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SSD8889779 – Stage 1&2 Liddell Decoupling Works – IEA Response Letter

22/04/2024

SSD8889779 – Stage 1 Liddell Decoupling Works – IEA Response Letter to Table 6 – IEA Recommendations

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2 Condition B15 (c)	minimise to the greatest extent practicable, dust generating surfaces exposed on the site.	It is recommended that AGLM complete retreatment of exposed areas where initial cover crop seeding was not successful, to minimise exposed areas that could result in dust generation	Hydromulch application was completed and is planned to be completed again depending on success. Site has implemented measures to minimise dust generating surfaces that are exposed.	Ongoing
Schedule 2 Condition B15 (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;	It is also recommended that erosion and sediment controls are maintained for the residual stockpile of	Hydromulch application was completed and is planned to be completed again	Ongoing



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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
		material excavated from the Stage 1 construction area (see). It is also recommended that cover crops are established in areas where the initial seeding of exposed areas for Stage 1 was not successful.	depending on success. Site has implemented measures to minimise dust generating surfaces that are exposed.	
Schedule 2, Condition B25, Condition B26	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.	It is recommended that erosion and sediment controls around the Stage 1 stockpile are reinstated.	Proposed Action will be completed by 19/05/2024.	19/05/2024.
Schedule 2, Condition B26	ensure the development is designed, constructed, and maintained to minimise impacts on surface water, flooding, and groundwater at the site;	It is recommended that stockpile locations and	Stage 1 works are completed. But	17/05/2024



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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
		dates of establishment for each stockpile are recorded in an updated ESCP for Stage 1.	AGLM will put necessary control in place to reduce the impacts on surface.	
Schedule 2 Condition C1 (e) (iii)	a clear plan depicting monitoring to be carried out under the conditions of this approval.	It is recommended that the Stage 1 and Stage 2 EMS documents are reviewed and updated to include plan(s) showing monitoring to be carried out under the conditions of SSD 8889679.	EMS will be updated for future stages as recommended	Ongoing
Schedule 2, Condition 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).	It is recommended that AGLM implement a process to ensure that Compliance Reports are prepared for the project in accordance	A period of 52 weeks has not elapsed since Stage 1 of the project entered the operational phase.	Not Triggered



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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
		with DPE (2020) Compliance Reporting Post Approval Requirements.		
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.	It is recommended that the AGLM response to the findings of this IEA provides comment on all identified non-compliances and improvement recommendations.	AGLM will submit the response to IEA findings to the DPHI on the same of IEA final report submission.	Completed as requested.
Schedule 2, Condition C19	The Applicant must make the following information publicly available on its website as relevant to the stage of the development:	It is recommended that responses to IEA reports available on the AGL website indicate which audit they relate to.	IEA report and response letter will be made publicly available within 14 days of the	It will be completed as requested.



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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When						
			submission to DPHI.							
Schedule 2, Condition D3	<p>The development of the Ravensworth Coal Unloader Facility must be carried out in accordance with the following document:</p> <table border="1" data-bbox="360 850 1375 1015"> <thead> <tr> <th data-bbox="360 850 703 890">Title</th> <th data-bbox="703 850 943 890">Written By</th> <th data-bbox="943 850 1375 890">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 890 703 1015"><i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i></td> <td data-bbox="703 890 943 1015">HLA - Enviro <i>Enviro</i>sciences</td> <td data-bbox="943 890 1375 1015">December 1997</td> </tr> </tbody> </table>	Title	Written By	Date	<i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i>	HLA - Enviro <i>Enviro</i> sciences	December 1997	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 Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement prior to surrender of	AGLM noted that the operation of the Ravensworth Coal Unloader Facility is managed by Aurizon. Viewed a copy of the Antiene and Newdell: Operational Environmental Management Plan dated 18 October 2022 and AGLM maintenance records sheet 'Newdell Unloader Workorder	Ongoing
Title	Written By	Date								
<i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i>	HLA - Enviro <i>Enviro</i> sciences	December 1997								



