for mitigation tree and shrub planting for Stage 1 to visually integrate the Project within the surrounding landscape and document the findings of this review. AGLM have committed to reviewing the need for visual mitigation screening prior to completion of the BESS.</p> <p><b>Stage 2</b></p> <p>The site inspection confirmed that the areas where Stage 2 works have</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>been completed to date are generally surrounded by existing vegetation and are not visually exposed.</p> <p><b>It is recommended that AGLM complete a review of the full footprint and extent of Stage 2 facilities to confirm whether additional mitigation plantings will be required in future prior to the completion of BESS construction.</b></p>
V6	<ul style="list-style-type: none"> <li>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</li> <li>Stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality</li> <li>On completion of the work disturbed areas will be stabilised and rehabilitated.</li> </ul>	Construction	C	<p><b>Stage 1</b> See Condition V5 above. It was recommended during the previous IEA that AGLM retains records of water used for Project dust suppression. Sighted copy of a Water Tracking Register – Liddell BESS for the period 11 July 2024 to 9 October 2024. The register provides water usage and tracking for construction and other purposes.</p> <p><b>Stage 2</b> No elevated dust emissions were identified during the audit site inspection (see <b>Plate 13</b>). The Stage 2 site inspection confirmed that all construction plant, equipment, waste and excess materials are being contained within the designated boundaries of</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>the Project construction area, with boundaries clearly delineated in the field (see <b>Plate 3</b> and <b>Plate 13</b>).</p> <p>Section 7 of the Stage 2 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. Temporary stockpiles were sighted during the site inspection and were generally shaped and stabilised, see <b>Plate 11</b>.</p>
<b>Waste</b>				
WR01	<p>A Waste Management Plan will be developed for the Project with the following criteria:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• The plans will promote the use of materials with minimal packaging requirements, removal of packaging offsite by suppliers and fabrication of parts offsite</li> <li>• Where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or disposal) by licensed contractors</li> <li>• All waste types will be separated at source for recycling</li> <li>• A licensed service provider will be appointed to collect waste during construction and operation</li> <li>• Each waste type will be classified for transport to ensure correct handling.</li> <li>• Any waste that cannot be recovered or recycled will be disposed of at a suitably authorised or licensed treatment or disposal facility</li> </ul> <p>where it will be treated and disposed of according to its classification.</p>	Detailed design	C	<p><b>Stage 1</b></p> <p>Deemed compliant during previous audit.</p> <p><b>Stage 2</b></p> <p>Sighted a copy of the Liddell Power Station Battery Energy Storage System Waste Management Sub Plan dated 16 May 2024.</p> <p>Section 5.3 of the plan notes a hierarchical waste management approach will be used, from the most preferable (reduce, reuse or recycle wastes) to the least preferable.</p> <p>Section 5.3 of the plan notes environment management measures including promote the use of materials with minimal packaging requirements, removal of packaging offsite by suppliers and</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>fabrication of parts offsite.</p> <p>Section 5.3 of the plan notes environment management measures including where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or other management) by licensed contractors.</p> <p>Section 5.3 of the plan notes environment management measures including all waste types will be separated at source for recycling.</p> <p>Section 5.3 of the plan notes environment management measures including a licensed service provider will be appointed to collect waste during construction and operation.</p> <p>Section 5.3 of the plan notes environment management measures including each waste type will be classified for transport to ensure correct handling.</p> <p>Section 5.3 of the plan notes environment management measures including any waste that cannot be recovered or recycled will be managed at a suitably authorised or licensed treatment or disposal facility, if required, where it will be treated and managed according to its classification.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>Sighted the Fluence CEMP dated 30 April 2024. Section 9.7 details waste management stating that construction activities will comply with the requirements detailed in the Waste Management Sub Plan of the EMS.</p> <p>The audit site inspection for Stage 2 confirmed that segregated waste skip bins are available on site.</p>
WRo2	<p>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 NSW <i>Biosecurity Act 2015</i>.</p>	Construction	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> Stockpiles of cleared vegetation material were sighted during the site inspection, see <b>Plate 10</b> and <b>Plate 14</b>.</p> <p><b>It is recommended that all cleared vegetation is either mulched onsite for reuse or used to create habitat piles, with weeds and pathogens managed according to requirements under the NSW <i>Biosecurity Act 2015</i>.</b></p>
<b>Water (surface water and groundwater)</b>				
W1	<p>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.</p>	Pre-construction	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that no discharges have occurred on the</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>Stage 2 site and sediment controls have been implemented for development work.</p> <p>Section 5 of the Stage 2 Soil and Water Management Sub plan notes that the BESS Project will be designed, constructed and maintained to minimise impacts on soils, surface water, flooding and groundwater. Specific requirements for water quality controls will be confirmed as the detailed design develops and prior to the commencement of construction of each Project component to ensure the objectives of the Project are achieved.</p> <p>Erosion and sediment controls for Stage 2 were viewed during the audit site inspection (see <b>Plate 5 – 7</b>).</p>
W2	<p>The following measures will be undertaken to manage activities in proximity to waterways:</p> <ul style="list-style-type: none"> <li>• The design and implementation of works within waterfront land would be undertaken in accordance with Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018)</li> <li>• Implementing practices to minimise disturbance of banks and undertake bank stabilization</li> <li>• 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.</li> </ul>	Pre-construction and construction	NT	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that construction work for Stage 2 undertaken during the audit period has not been undertaken in proximity to natural drainage lines or waterways.</p>
W3	Stockpiles would be managed to minimise the potential for mobilisation and transport of dust, sediment and leachate in runoff. This would include:	Construction	C	<p><b>Stage 1</b> EB (pers comms) confirmed that no</p>



Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	<ul style="list-style-type: none"> <li>Minimising the number of stockpiles, area used for stockpiles, and time that they are left exposed</li> <li>Locating stockpiles away from drainage lines, waterways and areas where they may be susceptible to wind erosion</li> <li>Stabilising stockpiles, establishing appropriate sediment controls and suppressing dust as required.</li> </ul>			<p>additional stockpiles are required for Stage 1 of the Project.</p> <p>The previous site audit confirmed that erosion and sediment controls are in place for Project construction areas, however some erosion and sediment controls required maintenance at the time of the site inspection.</p> <p>It was recommended that regular inspections and maintenance are completed on all erosion and sediment controls prior to disturbed areas being stabilised with vegetation cover.</p> <p>Sighted AGLM letter SSD8889779 – Stage 1&amp;2 Liddell Decoupling Works – IEA response letter which confirms that this recommendation will be completed as recommended (see <b>Plate 5 – 7</b>).</p> <p><b>Stage 2</b></p> <p>Section 5 of the Stage 2 Soil and Water Management Sub Plan notes that Stockpiles will be managed to minimise the potential for mobilisation and transport of dust, sediment and leachate in runoff.</p> <p>Viewed cover crop applied to Stage 2 stockpiles and sediment fencing established to prevent mobilisation.</p> <p>The site audit confirmed that stockpiles and erosion and sediment controls are in place for</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Project construction areas (see <b>Plate 5 – 7</b> ).
W4	Erosion and sediment control measures will be implemented and maintained at all work sites in accordance with the principles and requirements in <i>Managing Urban Stormwater – Soils and Construction, Volume 1</i> (Landcom, 2004) and Volume 2D commonly referred to as the “ <i>Blue Book</i> ” 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.	Construction	C	<p><b>Stage 1</b> See Condition W3 above.</p> <p><b>Stage 2</b> Section 5 of the Stage 2 Soil and Water Management Sub Plan states that erosion and sediment control measures will be implemented and maintained at all work sites in accordance with the principles and requirements specified in <i>Managing Urban Stormwater – Soils and Construction, Volume 1</i> (Landcom 2004).</p> <p>The site inspection confirmed that sediment and erosion control measures have generally been implemented within Project construction areas, see <b>Plates 5 – 7</b>.</p> <p><b>It is recommended that erosion and sediment controls are regularly inspected and maintained if required.</b></p> <p>Sighted Fluence Progressive Erosion &amp; Sediment Control Plan (PESCP) dated 22 May 2024. The PESCP states that inspections of erosion and sediment controls will occur following rainfall events &gt;10mm (daily on workdays or as soon as practical during site shutdown periods), with any necessary repairs implemented as</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>soon as possible. The PESCP also notes that checklists and records will be maintained. Sediment traps, sumps and filters are also required be desilted when 60% of storage capacity is reached. Site personnel are required to report any spills, leaks and failures as soon as possible.</p> <p>Sighted Enerven Liddell Battery Energy Storage System PESCP dated April 2024.</p>
W5	Water use during construction will be minimised where possible and measures to reduce water use will be applied.	Construction	C	<p><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that water use for Stage 2 is predominantly for water cart dust suppression, although this is minimal demand in the context site approvals.</p> <p>Sighted Water Tracking Register – Liddell BESS for the period 11 July 2024 to 9 October 2024. The tracking register confirms that water usage is predominantly for water cart dust suppression.</p>
W6	The Bayswater site operational water quality monitoring program will be updated and implemented as required.	Pre-operation and operation	C	The EMS notes that surface discharges must comply with volume and quality limits set in the site Environment Protection Licence.

