

Goulburn River Solar Farm

Assessment of Environmental System Compliance in accordance with
SSD-33964533 Development Consent IEA#2

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|--------------------------------|--|
| Audit Reference: | GRSF-02 |
| Audit Organisation: | Lightsource Development Services Australia Pty Ltd (Proponent) DT Infrastructure (Contractor) Enerven (Contractor) |
| Auditor: | Grant Brown, APP (Lead Auditor) |
| Auditor (report updates only): | Barbara Pater, BVBI (Lead Auditor) |
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This report has been prepared and reviewed in accordance with our quality control system.

This report has been prepared by:

Grant Brown

Lead Environmental Auditor

Date: 09 December 2025

Finalised and issued (V2) by:

Grant Brown

Lead Environmental Auditor

Date: 13 January 2026

Finalised and issued (V3) by:

Barbara Pater

Lead Environmental Auditor

Date: 20 May 2026

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1. Executive Summary

The Goulburn River project consists of a 585 MWp solar farm and battery energy storage system (BESS), located between Wollar and Merriwa, on Wollara Road, in the Upper Hunter Region of NSW. Lightsource bp will construct and operate the project and deliver renewable energy to Australia's grid network.

Lightsource bp have appointed DT Infrastructure (DTI) as the head contractor for the construction of this development. Transgrid has commenced work on site as contracting partner, with their scope of work on the project to design, procure and construct the switching station and substation, including two towers on the project footprint to connect to the grid. Enerven has been engaged by Transgrid as the Principal Contractor for these works. DTI is responsible for the civil construction of the substation bench.

More generally, the project includes a battery to shift renewable energy to night-time peaks and support the reliable operation of Australia's grid network. The project will also include operation and maintenance buildings, a temporary onsite workers accommodation camp, and electrical infrastructure required to connect to the existing electricity network.

This Audit Report presents the outcomes of the second independent environmental audit (IEA) of the project, conducted for the assessment of environmental controls established by Lightsource bp, DTI and Enerven against the requirements of State Significant Development SSD-33964533 for the project, in accordance with the *Independent Audit Post Approval Requirements (IAPAR 2020)*.

The audit was conducted by The APP Group (APP) on 19 November 2025 which encompassed a review of Schedule 2 Parts A, B, C and Appendices of the SSD-33964533 Development Consent conditions within 26 weeks of the first IEA. The audit period is therefore defined as 19 June 2025 to 19 November 2025.

Please note that effective 31 October 2025, APP Corporation Pty Limited (ACN 003 764 770) changed its entity name to Bureau Veritas Buildings and Infrastructure Pty Ltd (ACN 003 764 770). This change occurred during the period of finalisation of the previous audit report V2. Therefore, some references have been made to Bureau Veritas Buildings and Infrastructure (BVBI) throughout this report version (V3).

Review of Compliance

The independent environmental audit assessed a total of 82 conditions of consent comprising of a review of documents and records, interviews with key personnel and a site inspection. The following key strengths were noted:

- ▶ Strong collaboration between Lightsource bp and all contractors and partners was demonstrated with responsibility of conditions requirements clearly assigned to meet compliance.
- ▶ Clear communication protocols established for roadworks on local roads approaching the solar farm site.
- ▶ Installation and maintenance of environmental controls and established no-go zones (for heritage and ecological protection)
- ▶ Fencing of the site boundary and biodiversity fencing is progressing quickly
- ▶ Ecologists and fauna spotter catchers active on site
- ▶ Good management of the Transgrid pad site – this is well organised and well maintained
- ▶ Proactive measures undertaken to address actions raised onsite.

Notices, Incidents & Complaints

A Warning Letter was issued by DPHI on 26 August 2025 to Lightsource bp for failing to submit Final Layout Plans prior to commencing construction (Schedule 2, Condition C8) - NSW Planning ref: ENF-91571464. No further action was noted during the audit period.

Two reportable incidents have occurred on the Project to date:

1. Three designated No-Go Zones near the Temporary Workers Accommodation (TWA) were compromised. Incident occurred 01/09/25 and DPHI notified in writing on 02/09/25. An investigation was undertaken following the incident with details provided to DPHI as per Lightsource bp report dated 29 September 2025.
2. An estimated 1,500 litres of diesel was released across approximately 100 m2 of compacted gravel within the camp generator compound. Incident occurred 11/10/25 and DPHI notified in writing on 13/10/25. DTI notified NSW EPA on 12/10/25 via the EPA Hotline (Incident# 537911). The EPA confirmed they did not require an investigation. A follow up report was provided from Lightsource bp to DPHI on 10/11/25 with details of the investigation and outcome, an attached environmental investigation report, waste disposal evidence at licenced facility, and photos of replenished spill kits.

In accordance with the IAPAR 2020, a review of complaints was undertaken – refer to [Section 6.2](#) of this report.

Audit Findings Summary

A total of forty-one (41) non-conformances have been recorded, five (5) of which have been captured as part of this audit, with the remaining thirty-six (36) as aligned to those self-reported during the scope of this audit. Two Opportunities for Improvement (OFI) were also raised.

Self-Reported Non-Compliances

A summary of these findings has been tabled below. For ease of identification, self-reported non-compliances have been separated as follows:

| Finding No. | Condition of Consent | Audit Finding Details |
|----------------------|--|--|
| GRSF-02_NC-01 | B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | A self-reported non-compliance was notified against Condition B5 on 22 July 2025, under SSD-33964533-PA-29. |
| GRSF-02_NC-02 | B3: Access Route Unless otherwise agreed by the Planning Secretary, all heavy vehicles and heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway / Ringwood Road intersection as shown in Figure 3 and Figure 4 in Appendix 4. | A self-reported non-compliance was notified against Condition B3 on 31 July 2025, under SSD-33964533-PA-31. |
| GRSF-02_NC-03 | B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway | A self-reported non-compliance was notified against Condition B5 on 6 August 2025, under SSD-33964533-PA-33. |

| Finding No. | Condition of Consent | Audit Finding Details |
|---------------|--|---|
| | must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | |
| GRSF-02_NC-04 | B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | A self-reported non-compliance was notified against Condition B5 on 13 August 2025, under SSD-33964533-PA-34. |
| GRSF-02_NC-05 | B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | A self-reported non-compliance was notified against Condition B5 on 15 August 2025, under SSD-33964533-PA-35. |
| GRSF-02_NC-06 | B29(b): Operating Conditions The Applicant must: (b) ensure that construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual and the <i>Managing Urban Stormwater: Soils and construction - Volume 2A</i> manual (Landcom, 2008), or their latest versions; | A self-reported non-compliance was notified against Condition B29(b) on 27 August 2025, under SSD-33964533-PA-39. |
| GRSF-02_NC-07 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | A self-reported non-compliance was notified against Condition B4(a) on 28 August 2025, under SSD-33964533-PA-38. |
| GRSF-02_NC-08 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | A self-reported non-compliance was notified against Condition B4(a) on 8 September 2025, under SSD-33964533-PA-40. |
| GRSF-02_NC-09 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: | A self-reported non-compliance was notified against Condition B4(a) on 11 September 2025, under SSD-33964533-PA-41. |

| Finding No. | Condition of Consent | Audit Finding Details |
|---------------|---|--|
| | (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | |
| GRSF-02_NC-10 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 16 September 2025, under SSD-33964533-PA-42. |
| GRSF-02_NC-11 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 18 September 2025, under SSD-33964533-PA-43. |
| GRSF-02_NC-12 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 18 September 2025, under SSD-33964533-PA-45. |
| GRSF-02_NC-13 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 19 September 2025, under SSD-33964533-PA-44. |
| GRSF-02_NC-14 | <p>B17: Construction, Upgrading and Decommissioning Hours</p> <p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <p>(a) 7 am to 6 pm Monday to Friday;</p> <p>(b) 8 am to 1 pm Saturdays; and</p> <p>(c) at no time on Sundays and NSW public holidays.</p> | A self-reported non-compliance was notified against Condition B17 on 30 September 2025, under SSD-33964533-PA-46 regarding working outside the approved hours. |
| GRSF-02_NC-15 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> | A self-reported non-compliance was notified against Condition B4(a) on 2 October 2025, under SSD-33964533-PA-47. |

| Finding No. | Condition of Consent | Audit Finding Details |
|---------------|--|---|
| | (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | |
| GRSF-02_NC-16 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 3 October 2025, under SSD-33964533-PA-51. |
| GRSF-02_NC-17 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 3 October 2025, under SSD-33964533-PA-49. |
| GRSF-02_NC-18 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 4 October 2025, under SSD-33964533-PA-50. |
| GRSF-02_NC-19 | <p>B3: Access Route</p> <p>Unless otherwise agreed by the Planning Secretary, all heavy vehicles and heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway / Ringwood Road intersection as shown in Figure 3 and Figure 4 in Appendix 4.</p> | A self-reported non-compliance was notified against Condition B3 on 8 October 2025, under SSD-33964533-PA-53. |
| GRSF-02_NC-20 | <p>B26: Heritage Management Plan</p> <p>Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development and to the satisfaction of the Planning Secretary. This plan must:</p> <p><i>Refer to (a) through to (c)</i></p> <p>Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.</p> | A self-reported non-compliance was notified against Condition B26 on 10 October 2025, under SSD-33964533-PA-48. |
| GRSF-02_NC-21 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> | A self-reported non-compliance was notified against Condition B4(a) on 10 October 2025, under SSD-33964533-PA-54. |

| Finding No. | Condition of Consent | Audit Finding Details |
|----------------------|---|---|
| | (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | |
| GRSF-02_NC-22 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 10 October 2025, under SSD-33964533-PA-55. |
| GRSF-02_NC-23 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 16 October 2025, under SSD-33964533-PA-56. |
| GRSF-02_NC-24 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 19 October 2025, under SSD-33964533-PA-57. |
| GRSF-02_NC-25 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 20 October 2025, under SSD-33964533-PA-58. |
| GRSF-02_NC-26 | <p>B4(b): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(b) must exit Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(b) on 24 October 2025, under SSD-33964533-PA-60. |
| GRSF-02_NC-27 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 27 October 2025, under SSD-33964533-PA-63. |

| Finding No. | Condition of Consent | Audit Finding Details |
|---------------|--|---|
| GRSF-02_NC-28 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 27 October 2025, under SSD-33964533-PA-62. |
| GRSF-02_NC-29 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 27 October 2025, under SSD-33964533-PA-61. |
| GRSF-02_NC-30 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 29 October 2025, under SSD-33964533-PA-64. |
| GRSF-02_NC-31 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 3 November 2025, under SSD-33964533-PA-65. |
| GRSF-02_NC-32 | <p>B1(a)(i): Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions</p> <p>The Applicant must ensure that the:</p> <p>(a) development does not generate more than:</p> <p>(i) 55 heavy vehicle movements a day (a maximum of 15 heavy vehicle movements per hour) during construction, upgrading or decommissioning</p> | A self-reported non-compliance was notified against Condition B1(a)(i) on 6 November 2025, under SSD-33964533-PA-66 |
| GRSF-02_NC-33 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a), B4(b) and B5 on 7 November 2025, under SSD-33964533-PA-68, capturing 3 x non-compliances under the notification. |
| GRSF-02_NC-34 | <p>B4(b): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> | |

| Finding No. | Condition of Consent | Audit Finding Details |
|----------------------|---|--|
| GRSF-02_NC-35 | <p>(b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.</p> <p>B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4.</p> | |
| GRSF-02_NC-36 | <p>B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4.</p> | <p>A self-reported non-compliance was notified against Condition B5 on 11 November 2025, under SSD-33964533-PA-73.</p> |

Table 1-1 - Audit Findings (self-reported)

These findings have been further detailed under [Appendix F](#) – Self-Reported Non-Compliances.

