



INDEPENDENT ENVIRONMENTAL AUDIT REPORT

Wellington Solar Farm - SSD 8573

Lightsource BP Pty Ltd

27 March 2020



Independent Environmental Audit – Wellington Solar Farm

Executive Summary

J2M Systems Pty Ltd was engaged by Lightsource BP Pty Ltd (LSBP) to undertake an independent environmental audit (IEA) at the Wellington Solar Farm (referred to as the ‘Project’) in accordance with Schedule 4, Condition 6 of the NSW Department of Planning, Infrastructure and Environment (NSW DPIE) Project Approval SSD 8573 Modification 1 ('Project Approval').

Project Approval was granted on 25 May 2018 and has been modified on one occasion at the date of this audit, being SSD 8573 Modification 1, 11 December 2019. Project Approval MOD 1, which is the scope of this audit, includes conditions for construction, operation and decommissioning of a 174MW solar farm at Goolma Road, Wuuluman NSW, including associated ancillary infrastructure. The Project commenced construction on 04 December 2019.

The Wellington Solar Farm development is located along Goolma Road, Wuuluman NSW, approximately 2km north east of Wellington in central NSW. The project is within the Dubbo Regional Council Local Government Area (LGA).

Schedule 4, Condition 6 of the Project Approval requires LSBP to commission an IEA within three months of the date of commencement of construction, within 3 months of commencement of operations, and as directed by the Secretary. J2M Systems was formally commissioned on 23 January 2020 to carry out this independent environmental audit (IEA) of the Wellington Solar Farm, being the first IEA on the project and within three months of commencement of construction. NSW DPIE approved the auditor via correspondence dated 29 January 2020.

The audit methodology included:

- Audit planning discussion with LSBP representatives with regard to audit timing, provision of documentation, site visits and personnel involvement;
- Review of audit documentation provided by LSBP and its representatives;
- Consultation with relevant Government agencies, Registered Aboriginal Parties and the key stakeholders as identified by LSBP;
- Site inspection undertaken between 19 February and 21 February 2020;
- Review of additional audit documentation provided by LSBP and its representatives during and after the audit site inspection via email submission between 21 February and 13 March 2020;
- Submission of draft report to LSBP for review of adequacy and as an opportunity for LSBP to confirm findings and/or provide additional information; and
- Finalisation of report.

The audit scope assessed compliance with Project Approval and management plans applicable to Wellington Solar Farm at the time of the audit. A detailed audit table is presented in Appendix A identifying audit evidence, findings and recommendations. Section 3 of this report presents the audit findings, including an assessment of the adequacy of management plans and summary of environmental performance. Section 4 of this report presents non-compliances and auditor recommendations identified against the audit scope.

Overall, the audit of the Wellington Solar Farm determined a good level of compliance with the environmental management obligations under Project Approval. The Project's actual impacts appear generally consistent with those predicted in the Environmental Impact Assessment. The solar farm construction contractor's implementation of the project environmental management plans appeared non-systematic and underprepared. There have been substantial changes to team personnel and this is a considerable factor in the proficiency of implementation to date.

Document Revision Record

Issue No.	Date	Details of Revision
Draft	16 Jan 2020	Draft issued for comment.
Final	27 Mar 2020	Final for issue – no fundamental changes from draft.

Client Contact Details

Diana Mitchell
Principal Environmental Planner
Lightsource BP

Issued by:

Peter Marshman
Lead Environmental Auditor
J2M Systems Pty Ltd
P.O. Box 163 Newport Beach NSW 2106

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1 Introduction:

1.1 Project Background

J2M Systems Pty Ltd was engaged by Lightsource BP (LSBP) to undertake an independent environmental audit (IEA) on the Wellington Solar Farm (referred to as the ‘Project’) in accordance with Schedule 4, Condition 6 of the NSW Department of Planning, Infrastructure and Environment (NSW DPIE) Project Approval SSD 8573 Modification 1 (‘Project Approval’).

Project Approval was granted on 25 May 2018 and has been modified on one occasion the date of this audit, being MOD 1 dated 11 December 2019. Project Approval SSD 8753 MOD 1, which is the scope of this audit, includes conditions for construction, operation and decommissioning of the Wellington Solar Farm, including earthworks, installation of solar panels, collector substations, switching stations, permanent offices, site compounds, electricity transmission lines and internal roads.

The Project commenced construction on 4 December 2019.

The construction element of the project is being delivered under two scopes of work, that being the solar farm works and the substation works. LSBP has engaged separate head contractors to deliver the two scopes of work, that being Sterling & Wilson Pty Ltd (S&W) for the solar farm works, and TransGrid for the substation works.

1.2 Scope of Work

The scope of the independent environmental audit is pre-determined by Schedule 4, Condition 6 of the SSD 8573 Mod 1 and is reproduced here:

The audits must:

1. (a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018);
2. (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
3. (c) be prepared, unless otherwise agreed with the Secretary:
 - (i) within 3 months of commencing construction;
 - (ii) within 3 months of commencement of operations; and (iii) as directed by the Secretary;
4. (d) be carried out in consultation with the relevant agencies;
5. (e) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and
6. (f) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.

In addition to this, the scope of the audit is also defined in Section 3.3 of the *Independent Audit Post Approval Requirements* (DPE 2018), and is reproduced here:

An Independent Audit must include:

1. an assessment of compliance with:
 - a. conditions of consent applicable to the phase of the development that is being audited;
 - b. all post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;

- c. *all environmental licences and approvals applicable to the development excluding environmental protection licences issued under the Protection of the Environment Operations Act 1997;*
2. *an assessment of the environmental performance of the development, including but not necessarily limited to, an assessment of:*
 - a) *actual impacts compared to predicted impacts documented in the environmental impact assessment;*
 - b) *the physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;*
 - c) *incidents, non-compliances and complaints that occurred or were made during the audit period;*
 - d) *the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;*
 - e) *feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period;*
3. *the status of implementation of previous Independent Audit findings, recommendations and actions (if any);*
4. *a high-level review of the project's environmental management systems (if any), including assessment of any third party certification of them, the type, nature and scope of the systems having regard to the nature and scale of the development, and the implementation of the systems. It is not expected that an Independent Audit comprises a management system audit, however any key deficiencies identified in the system should be discussed;*
5. *a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate*; and*
6. *any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.*

The criteria of the audit included the requirements of:

- Works undertaken since Project Approval (25 May 2018) to completion of the audit site inspection 21 February 2020.
- the Project Approval (Appendix A – Audit Table);
- strategies/management Plans/programs required by the Development Consent conditions during the construction phase:
 - Construction Environmental Management Strategy;
 - Biodiversity Management Plan;
 - Cultural Heritage Management Plan;
 - Traffic Management Plan;
 - Soil, Water, Stormwater Management Plan; and
 - Landscaping Plan.

1.3 Audit Period

The audit period is defined as the period between the dates of Project Approval 25 May 2018 to completion of the audit site inspection 21 February 2020.

1.4 Audit Team

In accordance Section 3.1 of the NSW DPE Independent Audit Post Approval Requirements, this audit was completed by Peter Marshman of J2M Systems Pty Ltd. NSW DPPIE approval of the auditor is provided in Appendix B of this report. No technical specialists were required for this audit. The Auditor's deceleration of independence is provided in Appendix D of this report.

1.5 Methodology

1.5.1 Document review

Preparation for the IEA involved a desktop review of the documentation identified in the scope of this audit (Refer to Section 1.2). This included relevant plans, programs and statutory requirements. An audit checklist was developed as part this review (Appendix A – Audit Table). An adequacy assessment of plans and programs required under the consent is provided in Section 3.5 of this report.

The Auditor is a general environmental management systems auditor and is not qualified as a technical expert in any of the specialist topics of the management plans that were reviewed. Adequacy of the management plans is determined by:

- review of the plan(s) against the relevant development of approval requirements;
- considering that the plan(s) have been reviewed and approved by relevant agencies; and
- considering the environmental performance of the project with regard to the content and currency of the plan.

A Technical review is not included and this is assumed to have been done in the development of the plan, in consultation with relevant Agencies, and through the relevant approval processes.

1.5.2 Opening and Closing Meeting

An opening meeting was held on 19 February 2020 to introduce the auditor to the project management team and to outline the audit process and confirm audit arrangements.

An interim closing meeting was held on 21 February 2020 to provide a summary of audit findings at the time, noting that further review of evidence was required prior to finalising audit findings.

The issue of the draft report is considered as the close of the audit.

Audit attendance at the opening and closing meeting is summarised in Table 1 below.

Table 1: Audit attendance

Name	Title - Organisation	Opening Meeting	Closing Meeting
Diana Mitchell	LSBP Principal Environmental Planner	Yes	Yes, via Phone
Tim Lambert	LSBP Construction Manager	Yes	Yes
Donnacha Culloo	LSBP Project Manager	Yes	Yes
Brian Rafferty	S&W Project Manager	Yes	Yes
Dean Dreier	S&W Contracts Manager	Yes	Yes
Matty Waters	S&W Site HSE Manager	Yes	Yes
Johnny Auditore	S&W CHSE Manager	Yes	Yes
Peter Marshman	J2M Systems Lead Auditor	Yes	Yes

1.5.3 Site inspection and Interviews

Two site inspections were undertaken on the project with the aim of assessing the effectiveness of environmental management measures on site. The first inspection focused on the solar farm works, whilst the second inspection focussed on work activities within the TransGrid Substation. The audit site inspections included check of all active work areas at the time of the audit, as well as aboriginal heritage sites and environmental protection zones. Outcomes of the site inspections are provided in Section 3.8.

1.5.4 Reporting

The audit report was developed between 21 February 2020 and 13 March 2020. A draft report was provided to LSBP via email dated 13 March 2020. The audit report was finalised on 27 March 2020.

1.5.5 Compliance Status Descriptors

The compliance status of each compliance requirement in the Audit Table (Appendix A) has been determined using the relevant descriptors in Table 2 below as required by the NSW DPE Independent Audit Post Approval Requirements, June 2018.

Table 2: Compliance Status Descriptors

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

1.6 Site Description and Operation

1.6.1 Site Location

The Wellington Solar Farm development is located along Goolma Road, Wuuluman NSW, approximately 2km north east of Wellington in central NSW. The project is within the Dubbo Regional Council Local Government Area (LGA). The dominant land use on the project site and in the local area is agriculture, through some native vegetation remnants are present across some areas of the site (NGH, 2017). Full details of the site, including proposal layout, key environmental issues and site constraints are detailed within the Wellington Solar Farm Environmental Impact Statement, prepared by NGH Environmental, November 2017.

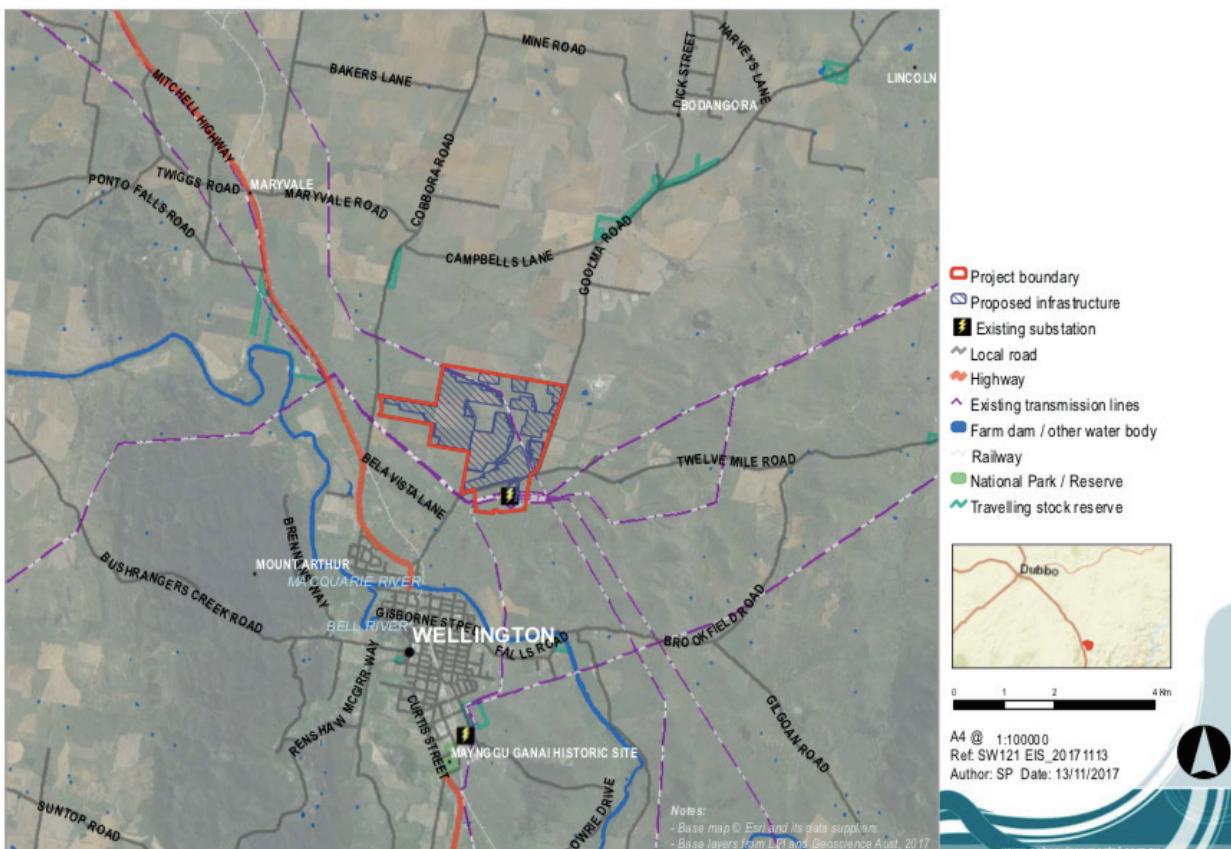


Figure 1: Project location. Sourced from Wellington Solar Farm, Environmental Impact Statement, NGH Environmental, November 2017.

2 Consultation with relevant agencies

As part of the audit process, J2M Systems undertook consultation with the following stakeholders to obtain feedback on the scope of the audit and gain an understanding of their interests in the Project and its environmental performance.

Notification of a request for consultation was issued via official agency portals and/or email dated 29 January 2020 to the following agencies and stakeholders:

- NSW Department of Planning, Infrastructure and Environment (NSW DPIE);
- NSW Environmental Protection Agency (NSW EPA);
- NSW Roads and Maritime Service (NSW RMS);
- Dubbo Regional Council;
- Wellington Valley Wiradjuri Aboriginal Corporation;
- Gallangabang Aboriginal Corporation;
- Binjang Wellington Wiradjuru Heritage Survey;
- Wiradjuru Central West Republic; and
- Wellington Local Aboriginal Land Council.

This section provides a summary of feedback and scope requests received. Record of the correspondence received via email is provided in Appendix C.

2.1 NSW DPIE

Jennifer Rowe, Senior Compliance Officer for NSW DPIE provided an email response received 11 February 2020 requesting the following:

- The Audit needs to ensure that it addresses all the requirements outlined in Schedule 4, Condition 6 of the SSD 8573.

Auditor response: *The auditor has undertaken this audit to the best of his ability to address all the requirements outlined in Schedule 4, Condition 6 of the SSD 8573.*

- Could you please address the following aspects as part of your review:
 - Biodiversity impact on site, particularly EEC vegetation clearing undertaken to date
Auditor response: *Refer to Section 3.7.1 and Section 4.1. A non-compliance was identified in relation to the lack of implementation of biodiversity management procedures on site, in particular during vegetation clearing works.*
 - Details of the works that have been undertaken so far on site and that they are within the project boundary:
Auditor response: *Refer to Section 3.8 for the outcomes of the audit site inspection. All works undertaken were within the project boundary.*
 - Confirm if the transmission corridor and substation works have commenced.
Auditor response: *The auditor undertook a site inspection and confirms that the substation works have commenced, however the transmission line works were yet to commence.*
 - Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans
Auditor response: *Refer to Section 4.1. A non-compliance (WSF-IEA-2020-NC05) was identified in relation to the lack of implementation of Erosion and Sediment Control*

Plans and existing controls do not demonstrate compliance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans

- The required development exclusion zones have been installed specifically in areas of riparian zones, Wuulman Creek, Aboriginal and cultural heritage and biodiversity sites

Auditor response: *The auditor undertook a site inspection and confirms that the required development exclusion zones have been installed including around the riparian zones, Wuulman Creek, Aboriginal and cultural heritage and biodiversity sites*

- Check no alterations has been done to the Narrawa Homestead

Auditor response: *The Narrawa Homestead is being occupied as the site office. There were no alterations at the date of the audit.*

- Accurate records are being kept for heavy vehicles entering and leaving site and movements are within the specified transport limits of the consent

Auditor response: *Refer to Section 4.1. A non-compliance (WSF-IEA-2020-NC02) was identified in relation to the lack of accurate records of heavy vehicles entering and leaving the site since construction commencement.*

2.2 NSW Department of Primary Industries | Agricultural Resources

Mary Kovac, Agricultural Landuse Planning Officer provided an email response dated 19 Feb 2020, which outlined the following statements:

- The salvage (of topsoil) occurs and final placement of the vegetative and soil resources for the ongoing operation of the area is a key to the ongoing successful revegetating of the site to protect the soil resource. Issues such as settling, ponding, erosion potential etc. need to be avoided so this will require ongoing monitoring particularly over the first 12 months of soil placement;
- Groundcover management, including soil placement and protection of soil resource, will be challenging; and
- Weed management is going to be a challenging issue especially on a site that has been cleared and had some agricultural disturbance.

Auditor response: *The approved Biodiversity Management Plan (BMP) includes details on re-use of resources, including procedures for re-use of coarse woody debris, rocks and soil resources. The BMP also details weed management controls and a groundcover management plan. A Soil Agronomist not yet engaged on the project.*

It is noted that the management of topsoil and weeds is challenging. This along with S&W's limited understanding of the specific details of how to implement the management plans has been addressed in the Auditor Recommendations (AR) 5 and 7 in Section 4.2 of this report.

2.3 NSW Department of Primary Industries | Crown Lands

DPIE Crown Lands provided an email response dated 17 Feb 2020 stating 'DPIE Crown Lands has no comments for this proposal'.

2.4 NSW EPA

Duncan McGregor, Acting Unit Head Central West Region provided a letter, dated 17 Feb 2020 with the following key statement: 'The EPA notes that the project is not a Scheduled Activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997 ("the Act") and is not being undertaken by a

public authority. Therefore, the EPA does not regulate the project under the Act and holds no information about its performance.

2.5 NSW Road and Maritime Service (NSW RMS)

NSW RMS provided an email response 02 Mar 2020 stating 'Transport for NSW (TfNSW) makes no submission in regard to the independent environmental audit of Wellington Solar Farm. We are satisfied at the current time that compliance is being adequately addressed by the usual approval processes required by the legislation and consent conditions'

TfNSW indicated the need for LSBP to follow up on the following:

- The need for a detailed design for the electrical crossing of Goolma Road to be submitted to TfNSW for concurrence under Section 138(2) of the *Roads Act 1993*; and
- That an easement over this crossing would not be supported, in line with previous advice provided by TfNSW to LSBP.

Auditor Response: *LSPB are aware of the need to provide further information. It was reported that the relevant detailed designs were not yet complete at the time of the audit.*

2.6 Dubbo Regional Council

Dubbo Regional Council did not provide a response to the request for consultation.

2.7 Wellington Valley Wiradjuri Aboriginal Corporation and Gallangabang Aboriginal Corporation

Bradley Bliss, representing both the Wellington Valley Wiradjuri Aboriginal Corporation and the Gallangabang Aboriginal Corporation was contact by telephone on 11 Feb 2020 and provided the following comments:

- The original Aboriginal Heritage survey conducted prior to planning approval provided insufficient coverage and may not have identified all Aboriginal heritage items.

Auditor response: *The scope of this audit addresses the conditions post project approval. As this survey was completed as a milestone towards obtaining planning approval it is considered to be outside the scope of the audit. The auditor has not reviewed or considered the adequacy of the scope of the survey for the Project approval.*

2.8 Registered Aboriginal Party: Binjang Wellington Wiradjuru Heritage Survey

Jamie Gray, representing Binjang Wellington Wiradjuru Heritage Survey, was contacted by telephone on 14 February 2020. A message was left however not returned.

2.9 Wiradjuru Central West Republic

Jamie Gray, also representing Wiradjuru Central West Republic, was contacted by telephone on 14 February 2020. A message was left however not returned.

2.10 Wellington Local Aboriginal Land Council

The auditor followed up the original email and attempted to contact Mike Nolan, representing Wellington Local Aboriginal Land Council, on 14 Feb 2020. A voicemail was left but not returned.

3 Audit Findings

In accordance with Schedule 4, Condition C6 (d) of the Consent, this section provides an assessment of the project's compliance with relevant requirements in the approval, and any strategy, plans or programs required under the Project Approval.

3.1 Compliance Performance

This audit is considered to address the requirement of the scope of works to '*assess the environmental performance of the project*'. Section 4 of this report lists the conditions considered to be non-compliant, whilst the Audit Table (Appendix A) provides an assessment of the project's compliance with relevant requirements in the approval, and associated strategies, plans and programs required under the Project Approval.

Site environmental controls were observed as being implemented on site generally in accordance with the measures stipulated in the approved management plans and development approval, with the exception of sediment and erosion controls and vegetation clearing. Refer to 4.1 for non-conformances identified against environmental performance on this project.

3.2 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

The LSBP Principal Environmental Planner and LSBP Site Project Manager reported that the Project had not received any Agency notices, orders, penalty notices or prosecutions at the time of this audit.

3.3 Summary of Environmental Incidents

The LSBP Site Project Manager and S&W Site Manager reported that no environmental incidents had occurred on the project, with the exception of some minor spills of hydraulic fluid on site. These minor spills were reportedly of low volume (less than 20L) and were contained on site, did not cause or threaten material harm to the environment and were immediately cleaned on site.

3.4 Summary of Environmental Complaints

LSBP is maintaining a feedback register and this was provided for review during the audit. No complaints had been received or recorded within the audit period.

3.5 Review of Adequacy of Project Management Plans

The Development Approval requires the preparation, Secretary approval and implementation of a series of management plans and programs. The following management plans and programs required to be developed and approved for the Project were reviewed during this Audit:

- LSBP Construction Environmental Management Strategy;
- Sterling & Wilson Construction Environmental Management Plan – Solar Farm works;
- TransGrid Construction Environmental Management Plan – Substation works;
- Biodiversity Management Plan;
- Cultural Heritage Management Plan;
- Traffic Management Plan;
- Soil, Water, Stormwater Management Plan; and
- Landscaping Plan.