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>EB (pers comms) confirmed that water quality monitoring for the EPL is available on the website.</p> <p>Sighted copy of Monthly Data Summary EPL 2122 report for start of month 1 May 2024 which includes water quality monitoring.</p> <p>Sighted copy of Monthly Data Summary EPL 2122 report for start of month 1 June 2024 which includes water quality monitoring.</p> <p>Sighted copy of Monthly Data Summary EPL 2122 report for start of month 1 July 2024 which includes water quality monitoring.</p>
<b>Social and economic</b>				
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>Sighted extract from Community Dialogue meeting presentation dated 28 February 2024. The presentation provided an overview of the key Project details, the Liddell BESS, and local content and workforce targets.</p> <p>The AGLM website provides a Project overview and copies of environmental approvals and management documents.</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><b>Stage 1</b> Deemed compliant during previous audit.</p> <p><b>Stage 2</b> EB (pers comms) confirmed that</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>AGLM use local sub-contractors to perform Project work.</p> <p>Sighted Fluence Liddell Social License Commitments Plan dated 6 June 2024. Section 3 outlines the Social Responsibility Framework, which includes workforce composition and local supply chain commitments.</p> <p>Sighted Fluence Procurement Plan dated 20 March 2024. Section 4 Key Program Delivery Issues details Local Content requirements.</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	C	Deemed compliant by previous audit
<b>Infrastructure</b>				
I1	AGLM will continue to consult with TransGrid and ETMC regarding any perceived impacts on the Liddell switchyard.	Pre-construction	C	EB (pers comms) confirmed that AGLM continue to consult with TransGrid on a weekly basis.
I2	AGLM will consult with Ausgrid as the network provider responsible for other onsite supply regarding continued supply.	Pre-construction / construction	NT	<p><b>Stage 1</b></p> <p>Deemed compliant during previous audit.</p> <p><b>Stage 2</b></p> <p>EB (pers comms) confirmed that this commitment has not been triggered for Stage 2.</p>
<b>Cumulative</b>				
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	C	EB (pers comms) confirmed that AGLM have implemented a process to review and update management plans for each stage of the Project

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>prior to commencement, in consultation with DPHI.</p> <p>Sighted the revised Stage 2 EMS dated 16/05/24. Section 7.0 of the EMS details that the CEMP will include a process to review and update management measures if any other development commences in proximity to the Project.</p>

**APPENDIX D**  
**STAKEHOLDER ENGAGEMENT**  
**CORRESPONDENCE**

**From:** [Sharon Pope](#)  
**To:** [Theresa Folpp](#); [Dorian Walsh](#)  
**Subject:** RE: Liddell Battery and Ancillary Works Project SSD 8889679 Audit - Consultation  
**Date:** Friday, 16 August 2024 2:33:26 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)

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

Hello Dorian

I would be interested to know that appropriate erosion and sediment controls were in place as were measures to limit site contamination as a result of decoupling activities.

Thanks



**Sharon Pope | Director Environment and Planning |  
Muswellbrook Shire Council**





Our Ref: DOC24/679518-1

JAMES BAILEY & ASSOCIATES  
6/127-129 John Street  
SINGLETON NSW 2330

Attention: Dorian Walsh

*By email: [dwalsh@baileyassociates.com.au](mailto:dwalsh@baileyassociates.com.au)*

2 September 2024

Dear Dorian Walsh

**LIDDELL BATTERY AND ANCILLARY WORKS PROJECT  
INDEPENDENT ENVIRONMENTAL AUDIT**

Thank you for your email received on 9 August 2024 requesting input from the NSW Environment Protection Authority (EPA) on the Independent Environmental Audit for the Liddell Battery and Ancillary Works Project (SSD-8889679).

The EPA encourages the preparation and implementation of audits, strategies, programs and plans. They are useful tools for industries to determine how they will meet their statutory obligations and designated environmental objectives. 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 Nirmala Dharmaratne on 0473866941 or [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to be 'KG', written over a light blue horizontal line.