Findings identified during the Audit

Five (5) non-compliances and two (2) opportunities for improvement were raised as part of this audit as follows:

| Finding No. | Condition of Consent | Audit Finding Details |
|--|---|--|
| <p>Non-Compliance</p> <p>GRSF-02_NC-37</p> | <p>A3: The development may only be carried out:</p> <ul style="list-style-type: none"> (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in Appendix 1. | <p>Non-compliances with the consent conditions were identified during the scope of this audit. A non-compliance has therefore been triggered against Condition A3(a).</p> |
| <p>Non-Compliance</p> <p>GRSF-02_NC-38</p> | <p>B7: Road Upgrades</p> <p>Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must complete the road upgrades detailed in Appendix 4.</p> <p>Unless the relevant roads authority agrees otherwise, these upgrades must comply with the current <i>Austroads Guidelines, Australian Standards</i> (as amended by TfNSW supplements), and be carried out to the satisfaction of the relevant roads authority.</p> | <p>A non-compliance was identified by DPHI following an inspection of the site on 5 November 2025: Failure to undertake road upgrades within 6 months of commencing construction in relation to Wollara Road and Ringwood Road i.e. by 14 October 2025, as observed on 5 November 2025 (Schedule 2, Condition B7). This was recorded as a breach by DPHI as detailed in their letter dated 17 November 2025, ref: INS-98404214.</p> <p>This has therefore been captured as a non-compliance as part of this audit.</p> |

| Finding No. | Condition of Consent | Audit Finding Details |
|---|---|---|
| <p>Non-Compliance GRSF-02_NC-39</p> | <p>B16. Prior to carrying out any development that could directly or indirectly impact biodiversity values, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> (i) be prepared in accordance with the Biodiversity Development Assessment Reports dated 11 January 2024 and 18 January 2024 provided in the Amendment Report; (ii) include a description of the measures and timeframes that would be implemented for: (viii) controlling weeds, feral pests and pathogens in consideration of the relevant Commonwealth threat abatement plans; | <p>This condition requires not only that the BMP is prepared in consultation with BCS and approved by the Planning Secretary, but that it <i>“includes a description of the measures and timeframes <u>that would be implemented</u> for controlling weeds, feral pests and pathogens in consideration of the relevant Commonwealth threat abatement plans.”</i></p> <p>Although pre-clearing ecological surveys were undertaken by the project ecologists in the early stages of the project, recent weed surveys conducted in September 2025 identified invasive weed species within Stage 1 and Stage 8. The surveys undertaken were utilised to identify areas requiring management, identifying areas of Priority and High Threat Weeds requiring management.</p> <p>The survey report provides treatment recommendations in Section 4.4.3 however there is no evidence of these recommendations being implemented.</p> <p>The audit recognises that the procurement of a weed sub-contractor has been challenging, with one only recently procured, and treatment to commence in early 2026. However, the procurement process should have commenced much earlier in order for the project to implement Biodiversity Mitigation and Management Measures for the Project (as per Table 6.1 of the BMP) within required timeframes.</p> <p>In particular, BMP Mitigation Measures 13 & 14 (BMP-13 and BMP-14) have not been implemented.</p> |
| <p>Non-Compliance GRSF-02_NC-40</p> | <p>B21. The Applicant must minimise the dust generated by the development.</p> | <p>The Applicant is not minimising dust generation across the project. As aligned to DPHI’s comments following their inspection on the 5 November 2025, a non-compliance has been raised against Condition B21, further detailed as below.</p> <p>During the site inspection, multiple separate instances of dust generation from light vehicles, semi-trailers and moxys was witnessed across site. Wheel generated dust and wind generated dust from loads was clearly visible and remained suspended in the air for extended periods. There was no evidence of any loads being covered despite hot, dry and windy conditions on the day.</p> <p>The contractor advised that there were five water carts in constant circulation, however only one water cart was sighted during the entire site inspection. They also advised that a 20km/hr speed limit had been enforced that day.</p> |

| Finding No. | Condition of Consent | Audit Finding Details |
|---|---|--|
| | | <p>The contractor also advised that polymer trials for haul road treatments had been discussed, however there is no evidence of these trials being investigated for implementation in December 2025, as advised by the contractor.</p> <p>The auditor notes that a Notice to Furnish Information and Records request was sent to DTI on 12/11/25 with regards to site observations relevant to dust management made by DPHI during a site inspection on 05/11/25. The notice highlights similar dust management issues as the audit site inspection.</p> |
| <p>Non-Compliance GRSF-02_NC-41</p> | <p>B30: Soil and Water Management Plan Prior to commencing construction, the Applicant must prepare a Soil and Water Management Plan for the development in consultation with DPE Water.</p> <p>The Applicant must implement the Soil and Water Management Plan.</p> | <p>A non-compliance was identified by DPHI following an inspection of the site on 5 November 2025: Failure to implement the Soil and Water Management Plan for failing to train staff and ensure spill kits were available and stocked at the TWA, as observed on 5 November 2025. This was recorded as a breach by DPHI as detailed in their letter dated 17 November 2025, ref: INS-98404214.</p> <p>This has therefore been captured as a non-compliance as part of this audit.</p> |
| <p>Opportunity for Improvement GRSF-02_OFI-01</p> | <p>B39. Prior to commencing construction of the accommodation camp, the Applicant must prepare an Accommodation Camp Management Plan in consultation with Council. The Applicant must implement the Accommodation Camp Management Plan.</p> | <p>The Camp Management Plan has not been updated since operation commenced. It is strongly recommended that DTI review & update Camp Management Plan as soon as possible.</p> |
| <p>Opportunity for Improvement GRSF-02_OFI-02</p> | <p>C19. The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <p>(viii) a complaints register</p> | <p>A complaints register is kept up to date for the project; however, more detail could be included to describe each complaint, what actions were taken to resolve each complaint and close out. It is recommended that a more detailed complaints register be uploaded to the website.</p> |

Table 1-2 - Audit Findings (during audit)

Details of these findings are included within the Audit Checklist ([Appendix E](#)) of this report.

Site Observations

Three (3) Site Observations were raised during the site inspection carried out on 19 November 2025 as follows:

1. **GRSF-02_OBS-01:** It was noted that the former go-line used by DTI sub-contractor A One was being gradually decommissioned and relocated to the BESS pad area. Evidence of minor maintenance and



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resultant minor spills were noted here. It is recommended that once full demobilisation has been completed, soil analysis be undertaken to ascertain whether any contamination has occurred.

2. **GRSF-02_OBS-02:** Wind-blown rubbish was noted across site. There are a number of skips on site. Recommend covering skip bins to reduce wind-blown rubbish.
3. **GRSF-02_OBS-03:** It was noted that two large stockpiles >2m high are situated near the DTI/Lightsource bp site office. These stockpiles are not stabilised. As per the Blue Book requirements stockpiles should be stabilised if not being worked for more than 10 days.

Photos from the site inspection are included as [Appendix H](#) of this report.

2. Introduction

2.1 Background

The Goulburn River project consists of a 585 MWp solar farm and battery energy storage system (BESS), located between Wollar and Merriwa, on Wollara Road, in the Upper Hunter Region of NSW. Lightsource bp will construct and operate the project and deliver renewable energy to Australia's grid network. Lightsource bp have appointed DT Infrastructure (DTI) as the head contractor for the construction of this development, and Transgrid has commenced work on site as contracting partner, with their scope of work on the project to design, procure and construct the switching station and substation, including two towers on the project footprint to connect to the grid. Enerven has been engaged by Transgrid as the Principal Contractor for these works. DTI is responsible for the civil construction of the substation bench.

The project includes a battery to shift renewable energy to night-time peaks and support the reliable operation of Australia's grid network. The project will also include operation and maintenance buildings, a temporary onsite workers accommodation camp, and electrical infrastructure required to connect to the existing electricity network.

Construction of the Goulburn River Solar Farm commenced on the 29th of May 2025, however early works including road upgrades commenced on 7th February 2025, and Planning Secretary approval was provided on 12th April 2025 for limited early construction works on the solar farm to commence on 14th April 2025. Construction work to date includes:

- ▶ Early works
 - Road and intersection upgrades of the following:
 - Intersection of Golden Highway and Ringwood Road
 - U-turn facility on Barnett Street (off Golden Highway)
 - Upgrades to Ringwood Road and Wollara Road
- ▶ Solar Farm site
 - Establishment of site office compounds
 - Bulk earthworks and clearing & grubbing
 - Construction of the workers accommodation
 - Construction of Transgrid pad & BESS pad
 - Establishment of environmental controls, including erosion and sediment controls, heritage no-go zones, and temporary ecological no-go zones
 - Installation of boundary and biodiversity fencing
 - Installation of solar farm piles

The project is expected to be completed in 2027.

Lightsource bp engaged The APP Group (APP) to undertake an independent environmental audit on 19 November 2025. The audit was conducted in compliance with Condition C15 of the Development Consent SSD-33964533, which states:

Condition C15: *Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).*

2.2 Project Details

| Project Details | |
|---------------------------|---|
| Project Name | Goulburn River Solar Farm |
| Project Application No.: | SSD-33964533 |
| Project Address: | Wollara Road, Merriwa, NSW 2329 |
| Project Phase: | Construction |
| Project Activity Summary: | <p>The following is a summary of the works that were in progress at the time of audit:</p> <ul style="list-style-type: none"> • Bulk earthworks and clearing & grubbing • Site establishment – camp, offices, BESS & Transgrid pads • Workers accommodation camp establishment • Mechanical install (piling) works have also commenced and were being undertaken at the time of the audit |

Table 2 - Project Details

2.3 Audit Team

Details of The APP Group independent environmental auditing team as approved by the Department of Planning, Housing and Infrastructure (DPHI) for this audit are as follows:

| Name | Company | Position | Certification |
|-------------|---------|----------------------------|---|
| Grant Brown | APP | Lead Environmental Auditor | Exemplar Global Lead Environmental Auditor – Certificate No. C-461697 |

Table -3-1 - Auditor Qualifications

An additional endorsement was sought to address DPHI's request in updating and finalising the report.

| Name | Company | Position | Certification |
|---------------|---------------------|----------------------------|--|
| Barbara Pater | BVBI (formerly APP) | Lead Environmental Auditor | Exemplar Global Lead Environmental Auditor – Certificate No. |
| Sanan Qasim | BVBI (formerly APP) | Auditor's Assist | Exemplar Global Lead Environmental Auditor – Certificate No. |

Table -3-2 - Auditor Qualifications (additional)

The auditor approval letters from DPHI for this audit are attached as [Appendix C](#).

Please note that effective 31 October 2025, APP Corporation Pty Limited (ACN 003 764 770) has changed its entity name to Bureau Veritas Buildings and Infrastructure Pty Ltd (ACN 003 764 770).

Independent Audit declaration forms are included as [Appendix D](#).

3. Audit Objectives and Scope

3.1 Audit Objectives

The objective of this audit was to undertake an independent environmental review of the project in compliance with Development Consent SSD-33964533 Condition C15, in accordance with the requirements for an independent audit methodology and independent audit report in the *Independent Audit Post Approval Requirements* (IAPAR 2020).

3.2 Audit Scope

The scope of this audit involved the review of project compliance against the conditions of SSD-33964533 Schedule 2, Parts A, B, C and Appendices, including the following:

Review of implementation of management plans, including:

- Project Environmental Management Strategy
- Biodiversity Management Plan
- Traffic Management Plan Rev. 3
- Heritage Management Plan
- Other Plans and documents – refer to Section 5 – Document Review
- ▶ Site inspection conducted on 19th November 2025
- ▶ Review the environmental performance of the project;
- ▶ Review of environmental records;
- ▶ Interviews with site personnel.

3.3 Audit Period

This was the second independent environmental audit of the project carried out by APP covering the review of environmental documentation and records of the construction works for the period 19th June 2025 to 19th November 2025, as defined as the audit period.

It is noted that this report is based on the result of sampling and supplied documentation and records, as well as site activities sighted on the date of the audit on 19th November 2025.

Additional documentation and information were requested following DPHI's feedback on the previous audit report version (V2). This was provided to BVBI by Lightsource bp on 6 and 8 May 2026. Updates to this audit report (V3) have been made with evidence recorded in accordance with the audit period (19 June to 19 November 2025).

4. Audit Methodology

4.1 Approval of Auditors

Letters from the Planning Secretary agreeing to the auditors is included under [Appendix C](#).

4.2 Audit Scope Development

APP developed the audit scope and a checklist based on the Project Requirements set out in the Development Consent SSD-33964533, Schedule 2 – refer to [Appendix E](#) of this report. Consultation with project stakeholders was also undertaken as part of the scope development as per [Section 4.6](#).

4.3 Audit Process

4.3.1 Opening Meeting

An opening meeting was held with personnel from Lightsource bp, DTI, Enerven, Transgrid and APP as per the Audit Attendance Sheet ([Appendix B](#)) on 19 November 2025 at 9:00am.

Key items were discussed as follows:

- ▶ Confirmation of the purpose and scope of the audit
- ▶ Overview of the Project and status of the works
- ▶ Occurrence of environmental incidents and non-compliances, if applicable
- ▶ Overview of the audit process in accordance with the Schedule 2 Consent Conditions, Project Staging Report, and the *Independent Audit Post Approval Requirements (IAPAR 2020)*.

4.3.2 Conduct of Audit

Audit activities included the following:

- Conduct of a site inspection led by DTI and Enerven (for applicable areas) to review implementation of mitigation measures and environmental controls.
- Review of the project documentation to verify compliance with the SSD-33964533 Schedule 2 conditions,
- Conduct of the audit based on the checklist with the Conditions of Consent, interviews with personnel and review of records provided as evidence of compliance, and
- Discussion of any identified findings and actions noted during the site inspection.

4.3.3 Closing Meeting

The closing meeting was held on 19th November 2025 at 4:00pm with representatives of Lightsource bp, DTI, Enerven, Transgrid and APP. General feedback and the audit findings were discussed during the closing meeting.