As set out in Section 1.5.1, adequacy of the management plans has been determined by:

- review of the plan(s) against the relevant development of approval requirements;
- consideration that the plan(s) have been reviewed and approved by relevant agencies; and

- consideration of the environmental performance of the project with regard to the content and currency of the plan.

A technical review was not undertaken as this is assumed to have been done in the development of the plan, in consultation with relevant Agencies, and through the relevant approval process. A summary of the adequacy assessment of each strategy, plan or program is provided below.

3.5.1 Environmental Management Strategy

NGH Environmental has prepared and continues to update an Environmental Management Strategy (EMS) for the project. The current EMS, Revision 3.1 dated 19 Dec 2019 was submitted to and approved by NSW DPIE on 26/09/2019. The EMS appears also to have been formally distributed to the NSW DPIE for the purposes of developing the strategy in consultation with the Department. The EMS was established and approved prior to commencement of construction.

The EMS sets out the strategic framework for environmental management on the project and includes details on applicable legal and other requirements, roles and responsibilities for key environmental management personnel, internal and external communication, environmental incident response and processes for environmental monitoring and complaint management.

The EMS is considered a concise and interpretable document that addresses the relevant requirements of the Project Approval. Given the recent development and approval of the EMS, it is considered adequate, up to date and relevant to the project.

The following recommendation is made following the adequacy review of the EMS.

Auditor Recommendation: The overarching EMS for the project should clearly set out that the construction element of the project is planned to be delivered under two scopes of work, that being the solar farm works and the substation works and that individual construction environmental management plans would be established for the two scopes.

3.5.2 Construction Environmental Management Plan - Solar Farm

Sterling and Wilson (S&W) has prepared a Construction Environmental Management Plan (CEMP) for the project. The current CEMP, Revision A dated 6 Nov 2019 was available on site at the time of the audit and implemented by the project team. The CEMP is not required to be reviewed and approved by the Secretary. The CEMP was established prior to commencement of construction and sets out the environmental management procedures for the project

Section 4 of the CEMP outlines the roles and responsibilities for key project personnel including: Head of Project, Project Manager, HSE Manager, HSE Advisor, Site Supervisor, Workers and Sub-contractors. Section 9 of the CEMP details environmental mitigation measures for identified environmental aspects and Section 9.13 details environmental parameters and monitoring. Overall the CEMP is generally considered adequate, up to date and relevant to the project.

S&W's implementation of the CEMP and LSBP environmental management plans appeared non-systematic and underprepared. The auditor understands that there have been substantial changes to team personnel and this is a considerable factor in the proficiency of implementation to date.

The following recommendation is made following the adequacy review of the EMS.

Auditor Recommendation (WSF-IEA-2020-AR 7): S&W's project team to thoroughly read and understand the implementation requirements of the CEMP and associated project environmental management plans to ensure ongoing implementation compliance.

3.5.3 Construction Environmental Management Plan - Substation Works

TransGrid has prepared a Construction Environmental Management Plan (CEMP) for the associated substation scope of works. The current CEMP, Revision 5 dated 13 December 2019 was available on site at the time of the audit and implemented by the project team. The CEMP is not required to be reviewed and approved by the Secretary, however was reviewed by LSBP. The CEMP is generally considered adequate, up to date and relevant to activities occurring on site.

3.5.4 Construction Biodiversity Management Plan

NGH Environmental has prepared a Biodiversity Management Plan (BMP) for the project. The BMP, Revision 3.1 dated 16 Oct 2019 was submitted to and approved by the Secretary six weeks prior to commencement of construction. The BMP was subsequently revised and reapproved by the Secretary to address SSD 8573 Mod 1.

Section 9 of the BMP details mitigation and management measures to be implemented across the various phases of the project, including pre-construction, construction and operation. Section 10 of the BMP outlines monitoring and inspection requirements, whilst Appendix A details rehabilitation processes planned within the Groundcover Management Plan.

The BMP is considered a concise and interpretable document that addresses the relevant requirements of the Project Approval. Given the recent development and approval of the BMP, it is considered adequate, up to date and relevant to the project, with no auditor recommendations identified.

It is noted that one non-conformance and one auditor recommendation were identified during the audit with regard to implementation of the BMP (Refer to Section 4.1 and 4.2 respectively).

3.5.5 Cultural Heritage Management Plan

NGH Environmental has prepared a Cultural Heritage Management Plan (CHMP) for the project. The CHMP, Version 1.3 dated 01 Aug 2019 was submitted to and approved by the Secretary four months prior to commencement of construction. The CHMP has since been revised and reapproved by the Secretary to address SSD 8573 Mod 1.

A review of the CHMP was undertaken and the CHMP is considered to adequately address the relevant requirements of the Project Approval, with no auditor recommendations identified. Given the recent development and approval of the CHMP, it is considered up to date and relevant to the project.

3.5.6 Traffic Management Plan

NGH Environmental has prepared a Traffic Management Plan (TMP) for the Project. TMP Version 2.0 was submitted to and approved by the Secretary 16 weeks prior to commencement of the road upgrades, in compliance with the requirement of the Project Approval. The TMP has since been revised to address the requirements of SSD 8573 Mod 1.

Correspondence between NSW DPIE and LSBP, as recently as 9 March 2020, indicates that the Department is requesting LSBP to provide additional information in relation to the revised TMP, in particular the need for a detailed design for the electrical crossing of Goolma Road to be submitted to TfNSW for concurrence under Section 138(2) of the *Roads Act 1993*. As such an adequacy review of the TMP was not conducted as part of this audit as the TMP was currently in draft and subject to change.

3.5.7 Soil, Water, Stormwater Management Plan

NGH Environmental prepared a Soil, Water and Stormwater Management Plan (SWSMP) for the project. SWSMP, Version 2 dated May 2019 was submitted to and approved by the Secretary five months prior to the commencement of construction. The SWSMP was subsequently revised and reapproved by the Secretary to address the requirements of SSD 8573 Mod 1.

The SWSMP includes requirements to develop progressive erosion and sediment control plans for the project. Section 7 of the SWSMP details environmental control measures to be implemented on the project. Section 8.3 outlines relevant monitoring and inspection requirements however the SWSMP is not clear what records would be maintained (if any) as evidence of monitoring and inspection processes.

Overall the SWSMP is considered to adequately address the relevant requirements of the Project Approval. The following recommendation is made following the adequacy review of the SWSMP.

Auditor Recommendation (WSF-IEA-2020-AR 8): Provide further detail in Section 8.3 of the SWSMP as to what records will be maintained (if any) as evidence of monitoring and inspection processes.

3.5.8 Landscaping Plan

NGH Environmental prepared a Landscaping Plan (LP) for the project. LP, Version 2.4 dated 03 Oct 2019 was submitted to and approved by the Secretary 2 months prior to commencement of construction. The LP was subsequently revised and reapproved by the Secretary to address the requirements of SSD 8573 Mod 1.

Section 6 provides the LP, including perimeter plantings, whilst Appendix C provides detailed specification for the planting. Appendix C.4.3 sets out proposed monitoring and maintenance methods for the plantings, whilst section 7.7 includes proposed reporting requirements.

The LP is considered to adequately address the relevant requirements of the Project Approval. Given the recent development and approval of the LP it is considered up to date and relevant to the project, with no auditor recommendations identified.

3.6 Status of Previous Audit Recommendations

Nil. This is the first Independent Environmental Audit for the Project.

3.7 Actual verses Predicted Environmental Impacts

The following section provides a summary of actual vs. predicted impacts for the key environmental aspects identified in the Environmental Impact Statement (EIS) prepared by NGH Environmental, November 2017. This is a high level summary of the predicated impacts outlined within the EIS as read and interpreted by the auditor at the time of the audit, as well as an general assessment of actual impacts in the opinion of the Auditor based on evidence of management plan implementation obtained during the audit and of observations made during the audit site inspection.

The EIS outlined the following key environmental aspects:

- Biodiversity;
- Aboriginal heritage;
- Visual impact;
- Noise impact; and
- Historic heritage

This section also includes considerations for environmental impacts predicted within the modification application reports for Mod 1. The project was under construction at the time of the audit and hence this assessment considers construction related impacts only, as no operational data exists to assess operational or decommissioning impacts.

3.7.1 Biodiversity Impacts

NGH Environmental (NGH) prepared a Biodiversity Assessment Report (BAR) for the project and the results of the BAR are summarised within the EIS.

Predicted Impacts

The following provides a high level summary the of predicated biodiversity impacts outlined in Section 7.1.6 of the EIS:

- Direct impact on three vegetation zones totalling 7.12 ha that are identified as endangered ecological communities (EEC), being:
 - 0.85 ha of White Box Grassy Woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion
 - 1.81 ha of White Box Grassy Woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion
 - 4.46 ha of White Box Grassy Woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion.
- Habitat clearance for permanent and temporary construction facilities (e.g. solar infrastructure, transmission lines, compound sites, stockpile sites, access tracks). The consequences of this impact may include:
 - Direct loss of native flora and fauna habitat from clearing, including removal of hollow bearing trees for Superb Parrot and Corben's Long-eared Bat
 - Injury and mortality to fauna during clearing of fauna habitat
 - Introduction and spread of noxious weeds and pathogens
 - Disturbance to fallen timber, dead wood, bush rock and riparian vegetation.
- Risks for soil and water contamination;
- Creation of barriers to fauna movement; and
- Generation of excessive dust, light or noise.

Actual Impacts:

As described in section 3.5.4 above, a Biodiversity Management Plan (BMP) has been prepared and implemented on the project. Works on site at the time of the audit site inspection included removal of native vegetation within the approved development area and commencement of fencing and minor civil earthworks on site. A site inspection was undertaken and it appears that felled vegetation solely within the approved development footprint. Environmental Exclusion Zones were established around project boundaries and no-go areas.

A non-compliance was identified with regard to the implementation of the BMP (Refer to Section 4.1 - 2020-IEA-NC-04). The actual impact of the project with regard to approved clearing limits was not able to be confirmed as the cumulative amount of vegetation cleared has not been determined. Additionally requirements outlined in the BMP relating to pre-clearing surveys to identify habitat trees, ground disturbance permits and hollow-bearing tree removal procedure was not been implemented. .

3.7.2 Aboriginal Heritage Impacts

NGH prepared an Aboriginal Cultural Heritage Assessment Report (ACHAR) to provide an assessment of the Aboriginal cultural values associated with the proposal site and to assess the cultural and scientific significance of any Aboriginal heritage sites recorded. The results of the ACHAR are summarised within the EIS.

Predicted Impacts

The following provides a high level summary the of predicated Aboriginal cultural heritage impacts outlined in Section 7.2.4 of the EIS:

- The impact to the scientific value of the site is considered low.
- Salvage of the following isolated finds (IF):
 - WSF IF3
 - WSF IF4

- WSF IF5
- WSF IF6
- WSF IF7
- WSF IF8
- WSF IF10
- WSF IF11
- WSF IF12
- WSF IF13
- WSF IF14
- WSF IF15.
- Salvage of the following artefact scatters (AS):
 - WSF IF1
 - WSF IF2
 - WSF IF3
 - WSF IF4
 - WSF IF5
 - WSF IF6
 - WSF IF7
 - WSF IF8
 - WSF IF10.
- Further archaeological research should be undertaken in the form of excavations in order to establish the presence or absence sub surface deposits at the following locations:
 - PAD 1
 - PAD 2.

Actual Impacts:

As described in section 3.5.5 above, a Cultural Heritage Management Plan (CHMP) has been prepared and implemented on the project. Aboriginal heritage sites, including an unexpected find, were observed delineated with exclusion zone fencing.

NGH Environmental undertook surface artefact collections within the approved development footprint over two days on 29-30 May 2019. It was reported that four Aboriginal representatives were present during the surface artefact collection on the 29th May and three Aboriginal representatives were present on the 30th May 2019.

The salvage operation covered the following locations:

- Wellington Solar Farm IF 3
- Wellington Solar Farm IF 4
- Wellington Solar Farm IF 5
- Wellington Solar Farm IF 6
- Wellington Solar Farm IF 7
- Wellington Solar Farm IF 8
- Wellington Solar Farm IF 10
- Wellington Solar Farm IF 12
- Wellington Solar Farm IF 13
- Wellington Solar Farm IF 14
- Wellington Solar Farm IF 15
- Wellington Solar Farm AS 1
- Wellington Solar Farm AS 2
- Wellington Solar Farm AS 3
- Wellington Solar Farm AS 4

- Wellington Solar Farm AS 5
- Wellington Solar Farm AS 6
- Wellington Solar Farm AS 7
- Wellington Solar Farm AS 10.

It was reported that due to both the availability of the Registered Aboriginal Parties (RAP) and a series of Total Fire Bans being in place, the salvaged items have not yet been relocated back on site, as the final placement will involve a smoking ceremony. At the time of the audit site inspection, LSBP was in the process of scheduling the relocation with the RAPs and NGH, with the aim to have it completed in March 2020. AHIMS site cards had not yet been finalised for the locations.

The test excavations and salvage of PAD1 and PAD2 was completed over eight days from 25 September to 2 October 2019. It was reported that NGH has been delayed in finalising their report for this salvage operation. A draft report was provided to the auditor during the audit.

One unexpected find was discovered on 13 February 2020. The item was immediately delineated with a 20 m exclusion zone (observed during audit site inspection). NGH Environmental Heritage Consultant was notified and attended site on 21 February 2020 to record and salvage the artefact. It was advised that this artefact would be relocated with the other stone artefacts.

Based on the above, and on the basis of the management of the unexpected find, including initial identification, cease work and reporting, the project is considered consistent with the predicated impacts identified by the EIS.

3.7.3 Visual Impacts

NGH Environmental completed a Visual Impact Assessment (VIA) to provide an assessment of the visual impacts associated with the project. The results of the VIA are summarised within the EIS.

Predicted Impacts

The following provides a high level summary the of predicated visual impacts outlined in Section 7.3.3 of the EIS:

- No high impact view locations were identified for the project;
- Four medium impact view locations were identified that required mitigation (vegetative screening);
- Further investigation required for five specific residential receivers (R1, R2, R3, R4 and R8); and
- Five low visual impact view locations, with no mitigation required.

Actual Impacts

As described in section 3.5.8 above, a Landscaping Plan (LP) has been prepared for the project to address visual impacts of the project. There was no implementation of the LP at the time of this audit due to the early stage of project works. It was reported that planting of the vegetative screens was to commence in the near term. No complaints had been received on the project at the time of the audit.

3.7.4 Noise Impacts

Renzo Tonin and Associates undertook a construction and operational noise and vibration assessment (CONVA) to provide an assessment of the noise and vibration impacts associated with the project. The results of the CONVA are summarised within the EIS.

Predicted Impacts

The following provides a high level summary the of predicated construction noise and vibration impacts outlined in Section 7.4.4 and 7.4.6 of the EIS:

- Construction noise management levels will be exceeded when the construction works are conducted at closest proximity to two receivers (R1 and R7);
- All receivers are predicted to be less than the highly noise affected level of 75dB(A);
- Structural damage due to vibration is not expected;
- The potential for adverse comment to vibration impacts was determined to be very low. No vibration mitigation measures are required; and
- Traffic noise levels would not adversely contribute to the existing traffic noise levels at the most affected residences along the surrounding roads and require no specific mitigation.

Actual Impacts:

Construction noise management measures are outlined within the Construction Environmental Management Plans. No noise or vibration monitoring is required for the project, except following a noise or vibration related complaint. There have been no specific noise or vibration related complaints within the audit period. The auditor did not identify any noise or vibration related issues during the audit site inspection. It is noted that potentially noisy works for sensitive receivers had not yet commenced at the time of this audit. Overall the project is considered to be consistent with the predicted noise and vibration impacts.

3.7.5 Historic heritage impacts

NGH completed a desktop study and site inspection to identify any historic heritage (Non-indigenous) items or places within the project site and surrounding landscape. The results of the investigation are summarised within the EIS.

Predicted Impacts

The following provides a high level summary the of predicated heritage impacts outlined in Section 7.5.7 of the EIS:

- One (1) heritage site is located within the proposal site: Narrawa Homestead; and
- It is proposed to use the Narrawa Homestead as the Operations and Maintenance (O&M) building for the solar farm.

Actual Impacts:

The auditor did not observe any damage or changes to existing plantings around the Narrawa Homestead and its driveway. The Narrawa Homestead is currently in use as a temporary site office, with no alterations observed. At the time of this audit LSBP were continuing to investigate the potential for repurposing the Narrawa Homestead for use as the O&M building for the solar farm. Detailed design has been undertaken for repurposing the Narrawa Homestead as the O&M Facility and a Statement of Heritage Impact was amended to take into account additional impacts required to facilitate the use of the Homestead as the O&M Facility. The Statement of Heritage Impact was finalised on 26 February 2020. LSBP has not yet demonstrated to the satisfaction of the Secretary that repurposing the Narrawa Homestead is not reasonable or feasible.

3.8 Outcomes of Audit Site Inspection

Two site inspections were undertaken on the project with the aim of assessing the effectiveness of environmental management measures on site. The first inspection focused on the solar farm works, whilst the second inspection focussed on work activities within the TransGrid Substation. The first and second inspection occurred 19 February and 20 February 2020 respectively.

The auditor was escorted by representatives of LSBP, S&W and/or TransGrid during the site inspections. The weather was dry and approximately 25°C both days, with light winds. Recent rains on site and

within in the broader region has resulted in increased groundcover and reduced potential for dust generation.

The site inspections consisted of a drive across the site using a light vehicle and also included walking to some specific Aboriginal heritage locations. The audit site inspection included assessment of all active work areas at the time of the audit, as well as aboriginal heritage sites and environmental protection zones.

Work activities observed included:

- Vegetation clearing within the approved project boundary;
- Civil works associated with landscape levelling;
- Delineation of environmental protection zones and Aboriginal heritage locations;
- Trenching works associated with the 11kV power line relocation;
- Boundary fence erection works;
- Main site compound establishment;
- Main site access establishment;
- Earthworks associated with establishing final ground level for the substation; and
- Formwork and materials placement with the substation footprint.

Photographs taken during the site inspection are included in Appendix E.

A summary of observations made during the audit are that:

- Water carts were observed in use for dust suppression across the site;
- Stockpiles observed on site were restricted in size, with no significantly high stockpiles observed;
- A good level of groundcover was observed across the site, predominately due to recent rains;
- Some weeds were observed on site and they may become visible in response to recent rainfall;
- Some erosion and sediment controls were observed on site, however implementation was not consistent with the requirements of the documented Erosion and Sediment Control Plan and did not appear consistent with the requirements of the Blue Book;
- Aboriginal heritage delineation fencing installed and observed during site inspection at relevant sites;
- Daily plant pre-start log-books were completed for a sample of plant observed;
- Compound parking area being established;
- Loading and unloading area being established within site compound; and
- Internal access roads remain as the original farm tracks and have not been upgraded to all weather access tracks.

Recommendations relating to the findings are included in the Audit Table and in Section 4.2 of this report.

3.9 Key Improvements

Not applicable – This is the first independent environmental audit.

3.10 Key Strengths

The auditor identified the following key strengths during the audit period:

- Consolidated environmental management plans that are concise and applicable to the project;
- Positive culture of environmental reporting, as demonstrated by the recent unexpected find of an Aboriginal heritage item; and
- Landholder consultation processes appear positive and productive.

4 Summary of Audit Non Compliances and Recommendations

The findings of the IEA compliance assessment of the Project Approval are presented in this section. The audit table included as Appendix A provides detailed compliance assessments, including verification evidence. The compliance assessment was based on visual observations of Project activities being undertaken on site during site inspections, interviews with site personnel and interpretation of the documentation provided to the auditor during the IEA.

Opinions expressed in the compliance assessment apply to the activities, as they existed at the time of the IEA and from information provided by site personnel. Variations to this information of which the auditor is not aware and did not have the opportunity to assess, have not been considered in the compliance assessment.

Non-compliant requirements identified during the audit are provided in Section 4.1 below. Refer to Appendix A for the complete audit findings and further context within regard to each condition of the Project Approval.

Auditor recommendations and opportunities for improvement identified during the audit are provided in Section 4.2.

4.1 Non-Compliances

The IEA compliance assessment determined that the following specific elements of the conditions or requirements have not been complied with within the scope of the audit: Project Approval SSD 8573 Mod 1.

Table 3: Non-compliances and Recommendations.