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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
		the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.	since Jan 2022' dated 25 July 2023.	
Schedule 2, Condition 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.	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.	Aurizon leasing with Rail Access Corporation to develop and implement operational protocols and AGLM confirmed that Aurizon doesn't allowed to do push and pull the trains.	Completed



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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When						
Schedule 2, Condition 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="360 751 1373 916"> <thead> <tr> <th data-bbox="360 751 703 791">Title</th> <th data-bbox="703 751 943 791">Written-By</th> <th data-bbox="943 751 1373 791">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 791 703 916"><i>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</i></td> <td data-bbox="703 791 943 916">HLA - Envirosciences</td> <td data-bbox="943 791 1373 916">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	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.	AGLM will provide evidence upon surrendering the DA401_2000	30/06/2024
Title	Written-By	Date								
<i>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</i>	HLA - Envirosciences	August 2000								
SSD8889679 EIS Commitments										
AQ6, BIO15, V5	The following will be undertaken to manage wind erosion from stockpiles and exposed surfaces:	It is recommended that exposed surfaces on	Hydromulch application was	Ongoing						



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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
	<p>Watering stockpiles and exposed surfaces</p> <p>Progressive rehabilitation of exposed surfaces (as feasible) where no longer required for construction.</p>	<p>stockpiles no longer required</p> <p>for Stage 1 construction are reseeded where previous treatment was not successful, to minimise exposed areas as far as practicable</p>	<p>completed and is planned to be completed again depending on success. Site has implemented measures to minimise dust generating surfaces that are exposed.</p>	
<p>BIO5</p>	<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 seedbank and assist with natural revegetation). Avoid stockpiling in the vicinity of drainage lines.</p>	<p>Sighted stockpile during the Stage 1 site inspection, which has not been delineated. It is recommended that material stockpiled during Stage 1 of the Project is delineated in the field and the</p>	<p>Hydromulch application was completed and is planned to be completed again depending on success. Site has implemented</p>	<p>Ongoing</p>



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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
		location recorded.	measures to minimise dust generating surfaces that are exposed.	
BIO10	During the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species.	It is recommended that during the clearing works for future stages of the Project, weeds will be disposed and managed appropriately to stop the spread of existing weed species and records are retained.	This project had small footprint, so this condition is more related for the future stages.	Ongoing
V3	Where possible, consider minimal use of reflective surfaces to avoid drawing attention to the site within views due to reflective glare.	It is recommended that the consideration of non-reflective surfaces is documented in the	Proposed recommendation will be completed.	On going



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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
		design phase for the development of infrastructure for Stage 2 and future elements of the Project.		
V6	<ul style="list-style-type: none"> ·All construction plant, equipment, waste and excess materials will be contained within the designated boundaries of the work site and will be removed from the site following the completion of construction ·Stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality ·On completion of the work disturbed areas will be stabilised and rehabilitated. 	It is recommended that AGLM retains records of water used for Project dust suppression.	All the dust suppression evidence provided to Auditors.	Completed.
W3	<p>Stockpiles would be managed to minimise the potential for mobilisation and transport of dust, sediment and leachate in runoff. This would include:</p> <ul style="list-style-type: none"> • Minimising the number of stockpiles, area used for stockpiles, and time that they are left exposed • Locating stockpiles away from drainage lines, waterways and areas where they may be susceptible to wind erosion <p>Stabilising stockpiles, establishing appropriate sediment controls and suppressing dust as</p>	It is recommended that regular inspections and maintenance are completed on all erosion and sediment controls.	It will be completed as recommended.	Ongoing