4.4 Interviewed Persons

Name and position of persons interviewed:

| Name | Organisation | Position |
|------------------|----------------|---|
| Michelle Housego | Lightsource bp | Senior HSE Advisor |
| Rachel Hannah | Lightsource bp | Environmental Advisor |
| Brendan Toohey | DTI | Environmental Manager |
| Rachel So | DTI | Environmental Advisor |
| James McNamara | Enerven | Environment Manager |
| Andrew Sampaklis | Transgrid | Environmental Business Partner |
| Andy McCormack | Transgrid | Environmental Business Partner - Delivery |

Table 4 - Personnel Interviewed

4.5 Site Inspection

A site inspection was carried out on 19th November 2025 from approximately 9:00am to 12:00pm with representatives of Lightsource bp, DTI, Enerven, Transgrid and the APP auditor. Three observations were identified during the site inspection. Refer to details of the inspection in [Section 6.4](#) of this report and site photos included under [Appendix H](#).

4.6 Consultation

Consultation with the Department of Planning Housing and Infrastructure (DPHI) was sent in advance of the audit (29th September 2025) to request feedback on the project as per the *Independent Audit Post Approval Requirements* (IAPAR 2020) Section 3.2.

The Department responded 7th October 2025 and requested that *“In addition to the consent conditions and a review of adequacy of management plans, please place additional focus on management of development footprint boundary and heritage management.”*

An additional request from the Department was received on 10th November 2025 to consult with the following stakeholders:

- Upper Hunter Shire Council
- Mid-Western Regional Council
- Australian Government DCCEEW (Biodiversity)
- NSW DCCEEW, CHPR (Formerly Biodiversity Conservation Division)
- NSW EPA
- Transport for NSW
- NSW DCCEEW, Water Group
- NRAR
- NSW DCCEEW, Environment and Heritage (Heritage NSW)
- Fire and Rescue NSW
- NSW RFS
- NPWS

The Department made another request on 14th November 2025 to include the following matters for review in the upcoming audit:

- Has section 6.6 of the Biodiversity Management Plan been complied with, including the weed survey, weed inspection, and weed control procedures?
- Where is the traffic for the project originating and was it described in the project in the EIS and has it been assessed as part of the Traffic impacts for the project? In particular, the traffic coming from the west along Golden Highway.

Refer to [Appendix G](#) for a copy of the consultation.

4.6.1 Response to consultation requirements

In response to the Department correspondence on the 7th October, 10th & 11th November 2025, and in response to agency consultation, the following status is provided:

| Request | Response | Where Addressed |
|--|---|--|
| Department of Planning, Housing and Infrastructure | | |
| Management of development footprint boundary | Site boundary is clearly surveyed with boundary fencing being installed progressively. | Appendix H – Site Inspection photos |
| Heritage management | Heritage items are being protected on site, with areas fenced and signed. Unexpected Finds process not followed – self-reported non-compliance recorded against Condition B26 | Appendix H – Site Inspection photos Section 1 Section 6 Section 6.6 Appendix E |
| Has section 6.6 of the Biodiversity Management Plan been complied with, including the weed survey, weed inspection, and weed control procedures? | High priority weeds have previously been treated on site, weed mapping has been undertaken with a plan in place for treatment. Although no environmental harm has occurred to date, Section 6.6 of the BMP has not been fully implemented, exposing the project to potentially causing environmental harm. This has resulted in a non-compliance with Condition B16 | Section 1 Section 6 Section 6.6 Appendix E |

| Request | Response | Where Addressed |
|--|---|---|
| <p>Where is the traffic for the project originating and was it described in the project in the EIS and has it been assessed as part of the Traffic impacts for the project? In particular, the traffic coming from the west along Golden Highway.</p> | <p>EIS Appendix 15 details the traffic assessment for the project. The EIS predicted that traffic from the west on the Golden Highway and turning right into Ringwood Road would increase during construction however the origins of the increased traffic was not determined. The increases in traffic have been considered in the TMP. Specifically, TMP sections 3.7 and 5.6 address traffic originating from the West, including vehicles turning around at a point in Merriwa, in consultation with UHSC, before making a left turn onto Ringwood Road.</p> <p>The Project has prepared a Request to the Planning Secretary under this condition to clearly communicate how vehicles originating in the west are to approach the site. This has been consulted on with both Council and TfNSW and is currently with DPHI for their assessment. Draft request letter dated 09/12/2025 provided.</p> | <p>Appendix E</p> |
| CPHR | | |
| <p>CPHR recommends the IEA concentrates on the biodiversity requirements listed in Schedule 2, Part B of the development consent, with particular focus on the items listed under consent condition B16 – Biodiversity Management Plan. The IEA should provide specific information to determine if obligations as stated within the BMP have been met. Details with reference to evidence of outcomes should be provided regarding each biodiversity mitigation and management measure for the project as outlined in Table 6.1 of the BMP.</p> | <p>Condition B16 is non-compliant due to the poor management of weeds on site.</p> <p>All other Biodiversity conditions are compliant.</p> <p>Biodiversity fencing is being progressively installed.</p> | <p>Section 1 Section 6 Section 6.6 Appendix E</p> |
| NSW Heritage | | |
| <p>Conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans.</p> | <p>The project self-reported a non-compliance against Condition B26.</p> <p>Although all other components of the HMP have been followed and addressed, the Unexpected Finds process was not followed.</p> | <p>Section 1 Section 6 Section 6.6 Appendix E</p> |

| Request | Response | Where Addressed |
|--|---|---|
| TfNSW | | |
| Schedule 2 of the conditions of consent within the Transport section from conditions B1 to B10 | Conditions B1 to B10 were assessed, noting many self-reported non-compliances against several of these conditions | Section 1 Section 6 Section 6.6 Appendix E |
| In particular review of the compliance with the left in/ out arrangement of Golden Highway/ Ringwood Road intersection for construction traffic. Also, compliance of using Golden Highway/Barnett St to head east when leaving the site | Self-reported non-compliances with Conditions B3, B4 and B5 | Section 1 Section 6 Section 6.6 Appendix E |
| DCCEEW Water | | |
| <p>NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the audit scope:</p> <ul style="list-style-type: none"> The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: <ul style="list-style-type: none"> Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan. The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be | <p>Soil and Water Management Plan section 4.1.1.1 “Construction” outlines the water supply arrangements during construction phase. It also states that “<i>non-potable water will primarily be used for plant establishment, dust suppression and site ablutions</i>”.</p> <p>Section 4.1.1.3 “Water Sourcing Strategy” outlines the strategy for sourcing potable and non-potable water.</p> <p>Water supply dockets were provided to support licensed cartage from third-party suppliers.</p> <p><u>Water Supply Update – Groundwater Bores and Licensing:</u></p> <p>The project has approval in principle to develop up to four (4) groundwater bores for construction water supply. These bores are being progressed under a Water Supply Works Approval (WSWA) application, which remains under assessment with the Department of Climate Change, Energy, the Environment and Water (DCCEEW).</p> <p>No groundwater has been taken to date, and none of the bores (GW1–GW4) have been commissioned or connected. The groundwater take associated with these bores is exempt from requiring a Water Access Licence (WAL) under the Water Management (General) Regulation, as the intended extraction is solely for use within the same title on which the water is sourced and for project</p> | Appendix E |

| Request | Response | Where Addressed |
|--|--|-----------------|
| <p>reported on within annual and exceedance-based reporting.</p> <ul style="list-style-type: none"> Water supply availability is clearly defined for the project. Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025. Consideration is also to be given to the relevance of excluded works at the site with reference to the factsheet at the following link: https://water.dpie.nsw.gov.au/data/assets/pdf_file/0008/554444/la-interpretingexcluded-works-dams-fact-sheet.pdf Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant. Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from. Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated. | <p>construction purposes. The project will continue to operate strictly within the scope of that exemption.</p> <p><u>Current Water Sources (Interim):</u> To maintain compliance while the WSWA is finalised, the project is sourcing water from the following approved methods:</p> <ul style="list-style-type: none"> Treated effluent reuse from the Temporary Accommodation Camp On-site dams managed under Harvestable Rights Licensed cartage from third-party suppliers where required <p><u>Planned Extraction Controls (Upon Bore Commissioning):</u> Once the WSWA is approved and bores are operational, the following controls will apply:</p> <ul style="list-style-type: none"> Daily extraction recording (kL/ML) into the project Water Register Weekly supervisory review of cumulative extraction against the exemption conditions Monthly internal reporting and verification as part of environmental performance review <p>This ensures the project will maintain transparent and auditable tracking of water usage, aligned to the WSWA conditions and statutory exemption provisions.</p> <p>The project will not draw groundwater until all regulatory approvals are in place, and the extraction tracking system is fully implemented.</p> | |

Table 5 - Consultation

4.6.2 DPHI Feedback – Audit Report V2

In response to the submission of the previous version of the audit report for IEA #2 (V2 issued to DPHI 16 January 2026), DPHI advised that the report did not satisfy the reporting requirements of the consent and *Independent Audit Post Approval Requirements (2020)* as per letter ref SSD-33964533-PA-101 dated 23 April 2026.

The audit report has therefore been updated to V3 with DPHI's request addressed as follows:

| Item No. | DPHI request & details | Where addressed |
|----------|---|--|
| 1 | <p><i>The following incidents/non-compliances that occurred during the audit period and/or have been self-reported by the Applicant or identified by the Department, have not been included in the IEA report. Please identify and include the following as separate non-compliances, seeking additional information as required:</i></p> | |
| 1(a) | <p><i>Disturbance outside boundary – No-Go Zones near TWA (1 September 2025) (Schedule 2, Condition B16).</i></p> <p>This incident was reported under Condition C11 as per Lightsource bp as per letter dated 29 September 2025. The letter notes notification occurred 2 September 2025 following the incident occurring 1 September 2025.</p> | <p>Details of the incident have now been captured under the following areas of this report:</p> <ul style="list-style-type: none"> • Executive Summary • Section 6.2 • Audit Checklist: Appendix E (Condition C11 & Appx 7) |
| 1(b) | <p><i>Diesel spill from generator at TWA (11 October 2025) (Schedule 2, Condition B39).</i></p> <p>This incident was reported under Condition C11 as per Lightsource bp letter dated 10 November 2025. Letter notes notification occurred 13 October 2025 following incident occurring 11 October 2025.</p> | <p>Details of the incident have now been captured under the following areas of this report:</p> <ul style="list-style-type: none"> • Executive Summary • Section 6.2 • Audit Checklist: Appendix E (Condition C11 & Appx 7) |
| 1(c) | <p><i>Dust observed on 5 November 2025 (Schedule 2, Condition B21)</i></p> | <p>A non-compliance was raised by the auditor as part of the audit report and included as part of the site inspection. The wording of this non-compliance has been updated to explicitly describe its alignment with the site observation made by DPHI on the 5 November 2025. Refer to GSRF-02_NC-39.</p> <p>The following areas of this report have been updated:</p> <ul style="list-style-type: none"> • Executive Summary • Section 6.1 • Table 7 • Section 6.8 (Audit Findings) • Audit Checklist: Appendix E (Condition B21) |

| Item No. | DPHI request & details | Where addressed |
|----------|--|--|
| 1(d) | <i>Fail to undertake road upgrades within 6 months of commencing construction in relation to Wollara Road and Ringwood Road i.e. by 14 October 2025, as observed on 5 November 2025 (Schedule 2, Condition B7)</i> | <p>This non-compliance was not captured by the auditor during the audit and has now been included as GSRF-02_NC-38.</p> <p>The following areas of this report have been updated to now include this non-compliance:</p> <ul style="list-style-type: none"> • Executive Summary • Section 6.1 • Table 7 • Section 6.8 (Audit Findings) • Audit Checklist: Appendix E (Condition B7) |
| 1(e) | <i>Fail to implement the Soil and Water Management Plan for failing to train staff and ensure spill kits were available and stocked at the TWA, as observed on 5 November 2025 (Schedule 2, Condition B30)</i> | <p>This non-compliance was not captured by the auditor during the audit and has now been included as GSRF-02_NC-41.</p> <p>The following areas of this report have updated to now include this non-compliance:</p> <ul style="list-style-type: none"> • Executive Summary • Section 6.1 • Table 7 • Section 6.8 (Audit Findings) • Audit Checklist: Appendix E (Condition B30) |
| 1(f) | <i>Fail to implement the Biodiversity Management Plan by failing to undertake weed control, as observed on 5 November 2025 (Schedule 2, Condition B16)</i> | <p>At the time of this audit, a non-compliance had not yet been confirmed, with DPHI's letter dated 17 November 2025 noting a potential non-compliance / breach.</p> <p>Information has therefore been captured under Condition A4 which relates to adherence to any written directions by DPHI and captures the relevant information applicable to the audit period.</p> <p>It is recommended that a review of the status of this matter be undertaken as part of IEA #3.</p> |
| 1(g) | <i>Warning Letter issued to Lightsource bp on 26 August 2025 for failing to submit Final Layout Plans prior to commencing construction (Schedule 2, Condition C8)</i> | <p>The following areas of this report have been updated to now include details of the Warning Letter:</p> <ul style="list-style-type: none"> • Executive Summary • Section 6.1 • Audit Checklist: Appendix E (Condition C8) |