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
Project Approval SSD 8573			
WSF-IEA-2020 NC-01	MCoA S2.13 & Revised Mitigation Measure B11.	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	<p>Non-compliant NC1:</p> <p>Whilst plant appears to be operated in a proper and efficient manner, processes to ensure plant are maintained in a proper and efficient manner appear inconsistently implemented on site with the following issues identified:</p> <ul style="list-style-type: none"> ○ Plant Pre-mobilisation Checklist records were inconsistently completed and not available for half of the items of plant sampled; ○ Plant register not maintained; and ○ Plant weed hygiene forms not available for 2 of 5 items of plant sampled. <p>Auditor Recommendation: Implement measures outlined in the CEMP for management of plant and equipment, including but not limited to weed hygiene declarations, plant pre-mobilisation checklist and plant register.</p>

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
WSF-IEA-2020 NC-02	McoA S3.2	The Applicant must keep accurate records of the number of heavy vehicles entering or leaving the site each day.	<p>Non-compliant NC2: There is limited evidence available with regard to accurate records of heavy vehicles entering or leaving the site each day.</p> <p>Auditor recommendation: Vehicle tracking register to be established, implemented and maintained to address this requirement. Site Delivery Driver Logs to be maintained to assist with capturing records of heavy vehicle movements each day.</p>
WSF-IEA-2020 NC-03	McoA S3.5 & Revised Mitigation Measure W5.	The Applicant must ensure: (a) the internal project site roadways are constructed as all-weather roadways (b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; (c) the capacity of the existing roadside drainage network is not reduced; (d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) vehicles leaving the site are in a clean condition and do not result in dirt being tracked onto the public road network.	<p>Non-complaint NC3: Internal roadways have not yet been constructed as all-weather roadways.</p> <p>Auditor recommendation: The applicant must construct the internal project site roadways as all-weather roadways. Additionally, install wheel wash facilities as specified within the Biodiversity Management Plan (Section 7.6).</p>
WSF-IEA-2020 NC-04	McoA S3.11	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> - protecting vegetation and fauna habitat outside the approved disturbance areas; - maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and <p>(b) include a seasonally based program to monitor and report on the effectiveness of these measures; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biobanking Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.</p>	<p>Non-Compliant NC4: During the site inspection, the following non-conformities were identified against the requirements of the plan:</p> <ul style="list-style-type: none"> ○ Section 7.1 of the LP: A ground disturbance permit process has not been implemented for works that have occurred within Management Zones 1 and 2; ○ Section 7.2 and 10.3 of the LP: The cumulative amount of vegetation cleared has not been progressively monitored; ○ Section 7.2.2 and 10.3 of the LP: Pre-clearing surveys to identify habitat trees was not completed prior to clearing vegetation on site; and ○ Section 7.2.6 of the LP: Hollow-bearing tree removal procedure was not implemented. <p>Auditor Recommendation: Calculate and record the cumulative amount of vegetation cleared to ensure the Project is within approved limits.</p> <p>Implement all requirements of the BMP for any future pre-clearing and clearing surveys to identify habitat trees, ground disturbance permit and hollow-bearing tree removal procedure as applicable.</p>

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
WSF-IEA-2020 NC-05	McoA S3.22 & Revised Mitigation Measure S2 and W8.	<p>The Applicant must:</p> <p>(a) 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) ensure the solar panels and associated infrastructure are designed, constructed and maintained to avoid causing any erosion on site;</p> <p>(c) ensure all works (including waterway crossings) are conducted in accordance with the:</p> <ul style="list-style-type: none"> - <i>Guidelines for Controlled Activities on Waterfront Land</i> (2012), or its latest version; and - <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (2004), or its latest version. 	<p>Non-compliance – NC 5</p> <p>Whilst an overarching Erosion and Sediment Control Plan has been established for the project, at the time of the audit site inspection there was limited evidence to support implementation compliance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) (The Blue Book).</p> <p>Issues identified on site include:</p> <ul style="list-style-type: none"> • It was not evident that controls as defined in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) had been installed consistently across the site; • Ground disturbance activities were occurring without downstream erosion and sediment controls; • Limited proactive drainage measures installed to direct water off internal access roads to prevent scouring; and • Part of the cleared area at the site access point appeared to drain without controls into a “clean water” diversion drain. <p>Auditor Recommendation:</p> <p>Install and maintain adequate erosion and sediment controls across the site in accordance with the requirements of the Managing Urban Stormwater: Soils and Construction Manual (Landcom, 2004) to manage erosion and sediment risks.</p>

4.2 Recommendations and Opportunities for improvement

Auditor identified recommendations where conditions were assessed as compliant with identified opportunities for continuous improvements.

Table 4: Opportunities for Improvement and Recommendations

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
WSF-IEA-2020 AR1	McoA S3.6	<p>Prior to the commencement of any road upgrades required under this consent, the Applicant must prepare a Traffic Management Plan for the development in consultation with the RMS and Council, and to the satisfaction of the Secretary. The plan must include:</p> <ul style="list-style-type: none"> (a) details of the transport route to be used for development-related traffic; (b) details of the measures that would be implemented to minimise traffic safety issues and disruption to users of Goolma Road during construction, upgrading or decommissioning works, including: - performance criteria, measures and indicators for shuttle bus utilisation and car-pooling in accordance with the commitments in the EIS; - temporary traffic controls, including detours and signage; - notifying the local community about project-related traffic impacts; - procedures for receiving and addressing complaints from the community about development-related traffic; - minimising potential for conflict with school buses, rail services and other motorists as far as practicable; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; - responding to any emergency repair or maintenance requirements; and - a traffic management system for managing over-dimensional vehicles; and <p>(c) a driver's code of conduct that addresses:</p> <ul style="list-style-type: none"> - travelling speeds; - driver fatigue; - procedures to ensure that drivers adhere to the designated transport routes; and - procedures to ensure that drivers implement safe driving practices; and <p>(d) a flood response plan detailing procedures and options for safe access to the site in the event of flooding.</p> <p>Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>	<p>Auditor Recommendation 1: Continue to implement the approved TMP (Version 2.0) until such time that the Secretary endorses the revised TMP. Remove TMP Version 2.1 from website until approved.</p>
WSF-IEA-2020 AR2			<p>Auditor recommendation: Whilst a Driver's Code of Conduct has been prepared, there was limited evidence of it being communicated to drivers. It is recommended that the Drivers Code of Conduct be provided to and signed off by drivers during their site induction.</p>
WSF-IEA-2020 AR3			<p>Auditor recommendation: The posted onsite speed limit of 40km/h contradicts the 20km/h limit nominated in the TMP. Controls listed in the approved TMP are required to be implemented.</p>

WSF-IEA-2020 AR4	McoA S3.8	<p>Prior to the commencement of construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with RMS, Council and surrounding landowners, to the satisfaction of the Secretary. The plan must include:</p> <ul style="list-style-type: none"> (a) a description of measures that would be implemented to ensure that the vegetated buffer achieves the objectives of condition 7 (a) – (c); (b) include a program to monitor and report on the effectiveness of these measures; and (c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. <p>Following the Secretary's approval, the Applicant must implement the Landscaping Plan.</p>	<p>It appears that NGH Environmental have updated the version numbering of the LP immediately following approval of the Secretary, i.e. the submitted and approved LP Version 2.3 became a final version 2.4 for issue after approval.</p> <p>Auditor Recommendation: The version numbers for subsequent versions of all project management plans remain unchanged from the time of approval to ensure only approved plans are subject to implementation on site.</p>
WSF-IEA-2020 AR5	McoA S3.11	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> - protecting vegetation and fauna habitat outside the approved disturbance areas; - maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and (b) include a seasonally based program to monitor and report on the effectiveness of these measures; and (c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. <p>Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biobanking Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.</p>	<p>Auditor Recommendation: Undertake weed management and inspections as per Section 7.5.1 of the BMP, including a survey of weed distribution across the project site.</p>
WSF-IEA-2020 AR6	McoA S4.3	<p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>...</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan</p>	<p>Auditor Recommendation: LSBP seek agreement of the Secretary to prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p>

		<p>or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> - While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. - If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 	
WSF-IEA-2020 AR7	S&W CEMP	Auditor review of adequacy.	Auditor Recommendation: S&W's project team to thoroughly read and understand the implementation requirements of the CEMP and associated project environmental management plans to ensure ongoing implementation compliance, in particular the on ground process and timing to adequately undertake all specified controls detailed in the management plans.
WSF-IEA-2020 AR8	Soil, Water and Stormwater Management Plan	Auditor review of adequacy.	Auditor Recommendation: Provide further detail in the Section 8.3 of the Soil, Water and Stormwater Management Plan as to what records will be maintained (if any) as evidence of monitoring and inspection processes.

5 Conclusion

The audit of the Wellington Solar Farm against the criteria in Section 1.2 demonstrated that the site is generally compliant with their environmental management obligations under the Project Approval SSD 8573 Mod 1. The actual impacts of the project appear consistent with those predicted in the Environmental Impact Statement.

This audit identified:

- Five non-compliances against the five conditions of Project Approval; and
- Eight auditor recommendations for continual improvement.

J2M Systems have recommended actions to address each of the non-conformance and opportunities for improvement identified. These actions are summarised in Section 4 of this Audit Report.

Note: There were no fundamental changes made to this report following the issue of the draft audit report to Lightsource BP.

Limitations

The findings of this audit are based upon visual observations of the site, interviews with site personnel and our interpretation of documentation made available by Project personnel. Opinions presented herein apply to the site as observed at the times of the inspections and from the Auditors interpretation of documentation and information provided by Project personnel. Any changes to this information of which the Auditor is not aware and has not had the opportunity to evaluate therefore cannot be considered in this report.

J2M Systems have taken due care to consider all reasonably available information provided during the undertaking of this audit and have taken this information to represent a fair and reasonable characterisation of the environmental status of the site, but recognise that any site assessment program is necessarily limited in scope and true site conditions may differ from those inferred from the available data.

Appendices

The following appendixes are attached to this document:

- Appendix A: Independent Audit Table
- Appendix B: Planning Secretary Audit Team Agreement
- Appendix C: Consultation
- Appendix D: Independent Audit Declaration Form
- Appendix E Site Inspection Photographs.



Appendix A: Independent Audit Table

Appendix A: Independent Audit Table

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
Schedule 2				
MCoA S2.1	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.	Refer to evidence collected throughout this audit table. Discussions with LSBP Principal Environmental Planner. Discussions with LSBP Project Manager Discussions with LSBP Site Manager	Based on the development and overall implementation of the project environmental management plans and on the basis that no material harm incidents have occurred, the project is considered compliant with the requirements of this condition, with the exception of the non-compliances identified by this audit.	Compliant
MCoA S2.2	The Applicant must carry out the development:	Refer to evidence collected throughout this Audit Table. Site inspection undertaken 19-21 February 2020.	With exception to the non-conformances and auditor recommendations identified by this audit, works were generally considered to be compliant with the EIS and conditions of consent.	Compliant
	(a) generally in accordance with the EIS; and	a) This checklist includes an assessment of compliance against the mitigation measures proposed in the EIS.	The audit table identifies the specific non-compliant findings identified against the individual condition of consent and against the mitigation measures outlined in the IEA.	
	(b) in accordance with the conditions of this consent.	b) This checklist includes an assessment of compliance against the each condition of consent.		
MCoA S2.3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	The auditor did not identify any inconsistency during the audit and no inconsistencies were reported to the auditor during interviews with the Project team.	No inconsistency identified or reported.	Not triggered.
MCoA S2.4	The Applicant must comply with any requirements of the Secretary arising from the Department's assessment of:	Evidence of consultation with the Department regarding development of the management plans is included as an appendix to the individual management plans.	No outstanding actions were identified during the audit. Project management plans have been revised, resubmitted and approved for the three modifications of the Project Approval.	Compliant.
	(a) any strategies, plans or correspondence that are submitted in accordance with this consent;	Correspondence between NSW DPIE and LSBP, dated 17 Jan 2020, regarding the relocated site access location and requesting LSBP to provide information and records.		
	(b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and	Correspondence between NSW DPIE and LSBP, dated 23 Jan 2020, confirming evidence provided was sufficient		
	(c) the implementation of any actions or measures contained in these documents.			

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Independent Audit Findings and Recommendations		Compliance Status
Approval ID	Requirement	Evidence Collected		
		and no further action is required.		
		Correspondence between NSW DPIE and LSBP, dated 11 Feb 2020 regarding action items following NSW DPIE site inspection.		
		Correspondence between LSBP and NSW DPIE dated 14 Feb 2020 providing response to site inspection enquiries.		
MCoA S2.5	Prior to the commencement of construction, the Applicant must submit detailed plans of the final layout of the development to the Secretary, including details on the siting of solar panels and ancillary infrastructure. Note: if the construction of the development is to be staged, then the provision of these plans may be staged.	LSBP correspondence (letter) dated 02 Dec 2019 to NSW DPIE regarding notice of commencement and issue of final layout plans. Letter attachment: Drawing - SWLB-LSBP-AUS-170MW-E-DWG-OAARL-204-RF OVERALL ARRAY LAYOUT .	LSBP provided final layout plans two days prior to commencement of construction. Layout plans included details on the siting of solar panels and ancillary infrastructure for works under Mod 1 and proposed Mod 2. Note: Operations, upgrading or decommissioning works have not been undertaken at the time of this audit, and construction work is current and ongoing at the time of this audit. As such, the requirements relating to these phases have not yet been triggered.	Compliant.
MCoA S2.6	Over time, the Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.	N/A	Construction commenced 04 December 2019 and as such the requirements of this condition had not been triggered at the time of this audit.	Not triggered.
MCoA S2.7	Prior to the commencement of operations or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development to the Department.	N/A	Construction commenced 04 December 2019 and as such the requirements of this condition had not been triggered at the time of this audit.	Not triggered.
MCoA S2.8	The Applicant may only construct the purpose-built operation and maintenance facility (OAM building) on the site if it has demonstrated to the satisfaction of the Secretary that repurposing the Narrawa Homestead is not reasonable or feasible. In seeking this approval, the Applicant must: (a) justify why it is not reasonable or feasible to repurpose the	Discussions with LSBP Principal Environmental Planner. Discussions with LSBP Project Manager. Discussions with LSBP Site Manager. Narrawa Homestead addendum Statement of Heritage Impact, NGH Environmental, 26 Feb 2020. MCR Equipment Layout (14/02/2020) with plans for the O&M Facility.	At the time of this audit the OAM building had not been constructed. LSBP were continuing to investigate the potential for repurposing the Narrawa Homestead. Detailed design has been undertaken for repurposing the Narrawa Homestead as the O&M Facility.	Not triggered.

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	Narrawa Homestead; (b) provide a detailed final layout plan for the operation and maintenance facility location on the site; and (c) demonstrate that construction and operation of the operation and maintenance facility location would not adversely affect the heritage values of the Narrawa Homestead.	repurposing of the homestead. Drawing no. SWLB-LSBP-AUS-170MW-E-DWG-MCREL-213.	The Statement of Heritage Impact was amended to take account additional impacts required to facilitate the use of the Homestead as the O&M Facility. This was only finalised on 26 February 2020. The requirements of this condition had not been triggered at the time of this audit.	Compliant.
MCoA S2.9	Prior to the commencement of construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	LSBP correspondence (letter) dated 02 Dec 2019 to NSW DPIE regarding notice of commencement and issue of final layout plans. Letter attachment: Drawing - SWLB-LSBP-AUS-170MW-E-DWG-OAARL-204-RF OVERALL ARRAY LAYOUT .	LSBP notified the department two days prior to commencement of construction. Note: Operations, upgrading or decommissioning works have not been undertaken at the time of this audit, and construction work is current and ongoing at the time of this audit. As such, the requirements relating to these phases had not yet been triggered.	Compliant.
MCoA S2.10	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 <i>Building Code of Australia</i> .	Discussions with LSBP Principal Environmental Planner. Discussions with LSBP Project Manager. Discussions with LSBP Site Manager.	It was reported than no construction certificates have been obtained to date. LSBP reported that where construction certificates and compliance with BCAs is required, such as redevelopment of the Narrawa homestead, the necessary certification will be sought through the contracted registered builder, upon finalisation of scope.	Not triggered.
MCoA S2.11	The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	N/A	No demolition works under taken on site. Planning for demolition of the abattoir. A contractor has been engaged now works have been undertaken.	Not triggered.
MCoA S2.12	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any	Site inspection undertaken 19-21 February 2020. S&W Incident investigation report, dated 30 Jan 2020 relating to a telecommunication cable being struck during works associated with drilling fence post holes	An 11kV transmission line is being relocated as part of the project works. With regard to the S&W Incident investigation report, it was reported within	Compliant.

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	public infrastructure that needs to be relocated as a result of the development. The condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.	along the Goolima Rd Boundary line.	the report that 'the Telecommunication service provider was contacted and inspected the telecommunication cable on the 29th January 2020. The service provider advised repairs will take place at a later time as it a non-essential service line. There were no reports of any telecommunication disruption in the area by the service provider'. LSBP reported that all costs relating to repair of the Telstra line to be borne by S&W.
MCoA S2.13	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Site inspection 19 – 21 February 2020. A section of plant observed on site during audit site inspection was sampled to assess compliance with this condition, with the following evidence obtained to demonstrate plant and equipment being maintained: <u>Solar Farm:</u> Roller APH0187 Rego 92663-D <ul style="list-style-type: none"> ○ Record of weed hygiene declaration ○ Service history available. <p>* Earth moving Plant Pre-mobilisation Checklist not completed.</p>	Non-compliant NC1: <p>Whilst plant appears to be operated in a proper and efficient manner, processes to ensure plant are maintained in a proper and efficient manner appear inconsistently implemented on site with the following issues identified:</p> <ul style="list-style-type: none"> ○ Plant Pre-mobilisation Checklist records were inconsistently completed and not available for half of the items of plant sampled. ○ Plant register not maintained ○ Plant weed hygiene forms not available for 2 of 5 items of plant sampled. <p>Auditor Recommendation: Implement measures outlined in the CEMP for management of plant and equipment, including but not limited to weed hygiene</p>

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			<ul style="list-style-type: none"> ○ Plant pre-mobilisation checklist, 19/01/2020. ○ Plant service record, last maintained 22/01/2020. ○ Plant risk assessment. <p>*** Record of weed hygiene declaration not available upon request.</p> <p>CAT Excavator 312D.</p> <ul style="list-style-type: none"> ○ Maintenance record last completed 12/01/2020. <p>*** Pre-mobilisation checklist not available upon request.</p> <p>*** Record of weed hygiene declaration not available upon request.</p> <p>Water Cart WE001.</p> <ul style="list-style-type: none"> ○ Record of weed hygiene declaration 14/01/2020 ○ Service history 12/01/2020 and service 19/12/2019. ○ Pre-mobilisation checklist 14/01/2020. <p>A section of plant operators observed on site during audit site inspection was sampled to assess compliance with this condition, with the following evidence obtained:</p> <p>Excavator operator B.Fischer: Site induction record #69, white card maintained, worker competency evaluation form completed.</p> <p>Water cart and roller operator S.Bennett: induction record, VOC for water cart, roller and excavator, white card and HR-R Drivers Licence.</p> <p>Roller operator D.Baxter: induction record, VOC (22 Jan 2020); White Card.</p>		

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Approval ID	Requirement	Evidence Collected		
		<p>Substation:</p> <ul style="list-style-type: none"> - Mobile Plant management Form, 14t Komatsu (last serviced 15/02/2020), Licences/VOC sighted at induction). - Mobile plant management form, tip truck. Old Bawn service report last service 15/01/2020, plant risk assessment. 		
MCoA S3.1	Schedule 3	<p>The Applicant must ensure that the:</p> <p>(a) development does not generate more than:</p> <ul style="list-style-type: none"> - 100 heavy vehicle movements a day during construction, upgrading or decommissioning; and - 5 heavy vehicle movement a day during operations; and - 2 over-dimensional vehicle movements during construction, upgrading or decommissioning; <p>(b) length of any heavy vehicles used for the development does not exceed 25 metres, unless the Secretary agrees otherwise.</p>	<p>The Security Office at the site access point has responsibility for recording all heavy vehicle movements using the Site Delivery Driver Log. This process was only recently implemented on site.</p> <p>It was reported that vehicle movements have not exceeded the requirements set out by this condition.</p> <p>Given the limited work activity to date the auditor is of the opinion that the limits, i.e. not more than 100 heavy vehicle movements per day during construction, would likely not have been exceeded.</p>	Compliant.

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
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MCoA S3.2	The Applicant must keep accurate records of the number of heavy vehicles entering or leaving the site each day.	Discussion with LSBP HSE Manager. Discussion with S&W Site Manager. Site Delivery Driver Log.	Non-compliant NC2: There is limited evidence available with regard to accurate records of heavy vehicles entering or leaving the site each day. Auditor recommendation: Vehicle tracking register to be established, implemented and maintained to address this requirement. Site Delivery Driver Logs to be maintained to assist with capturing records of heavy vehicle movements each day.	No over-dimensional vehicle movements were reported. It was reported that the length of all heavy vehicles used to date on the project have not exceeded 25 metres.
MCoA S3.3	All vehicular traffic associated with the development must travel to and from the project site via the Mitchell Highway, Goolma Road and the approved site access point (shown in Appendix 1 of Conditions of Consent)	Site inspection undertaken 19-21 February 2020. ○ Site access point located on Goolma Road. Correspondence between NSW DPIE and LSBP, dated 17 Jan 2020, regarding the relocated site access location and requesting LSBP to provide information and records. Correspondence between NSW DPIE and LSBP, dated 23 Jan 2020, confirming evidence provided was sufficient and no further action is required.	NSW DPIE reviewed information and records provided by LSBP with regard to the construction and re-location of the site access point. NSW DPIE concluded that the location of the constructed site access point is compliant with the requirements of this condition. All access to site is via the approved site access point. All other access points are blocked with perimeter fencing.	Complaint.
MCoA S3.4	Prior to the commencement of construction, unless RMS agrees otherwise, the Applicant must upgrade the intersection of Goolma Road and the site access point with a Basic Right Turn (BAR) and Basic Left Turn (BAL) treatment in accordance with the <i>Austroads Guide to Road Design</i> (as amended by RMS supplements), design and constructed for a 100km/h speed zone and able to accommodate the largest vehicle accessing the intersection, to the satisfaction of RMS.	Drawing: First Solar – Construction of the Wellington Solar Farm Intersection Main Road 633 Goolma Road, accepted for construction by RMS. Correspondence from TfNSW, undated, regarding practical completion for the upgrade works. Correspondence between S&W and RMS dated,	Practical completion for the upgrade works was achieved on 10 Dec 2019, which is six days after commencement of construction. RMS approved the early commencement of site works via email correspondence 6 weeks prior to practical completion.	Compliant.

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Independent Audit Findings and Recommendations		Compliance Status
Approval ID	Requirement	Evidence Collected		
MCoA S3.5	The Applicant must ensure: (a) the internal project site roadways are constructed as all-weather roadways (b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; (c) the capacity of the existing roadside drainage network is not reduced; (d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) vehicles leaving the site are in a clean condition and do not result in dirt being tracked onto the public road network.	Site inspection undertaken 19-21 February 2020. a) No new roadways have been construction on site, however current roadways are not considered to be all-weather. b) Sufficient parking areas were available for the number of contractors currently on site. New parking areas are currently under construction. c) The capacity of the existing roadside drainage network did not appear reduced; d) This practice was observed during the audit site inspection. e) This practice was observed during the audit site inspection. Rumble grid installed. Sighted: Road layout and cross section details (RLCSD-302), including specifications for sealing for sub-course and base course, prepared by RobertBirdGroup.	Non-complaint NC3: Internal roadways have not yet been constructed as all-weather roadways. Auditor recommendation: The applicant must construct the internal project site roadways as all-weather roadways. Additionally, install wheel wash facilities as nominated within the Biodiversity Management Plan (Section 7.6).	Non-compliant.
MCoA S3.6	Prior to the commencement of any road upgrades required under this consent, the Applicant must prepare a Traffic Management Plan for the development in consultation with the RMS and Council, and to the satisfaction of the Secretary. The plan must include: (a) details of the transport route to be used for development-related traffic; (b) details of the measures that would be implemented to minimise traffic safety issues and disruption to users of Goolma Road during construction, upgrading or decommissioning works, including: - performance criteria, measures and indicators for shuttle bus utilisation and car-pooling in accordance with the commitments in the EIS; - temporary traffic controls, including detours and signage; - notifying the local community about project-related traffic impacts; - procedures for receiving and addressing complaints from the community about development-related traffic;	Traffic Management Plan, Version 2.0, dated 30/07/2019, prepared by NGH Environmental Pty Ltd. Correspondence from NSW DPIE, dated 13 Aug 2019 endorsing the Traffic Management Plan. Traffic Management Plan, Version 2.1 dated 30 Sept 2019, prepared by NGH Environmental Pty Ltd. Commencement of road upgrades, correspondence S&W to LSBP, dated 24 October 2019, regarding commence of road upgrades under Condition 6., commencing 28 Oct 2019. Approval from RMS for commencement of road upgrades - Correspondence dated 24 October 2019. Correspondence with Transport for NSW Development Assessment Officer regarding performance of Wellington	The Traffic Management Plan (TMP) Version 2.0 was submitted to and approved by the Secretary 16 weeks prior to commencement of required road upgrades, in compliance with the requirement of this condition. Appendix B of the TMP provides a summary of Agency consultation including Council and RMS during the development of the plan. The Traffic Management Plan has since been reviewed and revised to Version 2.1 date 20 Sept 2019. This version has been submitted, but awaiting approval of, the Secretary. Auditor Recommendation 1: Continue to implement the approved TMP (Version 2.0) until such time that the Secretary endorses	Compliant.