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	required.			
W4	Erosion and sediment control measures will be implemented and maintained at all work sites in accordance with the principles and requirements in Managing Urban Stormwater – Soils and Construction, Volume 1 (Landcom, 2004) and Volume 2D commonly referred to as the “Blue Book” where appropriate. Additionally, any water collected from worksites will be treated and discharged (where able) to avoid any potential contamination or local storm water impacts. Measures will be designed in accordance with the relevant guideline where appropriate.	It is recommended that erosion and sediment controls are regularly inspected and maintained if required.	The site inspection with Auditors confirmed that sediment and erosion control measures have generally been implemented within Project construction areas, see Plate 1 and Plate 16.	Completed
SE1	AGLM will keep the community and stakeholders updated on the Project via the existing community engagement forum and AGL website	It is recommended that updates on the Project are provided via the AGLM website and that community dialogue meeting minutes are	Proposed action completed. Also, AGLM does quarterly CDM to inform community on	Completed



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		available.	community on various projects. Meeting minutes will be made available.	
CL1	The CEMP will include a process to review and update management measures if any other development commences in proximity to the Project.	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.	It will be completed as recommended.	08/07/2024



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SSD8889779 – Stage 2 Solar Thermal Array Demolition

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2 Condition A2	The development may only be carried out: (a) in compliance with the conditions of this consent	Non-compliances (NC) with SSD 8889679 conditions were identified during this IEA. Findings and recommendations in relation to each non-compliance are provided against the relevant conditions below.	See response for each action below.	See timing for each action below
Schedule 2 Condition C1 e) iii)	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. The strategy must include a clear plan depicting monitoring to be carried out under the conditions of this approval.	The Stage 2 EMS does not have a plan depicting monitoring to be carried out under the conditions of this approval. It is recommended that the Stage 1 and Stage 2 EMS documents are reviewed and updated to include plan(s) showing monitoring to be carried out under the conditions of SSD 8889679.	The EMS will be updated to include a clear plan depicting monitoring to be carried out under the conditions of this approval. The EMS will be submitted to DPHI for review and approval.	22 August 2024



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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
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.	Evidence was not available at the time of audit to confirm a designated refuelling area and procedures had been established for Stage 2 works. It is recommended that an area is delineated and communicated to the project contractor.	Solar Array demolition works have now been completed and the contractor has demobilised from site. A set refuelling area in a disturbed area was used as confirmed by SWMS for the project, however the area was not delineated or shown on a map. Future stages of works under Stage 2 of SSD 8889679 will be undertaken with consideration to this recommendation.	As required
AQ2	During loading and unloading of materials, the following will be undertaken: Water sprays as applicable Minimising drop heights Reviewing and where necessary modifying or suspending activities during dry and windy weather and elevated background air quality conditions.	Evidence was not available at the time of the audit to confirm dust mitigation controls were implemented during the loading and unloading of materials during Stage 1 and Stage 2. It is recommended that AGLM	Solar Array demolition works have now been completed and the contractor has demobilised from site. There was no opportunity due to timing of works for the auditor to observe works in progress to assess the	As required



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		document the implementation of control measures for Project loading and unloading activities.	effectiveness of air quality controls. Appropriate dust mitigation controls were implemented on site and were supported by inspections by both the contractor completing works and AGL. Future stages of works under Stage 2 of SSD 8889679 will be undertaken with consideration to this recommendation, with additional evidence collected (photographs, water cart records).	
BIO10	During the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species.	Areas of weed infestation (primarily galenia and other exotics) were observed within the Stage 2 footprint (see Plate 17). It is recommended that treatment of these areas is undertaken and monitored,	Weed treatment of these areas was undertaken, however sufficient evidence was not retained. Future stages of works under Stage 2 of SSD 8889679 will be undertaken with	As required



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		with evidence of weed treatment and disposal retained.	consideration to this recommendation, with additional evidence collected.	
V5	Mitigation tree and shrub planting will be considered to visually integrate the Project within the surrounding landscape.	The site inspection confirmed that the areas where Stage 2 works have been completed to date are generally surrounded by existing vegetation and are not visually exposed. 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.	This will be completed prior to completion of construction of the BESS.	Prior to completion of construction of the BESS.