| Item No. | DPHI request & details | Where addressed |
|----------|---|--|
| 1(h) | <i>The development has been staged, including submission of staged plans, without prior approval from the Planning Secretary (Schedule 2, Condition C3)</i> | Clarification with DPHI was sought by Lightsource bp 1 May 2026 as this matter appears to fall outside the audit period for IEA #2. DPHI responded 5 May 2026 with their agreement of this approach to include as part of IEA #3. |
| 1(i) | <i>Fail to submit a revised Environmental Management Strategy in accordance with conditional approval given by the Planning Secretary on 19 December 2024 (Schedule 2, Condition C1)</i> | Clarification with DPHI was sought by Lightsource bp 1 May 2026 as this matter appears to fall outside the audit period for IEA #2. DPHI responded 5 May 2026 with their agreement of this approach to include as part of IEA #3. |
| 1(j) | <i>Fail to prepare an Accommodation Camp Management Plan in consultation with council, prior to commencing construction of the accommodation camp on 14 April 2025, in accordance with Schedule 2, Condition B39 of the consent</i> | Clarification with DPHI was sought by Lightsource bp 1 May 2026 as this matter appears to fall outside the audit period for IEA #2. DPHI responded 5 May 2026 with their agreement of this approach to include as part of IEA #3. |
| 1(k) | <i>Fail to prepare an Accommodation and Employment Strategy in consultation with council, prior to commencing construction on 14 April 2025, that includes a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction, in accordance with Schedule 2, Condition B40 of the consent</i> | Clarification with DPHI was sought by Lightsource bp 1 May 2026 as this matter appears to fall outside the audit period for IEA #2. DPHI responded 5 May 2026 with their agreement of this approach to include as part of IEA #3. |
| 2 | <i>The IEA report lists only three non-compliances found during the audit (NC-01 to NC-03), even though there were also 36 self-reported (by the Applicant) non-compliances. It is not necessary to have distinction between which party identified the non-compliances. Please identify and report each non-compliance as a separate and distinct non-compliance against each relevant condition. The total number of non-compliances for the audit period should be reflected in each relevant section of the IEA report, and should also include those non-compliances listed above.</i> | <p>The audit findings have been updated to align to those self-reported during the scope of the audit with a separate table included under Appendix F.</p> <p>Additional non-compliances have also been captured as noted above.</p> <p>The following areas of this report have also been updated to include these non-compliances:</p> <ul style="list-style-type: none"> • Executive Summary • Section 6.1 • Table 7 • Section 6.8 (Audit Findings) • Audit Checklist: Appendix E • Self-Reported Non-Compliances: Appendix F. |

Table 5-2 - Consultation: DPHI feedback

4.7 Audit Compliance Status Descriptors

The following audit criteria were used for the rating of audit findings.

| Rating | 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. |

Table 6 - Audit Criteria

In addition to the above descriptors, there was the option to raise Opportunities of Improvement (OFI) during this audit.

5. Document Review

- ▶ SER Decision Statement “Transmission Line 54A – Optical Ground Wire Installation” was issued by Transgrid on 14 November 2024
- ▶ Letter from DPHI (Ref. SSD-339645333-PA-10), dated 10 March 2025
- ▶ Service record - Case Skid Steer Loader TR270B 250hr service - 31/07/25 (Job# JB02188)
- ▶ Service record - Kubota KX018-4 500hr service – 12/08/25 (Job# JB02307)
- ▶ Service record - Kubota U55-4 Hydraulic Service – 11/08/25 (Job# JB02322)
- ▶ DTI toolbox talks:
 - No-Go Zone Incident
 - Biodiversity: Protecting Fauna & Habitat
 - Boundary Fencing – Chainwire Installation
 - Heritage Awareness
 - Spill Response and Reporting
 - Managing Spoil Movement & Placement
 - Biosecurity: Weed and Pathogen Prevention
 - Compliance, Consequences & Community Impacts (01/09/25)
- ▶ Enerven toolbox talks:
 - Site Access & Egress (11/11/25)
 - Barricading (30/10/25)
- ▶ Biodiversity Management Plan
- ▶ Heritage Management Plan
- ▶ Accommodation Camp Management Plan
- ▶ Accommodation and Employment Strategy
- ▶ Non-compliance notifications to DPHI for B4(a): 03/09/25 to 11/11/25 (x22)
- ▶ Non-compliance notifications to DPHI for B4(b): 03/11/25 and 10/11/25 (x2)
- ▶ Non-compliance notifications to DPHI for B5: 29/07/25 to 18/11/25 (x6)
- ▶ Notice to Furnish Information to DTI on 06/08/25 & DTI response on 18/08/25.
- ▶ Figure 6-11 Draft landscaping Plan (031250_GRSF_LVIA_F6-11_draft_landscape_plan_230414_v02) developed by registered landscape architect (RLA#719 Australian Institute of Landscape Architects) by Envisage
- ▶ Pre-clearance surveys undertaken by Fauna Spotters Australia within the audit period:
 - Killoe Creek and Bow River on 11/07/25 (report date 17/07/25)
 - Stage 1, PCS 53-54-56-57-58 from 25/06/25 to 04/07/25
 - Stage 7, PCS 35, 42, 43, 44, 49, 50, 51, 52 from 24/08/25 to 29/08/25
 - Stage 1 PCS 55 and Stage 8 PCS 45, 46, 47, 59, 60, 61, 62, 63, 64 from 02/09/25 to 18/09/25
 - Stage 3, PCS 65, 66, 67, 68, 69, 70 from 29/08/25 to 31/08/25
- ▶ Weed Spray Calendar
- ▶ Weed and Seed Inspections:
 - A One Earthworks Caterpillar D9T (AOE106) 30/09/25
 - A One Earthworks Terex TA30 (AOE507) 30/09/25
- ▶ Goulburn River Solar Farm (SSD 33964533) Non-compliance with Condition B17 notification (07/10/25)
- ▶ Major Projects Portal Post Approval Form 20251007051513 (ref. SSD-33964533-PA-46)
- ▶ Response to DPHI RFI (07/11/25)

- ▶ Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval for extended construction hours under Development Consent condition B17 – version 3. (28/08/25).
- ▶ DPHI approval to vary of the hours of construction activities (12/09/2025).
- ▶ Site Hive noise monitoring data from September and October 2025:
 - Stage 3 boundary (on site)
 - 2076 Wollara Road (off site)
 - 1930 Wollara Road (off site)
- ▶ Water Tracking register (AOE GRSF – Water Tracking)
- ▶ Notice to Furnish Information and Records (12/11/25) from DPHI to DTI (ref: INV-99220706)
- ▶ ACH training presentation and attendance 30th & 31st July 2025
- ▶ GRSF Heritage Management and GED training 05/08/25
- ▶ DTI Heritage toolbox 11/11/25
- ▶ Post Approval Form_20251010022008
- ▶ ESCP's:
 - 20250616_PESCP_Haul Road Phase 2
 - 20251015_PESCP_Stage 4, 5 & 7
 - 20250711_PESCP_Bow River Culvert Works
 - 20250711_PESCP_Killoe Creek Culvert Works
 - 20250716_GRSF_PESCP_Stage 1
 - 20250926_PESCP_Stage 2
 - 20251008_PESCP_Stage 8
 - PESCP_August_TWAF
 - GLS-CIV-SK001_00C
 - GLS-CIV-SK002_00C
 - GLS-CIV-SK003_00C
- ▶ Non-compliance Notification with Condition B29 (b) – 03/09/25
- ▶ DPHI RFI (undated – Major Projects Portal message from Ann Hagerthy)
- ▶ NC RFI response 15/09/25
- ▶ DPHI RFI response (email dated 18/09/25)
- ▶ DTI Hazardous Substance Register
- ▶ DTI GRSF Manifest (04/11/25)
- ▶ Enerven SDS register (09/2025)
- ▶ Goulburn River Solar Farm – Master Emergency Plan Consultation – record of consultation from NSW RFS for Revision 3, August 2025, dated 09/10/25
- ▶ Consultation approach Goulburn River Solar Farm - EP & ESIP - Next Revision Review request dated 20/08/25
- ▶ Consultation approach Goulburn River Solar Farm - EP & ESIP - Next Revision Review response from RFS dated 17/10/25
- ▶ Goulburn River Solar Farm – Master Emergency Plan Rev. 4 (November 2025)
- ▶ Waste Register current up to 08/10/25
- ▶ Updated (draft) Accommodation and Employment Strategy Implementation Plan – Final – October 2025
- ▶ DPHI letter ref: INS-98404214, 17 November 2025 “Goulburn River Solar Farm (SSD-33964533) – Site Inspection Follow Up”
- ▶ DPHI Warning Letter Schedule 2, Condition C8 - NSW Planning ref: ENF-91571464, 26 August 2025

- ▶ Vantage Consulting, Project Number. VC24004: Structural Engineering Design Statement, Rev 0 dated 7 August 2025.
- ▶ Gateway Energy Structure Report for Goulburn Gantry, Report No. 250403-ENE- GOULBURN - STRUCTURE, Rev 1, 10 July 2025
- ▶ Hullcon Pty Ltd Certificate of Design Compliance for the Permanent Perimeter Fence for Goulburn River Solar Farm Project, Reference: AUS-GRSF-DTI-ENG-CIV-CER-1000, 12 August 2025.
- ▶ Silver Wolf Projects Pty Ltd Structural Design Certificate - NSW #1 for Pole Structure and Holding Down Bolts, Ref No. SWP 2507350, Rev A issued 31 July 2025.
- ▶ Transmission Line Engineering Design Statement by Enerven, 29 August 2025.
- ▶ Pro Cert Group Pty Ltd, ref: 512/2024-03, 10 October 2025 stamped as part of the construction certificate by registered builder BDC393
- ▶ Pro Cert Group Pty Ltd Construction Certificates No. 512/2024-02 dated 1 September 2025 for Stage 2 – Perimeter Fencing & Gates
- ▶ Pro Cert Group Pty Ltd Construction Certificates No. No. 512/2024-03 dated 10 September 2025 for Stage 3 – Substation & Switching Station installation of Foundations for all Building Works and the installation of Fencing, Light Poles, Lightning Masts, and Structural Steel associated with the Gantries
- ▶ Pro Cert Group Pty Ltd Construction Certificates No. No. 512/2024-04 dated 1 October 2025 for Stage 4 – Building Works associated with Piling, Tracker & Module Installations
- ▶ Pro Cert Group Pty Ltd Construction Certificates No. No. 512/2024-05 dated 7 October 2025 for Stage 5 – Substation & Switching Station Installation of Structural Steel, High Voltage Equipment & Over Head Transmission Line
- ▶ Occupation Certificate for the temporary accommodation by GMA Certification Group – Part Occupation Certificate, Registration No. RBC00015 dated 23 October 2025
- ▶ Certificate of Compliance for Proposed Building Work under the Building Act 1993, Section 238(1)(a), Building Regulations 2018, Regulation 126 as issued 31 August 2022
- ▶ OOHW Approval DPHI reference SSD-33964533-PA-36, issued 12 September 2025
- ▶ DPHI email, 13 November 2025 “Communication regarding Final Layout Plans Cond C8 SSD-33964533-PA-19”
- ▶ Portal Receipt SSD-33964533-PA-37, 2 September 2025
- ▶ Portal Receipt SSD-33964533-PA-52, 13 October 2025
- ▶ Environmental Investigation Report, 23 September 2025
- ▶ Environmental Investigation Report, 2 November 2025
- ▶ Non-compliance_Incident Table
- ▶ Lightsource bp Non-Compliance Notification, 24 October 2025
- ▶ Lightsource bp Non-Compliance Notification, 3 November 2025
- ▶ Portal Receipt SSD-33964533-PA-56, 24 October 2025
- ▶ Portal Receipt SSD-33964533-PA-62, 3 November 2025
- ▶ Email from Upper Hunter Shire Council dated 25 May 2025
- ▶ Email from TfNSW dated 21 May 2025
- ▶ Email from Lightsource bp dated 30 May 2025
- ▶ Email from Lightsource bp to DPHI dated 26 June 2025
- ▶ Email from Lightsource bp dated 2 July 2025
- ▶ Lightsource bp letter “Re: Goulburn River solar farm project (SSD 33964533): Proposed change to construction hours” dated 2 July 2025
- ▶ Letter from Lightsource bp to DPHI dated 28 August 2025
- ▶ Email from Lightsource bp to Upper Hunter Shire Council dated 18 June 2025