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	<ul style="list-style-type: none"> - minimising potential for conflict with school buses, rail services and other motorists as far as practicable; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; - responding to any emergency repair or maintenance requirements; and - a traffic management system for managing over-dimensional vehicles; and (c) a driver's code of conduct that addresses: <ul style="list-style-type: none"> - travelling speeds; - driver fatigue; - procedures to ensure that drivers adhere to the designated transport routes; and - procedures to ensure that drivers implement safe driving practices; and (d) a flood response plan detailing procedures and options for safe access to the site in the event of flooding. <p>Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>	<p>Solar Farm (email dated 02 March 2020).</p> <p>Observations during audit site inspection.</p> <p>Documentation:</p> <p>In relation to compliance with this condition:</p> <ul style="list-style-type: none"> a) TMP Section 4.2 outlines traffic routes for staff and TMP Section 4.3 outlines transport routes for materials and infrastructure. b) Management measures are outlined within the TMP as follows: - Section 8.3 provides performance criteria, measures and indicators for shuttle bus and car-pooling. - Section 6.1 sets out requirements for specific traffic control plans to be developed relevant to activities which could impact on public roads and traffic. - Section 6.8 outlines community engagement activities. - Section 8.6 Complaints Reporting is linked to the Complaints Procedure within the EMS and the Community Consultation Plan. - Section 4, 5 and 6 outlines details on minimising potential conflict with school buses, services and other motorists. - Section 4.6 outlines traffic timing and platooning requirements. - Section 6.6 provides details on road conditions, including fog, dust, rain, speed and flooding. - Section 6.4 sets out maintenance and emergency repair requirements. Section 8.3 includes monitoring and inspection 	<p>the revised TMP. Remove TMP Version 2.1 from website until approved.</p>	

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
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			<p>requirements to identify maintenance issues.</p> <ul style="list-style-type: none"> - Section 6.5 outlines strategies to address driver fatigue, and is supported by the 'Drivers' Code of Conduct'. - Section 4.5 sets out details on vehicle sizes. No over-dimensional vehicles, without Secretary approval. c) TMP Appendix E provides for a Drivers Code of Conduct, which addresses the requirements of this condition including obligations for: <ul style="list-style-type: none"> - Speed restrictions. - Safe driving practices (regular breaks); - Designated routes and - Penalties and Disciplinary action. d) TMP Section 6.6 Road Conditions includes details on flood management and response. <p>Implementation:</p> <p>All construction vehicles were observed entering and exiting the project site from the approved site entry point and in a forward direction.</p> <p>The Goolma Road intersection upgrade is complete.</p> <p>Auditor recommendation: Whilst a Driver's Code of Conduct has been prepared, there was limited evidence of it being communicated to drivers. It is recommended that the Drivers Code of Conduct be provided to and signed off by drivers during their site induction.</p>	

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
MCoA S3.7	The Applicant must establish and maintain a mature vegetation buffer (landscape screening) at the locations outlined in the figure in Appendix 1 of the Conditions of Consent to the satisfaction of the Secretary. This vegetation buffer must:	<p>Landscape Plan (LP), version 2.4 dated 03 October 2019, prepared by NGH Environmental.</p> <p>Site inspection observations:</p> <ul style="list-style-type: none"> Not triggered, no planting. 	<p>LP Section 6 addresses this requirement for landscape screening and is supported by details outlined in Appendix C of the LP.</p> <p>The project is in the early phase of construction and the requirements of this clause had not yet been triggered as no planted had commenced.</p>	Not triggered.
MCoA S3.8	<p>The Applicant must establish and maintain a mature vegetation buffer (landscape screening) at the locations outlined in the figure in Appendix 1 of the Conditions of Consent to the satisfaction of the Secretary. This vegetation buffer must:</p> <p>(a) consist of a variety of vegetation species that are endemic to the area;</p> <p>(b) within 3 years of the commencement of construction be effective at screening view of the solar panels and ancillary infrastructure (excluding the overhead power lines) on site from surrounding residences; and</p> <p>(c) be properly maintained with appropriate weed management, unless the Secretary agrees otherwise.</p>	<p>Prior to the commencement of construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with RMS, Council and surrounding landowners, to the satisfaction of the Secretary. The plan must include:</p> <p>(a) a description of measures that would be implemented to ensure that the vegetated buffer achieves the objectives of condition 7 (a) - (c);</p> <p>(b) include a program to monitor and report on the effectiveness of these measures; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following the Secretary's approval, the Applicant must implement the Landscaping Plan.</p>	<p>Landscaping Plan (LP), version 2.4 dated 03 Oct 2019, prepared by NGH Environmental.</p> <p>NSW DPIE correspondence dated 02 October 2019 approving the Landscaping Plan (Version 2.3, dated 30 Sept 2019).</p> <p>Discussion regarding Version 2.3 and Final 2.4.</p> <p>Landscaping Plan (LP), version 2.5 dated 19 December 2019, prepared by NGH Environmental.</p> <p>NSW DPIE correspondence dated 20 Dec 2019 approving the Landscaping Plan (Version 2.5, dated 19 Dec 2019).</p> <p>Site inspection observations:</p> <ul style="list-style-type: none"> No implementation on site. 	<p>A Landscaping Plan was prepared, submitted to, and approved by the Secretary 2 months prior to commencement of construction.</p> <p>The plan was prepared in consultation with relevant agencies and evidence is provided within Appendix D of the Landscaping Plan.</p> <p>The Landscaping plan has been subsequently updated to address SSD 8573 Mod 1 requirements. The revised plan has been submitted to and approved by the Secretary.</p> <p>Auditor Recommendation:</p> <p>It appears that NGH Environmental have updated the version numbering of the LP immediately following approval of the Secretary. I.e. the submitted and approved LP Version 2.3 became a final version 2.4 for issue after approval. It is recommended that the version numbers for subsequent versions of all project management plans remain unchanged from the time of approval to ensure only approved plans are subject to implementation on site.</p> <p>Documentation:</p>

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		In relation to compliance with this condition:	<p>a) Section 6 provides landscape management protocol, including perimeter plantings, whilst Appendix C provides detailed specification for this planting.</p> <p>b) Appendix C.4.3 sets out proposed monitoring and maintenance methods for the plantings, whilst section 7.7 includes proposed reporting requirements.</p> <p>c) Section 7.1 and Table 7-1 outlines responsibilities relevant to the management, and is supported by details in Appendix B.3, Appendix C.4.1, C.4.2 and C.4.5.</p> <p>Implementation: There was no implementation of the Landscape Plan at the time of this audit due to the stage of project works. It was reported that planting of the vegetative screens was to commence in the near term.</p>	
MCoA S3.9	Following any construction or upgrading on site, the Applicant must:	N/A	Construction commenced 04 December 2019 and as such the requirements of this condition had not yet been triggered at the time of this audit.	Not triggered.
MCoA S3.10	Within two years of commencing development under this consent, unless otherwise agreed by the Secretary, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below to the satisfaction of BCD.	N/A	The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can	Not triggered.

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	<p>be achieved by:</p> <ul style="list-style-type: none"> (a) acquiring or retiring 'biodiversity credits' within the meaning of the BC Act; (b) making payments into an offset fund that has been developed by the NSW Government; or (c) providing supplementary measures. 			
MCoAS3.11	<p>Table 1: Ecosystem Credit Requirements</p> <p>Vegetation Community: White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion</p> <p>PCT ID: 266</p> <p>Credits Required under the TSC Act: 3</p> <p>Credits Required under the BC Act: 1</p> <p>Table 2: Species Credit Requirements</p> <p>Species Credit Species: Pink-tailed Legless Lizard (<i>Aprasia parapulchella</i>)</p> <p>Credits Required under the BC Act: 2</p> <p>Note: Following repeal of the TSC Act on 25 August 2017, credits created under that Act are taken to be 'biodiversity credits' under the BC Act by virtue of clause 22 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.</p> <p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> - protecting vegetation and fauna habitat outside the approved disturbance areas; - maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and (b) include a seasonally based program to monitor and report on the effectiveness of these measures; and (c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. <p>Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p>	<p>Biodiversity Management Plan (BMP) Version 3.1 was submitted to and approved by the Secretary 7 weeks prior to commencement of construction, in compliance with the requirement of this condition.</p> <p>The BMP has since been revised, and approved by the Secretary, to address SSD 8573 Mod 1 requirements (Version 3.3).</p> <p>Appendix D of the BMP provides a summary of Agency consultation received from NSW DPIE during the development of the plan.</p> <p>The BMP appears current and applicable to the project.</p> <p>Site inspection observations, including implementation</p>	<p>Non-Compliant.</p>	

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1	Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>Note: If the biodiversity credits are retired via a Biobanking Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.</p>	<p>of the following controls:</p> <ul style="list-style-type: none"> • Establishment of exclusion zones are established, including a 40m exclusion zone around riparian vegetation along Wuuluman Creek. • Survey used to identify clearing areas. • Existing native vegetation appears to have been retained as much as possible. • Fallen vegetation retained for vegetative reuse as coarse woody debris. • Top soil separated and stockpiled for beneficial reuse. <p>Relocation of vegetation: Correspondence (email) dated 12/02 Lightsource BP and S&W discussing placement of coarse woody debris (>200mm) within the habitat exclusion zones.</p>	<p>Documentation:</p> <p>a) BMP Section 7 provides environmental management protocols and procedures, including:</p> <ul style="list-style-type: none"> - Section 7.1 Ground disturbance protocol and Section 7.1 Vegetation Clearance Procedure. - Section 7.3 Re-use of resources, including procedures for re-use of coarse woody debris, rocks and soil resources. <p>b) BMP Section 10.3 Monitoring and Inspection provides for pre-clearing surveys, vegetation clearing monitoring, fauna records and groundcover (rehabilitation) monitoring.</p> <p>c) BMP Section 10.1 outlines relevant roles and responsibilities, whilst section 10.3 includes requirements, timing and responsibilities for monitoring and inspection actions.</p> <p>Implementation:</p> <p>Vegetation clearing limits and project exclusion zones are established on site. Trees cleared for the project have been retained for beneficial re-use as coarse woody debris. It was reported that no weed treatment had occurred on the site to the date of the audit. The auditor is not an expert at weed identification. No weed infestation areas were reported to the auditor. Whilst the auditor did not observe the nominated weeds, African Boxthorn or Blue Heliotrope, it should be noted that weeds may have</p>	

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
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			<p>been suppressed by long-term drought conditions and that weeds may become more prevalent following recent rain events.</p> <p>Auditor Recommendation: Undertake weed management and inspections as per Section 7.5.1 of the BMP, including a survey of weed distribution across the project site.</p> <p>Non-Compliant NC4:</p> <p>During the site inspection, the following non-conformities were identified against the requirements of the plan:</p> <ul style="list-style-type: none"> ○ Section 7.1 of the LP: A ground disturbance permit process has not been implemented for works that have occurred within Management Zones 1 and 2. ○ Section 7.2 and 10.3 of the LP: The cumulative amount of vegetation cleared has not been progressively monitored. ○ Section 7.2.2 and 10.3 of the LP: Pre-clearing surveys to identify habitat trees was not completed prior to clearing vegetation on site. ○ Section 7.2.6 of the LP: Hollow-bearing tree removal procedure not implemented. <p>Auditor Recommendation:</p> <p>Calculate and record the cumulative amount of vegetation cleared and ensure the project is within approved limits.</p> <p>Implement all requirements of the BMP for any future clearing, pre-clearing surveys to identify habitat trees, ground disturbance</p>	

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
MCoA S3.12	Unless the Secretary agrees otherwise, the Applicant may only undertake construction, upgrading or decommissioning activities on site between: (a) 7am to 6pm Monday to Friday; (b) 8am to 1pm Saturdays; and (c) at no time no Sundays and NSW public holidays. The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary: - activities that are inaudible at non-associated receivers; - the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or - emergency work to avoid the loss of life, property and/or material harm to the environment.	Construction Environmental Management Plan (CEMP) Rev A, dated 06 Nov 2019, prepared by Sterling and Wilson. (a) - (c) Section 9.3 Noise Management. Discussion with Site Manager. Complaints Register. Observations during site inspection, including: <ul style="list-style-type: none">• Works within approved hours.	The CEMP outlines approved work hours. These are communicated during induction and within contracts with Purchase Orders. It was reported that no out of hours works had been undertaken on the project at the time of this audit. On the basis that no complaints have been reported or received, the project is generally considered complaint with the requirements of this condition.	Compliant.
MCoA S3.13	The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guidelines</i> (DECC, 2009), or its latest version.	Construction Environmental Management Plan (CEMP) Rev A, dated 06 Nov 2019, prepared by Sterling and Wilson, Section 9.3 Noise Management. No noise complaints. Observations during site inspection, including: <ul style="list-style-type: none">• Works within approved hours.• Works within approved site boundary.• Plant and equipment not in use turned off.	The CEMP outlines noise management measures and relevant mitigation measures that were observed implemented on site. On the basis that no complaints have been reported or received, the project is generally considered complaint with the requirements of this condition.	Compliant.
MCoA S3.14	The Applicant must minimise the dust generated by the development.	Construction Environmental Management Plan (CEMP) Rev A, dated 06 Nov 2019, prepared by Sterling and Wilson, Section 9.1 Air Quality and Emissions Management. Observations during site inspection, including: <ul style="list-style-type: none">• Water cart in operation.• Groundcover maintained where practical and possible.• 20-40km speed limit on site.	The CEMP outlines dust suppression measures that were observed implemented on site. On the basis that no complaints have been reported or received, the project is generally considered complaint with the requirements of this condition. At the time of the audit site inspections, dust observed from the operations was localised and appeared to settle within the project	Compliant.

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
MCoA S3.15	The Applicant must: (a) minimise the off-site visual impacts of the development including the potential for any glare or reflection from the solar panels; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	Discussion with LSBP Senior Environmental Planner Review of EIS Site inspection.	(a) Glare is not typically associated with solar panels. (b) Ancillary infrastructure is still being finalised (including paint colours). (c) No advertising signs were observed displayed at the time of the audit. On the basis of the above and supported by no complaints having been reported or received, the project is generally considered compliant with the requirements of this condition at the time of the audit, noting that ancillary infrastructure designs are still being finalised.	Compliant.
MCoA S3.16	The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that all external lighting associated with the development: - is installed as low intensity lighting (except where required for safety or emergency purposes); - does not shine above the horizontal; and - complies with Australian Standard AS4282 (N/T) 1997 - <i>Control of Obtrusive Effects of Outdoor Lighting</i> , or its latest version.	Discussion with LSBP HSE Manager. Discussion with S&W HSE Site Manager. Site inspection. Complaints register. Construction Environmental Management Plan (CEMP) Rev A, dated 06 Nov 2019, prepared by Sterling and Wilson, Section 9.10 Flora and Fauna and Section 9.13, Table 7 Monitoring.	CEMP requires visual assessment of directional lighting on a weekly basis. CEMP also outlines controls for night works. It was reported that detailed designs for the O&M building are still being prepared, however it is anticipated that minimal lighting would be required. No complaints have been reported or received regarding intrusive lighting. Guard house lights appear to be facing towards site, away from road to reduce visual impact.	Compliant.
MCoA S3.17	Prior to the commencement of construction, the Applicant must salvage and relocate all Aboriginal heritage items located within the approved development footprint to suitable alternative locations on site, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version. Note: The location of the Aboriginal heritage items referred to	Discussion with LSBP Senior Environmental Planner. Discussion with NGH Environmental Aboriginal Heritage Consultant. Correspondence from NGH Environmental, dated 31 May 2019 regarding heritage surface collection salvage	NGH Environmental undertook a surface artefact collection within the approved development footprint over two days on 29-30 May 2019. It was reported that four Aboriginal representatives present during the surface artifact collection on the 29th	Compliant.

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Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations
			Compliance Status
	in this condition are shown in the figure in Appendix 1 of the Conditions of Consent.	update.	<p>May and three Aboriginal representatives present on the 30th May 2019.</p> <p>The salvage operation covered the following locations:</p> <ul style="list-style-type: none"> • Wellington Solar Farm IF 3 • Wellington Solar Farm IF 4 • Wellington Solar Farm IF 5 • Wellington Solar Farm IF 6 • Wellington Solar Farm IF 7 • Wellington Solar Farm IF 8 • Wellington Solar Farm IF 10 • Wellington Solar Farm IF 12 • Wellington Solar Farm IF 13 • Wellington Solar Farm IF 14 • Wellington Solar Farm IF 15 • Wellington Solar Farm AS 1 • Wellington Solar Farm AS 2 • Wellington Solar Farm AS 3 • Wellington Solar Farm AS 4 • Wellington Solar Farm AS 5 • Wellington Solar Farm AS 6 • Wellington Solar Farm AS 7 • Wellington Solar Farm AS 10 <p>It was reported that due to both the availability of the RAPS and a Total Fire Ban being in place, the items have not yet been relocated back on site, as the final placement will involve a smoking ceremony. At the time of the audit site inspection, LSBP was in the process of scheduling in the relocation with the RAPS and NGH, with the aim to have it completed in March 2020.</p> <p>AHIMS site cards had not yet been finalised</p>

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
MCoA S3.18	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items and potential archaeological deposits located outside the approved development footprint; (b) minimise any impacts on the historic heritage items, and the potential archaeological deposits located within the approved development footprint; and (c) undertake a program of test excavation and salvage at the potential archaeological deposits located within the approved development footprint, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010)</i> or its latest version. <p>Note: The location of the Aboriginal heritage items and potential archaeological deposits referred to in this condition are shown in the figure in Appendix 1 of the Conditions of Consent.</p>	<p>(a) Cultural Heritage management Plan, Version 1.5, dated 19 Dec 2019.</p> <p>(b) Unexpected Finds Protocol within CHMP Final Mod 1 V1.5'.</p> <p>Modification Design for 11kV power line relocation – Aboriginal Heritage Due Diligence report, prepared by NGH NGH dated 15 Nov 2019.</p> <p>Observations during site inspection.</p> <p>(c) NGH Environmental Test Excavation Program proposal dated 22 March 2019.</p> <p>Discussion with NGH Heritage Consultant.</p> <p>Discussion with LSBP Principal Environmental Planner.</p>	<p>(a) It was reported and observed that no works have occurred outside the approved development footprint.</p> <p>(b) The Modification Design for 11kV power line relocation – Aboriginal Heritage Due Diligence report, prepared by NGH concluded that any potential harm to potential Aboriginal heritage posed by proposed works to be negligible.</p> <p>(c) The test excavations and salvage of the PADs was complete over 8 days from 25 September to 02 October 2019.</p>	Compliant.
MCoA S3.19	<p>Prior to the commencement of construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with BCD and Aboriginal Stakeholders; (c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> - protecting the Aboriginal heritage items and potential archaeological deposits located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction and/or pre-construction minor works; - salvaging and relocating the Aboriginal heritage items located within the approved development footprint; - minimising and managing the impacts of the development on the historic heritage item, and the potential archaeological deposits located within the development footprint, including: 	<p>Cultural Heritage Management Plan, Version 1.3 dated 01 Aug 2019, prepared by NGH Environmental Pty Ltd.</p> <p>Correspondence from NSW DPIE, dated 13 Aug 2019 endorsing the Cultural Heritage Management Plan (Rev 1.3).</p> <p>Cultural Heritage Management Plan, Version 1.5 dated 19 Dec 2019, prepared by NGH Environmental Pty Ltd.</p> <p>Correspondence from NSW DPIE, dated 20 Dec 2019 endorsing the Cultural Heritage Management Plan (Rev 1.5).</p> <p>Correspondence from NSW DPIE, dated 18 Jul 2019 endorsing the heritage expert (Mr Matthew Bradley) of NGH Environmental.</p> <p>Observations during audit site inspection.</p>	<p>A Cultural Heritage Management Plan (CHMP) was submitted to and approved by the Secretary 20 weeks prior to commencement of construction, in compliance with the requirement of this condition.</p> <p>The CHMP has subsequently been revised for SSD 8573 Mod 1. The Secretary has approved the revised CHMP, Version 1.5.</p> <p>Documentation:</p> <ul style="list-style-type: none"> a) Correspondence from NSW DPIE, dated 18 Jul 2019 endorsing the heritage expert (Mr Matthew Bradley) of NGH Environmental, one month prior to submission of final plan. 	Compliant.