**KAREN GALLAGHER**  
Unit Head - Operations  
Environment Protection Authority

Phone 131 555  
Phone 02 9995 5555  
(from outside NSW)

TTY 133 677, then  
ask for 131 555

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**APPENDIX E**  
**IEA SITE VISIT AGENDA**

**AGL Macquarie**  
**Department of Planning, Housing and Infrastructure**  
**Phase 4 Construction Independent Environmental Audit for**  
**Bayswater Power Station Upgrade Project (SSD 8889679)**

**Agenda for Site Visit scheduled**  
**Monday 15<sup>th</sup> July 2024**

**INVITEES:**

Ed Boucaut (EB)	AGL	Senior Manager, Environment
John Moore (JM)	AGL	Site Manager
Hamid Shilani (HS)	AGL	Project Director
Dorian Walsh (DW)	James Bailey & Associates	Auditor
Alexander Holz (AH)	James Bailey & Associates	Auditor

**Table 1**  
**Audit Agenda Items**

<b>Time</b>	<b>Description</b>	<b>Location</b>	<b>Attendees</b>
8:00 – 9:00am	<b>Opening Meeting</b> <ul style="list-style-type: none"> <li>• Inductions / housekeeping (HC)</li> <li>• IEA scope and purpose (DW)</li> <li>• Confidentiality arrangements (DW)</li> <li>• IEA process and timing (DW)</li> <li>• Brief overview of site during the audit period (HC)</li> <li>• Discussion on SSD 8889679 Stage 2 requirements</li> </ul>	Meeting Room	EB, CK, DW, AH
9:00am – 12:00pm	<b>Compliance Review</b> <ul style="list-style-type: none"> <li>• SSD 8889679 conditions and statement of commitments</li> <li>• EA, management plan commitments</li> <li>• AGL response to previous IEA report</li> <li>• Site Procedures</li> </ul>	Meeting Room	EB, CK, DW, AH
12:00 – 12:30pm	<b>Lunch</b>		

<b>Time</b>	<b>Description</b>	<b>Location</b>	<b>Attendees</b>
12:30 - 2:30pm	<b>Site Inspection</b> <ul style="list-style-type: none"> <li>• Review of environmental controls:               <ul style="list-style-type: none"> <li>○ Amenity Management</li> <li>○ Active construction areas</li> <li>○ Erosion and sediment controls</li> <li>○ Biodiversity controls</li> <li>○ Laydown areas and storages</li> </ul> </li> </ul>	Field	EB, CK, DW, AH
2:30 – 3:00pm	<b>Compliance Review (continued)</b> <ul style="list-style-type: none"> <li>• Licencing review</li> <li>• Review of any remaining compliance documents</li> <li>• JBA prepare preliminary findings</li> </ul>	Meeting Room	HC, AR, DW, TB
3:00 – 3:30pm (TBC)	<b>Close Out Meeting</b> <ul style="list-style-type: none"> <li>• Overview of preliminary findings</li> <li>• Outstanding information requirements</li> <li>• Confirmation of process for audit completion and reporting</li> </ul>	Meeting Room	HC, AR, DW, TB

**APPENDIX F**  
**SITE INSPECTION PLATES**



**Plate 1** Area 1, Stage 2 disturbance preparing area for BESS installation  
Note: Completed Stage 1 facilities in the background



**Plate 2** Area 1, Stage 2 sediment fencing and disturbance boundary delineation



**Plate 3** Area 2, Stage 2 disturbance preparing area for BESS installation



**Plate 4** Mobile truck refuelling equipment in the Stage 2 area



**Plate 5** Area 2, Stage 2 sediment fencing and disturbance boundary delineation



**Plate 6** Area 2, Stage 2 sediment fencing and disturbance boundary delineation





**Plate 7** Sediment fencing within the Stage 2 area, including around stockpile



**Plate 8** Areas under development prior to construction of Stage 2 site facilities



**Plate 9** Truck loading with controlled drop heights. Minimal dust generated by vehicle movements



**Plate 10** Cleared vegetation stockpiled within Area 2, Stage 2



**Plate 11** Signage situated at the entrance of Area 2, Stage 2 indicating speed limits

Note: Temporary topsoil stockpile is background behind the signage



**Plate 12** Areas of galenia with the Stage 2 area that had been treated prior to clearing



**Plate 13** Stage 2 construction area, showing no signs of elevated dust



**Plate 14** Cleared vegetation stockpiles within Stage 2 disturbance boundary