The APP Group is now
proudly part of Bureau Veritas

- ▶ Email from Upper Hunter Shire Council dated 23 June 2025
- ▶ Email from Lightsource bp to Upper Hunter Shire Council dated 28 October 2025
- ▶ Email from Upper Hunter Shire Council dated 29 October 2025
- ▶ Letter from Lightsource bp “Request for temporary increase to vehicle length under Development Consent condition B1(b) – response to TfNSW request for information” dated 12 November 2025
- ▶ Email from Lightsource bp to Mid-Western Regional Council dated 28 August 2025
- ▶ Email from Mid-Western Regional Council dated 11 September 2025
- ▶ Email from Lightsource bp dated 18 September 2025
- ▶ Email from Mid-Western Regional Council dated 23 September 2025
- ▶ Email from Lightsource bp to Upper Hunter Shire Council dated 3 September 2025
- ▶ Email from Upper Hunter Shire Council dated 10 September 2025

6. Audit Findings

6.1 Assessment of Compliance

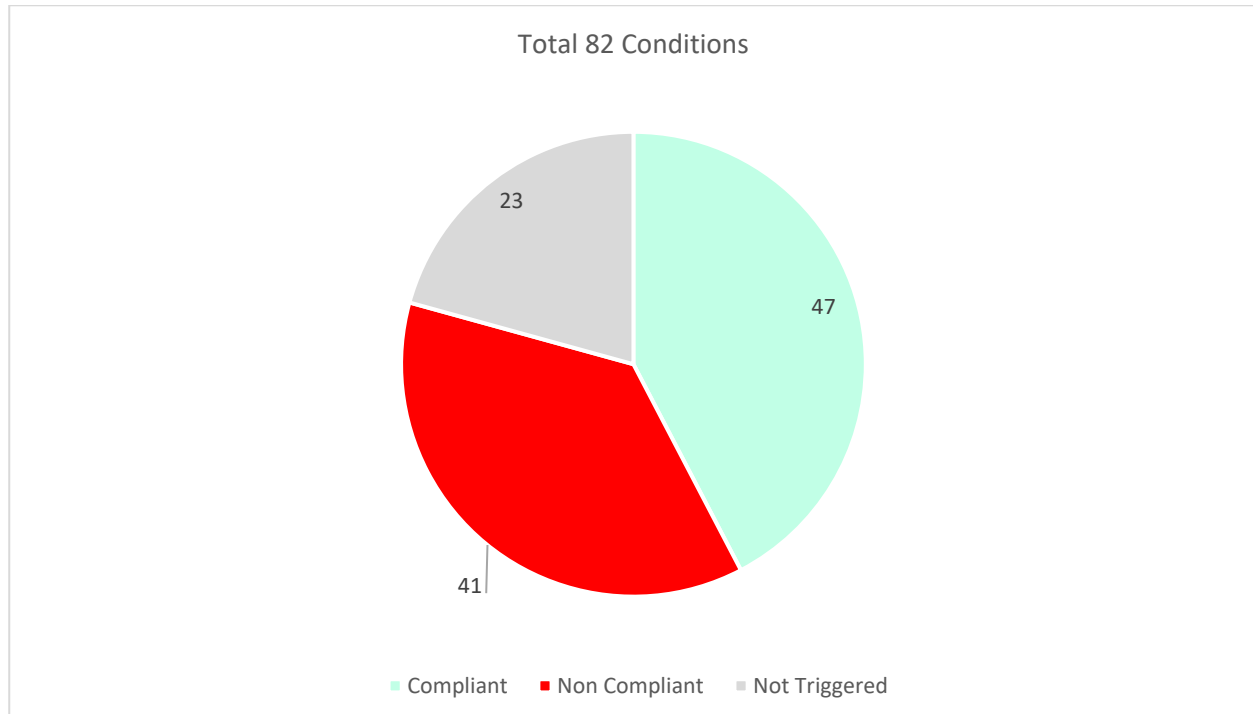
This audit was completed to assess the implementation of the Project Environmental Management Strategy and sub-plans, as well as environmental controls established by DTI and Enerven for the Project, against Development Consent SSD-33964533, Schedule 2 (82 conditions).

The following table summarises the audit findings by rating category:

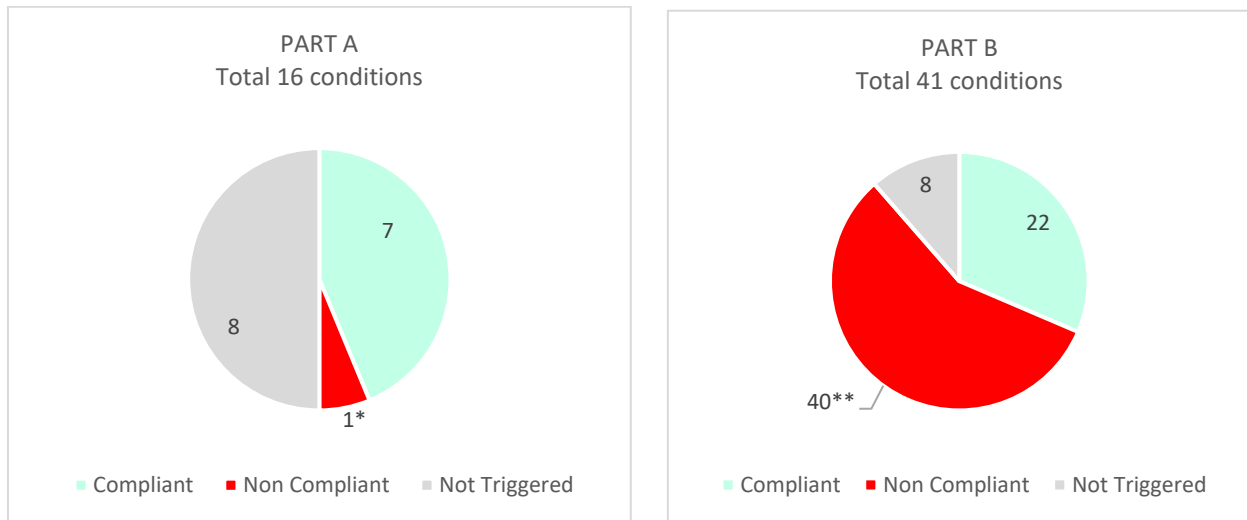
| Findings Rating | Findings |
|-----------------|-----------|
| Compliant | 47 |
| Non-Compliant | 41* |
| Not Triggered | 23 |
| Total | 82 |

Table 7 - Summary of Findings

*Note: this includes thirty-six self-reported non-compliances (34 notifications to DPHI) captured across eight conditions in addition to five (5) non-compliances identified during this audit.

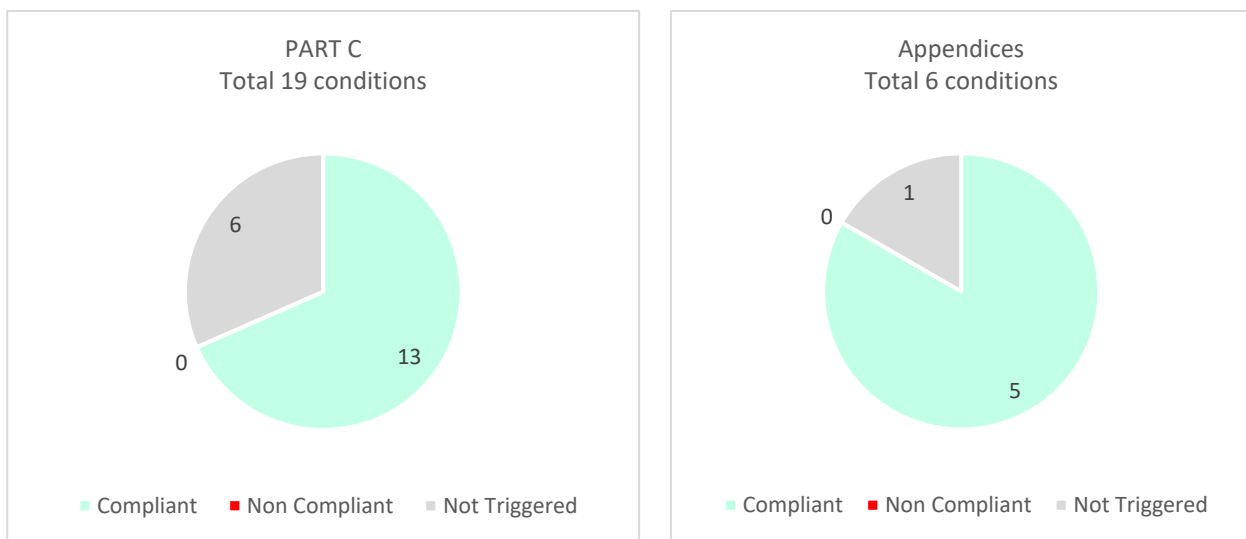


The comparison of audit requirements against the compliance ratings is as follows:



*Note: One (1) x non-compliance as recorded against Condition A3.

**Note: this includes thirty-six (36) self-reported non-compliances (34 notifications to DPHI) captured across eight conditions in addition to four (4) non-compliances identified during this audit against Part B conditions.



6.2 Notices, Incidents and Complaints

6.2.1 Notices and Incidents

Lightsource bp confirmed that a Notice to Furnish Information and Records request was sent by the Department to DTI on 12/11/25 with regards to site observations relevant to dust management made by DPHI during a site inspection on 05/11/25. The notice highlights similar dust management issues as raised during the audit site inspection.

A Warning Letter was issued by DPHI on 26 August 2025 to Lightsource bp for failing to submit Final Layout Plans prior to commencing construction (Schedule 2, Condition C8) - NSW Planning ref: ENF-91571464. No further action was noted during the audit period.

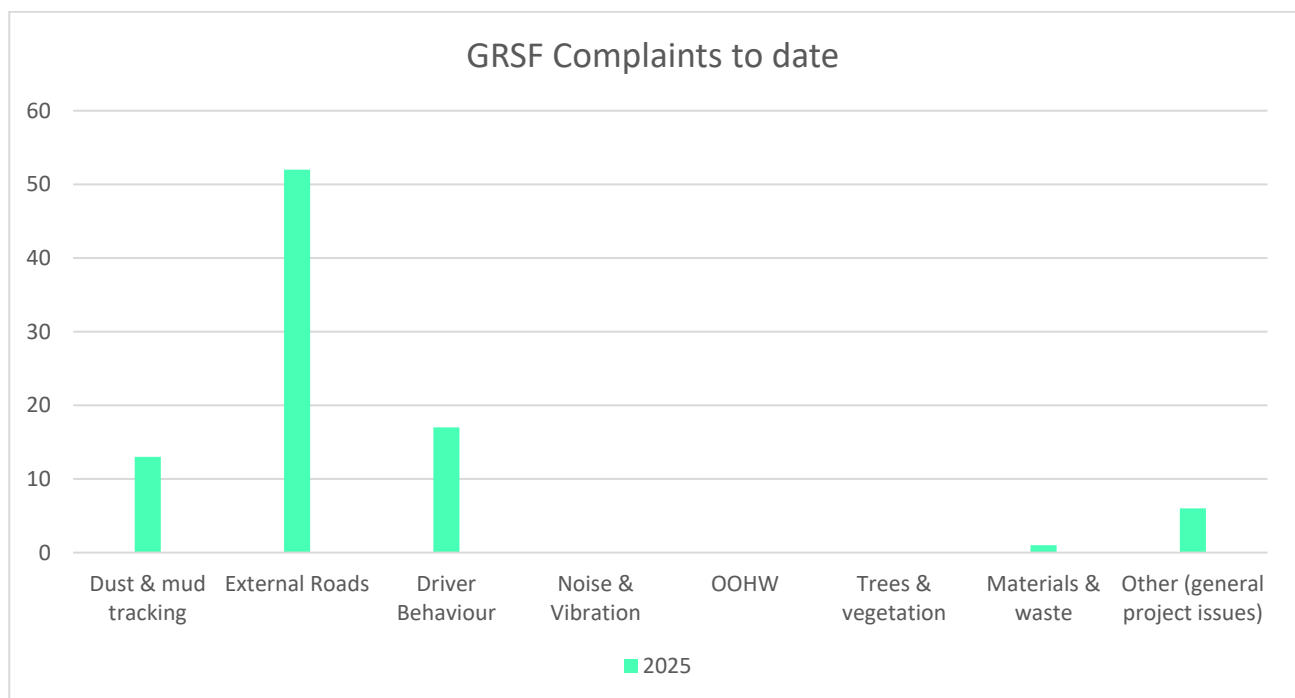
Two reportable incidents have occurred on the Project to date.

3. Three designated No-Go Zones near the Temporary Workers Accommodation (TWA) were compromised. Incident occurred 01/09/25 and DPHI notified in writing on 02/09/25. An investigation was undertaken following the incident with details provided to DPHI as per Lightsource bp report dated 29 September 2025.
4. An estimated 1,500 litres of diesel was released across approximately 100 m² of compacted gravel within the camp generator compound. Incident occurred 11/10/25 and DPHI notified in writing on 13/10/25. DTI notified NSW EPA on 12/10/25 via the EPA Hotline (Incident# 537911). The EPA confirmed they did not require an investigation. A follow up report was provided from Lightsource bp to DPHI on 10/11/25 with details of the investigation and outcome, an attached environmental investigation report, waste disposal evidence at licenced facility, and photos of replenished spill kits.