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
	<ul style="list-style-type: none"> - undertaking test excavation and salvage at the potential archaeological deposits, and <ul style="list-style-type: none"> - a strategy for the long-term management of any Aboriginal heritage items or material collected during the test excavation works; - a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - previously unidentified Aboriginal heritage items are found; or <ul style="list-style-type: none"> - Aboriginal skeletal material is discovered; - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and - ongoing consultation with Aboriginal stakeholders during the implementation of the plan; (d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. <p>Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	<p>Unidentified find located and isolated (photos).</p> <p>Correspondence between S&W Construction Manager and LSBP 13/02/2020 regarding the unexpected find, following verbal notification the previous day.</p> <p>No skeletal items located.</p> <p>b) Appendix E of the CHMP provides a summary of Aboriginal community consultation.</p> <p>c) Requirements addressed within the following sections of the management plan:</p> <ul style="list-style-type: none"> - Section 6, Table 4. Heritage control measures includes requirement for delineation and signage of non-impacted Aboriginal sites. - Section 6, Table 4. Heritage control measures includes a requirement for salvage and relocation of Aboriginal heritage items. - Section 6, Table 4 outline relevant mitigation measures, including: <ul style="list-style-type: none"> - Undertaking test excavation and salvage operations; - Strategy for long term management of salvaged artefacts. - Appendix C includes an 'Unexpected finds protocol'. - Appendix C.6 provides an 'Unexpected finds protocol' for human skeletal remains. - Section 7.2 outlines training requirements, including the CHMP training at induction. <p>(d) Section 7.3 provides for inspection and monitoring processes, including for periodic inspection of Aboriginal heritage sites.</p>		

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
	Implementation:		<p>An unexpected find was discovered on 13 February 2020. The item was immediately roped off with a 20 m exclusion zone (observed during audit site inspection). NGH Environmental Heritage Consultant was notified and attended site on 21 Feb 2020 to record and salvage the artefact. It was advised that this artefact would be relocated with the other stone artefacts (refer to MCoA S3.17).</p> <p>The auditor was provided a summarised site induction during the audit and this included details on Aboriginal heritage.</p> <p>Aboriginal heritage site, including the unexpected find, were observed demarcated with exclusion zone fencing.</p> <p>Based on the above, and on the basis of the management of the unexpected find, including initial identification, cease work and reporting, the project is considered compliant with the requirements of this condition.</p>	
MCoA S3.20	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the <i>Protection of the Environment Operations Act 1997</i> .	Site inspection. Discussion with LSBP HSE Manager Discussion with S&W Site Manager. Refuelling procedure.	<p>It was reported that there has been no water pollution incidents or events on the project at the time of this audit.</p> <p>The auditor did not identify any evidence of water pollution. There was no standing or flowing water on the project site at the time of the audit site inspection.</p>	Compliant.
MCoA S3.21	Prior to the commencement of construction, the Applicant must prepare a detailed Stormwater Plan for the site to the	Soil, Water and Stormwater Management Plan, Version 2 dated May 2019, prepared by NGH Environmental Pty Plan (SWSMP) was submitted to and	A Soil, Water and Stormwater Management Plan (SWSMP) was submitted to and	Compliant.

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Independent Audit Findings and Recommendations		Compliance Status
Approval ID	Requirement	Evidence Collected		
	satisfaction of the Secretary. Following the Secretary's approval, the Applicant must implement the Stormwater Plan.	Ltd. Correspondence from NSW DPE, dated 02 Jul 2019 endorsing the Soil, Water and Stormwater Management Plan (Rev 2). Soil, Water and Stormwater Management Plan, Version 2.2 dated 19 Dec 2019, prepared by NGH Environmental Pty Ltd. Correspondence from NSW DPIE, dated 20 Dec 2019 endorsing the Soil, Water and Stormwater Management Plan (Rev 2.2). Site inspection observations including: <u>Solar Farm</u> <ul style="list-style-type: none"> • Overarching Erosion and sediment control plan, Wellington Solar Farm (19612-RBG-ZZ-XX-DR-CV-81-001 C5). • Sediment and Erosion Control Detail, Prepared by RobertBirdGroup (SWLB-LSBP-AUS-170MV-C-DWGSAFCD-302-R0). • Installed sediment and erosion controls around ground disturbance areas. • Delineated riparian buffer along Wuuluman Creek. • Spill kits available on site and with earth work contractor. <u>Substation</u> Evidence sighted includes: <ul style="list-style-type: none"> - Environmental Site Map. - Erosion and sediment controls installed onsite. 	approved by the Secretary five months prior to the commencement of construction. The SWSMP has subsequently been revised for SSD 8573 Mod 1. The Secretary has approved the revised SWSMP, Version 2.2. The SWSMP generally appears to be implemented on site.	Non-compliant
MCoA S3.22	The Applicant must: (a) 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)		(a) Overarching Erosion and sediment control plan, Wellington Solar Farm (19612-RBG-ZZ-XX-DR-CV-81-001 C5). Sediment and Erosion Control Detail, Prepared by RobertBirdGroup (SWLB-LSBP-AUS-170MV-C-	Construction Environmental Management Plans and detailed Erosions and Sediment Controls plans have been established for the management of erosions and sediment risks

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Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>manual, or its latest version;</p> <p>(b) ensure the solar panels and associated infrastructure are designed, constructed and maintained to avoid causing any erosion on site;</p> <p>(c) ensure all works (including waterway crossings) are conducted in accordance with the:</p> <ul style="list-style-type: none"> - <i>Guidelines for Controlled Activities on Waterfront Land (2012)</i>, or its latest version; and - <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004)</i>, or its latest version. 	<p>DWGSAECD-302-R0).</p> <p>(b) Solar panels had not yet been constructed on site.</p> <p>(c) Discussion with LSBP Principal Environmental Planner Discussion with S&W Project Site Manager.</p>	<p>Designs for waterway crossings were not finalised at the time of this audit and no works had been undertaken within waterways.</p> <p>It was reported that following finalisation of designs by the civil design consultant, Robert Bird Group (RBG), drawings are required to be submitted to LSBP for review.</p> <p>It was reported that the civil design consultant has been in contact with the relevant agencies throughout the design process to ensure compliance with all appropriate policies and guidelines specifically regarding the creek crossing and culvert installation.</p> <p>Non-compliance – NC 5</p> <p>Whilst an overarching Erosion and Sediment Control Plan has been established for the project, at the time of the audit site inspection there was limited evidence to support implementation compliance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) (The Blue Book).</p> <p>Issues identified on site included:</p> <ul style="list-style-type: none"> • It was not evident that controls as defined in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) had been installed consistently across the site. • Ground disturbance activities were occurring without downstream 	

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
MCoA S3.23	At least one month prior to the commencement of construction of the development, or unless otherwise agreed by the Secretary, the Applicant must prepare a Fire Safety Study for the development, in consultation with Fire & Rescue NSW, and to the satisfaction of the Secretary. The study must: (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines', and (b) report on the implementation status of the mitigation measures, listed in the EIS. Following the Secretary's approval, the Applicant must implement the measures described in the Fire Safety Study.	Correspondence from NSW DPIE, dated 23 May 2019, regarding approval to defer the submission of the Fire Safety Study.	<p>DPIE has given approval for the Fire Safety Study to be deferred until at least one month prior to commencement of construction of the battery storage facility.</p> <p>The requirements of this condition had not been triggered at the time of this audit.</p>	Not triggered.
MCoA S3.24	The Applicant must: (a) store and handle all dangerous or hazardous materials on site in accordance with AS1940-2004: <i>The storage and handling of flammable and combustible liquids</i> , or its latest version; (b) ensure the substance is suitable banded; and (c) minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.	Observations during audit site inspection.	<p>Due to the early phase on construction there were minimal quantities of substances stored on site. Spill kits were observed on site and were reportedly available within contractors sites.</p> <p>The auditor did not observe any improper handling of dangerous or hazardous materials on site at the time of the audit.</p>	Compliant.

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Independent Audit Findings and Recommendations		Compliance Status
Approval ID	Requirement	Evidence Collected		
MCoA S3.25	The Applicant must: <ul style="list-style-type: none"> (a) minimise the fire risks of the development; (b) ensure that the development: <ul style="list-style-type: none"> - includes at least a 10 metre defendable space around the Electric Storage Facility as well as the perimeter of the solar array area that permits unobstructed vehicles access; - manages the defendable space and solar array area as an Asset Production Zone; - complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2006</i> (or equivalent) and <i>Standards for Asset Protection Zones</i>; - is suitable equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65mm Storz fitting located adjacent to the internal access road; (c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and (d) notify the relevant local emergency management committee following construction of the development, and prior to the commencement of operations. 	Discussion with LSBP HSE Manager. Discussion with S&W Site Manager. Observations during audit site inspection. Revised project layout. Fire trailer onsite, plus water cart and fire extinguishers.	This condition is considered to apply to operational activities rather than construction activities and as such the full requirements of this condition had not been triggered at the time of this audit. Nonetheless the site is managing the fire risks of the development through provision of a fire response trailer, water cart and fire extinguishers. The revised project layout appears to accommodate a 10m defendable space around the site.	Not triggered.
MCoA S3.26	Prior to the commencement of operations, the Applicant must prepare a Fire Management and Emergency Response Plan for the development in consultation with the RFS and Fire & Rescue NSW. This plan must identify the fire risks and controls of the development, and the procedures that would be implemented if there is a fire on site or in the vicinity of the site. Two copies of the plan must be kept on site in a prominent position adjacent to the site entry point at all times.	Discussion with LSBP HSE Manager. Discussion with LSBP Principal Environmental Planner. Correspondence between NGH Environmental and LSBP dated 18-19 June 2019 regarding ongoing development of the Fire Management and Emergency Response Plan.	It was reported that a Fire Emergency Response Plan is currently being drafted.	Not triggered.
MCoA S3.27	The Applicant must: <ul style="list-style-type: none"> (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version); (c) store and handle all waste on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal. 	Discussion with S&W Site Manager Discussion with LSBP HSE Manager	Due to the early phase of construction activities on site there has been only limited generation of waste on site. A waste register is currently being established to capture details of waste removed from site. It was reported that no waste classification or offsite disposal has been required (all soils retained on site).	Compliant It was reported that the site has not received or disposed of any waste on site.

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
MCoA S3.28	Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant shall rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 3 .	N/A	<p>On the basis of no waste issues being identified during the audit site inspection, the site is generally considered compliant with the requirements of this condition.</p> <p>Construction commenced 04 December 2019 and as such the requirements of this condition had not been triggered at the time of this audit.</p>	Not triggered.
Table 3: Rehabilitation Objectives <p>Feature: Project Site</p> <p>Objective:</p> <ul style="list-style-type: none"> - Safe, stable and non-polluting - Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use. <p>Feature: Solar farm infrastructure</p> <p>Objective: To be decommissioned and removed, unless the Secretary agrees otherwise.</p> <p>Feature: Land use</p> <p>Objective: Restore the land and soil capability to the same class, and the associated agricultural productivity potential to pre-existing levels.</p> <p>Feature: Community</p> <p>Objective: Ensure public safety</p>				
MCoA S4.1	Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. The strategy must: <ol style="list-style-type: none"> (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (d) describe the procedures that would be implemented to: 	<p>Environmental Management Strategy, prepared by NGH Environmental Pty Ltd, Version 3, dated 26 Aug 2019.</p> <p>Correspondence from NSW DPIE, dated 26 Sept 2019 endorsing the Environmental Management Strategy.</p> <p>Revised Environmental Management Strategy, prepared by NGH Environmental Pty Ltd, Version 3.1, dated 19 Dec 2019.</p> <p>Correspondence from NSW DPIE, dated 20 Dec 2019 endorsing the revised Environmental Management</p>	<p>An Environmental Management Strategy (EMS) was submitted to and approved by the Secretary 2 months prior to commencement of construction, in compliance with the requirement of this condition.</p> <p>The EMS has since been revised and approved by the Secretary to address requirements under SSD 8573 Mod 1.</p> <p>Appendix E of the EMS provides a summary of consultation received from NSW DPIE</p>	Compliant.

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1	Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
- keep the local community and relevant agencies informed about the operation and environmental performance of the development; - receive, handle, respond to, and record complaints; - resolve any disputes that may arise; - respond to any non-compliance; - respond to emergencies; and (e) include: - copies of any plans approved under the conditions of this consent; and - a clear plan depicting all the monitoring to be carried out in relation to the development.	Strategy. Observations during audit site inspection. Project Risk Register, last updated in January 2020. Recent examples of Toolbox talk include: - 20/12/2019 Smoke haze, snakes, heat, traffic, hydration - 17/01/2020 stay focussed, snakes, - 24/01/2020 interaction with mobile plant, dust storms and strong winds. - 31/01/2020 heat, possible wet weather, HRCW - 07/02/2020 asbestos hazard SWMS/JSEA	Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.	Induction register maintained. Workplace Inspection No.36 Environmental, completed by site manager 14/02/2020, 06/02/2020, 01/02/2020 De-Briefing (daily), evidence sighted fencing contractor de-brief dated 17, 18 and 19 Feb. Includes high risk works, controls, SWMS, permits and any areas of concern.	Documentation: a) EMS Section 1.1 and 1.3 outline the purpose of the EMS and is strategic context. b) EMS Section 2.1 and Appendix A provides a register of relevant legal and other requirements. c) EMS Section 4.1 provides an outline of the organisational structure, including and organisational chart in Section 4.1.1, whilst Section 4.1.2 outlines roles and responsibilities for the construction environmental management team, including Project Manager, Health Safety and Environment and Quality (HSEQ) Manager, Site Manager, All LSBP staff and all subcontractors. d) Section 4.4 of the EMS provides details on communication processes, including: - Section 4.4.2 Government Authority Communication and Section 4.4.3 Stakeholder and Community Consultation and the associated Community Consultation Plan. - Section 4.4.4 Complaints Procedure - Section 4.4.4 provides for a complaints management and mediation system - Section 5.3 non-compliance and corrective and preventative action - Section 4.7 Emergency Preparedness and Response (Incident Reporting), including Appendix C Environmental Incident Response	during the development of the plan.

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
		e)	<p>- EMS Section 4.2, Table 4-2 provides a list of associated sub-plans and strategies.</p> <p>- EMS Section 5.2 Table 5-1 Monitoring and reporting requirements.</p> <p>Implementation:</p> <p>Evidence was available to generally support the implementation of the EMS on site, including:</p> <ul style="list-style-type: none"> • Supporting management plans available on site and understood by site team. • Records of site inductions • Records of toolbox talks • Records of daily pre-start meetings • Records of site inspections. 	<p>Compliant.</p> <p>Compliance with this condition was assessed based on the approval of SSD 8573 Modification 1.</p> <p>All management plans appear to have been revised to the satisfaction of the Secretary within one month of the modification of the conditions of consent, with the exception of the Traffic Management Plan (TMP) for which LSBP are still seeking approval.</p>
MCoA S4.2	<p>The Applicant must:</p> <p>(a) update the strategies, plans or programs as required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:</p> <ul style="list-style-type: none"> - submission of an incident report under condition 4 of Schedule 4; - submission of an audit report under condition 6 of Schedule 4; or - any modification to the conditions of consent. 	<p>Development Consent SSD 8573 Modification 1 dated 11 December 2019.</p> <p>Revised plans:</p> <ul style="list-style-type: none"> • EMS Rev 3.1, 19 Dec 2019 • BMP Rev 3.3, 19 Dec 2019 • CHMP Rev 1.5, 19 Dec 2019 • TMP Rev 2.1.30 Sept 2019 • SWSMP Rev 2.2, 19 Dec 2019 • LP Rec 2.5, 19 Dec 2019. <p>Discussion with LSBP Principal Environmental Planner.</p> <p>Correspondence from LSBP to NSW DPIE re: submission of TMP 10 Dec 2019.</p> <p>Correspondence from NSW DPIE to LSBP re: further information required for Traffic Management Plan.</p>	<p>Compliant.</p> <p>Compliance with this condition was assessed based on the approval of SSD 8573 Modification 1.</p> <p>All management plans appear to have been revised to the satisfaction of the Secretary within one month of the modification of the conditions of consent, with the exception of the Traffic Management Plan (TMP) for which LSBP are still seeking approval.</p>	<p>Page 28 of 54 Revision: FINAL</p>

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
MCoA S4.3	<p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> - While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. - If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 	<p>Requirement to re-submit by 23 March 2020.</p> <p>Discussion with LSBP Principal Environmental Planner.</p>	<p>It was reported that LSBP has not sought to submit plans on a progressive basis and plans submitted for approval relate to the entire scope of the construction program.</p> <p>Strategies and plans are being updated on a regular basis, refer to MCoA S4.2, however evidence of consultation with relevant parties was not provided for the revised plans.</p> <p>Notes:</p> <p>Overall the project is considered compliant with the requirement of this clause however an auditor recommendation has been identified.</p> <p>Auditor Recommendation:</p> <p>It is recommended that LSBP seek agreement of the Secretary to prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p>	Compliant.
MCoA S4.4	<p>The Department must be notified in writing immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.</p>	<p>Discussion with LSBP HSE Manager</p> <p>Discussion with S&W Site Manager</p> <p>Discussion with LSBP Principal Environmental Planner.</p>	<p>The project team reported no notifiable incidents; hence the requirements of this condition have not yet been triggered.</p>	Not triggered.
MCoA S4.5	<p>The Department must be notified in writing within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent 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 done, or will be, undertaken to address the non-compliance.</p>	<p>Discussion with LSBP HSE Manager</p> <p>Discussion with S&W Site Manager</p> <p>Discussion with LSBP Principal Environmental Planner.</p> <p>Correspondence between NSW DPIE and LSBP re: relocated site access.</p>	<p>The project team reported there is no known non-compliance(s) to date on the project. Therefore this condition had not yet been triggered.</p> <p>Note: The requirements of this condition will be triggered upon receipt of this audit report, as non-compliances have been identified.</p>	Not triggered.

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Approval ID	Requirement			
MCoA S4.6	<p>The Applicant must commission and pay the full cost of an Independent Environmental Audits of the development. The audits must:</p> <ul style="list-style-type: none"> (a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018); (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (c) be prepared, unless otherwise agreed with the Secretary: <ul style="list-style-type: none"> (i) within 3 months of commencing construction; (ii) within 3 months of commencement of operations; and (iii) as directed by the Secretary; (d) be carried out in consultation with the relevant agencies; (e) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and (f) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent. <p>Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations.</p> <p>The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.</p>	<p>J2M Systems client agreement form approved by Lightsource BP dated 22 January 2020.</p> <p>Lightsource BP Purchase order dated 23 January 2020 to undertake independent environmental audit (IEA).</p> <p>NSW DPE correspondence 29 January 2020 approving the auditor.</p> <p>NSW DPE correspondence 29 January 2020 to commence the audit.</p> <p>(a) This IEA report.</p> <p>(b) NSW DPE correspondence 29 January 2020 approving the auditor.</p> <p>(c) Audit commenced 30 January 2020</p> <p>(i) eight weeks after commencement of construction.</p> <p>(ii) not triggered</p> <p>(iii) no directions received for additional audits or adjusted timeframes.</p> <p>d) Consultation was undertaken via email and details are included within the IEA report.</p> <p>(e) This audit table and associated IEA report.</p> <p>(f) Findings of this audit.</p> <p>Note: The requirement to submit the audit report within 3 months of commencing the audit had not been triggered at the time of writing this audit report.</p> <p>Note: The requirement to implement the recommendations of the IEA had not been triggered at the time of writing this audit report.</p>	<p>Lightsource BP issued a purchase order committing to the full costs associated to this IEA.</p> <p>In relation to compliance with this condition:</p>	Compliant.
MCoA S4.7	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) make the following information publicly available on its website as relevant to the stage of the development: <ul style="list-style-type: none"> - the EIS; - the final layout plans for the development; - current statutory approvals for the development; 	<p>The auditor accessed the LSBP Wellington Solar Farm website during the audit.</p> <p>On Tuesday 10 March 2020 the following documents were available on the following website:</p> <p>https://www.lightsourcebp.com/au/projects/wellington-</p>	<p>The Wellington Solar Farm website was found to include all information under with the requirements of this condition.</p>	<p>Compliant.</p> <p>Page 30 of 54 Revision: FINAL</p>

Minister's Conditions of Approval (MCoA) – SSD 8573 Mod 1		Independent Audit Findings and Recommendations		Compliance Status
Approval ID	Requirement	Evidence Collected		
	<ul style="list-style-type: none"> - approved strategies, plans or programs required under the conditions of this consent; - the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; - how complaints about the development can be made; - a complaints register; - compliance reports; - any independent environmental audit, and the Applicant's response to the recommendations in any audit; and - any other matter required by the Secretary; and (b) keep this information up to date. 	<p>https://www.lightsourcebp.com/au/projects/wellington-solar-farm/</p> <ul style="list-style-type: none"> - The EIS - Final layout plans - Development Consent SSD 8573 - Development Consent SSD 8573 Mod 1 - Environmental Management Strategy (Rev 3.1) - Biodiversity Management Plan (Rev 3.3) - Traffic Management Plan (Rev 2.0) - Cultural Heritage Management Plan (Rev 1.5) - Soil, Water and Stormwater Management Plan (Rev 2.2) - Landscaping Plan (Rev 2.5) 		
Other licences, approvals and permits	-	<ul style="list-style-type: none"> - Feedback form (complaints process) - Feedback register. 	<p>Discussion with LSBP HSE Manager Discussion with S&W Site Manager Discussion with LSBP Principal Environmental Planner</p>	<p>It was reported that the project team has not yet obtained, or been required to obtain, any additional permits, approvals or licences for works completed at the time of this audit.</p>
	End of MCoA checklist.			

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Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
B1	Biodiversity If the credit profile of the final infrastructure layout cannot be reduced to zero, retirement of the biodiversity credits from the biodiversity register established under Part 7A of the TSC Act would be undertaken.	Refer to MCoA S3.10	Addressed under MCoA S3.10	Not triggered.
B2	Hollow-bearing trees within the development site would not be cleared between June and January, to avoid the breeding season of Superb Parrot and Corben's Long-eared Bat and the core hibernation period for Corben's Long-eared Bat. If clearing outside of this period cannot be achieved, pre-clearing surveys would be undertaken to ensure these species do not occur.	Discussion with LSBP Site Project Manager. Discussion with S&W Site Manager Discussion with LSBP Principal Environmental Planner	It was reported that clearing commenced in February 2020 and as such no survey was required to be undertaken.	Not triggered.
B3	Preparation of a Flora and Fauna Management Plan (FFMP) that would incorporate protocols for: <ul style="list-style-type: none">• Protection of native vegetation to be retained• Best practice removal and disposal of vegetation• Staged removal of hollow-bearing trees and other habitat features such as fallen logs with attendance by an ecologist• Weed management• Unexpected threatened species finds and Rehabilitation of disturbed areas The FFMP would consider the potential to link and enhance remnant patches on the site. The FFMP would form part of the Wellington Solar Farm Construction Environmental Management Plan (CEMP).	Refer to MCoA S3.11.	Biodiversity Management Plan prepared and approved by the Secretary that includes control measures for flora and fauna management.	Compliant.
B5	Stockpiling materials and equipment and parking vehicles will be avoided within the dripline (extent of foliage cover) of any native tree.	Observations during audit site inspection.	There was no evidence of stockpiling of materials or parking under the drip line of trees.	Compliant.
B5	A riparian buffer zone of 40m along Wauluman Creek should be clearly delineated prior to works commencing. Works should be avoided within the riparian buffer zone. <ul style="list-style-type: none">• Existing native riparian vegetation is retained to the	Refer to MCoA S3.22 Site inspection observations.	A riparian buffer zone was observed established along Wauluman Creek. Existing native vegetation appears to have been retained to the greatest extent possible with detailed survey completed prior to clearing.	Compliant.