Refer to [Appendix E](#) for details.

6.2.2 Complaints

A Complaints Register is in place and is published on the project website. A total of 91 complaints has been recorded to date, with 63 received during the audit period. These were mostly categorised as external road issues (road quality, damages), driver behaviour, and dust.



6.2.3 Non-Compliances

Thirty-six (36) non-compliances were self-reported within the audit period, submitted as 34 self-reported non-compliance notifications to the Department. These, in addition to five (5) non-compliances raised during the audit, have been captured as part of this report. Refer to [Section 6.8](#), [Appendix E](#) and [Appendix F](#) for details.

6.3 Previous Audit Findings

Findings and their status from the previous Independent Audit of the Goulburn River Solar Farm under SSD-33964533 IEA#01 dated 4 August 2025, are as follows:

| Audit Rating and Ref | Condition Details | Audit Finding Details + Recommendations | Status |
|---|---|--|---|
| Non-Compliance GRSF-01_NC-01 | <p>A3. The development may only be carried out:</p> <p>a. in compliance with the conditions of this consent</p> <p>B17. Construction, Upgrading and Decommissioning Hours Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <p>(a) 7 am to 6 pm Monday to Friday;</p> <p>(b) 8 am to 1 pm Saturdays; and</p> <p>(c) at no time on Sundays and NSW public holidays.</p> | <p>A self-reported non-compliance was notified during the audit period due to construction activities occurring outside of the approved construction hours.</p> <p>Construction activities occurred outside the approved construction hours on Sunday, 25 May 2025. The final demobilisation of the 5 Mile Rest Stop worksite was scheduled for 26 May 2025; however, due to forecast rainfall and the associated risk of sediment runoff, the contractor removed the material stockpile on Sunday, 25 May 2025, without obtaining prior approval. Three truck & dogs from the 5 mile rest area (Golden Hwy) moved VENM to the council borrow pit. Each truck undertook three trips each.</p> <p>The non-compliance was notified to DPPI on 28 May 2025 and follow up correspondence sent to DPPI on 10 June 2025 with updated information. On 13/06/2025, DPPI requested further information from the project, due by 23/06/2025. A response to DPPI was still being drafted at the time of the audit.</p> <p>A non-compliance is therefore triggered against condition A3(a) and condition B17(c).</p> | <p>Letter sighted as provided from Lightsource bp: "Goulburn River Solar Farm (SSD 33964533) Non-compliance with Condition B17 – response to information request" dated 23 June 2025. Nine (9) items were requested as part of the RFI to be responded to which Lightsource bp have included and provided additional information in their letter.</p> <p>The status and full close out of this matter should be reviewed and included as part of the next IEA (#3).</p> |

Table 8 – Previous Audit Findings

6.4 Audit Site Inspection

A site inspection was conducted of the construction areas with representatives of Lightsource bp, DTI, Enerven, Transgrid and APP to review the effectiveness of environmental mitigation measures implemented on the site. The main works have now extended to include finalisation of the temporary workers accommodation and

associated infrastructure, erosion & sediment controls, progressive installation of piles, establishment of the substation site, clearing and grubbing, and fencing installation.

Environmental controls noted during the site inspection included:

- ▶ Signage in place at the Wollara Road Main Site entrance
- ▶ Camp Accommodation and associated infrastructure has been installed
- ▶ Wastewater Treatment Plant is running and treated effluent used for dust suppression
- ▶ DTI/Lightsource bp site office established in Stage 8, with offices, first aid, lunchroom & ablution facilities in place
- ▶ Transgrid/Energen site offices and volumetric set up established in Stage 3
- ▶ Storage facilities established, including diesel & fuel storage
- ▶ Waste bins available onsite and observed to be within capacity
- ▶ Spill kits stocked and available
- ▶ Site Safety Noticeboard displayed onsite
- ▶ Erosion & sediment controls in place
- ▶ Topsoil stockpiled separately for future use
- ▶ Heritage No-go zones demarcated and active vegetation control underway in the Slab Hut area
- ▶ Site boundary fencing and biodiversity fencing installation underway, with the project footprint clearly demarcated with survey pegs and no evidence of encroachment outside the known boundary
- ▶ A One sub-contractor go-line was being demobilised and moved to the BESS pad
- ▶ Pano Fire Detection unit in place and functional. One verified fire alert was detected during the audit

Three (3) Site Observations were raised during the site inspection carried out on 19 November 2025 as follows:

1. **GRSF-02_OBS-01:** It was noted that the former go-line used by DTI sub-contractor A One was being gradually decommissioned and relocated to the BESS pad area. Evidence of minor maintenance and resultant minor spills were noted here. It is recommended that once full demobilisation has been completed, soil analysis be undertaken to ascertain whether any contamination has occurred.
2. **GRSF-02_OBS-02:** Wind-blown rubbish was noted across site. There are a number of skips on site. Recommend covering skip bins to reduce wind-blown rubbish.
3. **GRSF-02_OBS-03:** It was noted that two large stockpiles >2m high are situated near the DTI/Lightsource bp site office. These stockpiles are not stabilised. As per the Blue Book requirements stockpiles should be stabilised if not being worked for more than 10 days.

Photos of the site inspection are included in [Appendix H](#).

6.5 Suitability of Plans and the Environmental Management System

As part of the project's environmental management framework, Lightsource bp maintains an Environmental Management Strategy (EMS). The EMS has been prepared for the project to comply with the relevant conditions within the Development Consent, as well as to meet other applicable statutory requirements and obligations during the construction, operation and decommissioning of the Project.

The purpose of this EMS is to:

- ▶ Outline the strategic environmental management framework for the construction, operation and decommissioning of the Project.

- ▶ Identify the statutory approvals that apply to the Project.
- ▶ Identify the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Project.
- ▶ Establish procedures to:
 - Inform the community and relevant Government agencies about the operation and environmental performance of the Project.
 - Manage and respond to complaints and resolve any disputes.
 - Respond to any non-compliances or emergencies.
- ▶ Outline the monitoring program for the Project, to ensure ongoing compliance with all relevant statutory approvals

Other project plans have been developed with the assistance of SME's (where required), in consultation with government departments, authorities, councils, and stakeholders (where required), and in accordance with the consent conditions. These include the Biodiversity Management Plan, Traffic Management Plan, Heritage Management Plan, Emergency management Plan, and the Soil and Water Management Plan. No updates to the plans were required during the initial audit period.

Implementation of the Environmental Management Strategy and other management plans was verified during the review of records and as demonstrated during the site inspection, with all plans deemed to be suitable for the current stage of the works with only improvement opportunities identified.

6.6 Actual vs Predicated Impacts

An assessment of actual impacts was undertaken via a review of documentation prior to and during the audit, and via observations made during the site inspection. Predicted impacts are described in the Environmental Impact Statement for the project, prepared by Umwelt, dated 3rd May 2023. Section 6 of the EIS contains a summary of the Assessment and Mitigation of Impacts and includes categories for Biodiversity, Heritage, Land, Visual Amenity (including glint and glare), Noise, Transport, Water, Hazards, Social Impact, Economics, and Waste.

When comparing actual vs predicted impacts the following factors have been considered:

- ▶ the occurrence of environmental incidents
- ▶ compliance history against the conditions of consent and adherence to the approved management plan requirements
- ▶ number of and frequency of internal actions raised during site inspections
- ▶ the nature and frequency of complaints
- ▶ regulatory notices
- ▶ consistency of designs with the EIS; and
- ▶ any planning approval modifications.

The Project endeavours to demonstrate a strong level of environmental performance, however, is failing to effectively manage traffic incursions, weed infestations and dust generation on site. The Project has relevant environmental management plans and sub-plans in place to mitigate impacts; however these procedures are not always implemented on site.

In general, the Auditor does not consider that the Project's actual environmental impacts are consistent with the EIS predictions. The following items, including non-compliances raised against the conditions of consent, are noted as relevant during the audit period:

▶ **Biodiversity**

- The Project continues to implement a comprehensive biodiversity mitigation strategy and undertakes ecological surveys and relocations as required.
- Weed Management is an ongoing issue on site. Failure to control weeds as per the BMP has resulted in a non-compliance.
- Demarcation of No-Go Zones are established for ecological areas as required.
- Biodiversity credits for critically endangered habitat and species have been retired.

▶ **Heritage**

- An unexpected finds procedure has been developed for the project. One unexpected heritage find has occurred to date. The unexpected finds procedure within the Heritage Management Plan was not followed, resulting in a non-compliance, however no harm to heritage items was caused.
- The heritage listed Slab Hut and heritage item 37-01-1027 are demarcated No-Go Zones.

▶ **Noise and Vibration**

- There have been no noise or vibration complaints to date.
- Construction works are undertaken during standard construction hours and community notifications are provided to noise sensitive receivers.

▶ **Traffic and Transport**

- The Construction Traffic Management Plan continues to be in place. The plan considers working hours, oversize/overmass vehicle movements, and site access.
- Traffic related issues continue to be the source of the majority of self-reported non-conformances to date.

▶ **Bushfire Hazard Management**

- The Emergency Management plan has been approved and in place. This has been developed with consultation with NSW RFS. FRNSW and RFS are both satisfied with the EMP in its current revision.
- The project is using Pano AI powered Bushfire Detection and Situational Awareness system for early detection of bushfires.

▶ **Other items**

- No evidence of stormwater movement off site, with erosion and sediment controls installed as per the CPESC certified ESCP's. A self-reported non-compliance relating to previous uncontrolled stormwater flow and ERSED controls not in place was noted.
- Waste management is in place, with a permanent waste contractor servicing site.
- Air quality (dust) is not being managed effectively. A non-compliance has been raised for this issue.

6.7 Key Strengths

Mitigation controls for environmental management of the site were generally in compliance with the consent conditions SSD-33964533, albeit with several areas to focus on improving, including traffic, weed management and dust mitigation. The following key strengths were noted:

- ▶ Strong collaboration between Lightsource bp and all contractors and partners was demonstrated with responsibility of conditions requirements clearly assigned to meet compliance.
- ▶ Clear communication protocols established for roadworks on local roads approaching the solar farm site.
- ▶ Installation and maintenance of environmental controls and established no-go zones (for heritage and ecological protection)
- ▶ Fencing of the site boundary and biodiversity fencing is progressing quickly
- ▶ Ecologists and fauna spotter catchers active on site
- ▶ Good management of the Transgrid pad site – this is well organised and well maintained
- ▶ Proactive measures undertaken to address actions onsite.

6.8 Audit Findings and Recommendations

Throughout the audit process Lightsource bp, DTI and Enerven have generally demonstrated compliance with the conditions of Development Consent SSD-33964533 demonstrated through the implementation of management plans and Environmental Management Strategy, and by meeting their notification obligations when self-reporting non-compliances.

A total of forty-one (41) non-conformances has been recorded, five (5) of which have been captured as part of this audit, with the remaining thirty-six (36) as aligned to those self-reported during the scope of this audit. Two Opportunities for Improvement (OFI) were also raised, along with three site observations

Self-Reported Non-Compliances

A summary of these findings has been tabled below. For ease of identification, self-reported non-compliances have been separated as follows:

| Finding No. | Condition of Consent | Audit Finding Details |
|----------------------|---|---|
| GRSF-02_NC-01 | B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | A self-reported non-compliance was notified against Condition B5 on 22 July 2025, under SSD-33964533-PA-29. |
| GRSF-02_NC-02 | B3: Access Route Unless otherwise agreed by the Planning Secretary, all heavy vehicles and heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway / Ringwood Road | A self-reported non-compliance was notified against Condition B3 on 31 July 2025, under SSD-33964533-PA-31. |

| Finding No. | Condition of Consent | Audit Finding Details |
|---------------|--|--|
| | intersection as shown in Figure 3 and Figure 4 in Appendix 4. | |
| GRSF-02_NC-03 | B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | A self-reported non-compliance was notified against Condition B5 on 6 August 2025, under SSD-33964533-PA-33. |
| GRSF-02_NC-04 | B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | A self-reported non-compliance was notified against Condition B5 on 13 August 2025, under SSD-33964533-PA-34. |
| GRSF-02_NC-05 | B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | A self-reported non-compliance was notified against Condition B5 on 15 August 2025, under SSD-33964533-PA-35. |
| GRSF-02_NC-06 | B29(b): Operating Conditions The Applicant must: (b) ensure that construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual and the <i>Managing Urban Stormwater: Soils and construction - Volume 2A</i> manual (Landcom, 2008), or their latest versions; | A self-reported non-compliance was notified against Condition B29(b) on 27 August 2025, under SSD-33964533-PA-39. |
| GRSF-02_NC-07 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | A self-reported non-compliance was notified against Condition B4(a) on 28 August 2025, under SSD-33964533-PA-38. |
| GRSF-02_NC-08 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | A self-reported non-compliance was notified against Condition B4(a) on 8 September 2025, under SSD-33964533-PA-40. |

| Finding No. | Condition of Consent | Audit Finding Details |
|----------------------|---|--|
| GRSF-02_NC-09 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 11 September 2025, under SSD-33964533-PA-41. |
| GRSF-02_NC-10 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 16 September 2025, under SSD-33964533-PA-42. |
| GRSF-02_NC-11 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 18 September 2025, under SSD-33964533-PA-43. |
| GRSF-02_NC-12 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 18 September 2025, under SSD-33964533-PA-45. |
| GRSF-02_NC-13 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 19 September 2025, under SSD-33964533-PA-44. |
| GRSF-02_NC-14 | <p>B17: Construction, Upgrading and Decommissioning Hours</p> <p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <p>(d) 7 am to 6 pm Monday to Friday;</p> <p>(e) 8 am to 1 pm Saturdays; and</p> <p>(f) at no time on Sundays and NSW public holidays.</p> | A self-reported non-compliance was notified against Condition B17 on 30 September 2025, under SSD-33964533-PA-46 regarding working outside the approved hours. |

| Finding No. | Condition of Consent | Audit Finding Details |
|----------------------|--|--|
| GRSF-02_NC-15 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 2 October 2025, under SSD-33964533-PA-47. |
| GRSF-02_NC-16 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 3 October 2025, under SSD-33964533-PA-51. |
| GRSF-02_NC-17 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 3 October 2025, under SSD-33964533-PA-49. |
| GRSF-02_NC-18 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 4 October 2025, under SSD-33964533-PA-50. |
| GRSF-02_NC-19 | <p>B3: Access Route</p> <p>Unless otherwise agreed by the Planning Secretary, all heavy vehicles and heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway / Ringwood Road intersection as shown in Figure 3 and Figure 4 in Appendix 4.</p> | A self-reported non-compliance was notified against Condition B3 on 8 October 2025, under SSD-33964533-PA-53. |
| GRSF-02_NC-20 | <p>B26: Heritage Management Plan</p> <p>Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development and to the satisfaction of the Planning Secretary. This plan must:</p> <p><i>Refer to (a) through to (c)</i></p> <p>Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.</p> | A self-reported non-compliance was notified against Condition B26 on 10 October 2025, under SSD-33964533-PA-48. |

| Finding No. | Condition of Consent | Audit Finding Details |
|----------------------|--|---|
| GRSF-02_NC-21 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | A self-reported non-compliance was notified against Condition B4(a) on 10 October 2025, under SSD-33964533-PA-54. |
| GRSF-02_NC-22 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | A self-reported non-compliance was notified against Condition B4(a) on 10 October 2025, under SSD-33964533-PA-55. |
| GRSF-02_NC-23 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | A self-reported non-compliance was notified against Condition B4(a) on 16 October 2025, under SSD-33964533-PA-56. |
| GRSF-02_NC-24 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | A self-reported non-compliance was notified against Condition B4(a) on 19 October 2025, under SSD-33964533-PA-57. |
| GRSF-02_NC-25 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | A self-reported non-compliance was notified against Condition B4(a) on 20 October 2025, under SSD-33964533-PA-58. |
| GRSF-02_NC-26 | B4(b): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (b) must exit Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | A self-reported non-compliance was notified against Condition B4(b) on 24 October 2025, under SSD-33964533-PA-60. |
| GRSF-02_NC-27 | B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: | A self-reported non-compliance was notified against Condition B4(a) on 27 October 2025, under SSD-33964533-PA-63. |

| Finding No. | Condition of Consent | Audit Finding Details |
|---------------|--|---|
| | (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4 | |
| GRSF-02_NC-28 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 27 October 2025, under SSD-33964533-PA-62. |
| GRSF-02_NC-29 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 27 October 2025, under SSD-33964533-PA-61. |
| GRSF-02_NC-30 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 29 October 2025, under SSD-33964533-PA-64. |
| GRSF-02_NC-31 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a) on 3 November 2025, under SSD-33964533-PA-65. |
| GRSF-02_NC-32 | <p>B1(a)(i): Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions</p> <p>The Applicant must ensure that the:</p> <p>(a) development does not generate more than:</p> <p>(i) 55 heavy vehicle movements a day (a maximum of 15 heavy vehicle movements per hour) during construction, upgrading or decommissioning</p> | A self-reported non-compliance was notified against Condition B1(a)(i) on 6 November 2025, under SSD-33964533-PA-66 |
| GRSF-02_NC-33 | <p>B4(a): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4</p> | A self-reported non-compliance was notified against Condition B4(a), B4(b) and B5 on 7 November 2025, under SSD-33964533-PA-68, capturing 3 x non-compliances under the notification. |

| Finding No. | Condition of Consent | Audit Finding Details |
|----------------------|---|---|
| GRSF-02_NC-34 | B4(b): All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | |
| GRSF-02_NC-35 | B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | |
| GRSF-02_NC-36 | B5: All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | A self-reported non-compliance was notified against Condition B5 on 11 November 2025, under SSD-33964533-PA-73. |

Table 9-1 - Audit Findings (self-reported)

These findings have been further detailed under [Appendix F – Self-Reported Non-Compliances](#).

Findings identified during the Audit

Five (5) non-compliances and two (2) opportunities for improvement were raised as part of this audit as follows:

| Finding No. | Condition of Consent | Audit Finding Details |
|---|---|--|
| Non-Compliance GRSF-02_NC-37 | The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in Appendix 1. | Non-compliances with the consent conditions were identified during the scope of this audit. A non-compliance has therefore been triggered against Condition A3(a). |
| Non-Compliance GRSF-02_NC-38 | B7: Road Upgrades Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must complete the road upgrades detailed in Appendix 4. | A non-compliance was identified by DPHI following an inspection of the site on 5 November 2025: Failure to undertake road upgrades within 6 months of commencing construction in relation to Wollara Road and Ringwood Road i.e. by 14 October 2025, as observed on 5 November 2025 (Schedule 2, Condition B7). This was recorded as a breach by DPHI as |

| Finding No. | Condition of Consent | Audit Finding Details |
|---|---|--|
| | <p>Unless the relevant roads authority agrees otherwise, these upgrades must comply with the current <i>Austroroads Guidelines, Australian Standards</i> (as amended by TfNSW supplements), and be carried out to the satisfaction of the relevant roads authority.</p> | <p>detailed in their letter dated 17 November 2025, ref: INS-98404214.</p> <p>This has therefore been captured as a non-compliance as part of this audit.</p> |
| <p>Non-Compliance GRSF-02_NC-39</p> | <p>B16. Prior to carrying out any development that could directly or indirectly impact biodiversity values, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> (iii) be prepared in accordance with the Biodiversity Development Assessment Reports dated 11 January 2024 and 18 January 2024 provided in the Amendment Report; (iv) include a description of the measures and timeframes that would be implemented for: (ix) controlling weeds, feral pests and pathogens in consideration of the relevant Commonwealth threat abatement plans; | <p>This condition requires not only that the BMP is prepared in consultation with BCS and approved by the Planning Secretary, but that it <i>“includes a description of the measures and timeframes that would be implemented for controlling weeds, feral pests and pathogens in consideration of the relevant Commonwealth threat abatement plans.”</i></p> <p>Although pre-clearing ecological surveys were undertaken by the project ecologists in the early stages of the project, recent weed surveys conducted in September 2025 identified invasive weed species within Stage 1 and Stage 8. The surveys undertaken were utilised to identify areas requiring management, identifying areas of Priority and High Threat Weeds requiring management.</p> <p>The survey report provides treatment recommendations in Section 4.4.3 however there is no evidence of these recommendations being implemented.</p> <p>The audit recognises that the procurement of a weed sub-contractor has been challenging, with one only recently procured, and treatment to commence in early 2026. However, the procurement process should have commenced much earlier in order for the project to implement Biodiversity Mitigation and Management Measures for the Project (as per Table 6.1 of the BMP) within required timeframes.</p> <p>In particular, BMP Mitigation Measures 13 & 14 (BMP-13 and BMP-14) have not been implemented.</p> |
| <p>Non-Compliance GRSF-02_NC-40</p> | <p>B21. The Applicant must minimise the dust generated by the development.</p> | <p>The Applicant is not minimising dust generation across the project. As aligned to DPHI’s comments following their inspection on the 5 November 2025, a non-compliance has been raised against Condition B21, further detailed as below.</p> <p>During the site inspection, multiple separate instances of dust generation from light vehicles, semi-trailers and moxys was witnessed across site. Wheel generated dust and wind generated dust from loads was clearly visible and remained suspended in the air for extended periods. There was no evidence of any</p> |

| Finding No. | Condition of Consent | Audit Finding Details |
|--|--|---|
| | | <p>loads being covered despite hot, dry and windy conditions on the day.</p> <p>The contractor advised that there were five water carts in constant circulation, however only one water cart was sighted during the entire site inspection. They also advised that a 20km/hr speed limit had been enforced that day.</p> <p>The contractor also advised that polymer trials for haul road treatments had been discussed, however there is no evidence of these trials being investigated for implementation in December 2025, as advised by the contractor.</p> <p>The auditor notes that a Notice to Furnish Information and Records request was sent to DTI on 12/11/25 with regards to site observations relevant to dust management made by DPHI during a site inspection on 05/11/25. The notice highlights similar dust management issues as the audit site inspection.</p> |
| <p>Non-Compliance</p> <p>GRSF-02_NC-41</p> | <p>B30: Soil and Water Management Plan</p> <p>Prior to commencing construction, the Applicant must prepare a Soil and Water Management Plan for the development in consultation with DPE Water. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared by suitably qualified and experienced persons; (b) include a description of the measures that would be implemented to ensure that the objectives of condition B29 – (g) above are achieved; (c) include a program to monitor and report on the effectiveness of these measures; and (d) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. <p>The Applicant must implement the Soil and Water Management Plan.</p> | <p>A non-compliance was identified by DPHI following an inspection of the site on 5 November 2025: Failure to implement the Soil and Water Management Plan for failing to train staff and ensure spill kits were available and stocked at the TWA, as observed on 5 November 2025. This was recorded as a breach by DPHI as detailed in their letter dated 17 November 2025, ref: INS-98404214.</p> <p>This has therefore been captured as a non-compliance as part of this audit.</p> |
| <p>Opportunity for Improvement</p> <p>GRSF-02_OFI-01</p> | <p>B39. Prior to commencing construction of the accommodation camp, the Applicant must prepare an Accommodation Camp Management Plan in consultation with Council.</p> <p>The Applicant must implement the Accommodation Camp Management Plan.</p> | <p>The Camp Management Plan has not been updated since operation commenced. It is strongly recommended that DTI review & update Camp Management Plan as soon as possible.</p> |



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| Finding No. | Condition of Consent | Audit Finding Details |
|---|--|---|
| Opportunity for Improvement GRSF-02_OFI-02 | C19. The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (ix) a complaints register | A complaints register is kept up to date for the project; however, more detail could be included to describe each complaint, the actions taken to resolve each complaint and close out. It is recommended that a more detailed complaints register be uploaded to the website. |

Table 9-2 - Audit Findings (during audit)

Details of these findings are included within the Audit Checklist ([Appendix E](#)) of this report.