Environmental Impact Statement – Revised Mitigation Measures – Submissions Report		Independent Audit Findings and Recommendations		Compliance Status
Approval ID	Requirement	Evidence Collected		
	<p>greatest extent possible in an undamaged and unaltered condition.</p> <ul style="list-style-type: none"> • Works occurring around the Wuuluman Creek should be in accordance with the DPI Fisheries Policy and Guideline Document Policies and Guidelines for Fish Habitat Conservation and Management. 	No works have been undertaken within creek areas at the time of this audit. Design of waterway crossings was still being finalised by design consultant Robert Bird Group.		
B6	<ul style="list-style-type: none"> • A groundcover management plan would be developed and implemented to ensure an appropriate perennial ground cover is established and maintained beneath the arrays during operation of the solar farm. This will require consideration of existing groundcover and may require expert input and trials to achieve the objective. 	Biodiversity Management Plan (version 3.3)	<p>A groundcover management plan has been prepared within the approved Biodiversity Management Plan.</p> <p>The implementation of the Groundcover Management Plan had not been triggered at the time of this audit.</p>	Compliant.
B7	<ul style="list-style-type: none"> • Where possible, landscape plantings will be comprised of local indigenous species with the objective of increasing the diversity of the existing vegetation. Planting locations would be designed to improve the connectivity between patches in the landscape where consistent with landscaping outcomes. 	<p>Site inspection observations.</p> <p>Discussion with S&W Project Site Manager.</p> <p>Landscape Plan (V2.5).</p>	<p>The landscape plan includes specifications for perimeter plantings, including for use of native species. No landscaping planting works had been undertaken at the time of this assessment; hence compliance with this requirement had not been triggered.</p>	No triggered
B8	<ul style="list-style-type: none"> • Carry out refuelling of plant and equipment, chemical storage and decanting off site or at least 50m away from farm dams in impervious bunds. • Ensure that dry and wet spill kits are readily available. 	<p>Site inspection observations.</p> <p>Discussion with S&W Project Site Manager.</p>	<p>Site kits were observed within the site compound and were reportedly available in contractors' vehicles/plant.</p> <p>No refuelling issues were identified during the audit site inspection. No uncontained spills were reported.</p>	Compliant.
B9	<ul style="list-style-type: none"> • The Construction Environmental Management Plan will include measures to avoid noise encroachment on adjacent habitats such as avoiding night works as much as possible. 	S&W Construction Environmental Management Plan (CEMP) (Rev A), dated 06/11/2019.	Section 9.3 of the CEMP includes noise management measures, including requirements for works within approve construction hours.	Compliant.
B10	<ul style="list-style-type: none"> • Avoid night works. • Direct lights away from vegetation 	<p>Site inspection observations.</p> <p>Discussion with S&W Project Site Manager.</p>	It was reported that no night works had been undertaken at the time of this audit and that all construction work was within approved hours.	Compliant.
B11	<ul style="list-style-type: none"> • Weed, hygiene and pest management protocols will be prepared and implemented as part of the Flora and Fauna Management Plan for the proposal. 	Refer to MCoA S2.13 and S3.11	Biodiversity Management Plan prepared and approved by the Secretary that includes control measures for weed, hygiene and pest	Non-Compliant (Repeat item - NC 1)

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B12	<ul style="list-style-type: none"> Awareness training during site inductions regarding enforcing site speed limits Site speed limits to be enforced. 	Discussion with LSBP Site HSE Manager Induction presentation. Refer to MCoA S3.6	management. Audit finding discussed under MCoA S2.13 and S3.11	raised under MCoA S2.13)
AH1	Aboriginal heritage	Observation during audit site inspection.	Speed limit awareness is included as part of the site induction process and limits are sign posted on site. Speed limits may be enforced, including through the Driver's Code of Conduct.	Compliant.
AH2	<ul style="list-style-type: none"> The development must avoid the site Wellington Scarred Tree 1, as per the current development design plans detailed in this report. A minimum 10m buffer around the tree should be in place to protect the tree given its current condition. If complete avoidance of the ten artefacts scatters and 15 isolated find sites recorded within the proposal area is not possible, the artefacts within the development footprint must be salvaged prior to the proposed work commencing and moved to a safe area within the property that will not be subject to any ground disturbance. 	Refer to MCoA S3.17.	A 10m-exclusion zone was observed established around the Wellington Scarred Tree 1.	Compliant.
AH3	<ul style="list-style-type: none"> The collection and relocation of the artefacts should be undertaken by an archaeologist with representatives of the registered Aboriginal parties. A new site card/s will need to be completed once the artefacts are moved to record their new location on the AHIMS database. 	Refer to MCoA S3.17.	Requirement addressed under MCoA S3.17	Compliant.
AH4	<ul style="list-style-type: none"> A minimum 5m buffer should be observed around all sites including those outside the development footprint. 	Observations during site inspection.	Exclusion zone fencing has been erected around heritage sites, including those inside and outside the development footprint.	Compliant.
AH5	<ul style="list-style-type: none"> If the complete avoidance of PAD1 and PAD2 is not possible, further archaeological investigation should be undertaken in the form of excavations in order to establish the presence or absence and significance of any sub surface deposits. The excavations would be conducted prior to any development and would be undertaken in consultation with the Registered 	Refer to MCoA S3.18.	Requirement addressed under MCoA S3.18.	Compliant.

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			Compliance Status
AH6	<p>Aboriginal Parties in compliance with the OEH Code of Practice. A technical report on the results of the testing would be provided and management strategies recommended depending on the outcome. The testing would be conducted by a qualified archaeologist and members of the registered Aboriginal parties. Any monitoring or testing would be undertaken in consideration of OEH advice and outlined through a Cultural Heritage Management Plan.</p> <ul style="list-style-type: none"> First Solar should prepare a Cultural Heritage Management Plan (CHMP) to address the potential for finding additional Aboriginal artefacts during the construction of the Solar Farm and management of known sites and artefacts. The plan should include the unexpected finds procedure to deal with construction activity. Preparation of the CHMP should be undertaken in consultation with the registered Aboriginal parties. 	<p>Refer to MCoA S3.19.</p>	<p>Requirement addressed under MCoA S3.19.</p>
V1	<p>Solar farm vegetation screening:</p> <ul style="list-style-type: none"> A sparse vegetation screen, 1 -2 rows deep, would be established with reference to Appendix C Proposed onsite screening. The screen would be comprised of varying native species appropriate to the area and of varying height to soften not block the view of the site. Breaks in the screen, reflecting natural 'breaks' in existing remnants would be appropriate. Planting should be undertaken as soon as practical in the construction process depending on the season, as it will take time for the plants to establish and become effective as a screen. Seasonal requirements for planting should also be considered. The screen would be maintained for the operational life of the solar farm. Dead plants would be replaced. <p>Pruning and weeding would be undertaken as</p>	<p>Refer to MCoA S3.8</p> <p>Discussion with S&W Site Project Manager.</p>	<p>Not triggered.</p> <p>No planting undertaken on site. It was reported that the species lists identified within the Landscape Management Plan are being reviewed by the Landscaping Contractor to ensure compatibility with site conditions.</p>

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V2	<ul style="list-style-type: none"> required to maintain the screen's visual amenity and effectiveness in breaking up views. Residential receiver screening Establish plantings for receivers R2 and R8, in consultation with landowners, based on the as-built views of the solar farm. 	<p>Observations during audit site inspection. Discussion with S&W Site Project Manager. Discussion with LSBP Site Manager.</p> <ul style="list-style-type: none"> Where feasible, underground rather than overhead power lines would be considered. Where feasible, co-location of powerlines would be undertaken to minimise the look of additional power poles. If additional poles are required, these would match existing pole design as much as possible. 	<p>Existing power lines between Goolma Road and the Soil Conservationist property are being located underground.</p> <p>An 11kV power line is also being relocated with poles similar to existing design.</p> <p>All associated infrastructure is underground around the solar farm, including under Goolma road into substation.</p>	Compliant.
V3	<ul style="list-style-type: none"> The materials and colour of onsite infrastructure will, where practical, be non-reflective and in keeping with the materials and colouring of existing infrastructure or of a colour that will blend with the landscape. Where practical: <ul style="list-style-type: none"> Proposed new buildings will be non-reflective and colouring will be in keeping with the existing landscape. Pole mounts will be non-reflective. Security fencing posts and wire would be non-reflective, colouring would be chosen to reduce the industrial character of the fence and fit the existing landscape. 	<p>Observations during audit site inspection. Discussion with S&W Site Project Manager. Discussion with LSBP Site Manager.</p>	<p>Proposed new buildings are still being designed, not yet finalised, colours will be specified in the design.</p> <p>The security fencing posts and wire are galvanised grey, which will become non-reflective.</p>	Compliant
V4	<ul style="list-style-type: none"> During construction, dust would be controlled in response to visual cues. Areas of soil disturbed by the project would be rehabilitated progressively or immediately post-construction, reducing views of bare soil. Ground cover would be maintained beneath the panels and within the site 	<p>Observations during audit site inspection. Discussion with S&W Site Project Manager. Discussion with LSBP Site Manager.</p>	<p>A water cart was observed in operation during the audit site inspection for dust suppression purposes. The water cart was called to certain locations based on visual cues.</p> <p>Due to the early phase of the project, no rehabilitation has occurred on site at the time of this audit and no solar panel were installed.</p>	Compliant.

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Approval ID	Requirement	Evidence Collected	
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V5	<ul style="list-style-type: none"> boundary, to break up views of the infrastructure from the side and back views. Night lighting would be minimised to the maximum extent possible (i.e. manually operated safety lighting at main component locations). 	<ul style="list-style-type: none"> Maintenance of ground cover beneath panels, to reduce dust. Minimise traffic movements on unsealed tracks, to reduce dust. Night lighting would be minimised to the maximum extent possible (i.e. manually operated safety lighting at main component locations). <p>NOISE</p> <ul style="list-style-type: none"> Implement noise control measures such as those suggested in Australian Standard 2436-2010 "Guide to Noise Control on Construction, Demolition and Maintenance Sites", to reduce predicted construction noise levels. 	<p>No night lighting had been installed on the project at the time of this audit.</p> <p>This mitigation measure is identified within the EIS as being applicable to the operational phase, and as such had not been triggered at the time of this audit.</p>
N1	<ul style="list-style-type: none"> A Noise Management Plan would be developed as part of the CEMP and will specifically target R1 and R7 in order to achieve compliance. The plan would include, but not be limited to: <ul style="list-style-type: none"> Use less noisy plant and equipment where feasible and reasonable Plant and equipment to be properly maintained. Provide special attention to the use and maintenance of 'noise control' or 'silencing' kits fitted to machines to ensure they perform as intended. Strategically position plant on site to reduce the emission of noise to the surrounding neighborhood and to site personnel. Avoid any unnecessary noise when carrying out manual operations and when operating plant. 	<p>Refer to MCoA S3.13</p> <p>Requirement addressed under MCoA S3.13</p>	<p>Compliant.</p> <p>Requirement addressed under MCoA S3.19.</p> <p>Limited noisy work has been conducted on site at the time of this audit.</p> <p>It was reported that Noise monitoring may be undertaken for noisy works, such as piling.</p> <p>No noise complaints reported to date.</p>
N2	<ul style="list-style-type: none"> A Noise Management Plan would be developed as part of the CEMP and will specifically target R1 and R7 in order to achieve compliance. The plan would include, but not be limited to: <ul style="list-style-type: none"> Use less noisy plant and equipment where feasible and reasonable Plant and equipment to be properly maintained. Provide special attention to the use and maintenance of 'noise control' or 'silencing' kits fitted to machines to ensure they perform as intended. Strategically position plant on site to reduce the emission of noise to the surrounding neighborhood and to site personnel. Avoid any unnecessary noise when carrying out manual operations and when operating plant. 	<p>Refer to MCoA S3.13</p> <p>Discussion with S&W Project Site Manager.</p>	<p>Compliant.</p> <p>Requirement addressed under MCoA S3.19.</p> <p>Earthmoving Plant Pre-mobilisation checklist includes checks for noise control devises and maintenance of plant prior to acceptance and commencement on site.</p>

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Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
N3	<ul style="list-style-type: none"> ○ Any equipment not in use for extended periods during construction work should be switched off. ○ Complaints procedure deal with noise complaints that may arise from construction activities. Each complaint would need to be investigated and appropriate noise amelioration measures put in place to mitigate future occurrences, where the noise in question is in excess of allowable limits. • Establish good relations with people living in the vicinity of the site at the beginning of proposal and maintain. Keep people informed, take complaints seriously, deal with complaints expeditiously. The community liaison member of staff should be adequately experienced. 			
N4	<ul style="list-style-type: none"> • If the ESF is constructed outside the main construction period, a specific construction noise management plan would be undertaken to manage any additional impacts. <p>Historic Heritage</p>	<p>Discussion with S&W Project Site Manager.</p> <p>Discussion with LSBP Project Manager.</p>	<p>It was reported that all works have been, and are to be completed within the main construction period.</p>	<p>Not triggered.</p>
HH1	<ul style="list-style-type: none"> • The Applicant must ensure that all new buildings and structure, and any alterations and additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia 	<p>Discussion with S&W Project Site Manager.</p> <p>Discussion with LSBP Project Manager.</p>	<p>It was reported that this requirement forms part of the contract. No new buildings or structures had been constructed at the time of this audit.</p>	<p>Not triggered.</p>
HH2	<ul style="list-style-type: none"> • It is understood that, under Part 4A of the EP&A Act, the applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation set out the requirements for the certification of the development. 	<p>Discussions with LSBP Principal Environmental Planner.</p> <p>Discussions with LSBP Project Manager.</p> <p>Discussions with LSBP Site Manager.</p>	<p>No construction certificates have been obtained to date.</p> <p>LSBP reported that where construction certificates and compliance with BCA is required, such as redevelopment of the Narrawa homestead, the necessary certification will be sought through the contracted registered builder, upon finalisation of scope.</p>	<p>Not triggered.</p>
HH3	<ul style="list-style-type: none"> • Should an item of historic heritage be identified, the Heritage Division (OEH) would be contacted prior to further work being carried out in the vicinity. 	<p>Discussion with S&W Project Site Manager.</p> <p>Discussion with LSBP Project Manager.</p>	<p>It was reported that no items of historic heritage have been identified.</p>	<p>Not triggered.</p>

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HH4	<ul style="list-style-type: none"> The Narrawa Homestead should not be altered whilst in use as an Office and Maintenance building for the solar farm. 	Refer to MCoA S2.8.	Currently in use as a temporary site office, with no alterations observed. Requirement addressed under MCoA S2.8
HH5	<ul style="list-style-type: none"> The existing cultural plantings around the Narrawa Homestead and its driveway should be maintained. 	Observation during audit site inspection.	The auditor did not observe any damage or changes to existing plantings around the Narrawa Homestead and its driveway. Compliant.
TRAFFIC TRANSPORT AND ROAD SAFETY			
T1	<ul style="list-style-type: none"> Carpooling/shuttle bus arrangements to minimise vehicle numbers during construction (the proponent is committed to transporting 80% of construction traffic to the site by bus. Pick up points will be identified in the Traffic Management Plan which will be developed prior to construction). 	Discussion with S&W Project Site Manager. Discussion with LSBP Project Manager.	Shuttle bus services have not yet commenced, however there were only limited specialist contractors on site at the time of the audit and the project site amenities were not yet established. It was reported that a shuttle bus service will be operational from Dubbo, but this requirement for this had not been triggered. Not triggered.
T2	<ul style="list-style-type: none"> The proponent would consult with the Roads and Maritime Services regarding the proposed upgrading of the site access from Goolma Road. The upgrade would be subject to detailed design, and must be designed and constructed to the standards specified by RMS Guidelines. 	Refer to MCoA S3.4.	Requirement addressed under MCoA S3.4 Compliant.
T3	<ul style="list-style-type: none"> A Haulage Plan would be developed with input from the roads authority, including but not limited to: <ul style="list-style-type: none"> Assessment of road routes to minimise impacts on transport infrastructure. Scheduling of deliveries of major components to minimise safety risks (on other local traffic). Consideration of cumulative traffic loads due to other local developments. Traffic controls (signage and speed restrictions etc.). 	TMP (Final, V2.1), specifically Sections 3 and 4.3, and Appendix B.	The approved Traffic Management Plan includes haulage details. Haulage plans were being discussed with the Materials and Logistic Contractor at the time of the audit site inspection. Compliant.
T4	<ul style="list-style-type: none"> Upon determining the haulage route(s) for construction vehicles associated with the Project, and prior to 	TMP (Final, V2.1), specifically Sections 3 and 4.3, and Appendix B.	While the EIS does commit to undertaking a Road Dilapidation Report once the haulage route is Not triggered.

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	<p>construction, undertake a Road Dilapidation Report. The Report shall assess the current condition of the road(s) and describe mechanisms to restore any damage that may result due to traffic and transport related to the construction of the Project. The Report shall be submitted to the relevant road authority for review prior to the commencement of haulage.</p>	determined, as the full length of both of the Project's determined haulage routes are along RMS heavy vehicle approved routes, a dilapidation report is not required. A dilapidation report is only required for local roads along the haulage route and there are no local roads located along the haulage route.	
T5	<ul style="list-style-type: none"> A Traffic Management Plan would be developed as part of the CEMP and DEMP, in consultation with the Dubbo Regional Council and Roads and Maritime. The plan would include, but not be limited to: <ul style="list-style-type: none"> The designated routes of construction traffic to the site. Carpooling/shuttle bus arrangements to minimise vehicle numbers during construction. Scheduling of deliveries. Community consultation regarding traffic impacts for nearby residents and school/bus operators. Consideration of cumulative impacts, undertaken consultation with Bodangora Wind Farm. Consideration of impacts to the railway. Traffic controls (speed limits, signage, etc.). Procedure to monitor traffic impacts and adapt controls (where required) to reduce the impacts. Providing a contact phone number to enable any issues or concerns to be rapidly identified and addressed through appropriate procedures. 	Refer to MCoA S3.6	Requirements addressed under MCoA S3.6
T6	<ul style="list-style-type: none"> If the ESF is constructed outside the main construction period, a specific traffic management plan would be undertaken to manage any additional impacts. 	<p>Discussion with S&W Project Site Manager.</p> <p>Discussion with LSBP Project Manager.</p>	<p>It was reported that all works have been, and are to be completed within the main construction period.</p> <p>Not triggered.</p>
L1	<p>LAND USE (INCLUDING MINERAL RESOURCES)</p> <ul style="list-style-type: none"> Consultation with local community, to minimise impact of construction of adjacent agricultural activities and access. 	<p>Community Consultation Plan (CCP) Final V2.3'. Table 5-1 specifically outlines community engagement activities at key milestone events.</p> <p>Community Engagement Register.</p>	<p>It was reported that consultation has been undertaken with surrounding landowners on an on-going basis through both meetings and phone calls, with face-to-face meetings being undertaken.</p> <p>Compliant.</p>

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		<p>Discussion with LSBP Principal Environmental Planner Specifically, the adjoining landowners were met with on the following dates to discuss the commencement of and/or progress of construction:</p> <ul style="list-style-type: none"> ○ <u>13-11-19</u> - Mt Tony Inder – North West Boundary ○ <u>28-11-19</u> – Janet & Greg Henman – Western Boundary ○ <u>07-01-20</u> – Soil Conservation Service – Northern Boundary ○ <u>11-01-20</u>, <u>16-01-20</u>, <u>05-02-20</u> – Mr Ross Plasto – South West boundary. 	<p>Generally this consultation is informal, so no formal meeting minutes have been recorded.</p> <p>It was reported that all adjacent landowners have the S&W site managers direct contact details, so can contact them at any time with any concerns.</p>
L2	<ul style="list-style-type: none"> • Consultation would be undertaken with TransGrid regarding connection to the substation and design of electricity transmission infrastructure. 	<p>Correspondence between LSBP and TransGrid, including emails dated 06 Jun 2019, 08 Jul 2019, 19 Nov 2019 and 19 Dec 2019.</p>	<p>Evidence of consultation with TransGrid was provided.</p> <p>A site inspection was undertaken of the TransGrid site. The TransGrid representative did not raise any issue with regard to WSF.</p>
L3	<ul style="list-style-type: none"> • Consultation with proposal site mineral titleholders regarding the proposal and potential impacts. 	<p>Correspondence with the mineral titleholders:</p> <ul style="list-style-type: none"> • Wellington SF_EIS_Appendix K - Mineral Titles Consultation • WSF Response to Submissions _Appendix J • Modelling Resources Correspondence • WSF Response to Submissions _Appendix K - Drummond West Correspondence • WSF Response to Submissions _Appendix L - Boral Correspondence 	<p>Evidence of consultation is provided in the EIS and subsequent response to submissions.</p>
L4	<ul style="list-style-type: none"> • A Rehabilitation Plan would be prepared to ensure the array site is returned to pre solar farm land capability. The plan would be developed with reference to baseline soil testing and with input from an Agronomist to ensure the site is left stabilised, under a cover crop or other suitable ground cover. The plan would reference: 	Nil	<p>This is considered to be required prior to/during decommissioning and as such is not considered triggered.</p>

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	<ul style="list-style-type: none"> ○ Australian Soil and Land Survey Handbook (CSIRO 2009) ○ Guidelines for Surveying Soil and Land Resources (CSIRO 2008) ○ The land and soil capability assessment scheme: second approximation (OEH 2012) 			
	SOILS			
S1	<ul style="list-style-type: none"> • The array would be designed to allow sufficient space between panels to establish and maintain ground cover beneath the panels and facilitate weed control. 	Discussion with LSBP Project Manager.	This is a standardised design requirement to ensure full tilt function of the panel and the to allow maintenance.	Compliant.
S2	<ul style="list-style-type: none"> • As part of the CEMP, a Soil and Water Management Plan (SWMP) (with erosion and sediment control plans) would be prepared, implemented and monitored during the proposal, in accordance with Landcom (2004), to minimise soil (and water) impacts. These plans would include provisions to: <ul style="list-style-type: none"> ○ Carry out soil testing prior to any impacts, to inform any soil treatments and provide baseline information for the decommissioning/rehabilitation. ○ Install, monitor and maintain erosion controls. ○ Ensure that machinery leaves the site in a clean condition to avoid tracking of sediment onto public roads which may cause risks to other road users through reduced road stability. ○ Manage topsoil: In all excavation activities, separate subsoils and topsoils and ensure that they are replaced in their natural configuration to assist revegetation. ○ Stockpile topsoil appropriately so as to minimise weed infestation, maintain soil organic matter, maintain soil structure and microbial activity. ○ Minimise the area of disturbance from excavation and compaction; rationalise vehicle movements and restrict the location of activities that compact and erode the 	<p>Refer to MCoA S3.22 Biodiversity management plan (Rev 3.3).</p> <p>Requirements addressed under MCoA S3.22. The Biodiversity Management Plan also includes mitigation measures for management of soils and machinery</p> <p>Non-Complaint NCS</p> <p>Insufficient and inconsistent evidence of implementation of erosions and sediment controls on site at the time of the audit site inspection.</p>	<p>Non-compliant NC 5 raised under MCoA S3.22</p>	

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S3	<ul style="list-style-type: none"> soils as much as practical. Any compaction caused during construction would be treated such that revegetation would not be impaired. Manage works in consideration of heavy rainfall events; if a heavy rainfall event is predicted, the site should be stabilised, and work ceased until the wet period had passed. 	<p>LSBP Environmental Management Strategy, Appendix D – Spill Response Plan.</p> <p>LSBP Environmental Management Strategy, Appendix C – Environmental Incident Response Plan.</p> <ul style="list-style-type: none"> Respond to the discovery of existing contaminants at the site (e.g. pesticide containers or asbestos), including stop work protocols and remediation and disposal requirements. Requirement to notify EPA for incidents that cause material harm to the environment (refer s147-153 Protection of the Environment Operations Acts). Manage the storage of any potential contaminants onsite. Mitigate the effects of soil contamination by fuels or other chemicals (including emergency response and EPA notification procedures and remediation). Ensure that machinery arrives onsite in a clean, washed condition, free of fluid leaks. Prevent contaminants affecting adjacent pastures, dams, water courses and native vegetation. Monitor and maintain spill equipment. Induct and train all site staff. 	<p>The Environmental Management Strategy includes an incident response plan and spill response plan which address the requirements of this mitigation measure.</p>
S4	<ul style="list-style-type: none"> A Groundcover Management Plan would be developed in consultation with an agronomist and taking account of soil survey results to ensure perennial grass cover is established across the site as soon as practicable after construction and maintained throughout the operation phase. The 	<p>Discussion with LSBP Project Manager</p> <p>Discussion with LSBP Project Site Manager</p> <p>Biodiversity Management Plan (V3.3), including</p>	<p>A Groundcover Management Plan has been established and is provided within Appendix A of the Biodiversity Management Plan. A Soil Agronomist not yet engaged on the project.</p> <p>The Groundcover Management Plan has been</p>

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	plan would cover: <ul style="list-style-type: none"> ○ Soil restoration and preparation requirements ○ Species election ○ Soil preparation ○ Establishment techniques ○ Maintenance requirements ○ Perennial groundcover targets, indicators, condition monitoring, reporting and evaluation arrangements — ie. live grass cover would be maintained at or above 70% at all times to protect soils, landscape function and water quality. Any grazing stock would be removed from the site when cover falls below this level. Grass cover would be monitored on a fortnightly basis using an accepted methodology. ○ Contingency measures to respond to declining soil or groundcover condition ○ Identification of baseline conditions for rehabilitation following decommissioning. 	Appendix A – Groundcover Management Plan, Correspondence from NSW DPIE, dated 20 Dec 2019 endorsing the Biodiversity Management Plan (Version 3.3, dated 19 Dec 2019).	reviewed and approved by the Secretary. The requirements of this mitigation measure are focused on the end of construction and ongoing operational phase On the basis of the stage of construction works, the requirements of this measure were not yet triggered.	
S5	<ul style="list-style-type: none"> • A protocol would be developed in relation to discovering buried contaminants within the proposalsite(e.g. pesticide containers). It would include stopwork, remediation and disposal requirements. 	Soil, Water and Stormwater Management Plan, Rev 2.2 – Appendix D: Discovery of Buried Contaminants Protocol.	A protocol for the discovery of buried contaminants is included within the approved Soil, Water and Stormwater Management Plan.	Compliant.
W1	<p>Hydrology (Surface and groundwater), Water quality and water use</p> <ul style="list-style-type: none"> • The maximum harvestable right for surface water of approximately 32.05ML would not be exceeded. • The WAL would be obtained, should on site ground water sources be used. • The proponent would purchase water from Council if onsite requirements are not sufficient. 	Observations during audit site inspection. Discussion with S&W Project Site Manager.	No dams or water storage features have been established on site and as such the maximum harvestable right for surface water has not been exceeded. It was reported that water is being purchased from Council for water carts, as groundwater is not being utilised.	Compliant.
W2	<ul style="list-style-type: none"> • As part of the CEMP, DOI would be consulted regarding water quality impacts. 	Refer to MCoA S3.21	NSW DPIE has reviewed and approved the Soil, Water and Stormwater Management Plan	Compliant.
W3	<ul style="list-style-type: none"> • Design waterway crossings and services crossing in 	Discussion with LSBP Principal Environmental Planner	Designs for waterway crossings were not finalised	Not triggered.

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	<p>accordance with the publications:</p> <ul style="list-style-type: none"> ○ <i>Why do fish need to cross the road? Fish Passage Requirements for Waterway Crossings</i> (Fairfull & Witheridge, 2003); and ○ <i>Policy and Guidelines for Fish Friendly Waterway Crossings</i> (NSW DPI, 2003). ○ <i>Guidelines for Watercourse Crossings on Waterfront Land</i> (NSW DPI, 2012) ○ <i>Guidelines for Laying Pipes and Cable in Watercourses on Waterfront Land</i> ● (NSW DPI, 2012) 	Discussion with S&W Project Site Manager.	<p>at the time of this audit and no works had been undertaken within waterways.</p> <p>It was reported that following finalisation of designs by the civil design consultant, Robert Bird Group (RBG), drawings are required to be submitted to LSBP for review.</p> <p>It was reported that the civil design consultant has been in contact with the relevant agencies throughout the design process to ensure compliance with all appropriate policies and guidelines specifically regarding the creek crossing and culvert installation.</p>	Compliant.
W4	<ul style="list-style-type: none"> • All fuels, chemicals, and liquids would be stored at least 40m from any waterways or drainage lines, not on sloping land and would be stored in an impervious bunded area. 	Observations during audit site inspection.	<p>The auditor did not identify any non-compliance against the requirements of this condition. Due to the early phase of the project there was minimal fuel and chemical storage on site.</p>	Compliant.
W5	<ul style="list-style-type: none"> • The proposed network of access roads is to be construction from gravel, and within the floodplains itself are to be constructed at the existing surface level so as not to results in adverse impact on flood behaviour. • Any proposed crossing of existing watercourses should, where possible, consist of fords constructed flush with the bed of the watercourse to minimise any hydraulic impact. 	<p>Refer to MCoA S3.5 Refer to W3 above.</p>	<p>Non-complaint NC3: Internal roadways have not yet been constructed as all-weather roadways.</p> <p>Auditor recommendation: The applicant must construct the internal project site roadways as all-weather roadways. Additionally, install wheel wash facilities as nominated within the Biodiversity Management Plan (Section 7.6).</p>	<p>Non-compliant Raised under MCoA S3.5</p>
W6	<ul style="list-style-type: none"> • The refuelling of plant and maintenance would be undertaken in impervious bunded areas on hardstand areas only. 	Observations during audit site inspection. Discussions with S&W Site Manager.	<p>Due to the early phase of the project, hardstands were still being established. Refuelling was not observed during the audit site inspection. It was reported that spill kits and portable bunds are available for use during refuelling.</p>	Compliant
W7	<ul style="list-style-type: none"> • All potential pollutants stored on-site would be stored in accordance with HAZMAT requirements and banded. 	Observations during audit site inspection.	<p>The auditor did not identify any non-compliance against the requirements of this condition. Due to the early phase of the project there was minimal</p>	Compliant.

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W8	<ul style="list-style-type: none"> Roads and other maintenance access tracks would incorporate appropriate water quality/treatment measures such as vegetated swales to minimise the opportunity of dirty water leaving the site or entering the waterways. 	<p>Refer to MCoA S3.22 Biodiversity management plan (Rev 3.3).</p>	<p>fuel and chemical storage on site.</p> <p>Non-Compliant NCS</p> <p>Requirements addressed under MCoA S3.22.</p> <p>Insufficient and inconsistent evidence of implementation of erosions and sediment controls on site at the time of the audit site inspection.</p>
F1	<h3>Flooding</h3> <ul style="list-style-type: none"> The design of buildings, equipment foundations and footings for electrical components and panel mounts would be designed to avoid the 1% AEP flood level to minimise impacts from potential flooding including: <ul style="list-style-type: none"> The solar array mounting piers are designed to withstand the forces of floodwater (including any potential debris loading) up to the 1% AEP flood event, giving regard to the depth and velocity of floodwaters; The layout of the solar array mounting piers are designed to minimise encroachment within the areas of highest velocity and depth. This may necessitate solar module frame spans in excess of those proposed. The mounting height of the solar module frames should be designed such that the lower edge of the module is clear of the predicted 1% AEP flood level. All electrical infrastructure, including inverters, should be located above the 1% AEP flood level. Where electrical cabling is required to be constructed below the 1% AEP flood level it should be capable of continuous submergence in water. The proposed perimeter security fencing should be constructed in a manner which does not adversely affect the flow of floodwater and should be designed to withstand 	<p>Overall site layout.</p> <p>Discussion with S&W Project Site Manager.</p> <p>The Overall site layout provides for tracker heights varying from 1.22m – 1.83m from natural ground to manage flood risks.</p> <p>Designs of other buildings and facilities had not been finalised at the time of the audit.</p>	Compliant.

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F2	<ul style="list-style-type: none"> The proposed network of access roads is to be constructed from gravel, and within the floodplains itself are to be constructed at the existing surface level so as not to result in adverse impact on flood behaviour. Any proposed crossing of existing watercourses should, where possible, consist of fords constructed flush with the bed of the watercourse to minimise any hydraulic impact. Detailed design of fencing to ensure no adverse impact of the flow of floodwater and ability to withstand floodwater, the design may include removable section or collapsible panels. 	<p>Observations during audit site inspection.</p> <p>Discussion with S&W Project Site Manager.</p>	<p>It was reported that detailed design of fencing was not yet complete, and as such the requirement of this condition was not yet triggered.</p>	Not triggered.
F3	<ul style="list-style-type: none"> An Emergency Response Plan incorporating a Flood Response Plan would be prepared prior to construction covering all phases of the project. The plan would: <ul style="list-style-type: none"> Detail who would be responsible for monitoring the flood threat and how this is to be done. Detail specific response measures to ensure site safety and environmental protection. Outline a process for removing any necessary equipment and materials offsite and out of flood risk areas (i.e. rotate array modules to provide maximum clearance of the predicted flood level). Consideration of site access in the event that some tracks become flooded. Establish an evacuation point. Define communications protocols with emergency services agencies. 	<p>Emergency Management Plan.</p>	<p>An emergency management plan has been established on site and includes a procedure for flood response.</p>	Compliant.
RW1	<ul style="list-style-type: none"> A Waste Management Plan (WMP) would be developed to minimise wastes. It would include but 	<p>Waste Management Plan, V1.0 Draft (NGH) 07 March 2019.</p>	<p>A Waste Management Plan (WMP) has been established for the project. Section 6 addresses the</p>	Compliant.

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			requirements of this condition, including: <ul style="list-style-type: none"> Section 6.1 Waste management hierarchy principles. Section 6.2 Classification of waste streams. Section 6.3 Reuse and recycling Section 6.4 Waste handling and storage Section 6.7 Waste tracking Section 6.5 Waste disposal Section 6.6 Waste haulage.
RW2	<p>not be limited to:</p> <ul style="list-style-type: none"> Identification of opportunities to avoid, reuse and recycle, in accordance with the waste hierarchy. Quantification and classification of all waste streams. Provision for recycling management onsite. Provision of toilet facilities for onsite workers and identify that sullage would be disposed of (i.e., pump out to local sewage treatment plant). Tracking of all waste leaving the site. Disposal of waste at facilities permitted to accept the waste. Requirements for hauling waste (such as covered loads). <p>• Septic system is installed and operated according to the Dubbo Regional Council regulations.</p>	<p>Discussion with S&W Site Manager.</p> <p>Discussion with LSBP Project Site Manager.</p>	The site is currently utilising the existing pump out septic system. Temporary amenities facilities were being installed at the time of the audit. It is understood these would also be pump out septic systems.
C1			<p>It was reported that local industry representatives are being contacted as applicable. A local transport operator was observed meeting with the team during the audit to discuss transport logistics.</p> <p>Another local industry focus is the shuttle bus service between Dubbo and the site.</p>
C2	<ul style="list-style-type: none"> Liaison with local industry representatives to maximise the use of local contractors, manufacturing facilities, materials. 	<p>Discussion with S&W Site Manager.</p> <p>Discussion with LSBP Project Site Manager.</p>	<p>It was reported that local real estate agents have been engaged to assist with accommodation need.</p>
C3	<ul style="list-style-type: none"> Liaison with local representatives regarding accommodation options for staff, to minimise adverse impacts on local services Liaison with local tourism industry representatives to manage potential timing conflicts with local events. 	<p>Discussion with S&W Site Manager.</p> <p>Discussion with LSBP Project Site Manager</p>	<p>It was reported that this has been informal and no records were available at the time of the audit.</p>

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C4	The Community Consultation Plan would be implemented to manage impacts to community stakeholders, including but not limited to: Protocols to keep the community updated about the progress of the proposal and proposal benefits. Protocols to inform relevant stakeholders of potential impacts (haulage, noise, air quality etc.). Protocols to respond to any complaints received.	Community Consultation Plan (CCP) Final V2.3.	Compliant.
C5	<ul style="list-style-type: none"> A site inspection is to be undertaken prior to construction to ensure no watermills would be impacted by the proposal. 	Discussion with S&W Site Manager. Discussion with LSBP Project Site Manager. Observations during audit site inspection.	Compliant.
C6	<ul style="list-style-type: none"> If the ESI is constructed outside the main construction period, a specific community notification procedure would be undertaken to manage any additional impacts of this installation. 	Discussion with S&W Project Site Manager. Discussion with LSBP Project Manager. Observations during audit site inspection.	It was reported that all works have been, and are to be completed within the main construction period. Not triggered.
Air quality and Climate			
A1	<ul style="list-style-type: none"> Dust generation by vehicles accessing the site and earthworks at the site would be suppressed using water applications or the other means as required. 	Observations during audit site inspection.	A water cart was observed in operation during the audit site inspections for dust suppression purposes.
A2	<ul style="list-style-type: none"> Vehicle loads of material which may create dust would be covered while using the public road system. 	Observations during audit site inspection. Discussion with S&W Project Site Manager. Discussion with LSBP Project Manager.	It was reported that this is a responsibility of the security guard at the main site access point to ensure compliance with this condition. No non-compliance observed during the audit site inspections and nil complaints received.
A3	<ul style="list-style-type: none"> All vehicles and machinery used at the site would be in good condition, fitted with appropriate emission controls and comply with the requirements of the POEO Act, relevant Australian standards and manufacturer's operating recommendations. Plant would be operated efficiently and turned off when not in use. 	Observations during audit site inspection.	No issues were observed or reported during the audit and generally the operation of plant on site appeared consistent with these requirements.
	Hazards		

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H1	<ul style="list-style-type: none"> Risk control measure would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances, and a safe method of shutting down and isolating the photovoltaic system (either in its entirety or partially, as determined by risk assessment). Other risk control measures for unique site-specific hazards would be included. 	Induction presentation and site signage.	<p>Risk controls measures are defined within risk assessments, SWMS, project plans, site induction and site signage.</p> <p>This audit did not assess safety risk assessments, management or control, however generally the site is considered to have communicated requirements for determining and implementing risk controls.</p>
H2	<ul style="list-style-type: none"> Once constructed and prior to operation, the operator of the facility will contact the relevant local emergency management committee (LEM/C). 	- Nil -	<p>This mitigation measure is identified within the EIS as being applicable to the operational phase, and as such had not been triggered at the time of this audit.</p>
H3	<ul style="list-style-type: none"> Two copies of the ERP are stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s. 	<p>Discussion with LSBP Project Manager.</p> <p>Discussion with LSBP Project Manager.</p>	<p>The site entry gatehouse was being established at the time of the audit site inspection and as such this requirement had not yet been triggered.</p>
H4	<ul style="list-style-type: none"> Dangerous or hazardous materials would be stored and handled in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids. 	Observations during audit site inspection.	<p>The auditor did not identify any non-compliance against the requirements of this condition. Due to the early phase of the project there was minimal fuel and chemical storage on site.</p>
H5	<ul style="list-style-type: none"> Protocols would be developed for lithium-ion battery storage, maintenance, and incident response to mitigate Li-ion fire risks. 	Discussion with LSBP Project Manager.	<p>Final designs for battery storage not completed.</p>
H6	<ul style="list-style-type: none"> The transportation of new and waste lithium-ion batteries would comply with the requirements of the Dangerous Goods Code, including specific 'special provisions' and 'packing instructions' applying to the transportation of Li-ion batteries. 	Discussion with LSBP Project Manager.	<p>It was reported that there has been no transport of lithium-ion batteries.</p>
H7	<ul style="list-style-type: none"> Develop Bush Fire Management Plan to include but not be limited to: <ul style="list-style-type: none"> Specific management of activities with a risk of fire ignition (hot works, vehicle use, smoking, use of flammable materials, blasting) Incorporation of fire safety and response in 	Refer to MCoA S3.26.	<p>Requirement addressed under MCoA S3.26</p> <p>Not triggered</p>

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H8	<ul style="list-style-type: none"> ○ staff and contractor induction, training, OHS procedures and Work Method Statements ○ Designation of a staff safety officer tasked with ensuring implementation of the plan and regular liaison with firefighting agencies ○ Document all firefighting resources maintained at the site with an inspection and maintenance schedule ○ Monitoring and management of vegetation fuel loads ○ A communications strategy incorporating use of mobile phones, radio use (type, channels and call-signs), Fire Danger Warning signs located at the entrance to the site compounds, emergency services agency contacts ● In developing the Fire Management Plan, NSW RFS would be consulted on the volume and location of water supplies, fire-fighting equipment maintained on-site, fire truck connectivity requirements, proposed APZ and access arrangements, communications, vegetation fuel levels and hazard reduction measures. 	<p>This mitigation measure is identified within the EIS as being applicable to the operational phase, and as such had not been triggered at the time of this audit.</p>	Not triggered.
H9	<ul style="list-style-type: none"> ● An APZ of minimum 10 metres would be maintained between remnant or planted woody vegetation and solar farm infrastructure. The APZ around the perimeter of the site would incorporate a 4 metre wide gravel access track. ● Average grass height within the APZ would be maintained at or below 5 centimetres on average throughout the October–March fire season. Average grass height outside the APZ, including beneath the solar array, would be maintained at or below 15 centimetres throughout the fire season. ● The overhead powerlines at the site would be managed by maintaining appropriate vegetation clearance limits to minimise potential ignition risks, in accordance with the ISSC 3 Guideline for Managing Vegetation Near Power Lines. 	<p>This mitigation measure is identified within the EIS as being applicable to the operational phase, and as such had not been triggered at the time of this audit.</p>	Not triggered.
H10	<ul style="list-style-type: none"> ● Appropriate fire-fighting equipment would be 	Discussion with LSBP HSE Manager.	A fire response trailer, water cart and fire Compliant.

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	held on site to respond to any fires that may occur at the site during construction. This equipment will include fire extinguishers, a 1000 litre water cart retained on site on a precautionary basis, particularly during any blasting and welding operations. Equipment lists would be detailed in Work Method Statements.	Discussion with S&W Site Manager. Observations during audit site inspection. Fire trailer onsite, plus water cart and fire extinguishers.	extinguishers are provided to response to fire emergencies.	
H11	• The NSW RFS and Fire and Rescue would be provide with a contact point for the solar farm, during construction and operation.	Discussion with LSBP Project Manager.	Site Project Manager reported that RFS and Fire and Rescue have been contacted; however due to recent bushfires across NSW, resources have not been available.	Compliant.
H12	• Following commissioning of the solar farm, the local RFS and Fire and Rescue brigades would be invited to an information and orientation day covering access, infrastructure, firefighting resources on-site, fire control strategies and risks/hazards at the site.	- Nil -	This mitigation measure is identified within the EIS as being applicable to the operational phase, and as such has not been triggered at the time of this audit.	Not triggered.
H13	• The perimeter access track would comply with the requirements for Fire Trails in the PBP guidelines. All access and egress tracks on the site would be maintained and kept free of parked vehicles to enable rapid response for firefighting crews and to avoid entrapment of staff in the case of bush fire emergencies. Access tracks would be constructed as through roads as far as possible. Dead end tracks would be signposted and include provision for turning firetrucks.	- Nil -	Access tracks have not yet been constructed.	Not triggered.
H14	• A Hot Works Permit system would be applied to ensure that adequate safety measures are in place. Fire extinguishers would be present during all hot works. Where possible hot works would be carried out in specific safe areas (such as the Construction Compound temporary workshop areas).	Hot work permit 19/02/2020 for cutting steel cable with 5' grinder for the new office pad. Permit 001.	Hot work permit process has recently been established and implemented on site.	Compliant.
H15	• Machinery capable of causing an ignition would not be used during bushfire danger weather, including Total Fire Ban days.	Discussion with LSBP Project Manager. Discussion with S&W Site Manager.	It was reported that this condition is taken into consideration during bushfire danger weather.	Compliant.
H16	• Prior to operation of the solar farm, an Emergency Response Plan (ERP) must be prepared in consultation with the RFS and Fire & Rescue NSW. This plan must include but not be	- Nil -	This mitigation measure is identified within the EIS as being applicable to the operational phase, and as such has not been triggered at the time of this audit.	Not triggered.

Environmental Impact Statement – Revised Mitigation Measures – Submissions Report				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	limited to: <ul style="list-style-type: none"> ○ Specifically addresses foreseeable on site and off site fire events and other emergency incidents. ○ Detail appropriate risk control measures to mitigate potential risks to the health and safety of firefighters and other first responders ○ Outline other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site. ○ A copy of the ERP is to be stored in a location directly adjacent to the sites main entry points ● Once constructed and prior to operation, the operator is to contact with the relevant local emergency management committee regarding the site. 		audit.	
H17	● All electrical equipment would be designed in accordance with relevant codes and industry best practice standards in Australia	Discussion with LSBP Principal Environmental Planner	AECOM are engaged as the owners Engineer to verify and validate the designs for the project, including an electrical engineer.	Compliant.
H18	● All design and engineering would be undertaken by qualified and competent person/s with the support of specialist as required.	Discussion with LSBP Principal Environmental Planner	AECOM are engaged as the owners Engineer to verify and validate the designs for the project, including an electrical engineer.	Compliant.
H19	● Design of electrical infrastructure would minimise EMFs.	Discussion with LSBP Principal Environmental Planner	It was reported that the project has been designed in accordance with the International Commission on Non-Ionizing Radiation Protection's (ICNIRP) Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 Hz – 100 kHz), to minimise occupational and public exposure to electric and magnetic fields (EMF). Measures implemented include: <ul style="list-style-type: none"> ● inverter stations have been located central to the site, where practical; ● powerlines and cables have been located underground instead of overhead; ● all electric infrastructure is located a 	Compliant.

Environmental Impact Statement – Revised Mitigation Measures – Submissions Report			
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations
			Compliance Status
			minimum of 10 m from the site boundary; and • a secure perimeter fence will be located around the site, limiting any public access.
	• Transgrid Substation works	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> - CEMP available on site. - Environmental Site Map. - Emergency contacts - Site Layout and Traffic Movement Plan - Environmental Policy - Mobile Plant management Form, 14t Komatsu (last serviced 15/02/2020), Licences/VOC sighted at induction). - Mobile plant management form, tip truck. - Old Bawn service report last service 15/01/2020, plant risk assessment. - Smooth drum roller, service history. - Transgrid site conformance inspections (94.7%) 17 Jan 2020, which includes environmental items. Also sighted records for 30 Jan, and 14 Feb. - Transgrid Environmental inspection 13 Feb 2020 and 15 Jan 2020. - Toolbox talk 14 Feb 2020 discussing site inspection observations. Including contractor sign on. - Waste register. - No incidents. No complaints. - Proactive discussion between Transgrid Site Manager and land lease holder. 	Compliant.
End of EIS MM Checklist.			
End of Audit Table.			



Appendix B: Secretary Approval of Audit Team



Ms Diana Mitchell
Lighsource BP
Lv 10/420 George Street
Sydney NSW 200

29 January 2020

Dear Ms Mitchell

Contact: Jennifer Rowe
Phone: (02) 4247 1851
Reference: SSD 8573

**Wellington Solar Farm (SSD 8573)
Independent Environmental Audit**

I refer to your email dated 24 January 2020 seeking the Secretary's endorsement for an auditor to undertake the Independent Environmental Audit (audit) for the Wellington Solar Farm Project Consent SSD 8573 (**Consent**).

Having considered the qualifications and experience, the Secretary endorses the appointment of Mr Peter Marsham of J2M Systems to undertake the audit in accordance with Schedule 4 Condition 6 of the Consent. This approval is conditional on Mr Peter Marsham being independent of the development.

The audit is to be conducted in accordance with the IAPAR. A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>. Auditors may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems

The audit report is to:

- include a compliance table indicating the compliance status of each condition of consent;
- not use the term "partial compliance"
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this approval; and
- identify opportunities for improved environmental management and performance.

Within 3 months of commissioning the audit, or otherwise as agreed by the Secretary, Lightsource BP is to submit a copy of the audit report to the Secretary together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Secretary, it is recommended that Lightsource BP reviews the report to ensure it complies with the relevant approval condition.

Should you wish to discuss this matter please contact Jennifer Rowe on the details above.

Yours sincerely,

Katrina O'Reilly
Team Leader Compliance
as nominee for the Secretary



Appendix C: Consultation

Subject: RE: Request for consultation - Wellington Solar Farm Independent Environmental Audit

From: Jennifer Rowe - To: peter@j2m.com.au - Cc: - Date: 11 February 2020 at 11:46 am, Attachments: image001.jpg

Subject: Wellington Solar Farm Independent Audit Feedback - Department of Primary Industries (Agriculture)

From: Mary Kovac - To: peter@j2m.com.au - Cc: - Date: 19 February 2020 at 4:29 pm

Subject: Fwd: Request for consultation - Wellington Solar Farm Independent Environmental Audit

From: Lands Ministerials - To: peter@j2m.com.au - Cc: - Date: 17 February 2020 at 4:20 pm



Our reference : SF18/39201; DOC20/121131
Contact : Brooke Emerton, 02 6883 5368

The Director
J2M Systems Pty Ltd
PO Box 163
NEWPORT BEACH NSW 2106

17 February 2020

Dear Mr Marsham,

RE: Independent Environmental Audit – Wellington Solar Farm Project (SSD 8573)

I refer your email to the Environment Protection Authority (EPA) on 29 January 2020 seeking feedback on the environmental performance of the Wellington Solar Farm Project for the purpose of an independent environmental audit.

The EPA notes that the project is not a Scheduled Activity listed in Schedule 1 of the *Protection of the Environment Operations Act 1997* ("the Act") and is not being undertaken by a public authority. Therefore, the EPA does not regulate the project under the Act and holds no information about its performance.

I encourage you to engage with Dubbo Regional Council to obtain information on the project's environmental performance.

If you have any questions or wish to discuss this matter further, please contact Brooke Emerton at the EPA's Central West Dubbo office by telephoning 02 6883 5368 or by email at central.west@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "DUNCAN McGREGOR".

DUNCAN McGREGOR
Acting Unit Head Central West Region
Environment Protection Authority

Subject: RE: WST17/00102/13 - Wellington Solar Farm; Independent Environmental Audit

From: Bevan Crofts - To: peter@j2m.com.au - Cc: Diana Mitchell, Ainsley Bruem, Development Western, Keri Macgregor - Date: 2 March 2020 at 1:02 pm, Attachments: image001.jpg



Appendix D: Independent Audit Declaration Form

Independent Audit Declaration Form

Project Name	Wellington Solar Farm
Consent Number	SSD 8573 Mod 1
Description of Project	Solar Farm (Construction)
Project Address	Goolma Road, Wuuluman NSW
Proponent	Lightsource BP
Title of Audit	Independent Environmental Audit – Wellington Solar Farm
Date	27 March 2020

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2018)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- 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;
- 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;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- 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.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Audit	Peter Marshman
Signature	
Qualification	Lead EMS Auditor – Exemplar Global No. 114942
Company	J2M Systems
Company Address	P.O. Box 163 Newport Beach NSW 2106



Appendix E: Site Inspection Photographs.

Site Inspection Observations

A site inspection was carried out as part of this audit with the following photos taken of key work areas and environmental control measures.

	
Photo 1: Establishment of site compound and laydown area.	Photo 2: Internal access tracks, using existing farm tracks, are not yet constructed as all weather access.
	
Photo 3: Evidence of approved vegetation clearing within project boundary.	Photo 4: Main site access road between Goolma Rd and the site compound. No erosion and sediment controls to present scouring etc.
	
Photo 5: Evidence of flagging to delimitate exclusion zone – former Aboriginal heritage artefact site prior to salvage.	Photo 6: Evidence of existing water way crossing.

	
Photo 7: Evidence of riparian exclusion zone.	Photo 8: Evidence of coarse woody debris maintained on site for later beneficial reuse.
	
Photo 9: Evidence of perimeter fencing being installed at time of audit site inspection.	Photo 10: Evidence of maintained vegetation and cleared vegetation for installation of perimeter fencing.
	
Photo 11: Example of plant on site.	Photo 12: Works underway to establish the site access point.
	
Photo 13: Rumble pad installed at the site access point.	Photo 14: Water cart observed in operation at the site access point.

	
Photo 15: Water cart observed in operation on internal access track.	Photo 16: General overview of project area. Recent rainfall has increased the quality of groundcover.
	
Photo 17: Evidence of cable trenching for subsurface 11kV transmission line relocation.	Photo 18: Evidence of environmental exclusion zone fencing.
	
Photo 19: Vegetation clearing and retention of coarse woody debris.	Photo 20: Evidence of environmental exclusion zone.
	
Photo 21: Evidence of environmental exclusion zone fencing for riparian vegetation at Wuulman Creek.	Photo 22: Evidence of environmental exclusion zone for riparian vegetation at Wuulman Creek.

	
Photo 23: Establishment of contractors site compound.	Photo 24: Fire fighting equipment maintained near site office.
	
Photo 25: Exclusion zone established around unexpected find – Aboriginal heritage artefact.	Photo 26: Exclusion zone established around unexpected find – Aboriginal heritage artefact.
	
Photo 27: Exclusion zone established around Aboriginal heritage artefact prior to salvage.	Photo 28: Earthworks commencing on site, with minimal downstream erosion and sediment controls.
	
Photo 29: Mulch and woody debris stockpiled for beneficial reuse on site.	Photo 30: Site office parking in existing driveway of the Narrawa Homestead.



Photo 31: Exclusion zone established adjacent to Narrawa Homestead.



Photo 32: Site access area: Upslope 'clean water' diversion drain without adequate erosion and sediment control measures.



Photo 33: Vegetation removal on site within the project boundary.



Photo 34: TransGrid substation site compound.



Photo 35: TransGrid substation bench extension.



Photo 36: TransGrid substation work area.



Photo 37: TransGrid substation work area.

23 March 2020

NSW Department of Planning, Industry and Environment
Attn: Ms. Jennifer Rowe
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Dear Ms. Rowe,

Re: Wellington Solar Farm – Independent Environmental Audit - Non-Compliance Notification

In accordance with condition 4 (Non-Compliance Notification), Schedule 4 (Environmental Management) of the State significant development consent (SSD 8573) (the “Consent”) for the Wellington Solar Farm (the “Project”), I am writing to notify you that it has been identified that the Project is non-compliant with five conditions of the Consent. Refer to Table 1 which provides details of the five non-compliances, including:

- the condition of the Consent that the Project is non-compliant with;
- the way in which the Project does not comply and the reasons for the non-compliance (if known); and
- what actions have been, or will be, undertaken to address the non-compliance.

These non-compliances first came to our attention upon receipt of the Draft Independent Environmental Audit report from Peter Marshman of J2M Systems on 16 March 2020. The report is currently being finalised, and we will provide the Department of Planning, Industry and Environment (DPIE) with a copy of the finalised report in the near future, in accordance with condition 5 (Independent Environmental Audit), Schedule 4 (Environmental Management of the conditions of Consent).

Thank you and feel free to contact me on 0409 691 473 if you have any questions.

Yours sincerely,



Diana Mitchell
Principal Environmental Planner



Table 1: Details of Non-Compliances

Condition of Consent / Approval ID	Specific Requirement	Independent Audit Finding	Independent Auditor Recommendation	Lightsource BP Response
Condition 13, Schedule 2 Revised Mitigation Measure B11	<p>The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is:</p> <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. 	<p>Whilst plant appears to be operated in a proper and efficient manner, processes to ensure plant are maintained in a proper and efficient manner appear inconsistently implemented on site with the following issues identified:</p> <ul style="list-style-type: none"> - Plant Pre-mobilisation Checklist records were inconsistently completed and not available for half of the items of plant sampled. - Plant register not maintained. - Plant weed hygiene forms not available for 2 of 5 items of plant sampled. 	<p>Implement measures outlined in the CEMP for management of plant and equipment, including but not limited to weed hygiene declarations, plant pre-mobilisation checklist and plant register.</p> <ul style="list-style-type: none"> - a plant register. 	<p>The Project's EPC Contractor, Sterling & Wilson (S&W), has developed and implemented the following for all plant and equipment used on site:</p> <ul style="list-style-type: none"> - weed hygiene declarations; - plant pre-mobilisation checklists; and - a plant register.
Condition 2, Schedule 3	<p>The Applicant must keep accurate records of the number of heavy vehicles entering or leaving the site each day.</p>	<p>There is limited evidence available with regard to accurate records of heavy vehicles entering or leaving the site each day.</p>	<p>Vehicle tracking register to be established, implemented and maintained to address this requirement. Site Delivery Driver Logs to be maintained to assist with capturing records of heavy vehicle movements each day.</p>	<p>S&W has developed and implemented the following:</p> <ul style="list-style-type: none"> - a vehicle tracking register; and - site delivery driver logs for all heavy vehicle movements.
Condition 5, Schedule 3 Revised Mitigation Measure W5	<p>The Applicant must ensure:</p> <ul style="list-style-type: none"> (a) the internal project site roadways are constructed as all-weather roadways; (b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; (c) the capacity of the existing roadside drainage network is not reduced; (d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) vehicles leaving the site are in a clean condition and do not result in dirt being tracked onto the public road network. 	<p>Internal roadways have not yet been constructed as all-weather roadways.</p>	<p>In accordance with the 'Road layout and cross section details' (RLCSD-302) prepared by Robert Bird Group, construct the internal project site roadways as all-weather roadways. Additionally, install wheel wash facilities as nominated within the Biodiversity Management Plan (Section 7.6).</p>	<p>S&W are currently constructing the internal roadways as all-weather roadways in accordance with the 'Road layout and cross section details' (RLCSD-302) prepared by Robert Bird Group. A wheel wash facility has been installed by S&W at the site access point, as nominated within the Biodiversity Management Plan.</p>

Condition of Consent / Approval ID	Specific Requirement	Independent Audit Finding	Independent Auditor Recommendation	Lightsource BP Response
Condition 11, Schedule 3	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> - protecting vegetation and fauna habitat outside the approved disturbance areas; - maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and (b) include a seasonally based program to monitor and report on the effectiveness of these measures; and (c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. <p>Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> 	<p>During the site inspection, the following non-conformities were identified against the requirements of the plan:</p> <ul style="list-style-type: none"> - Section 7.1 of the LP: A ground disturbance permit process has not been implemented for works that have occurred within Management Zones 1 and 2. - Section 7.2 and 10.3 of the LP: The cumulative amount of vegetation cleared has not been progressively monitored. - Section 7.2.2 and 10.3 of the LP: Pre-clearing surveys to identify habitat trees was not completed prior to clearing vegetation on site. - Section 7.2.6 of the LP: Hollow-bearing tree removal procedure not implemented. 	<p>Establish and record the cumulative amount of vegetation cleared and ensure the project is within approved limits.</p> <p>Implement all requirements of the BMP for any future clearing, pre-clearing surveys to identify habitat trees, ground disturbance permit and hollow-bearing tree removal procedure as applicable.</p>	<p>S&W, in consultation with us, have formed the view that in accordance with the BMP, pre-clearance surveys of hollow-bearing trees were only required to be undertaken if vegetation clearing occurred between the months of June and January, in order to avoid impacts to Corben's Long-eared Bat, whose breeding and core hibernation period occur during those months. As such, vegetation clearing did not commence until after the 31 January 2020.</p> <p>Notwithstanding, for all future vegetation clearing S&W will implement the following procedures:</p> <ul style="list-style-type: none"> - undertake pre-clearing surveys for any additional vegetation to be removed to identify habitat trees; - implement a ground disturbance permit requirement in order to record the cumulative amount of vegetation cleared to ensure it is within the approved Project limits; - implement a hollow-bearing tree removal procedures for any additional hollow-bearing trees to be removed.

Condition of Consent / Approval ID	Specific Requirement	Independent Audit Finding	Independent Auditor Recommendation	Lightsource BP Response
Condition 22, Schedule 3 Revised Mitigation Measure S2 and W8	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) 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; (b) ensure the solar panels and associated infrastructure are designed, constructed and maintained to avoid causing any erosion on site; (c) ensure all works (including waterway crossings) are conducted in accordance with the: - <i>Guidelines for Controlled Activities on Waterfront Land</i> (2012), or its latest version; and - <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (2004), or its latest version. 	<p>Whilst an overarching Erosion and Sediment Control Plan has been established for the project, at the time of the audit site inspection there was limited evidence to support implementation compliance with the relevant requirements of the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) (The Blue Book). Issues identified on site included:</p> <ul style="list-style-type: none"> - It was not evident that controls as defined in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) had been installed consistently across the site. - Ground disturbance activities were occurring without downstream erosion and sediment controls. - Limited proactive drainage measures installed to direct water off internal access roads to prevent scouring. - Part of the cleared area at the site access point appeared to drain within controls into a "clean water" diversion drain. 	<p>Install and maintain adequate erosion and sediment controls across the site in accordance with the requirements of <i>Managing Urban Stormwater: Soils and Construction Manual</i> (Landcom, 2004).</p>	<p>S&W has installed and is maintaining erosion and sediment controls across the site on a progressive basis, in accordance with the requirements of <i>Managing Urban Stormwater: Soils and Construction Manual</i> (Landcom, 2004).</p>



Diana Mitchell,
Principal Environmental Planner
Lightsource bp

29/4/2020

RE: Response to Independent Environmental Audit, Wellington Solar Farm SSD 8573 undertaken on 27 March 2020.

J2M Systems Pty Ltd attended site on 27 March 2020 to undertake an independent environmental audit (IEA) at the Wellington Solar Farm (referred to as the 'Project') in accordance with Schedule 4, Condition 6 of the NSW Department of Planning, Infrastructure and Environment (NSW DPIE) Project Approval SSD 8573 Modification 1 ('Project Approval').

In accordance with Schedule 4, Condition C6 (d) of the Consent, an assessment of the project's compliance with relevant requirements in the approval, and any strategy, plans or programs required under the Project Approval was undertaken. The assessment findings included 5 NCRs and 8 observations for Sterling and Wilson to address; these are briefly described in the table below; further information and evidence of compliance closeout are included in the attachment.

Non-Compliances

J2M Report Reference	Consent Reference	Summary of auditor response	Sterling & Wilson Response
WSFIEA-2020-NC01	MCoA S2.13 & RMM B11.	Non-Compliant NC1: Plant Management processes inconsistently implemented.	Weed hygiene declarations have been in use since the commencement of works, unfortunately not all records were available during the audit. Record keeping has since been improved – see attachment part A for examples of plant management processes.
WSFIEA-2020-NC02	MCoA S3.2	Non-compliant NC2: Limited records of heavy vehicle movement	All delivery drivers are required to undertake a delivery driver induction, this is outlined in the project induction and onsite at the gate entry. A log for the delivery trucks has since been implemented, see Attachment part B .
WSFIEA-2020-NC03	MCoA S3.5 & RMM W5.	Non-complaint NC3: Internal roadways have not yet been constructed as all-weather roadways.	The all-weather roadways have commenced construction, due for completion in early May 2020, see Attachment C .
WSFIEA-2020-NC04	MCoA S3.11	Non-Compliant NC4: System non-conformities including; Lack of ground disturbance permits, vegetation clearance monitoring, pre-clearing surveys not completed, hollow bearing tree removal procedure not implemented.	A ground disturbance permit procedure and tracking register has been implemented. Vegetation clearance tracking has commenced and will be undertaken throughout the clearing works on the project. An ecologist has attended site to supervise hollow bearing tree removal, see Attachment part D .

STERLING AND WILSON SOLAR AUSTRALIA PTY LTD

Registered Address: Suite 53, Level 2, 15 Labouchere Road PO BOX No. 1005, South Perth WA 6151
Australian Company Number. 632 960 680

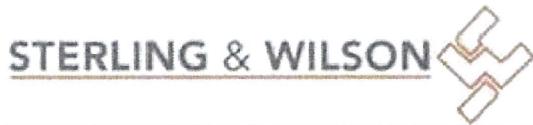
WSFIEA-2020-NC05	MCoA S3.11	Non-compliance – NC 5: limited evidence to support implementation compliance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction (Landcom, 2004)	The site erosion and sedimentation controls have been revised and bolstered in line with best practice and the NSW Bluebook. Additional actions have been undertaken throughout the project and will be continually monitored and adjusted progressively as required. See Attachment part E for example of updated controls in line with the project ESCP.
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Recommendations and Areas for Improvement:

J2M Report Reference	Consent Reference	Summary of auditor response	Sterling & Wilson Response
WSFIEA-2020 AR1	MCoA S3.6	Incorrect version of the Traffic Management Plan being used.	Traffic Management Plan v2.0 is being used onsite, until such time as v2.1 is approved.
WSFIEA-2020 AR2	MCoA S3.8	Limited evidence of driver induction being communicated to drivers.	Delivery driver inductions are being undertaken for all deliveries to site, frequent delivery drivers undergo full project induction. See Appendix F.
WSFIEA-2020 AR3	MCoA S3.8	The posted onsite speed limit of 40km/h contradicts the 20km/h limit nominated in the TMP. Controls listed in the approved TMP are required to be implemented.	<p>Page 7 of the LSPB states: <i>Traffic Control Plans (TCPs) are to be finalised prior to works being undertaken. TCPs will implement specific controls that have been identified in this TMP. TCPs will specify the description, position, quantity, applicability, behaviour, and methodology of actions on the road network (on and off-site), including speed limit alterations, road signage, junction upgrades, behaviour of drivers, control mechanisms, reporting.</i></p> <p>Section 2.1 of the S&W TMP states: <i>All drivers are to be made aware that the posted speed limit within the site is 40kp/h. The exception to this is along the area of the site offices where the speed will be limited to 20kp/h. See Appendix G</i></p>
WSFIEA-2020 AR4	MCoA S3.8	It appears that NGH Environmental have updated the version numbering of the LP immediately following approval of the Secretary, i.e. the submitted and approved LP Version 2.3 became a final version 2.4 for issue after approval.	LSPB are currently addressing this item.
WSFIEA-2020 AR5	MCoA S3.11	Weed management has not been undertaken as per the Biodiversity Management Plan.	S&W are currently in the process of onboarding a contractor to undertake the first round of weed control throughout the site. Weed spray report to be provided to client in May 2020.
WSFIEA-2020 AR6	MCoA S4.3	Permissions required for submission of plans or programs without consultation.	LSPB are currently addressing this item.
WSFIEA-2020 AR7	S&W CEMP	Understanding and implementation of the CEMP has not been demonstrated onsite.	S&W have engaged an environmental consultant from Wolfpeak Pty Ltd to attend site in order to assist with the communication and implementation of the project CEMP. Actions since the audit have included assessing current

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			and upcoming risks, adherence to CEMP and project approvals, updating site controls, records management, creating a compliance tracking system and overall onsite guidance in line with the requirements of the CEMP.
WSFIEA-2020 AR8	Soil, Water and Stormwater Management Plan	Soil and Water monitoring and inspection processes are not clearly defined.	As per page 72 of the S&W CEMP soil and water inspections are undertaken and documented weekly, before rain events to identify any additional controls required, and after rain events to assess the effectiveness of controls. The Project CEMP is currently under review which will further define environmental monitoring responsibilities on the site, due for submission in late May 2020.

If you require any further information relating to the closeout of the non-conformances and observations identified in the independent environmental inspection, please advise.

Regards,

Colin Lovett

A handwritten signature in black ink, appearing to read "Colin Lovett".

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