Appendix A – Audit Agenda

Goulburn River Solar Farm IEA #2

| | |
|-----------------------|--|
| Project | Independent Environmental Audit #2 – Goulburn River Solar Farm |
| Proponent | Lightsource bp |
| Contractors | DT Infrastructure Transgrid and Enerven |
| Location | On site |
| Date and Time | 19 November 2025 8:00 AM – 4:00 PM |
| Auditing Team | Grant Brown (Lead Independent Auditor) |
| Site contact | Michell Housego (Senior HSE Advisor) |
| Audit criteria | Development Consent SSI-33964533, and in accordance with the Independent Audit Post Approval Requirements (IAPAR 2020) |
| Audit scope | Second construction audit, from 19/06/2025 to 19/11/2025 |

Agenda

| Item | Time | Required Personnel |
|--|--------------------|--|
| Wednesday 19 November 2025 | | |
| Travel from Merriwa to Site | 8:00 AM – 9:00 AM | APP and Lightsource bp |
| Opening Meeting – Onsite DTI Meeting Room <ul style="list-style-type: none"> Confirm scope of the audit, outline the audit process, methodology, timing, access, and resources required. | 9:00 AM – 9:15 AM | All |
| Site Inspection <ul style="list-style-type: none"> Undertake site induction/sign on as required. Witness current construction activities and provide focus for the review of environmental aspects, impacts and controls. | 9:15 AM – 11:45 AM | All |
| Review of Consent Conditions SSI-33964533 | | |
| <ul style="list-style-type: none"> Part A: Administrative Conditions | 11:45AM – 12:30 PM | Lightsource bp |
| Lunch Break | 12:30 PM – 1:00 PM | All |
| <ul style="list-style-type: none"> Part B: Environmental Conditions – General (cont.) Part C: Environmental Management, Reporting and Auditing | 1:00 PM – 3:15 PM | Lightsource bp DTI/Transgrid/ Enerven |
| Auditor consolidation (auditor only) / Afternoon tea break | 3:15 PM – 3:45 PM | APP |



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|--|-------------------|------------------------|
| Closing meeting <ul style="list-style-type: none"> Outcome of audit and presentation of findings. Deliverables as noted below. | 3:45 PM – 4:00 PM | All |
| Travel from Site to Merriwa | 4:00 PM – 5:00 PM | APP and Lightsource bp |

Deliverables

| Audit Deliverables | Responsibility |
|---|-------------------------------|
| Draft Report Submission <ul style="list-style-type: none"> 15 days following conduct of independent audit Invoice for works undertaken issued with draft report | APP |
| Response to draft report <ul style="list-style-type: none"> 7 days following receipt of draft audit report from APP | Lightsource bp, DTI & Enerven |
| Final report submission <ul style="list-style-type: none"> Finalised within 7 days following receipt of comments from Lightsource bp & DTI Submitted to Lightsource bp upon payment of invoice | APP |
| Response to findings and submission of final audit report <ul style="list-style-type: none"> Final audit report submitted to DPHI within 60 days | Lightsource bp |
| Non-Compliances (if applicable) <ul style="list-style-type: none"> Lightsource bp is to follow the process to notify DPHI within 7 days regarding any non-compliances raised during the audit. Refer to conditions C12 & C13 of SSI-33964533 for details. | Lightsource bp |

Limitations

- A. The audit will cover the construction requirements and will therefore be limited to auditing the applicable conditions of Schedules 2, Parts A, B, C and Appendices in accordance with Development Consent Conditions SSI-33964533.
- B. The audit will cover a sampling of records relevant to the scope. APP auditors will apply their professional judgment based on the information made available during the audit.
- C. APP will conduct the audit in accordance with the *Independent Auditing Post Approval Requirements* (IAPAR 2020) with the following ratings applied: Compliant, Non-Compliant and Not Triggerred, with the option to raise any Opportunities for Improvement.

Appendix B – Audit Attendance Sheet



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Audit Attendance Sheet

| | | | |
|-----------------------------|---------------------------|---------------------|-------------|
| Project | Goulburn River Solar Farm | Audit No. | IEA#2 |
| Auditee | Michelle Housego | Lead Auditor | Grant Brown |
| Location | Goulburn River site | | |
| Opening Meeting Date | 19/11/25 | | |
| Closing Meeting Date | 19/11/25 | | |

| Name | Organisation | Position | Signature |
|----------------------------|---------------|--------------------------------------|-----------|
| LESLIE SOUS | DTI | HSE | |
| Rachel Soh | DTI | Environment | |
| T MARLEAVES | DTI | SUPERINTENDANT | |
| Renée Ciappi | DTI | Communications & Stakeholder Advisor | |
| Andrew Smith | DTI | Senior PE | |
| (AV) ANDREW SAMPALUS | TG | ENVIRO BUS PARTNER | |
| BLAD PARKER | TG | SNR ENV BUS PARTNER | |
| ANDY McLOUGHLIN | TG | ENVIRO BUS PARTNER | |
| Rachael Hannah | Lsbp | Enviro Advisor | |
| COLIN GRIFFITHS | DTI | HSE | |
| Brendan Tooby | DTI | ENV. MANAGER | |
| James McNamee | EET | Env. Manager | |
| Michelle Housego | Lsbp | Smr HSE Advisor | |
| GRANT BROWN | APP | AUDITOR | |
| ANDY McLOUGHLIN | | TRANSDRID | |

Appendix C – Approval of Auditors

NSW Planning ref: SSD-33964533-PA-18

Ellie Andrivon
[REDACTED]

LIGHTSOURCE DEVELOPMENT SERVICES AUSTRALIA PTY LTD

Level 29 420 George Street Sydney
New South Wales 2000 15/04/2025

Sent via the Major Projects Portal only

Subject: Goulburn River Solar Farm (SSD 33964533) - Proposed IEA team

Dear Ms Andrivon

Reference is made to your post approval matter, SSD-33964533-PA-18, request for the Planning

Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Audit of the Goulburn River Solar Farm, submitted as required by Schedule 2, Condition C15 of SSD-33964533 (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 7 April 2025.

In accordance with Schedule 2, Condition C15 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements (2020)*, as nominee of the Planning Secretary, I endorse the following independent audit team:

- Mr Grant Brown, Lead Auditor
- Mr Sanan Qasim, Auditor Assistant

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

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

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

Please note, the Lead Auditor must attend the site inspection/s. The end of the audit period shall coincide with the date of the site inspection.

Should you wish to discuss the matter further, please contact Ann Hagerthy, (Senior Compliance Officer) on 02 6575 3407 or email compliance@planning.nsw.gov.au

Yours sincerely



Joel Fleming

A/ Team Leader Compliance - Northern Region Compliance

As nominee of the Planning Secretary

Department of Planning, Housing and Infrastructure

Reference: SSD-33964533-PA-136

Michelle Housego

Senior HSE Advisor

LIGHTSOURCE DEVELOPMENT SERVICES AUSTRALIA PTY LTD

07/05/2026

Sent via the Major Projects Portal only

Subject: Goulburn River Solar Farm (SSD-33964533) - Proposed IEA team – Revised IEA No.2

Dear Ms Housego

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Audit of the Goulburn River Solar Farm, submitted as required by Schedule 2, Condition C15 of SSD-33964533 (the consent) to NSW Department of Planning, Housing and Infrastructure (the Department) on 5 May 2026.

The Department wrote to Lightsource bp on 23 April 2026 with review comments on IEA No.2 (November 2025) and requested a revision to the IEA report. The Department notes that the previously endorsed Lead Auditor (Mr Grant Brown) is no longer available, and Lightsource bp is requesting an alternate auditor approval to complete the revisions to IEA Report No. 2.

In accordance with Schedule 2, Condition C15 of the consent and the Department's *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team to prepare a revision to IEA Report No. 2:

- Ms Barbara Pater (Lead Auditor)
- Mr Sanan Qasim (Assistant Auditor)

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the Department's *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- This endorsement for the revision of IEA No. 2 (November 2025) does not apply to endorsement for future audits.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.



Department of Planning, Housing and Infrastructure

Should you wish to discuss the matter further, please contact Ann Hagerthy, (Senior Compliance Officer) on 02 6575 3407 or email compliance@planning.nsw.gov.au

Yours sincerely

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

Heidi Watters
Team Leader - Hunter
Compliance

As nominee of the Planning Secretary

Appendix D – Independent Audit Declaration

Declaration of Independence Form


| Independent Audit Declaration Form | |
|------------------------------------|--|
| Project Name: | Goulburn River Solar Farm |
| Consent Number: | SSD-33964533 |
| Description of Project: | Construction of a 585 MWp solar farm and battery energy storage system (BESS) to shift renewable energy to night-time peaks and support the reliable operation of Australia's grid. The project will also include operation and maintenance buildings, a temporary onsite workers accommodation camp, and electrical infrastructure required to connect to the existing electricity network. |
| Project Address: | Wollara Road, Merriwa, NSW, 2329 |
| Proponent: | Lightsource bp |
| Title of Audit: | Independent Environmental Audit |
| Date: | 08 December 2025 |

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:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2020);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Independent Audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

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 the Auditor: | Grant Brown |
| Signature: |  |
| Qualification: | Lead Environmental Auditor |
| Company: | APP Corporation Pty Ltd |
| Company Address: | Level 14, 10 Spring Street, Sydney NSW 2000 |

Declaration of Independence Form


| Independent Audit Declaration Form | |
|------------------------------------|--|
| Project Name: | Goulburn River Solar Farm |
| Consent Number: | SSD-33964533 |
| Description of Project: | Construction of a 585 MWp solar farm and battery energy storage system (BESS) to shift renewable energy to night-time peaks and support the reliable operation of Australia's grid. The project will also include operation and maintenance buildings, a temporary onsite workers accommodation camp, and electrical infrastructure required to connect to the existing electricity network. |
| Project Address: | Wollara Road, Merriwa, NSW, 2329 |
| Proponent: | Lightsource bp |
| Title of Audit: | Independent Environmental Audit |
| Date: | 11 May 2026 |

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:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2020);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Independent Audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

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 the Auditor: | Barbara Pater |
| Signature: |  |
| Qualification: | Lead Environmental Auditor |
| Company: | Bureau Veritas Buildings and Infrastructure (formerly APP Corporation Pty Ltd) |
| Company Address: | Level 14, 10 Spring Street, Sydney NSW 2000 |

Appendix E – Audit Checklist

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|---|----------|---|---|--|-------------------|
| SCHEDULE 2, PART A ADMINISTRATIVE CONDITIONS | | | | | |
| NETWORK CONNECTION WORKS | | | | | |
| 1. | A1 | <p>Prior to commencing construction of the development, the Applicant must submit evidence to the satisfaction of the Planning Secretary that development for the augmentation of the existing transmission line and any associated works required to connect the solar farm to the electricity network:</p> <ul style="list-style-type: none"> (a) has been granted development consent under Part 4 of the EP&A Act; or (b) if the development is an activity within the meaning of section 5.1 of the EP&A Act, a determining authority has assessed and determined to carry out, or approved the carrying out of, the activity in accordance with Part 5, Division 5.1 of the EP&A Act. | <p>A Letter from Lightsource bp to DPHI, dated 6 March 2025, submitting the evidence that Transgrid has assessed and approved the carrying out of augmentation work to the existing transmission line in accordance with A1(b). A SER Decision Statement "Transmission Line 54A – Optical Ground Wire Installation" was issued by Transgrid on 14 November 2024, confirming that the project is approved to proceed. A letter from DPHI (Ref. SSD-339645333-PA-10), dated 10 March 2025, confirmed that the requirements of Condition A1(b) have been satisfied, subject to compliance with the terms and conditions of the NSW National Parks and Wildlife Service and the implementation of the mitigation measures outlined in the Environmental Report prepared by GHD.</p> <p>This condition is applicable to prior to the commencement of construction. Based on the timing of this requirement, this condition is no longer triggered.</p> | | Not Triggered |
| OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT | | | | | |
| 2. | A2 | <p>In meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, commissioning, operation, upgrading, rehabilitation or decommissioning of the development.</p> | <p>The site inspection undertaken as part of this audit confirmed that this condition has generally been met with 3 site observations identified for action.</p> <p>Refer to Site Inspection and photos within the audit report (Appendix H).</p> | <p>Note: weed and dust management are an ongoing concern, with potential for causing environmental harm It is noted that no material environmental harm has occurred to date.</p> | Compliant |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------------------------|----------|--|---|---|-------------------|
| TERMS OF CONSENT | | | | | |
| 3. | A3 | <p>The development may only be carried out:</p> <ul style="list-style-type: none"> (e) in compliance with the conditions of this consent; (f) in accordance with all written directions of the Planning Secretary; (g) generally in accordance with the EIS; and (h) generally in accordance with the Development Layout in Appendix 1. | <p>Based on review of compliance:</p> <ul style="list-style-type: none"> (a) Thirty-six self-reported non-compliances with Conditions B1(a)(i), B3, B4(a), B4(b), B5, B17, B26 and B29, with five non-compliances and two improvement opportunities identified as part of this audit (b) Written direction from DPHI regarding early access request to the site as per condition B7 specifying requirements pursuant to this approval (as evidenced in DPHI letter 10th October 2024). Other written directions are detailed under Condition A4. (c) Generally in accordance with EIS (d) Generally in accordance with the development layout in appendix 1. | <p>Non-Compliance GRSF-02_NC-37:</p> <p>Non-compliances with the consent conditions were identified during the scope of this audit. A non-compliance has therefore been triggered against Condition A3(a).</p> <p>Note: non-compliances have been captured throughout this Audit Checklist against the relevant conditions and detailed under Section 6.8 and Appendix F of the audit report.</p> | Non-Compliant |
| 4. | A4 | <p>The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:</p> <ul style="list-style-type: none"> (a) any strategies, plans or correspondence that are submitted in accordance with this consent; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and (c) the implementation of any actions or measures contained in these documents. | <p>The Nominee of the Planning Secretary requested on 11/11/2025 (ref: SSD-33964533-PA-32) that, after reviewing the Initial Construction IEA report, that the IEA report does not satisfy the reporting requirements of the consent and the <i>NSW Planning Independent Audit Post Approval Requirements (2020)</i>.</p> <p>The Department therefore requested the following changes be made to IEA#1 report:</p> <ol style="list-style-type: none"> 1. Sections 2, and 3.3, and Executive Summary – the start date of the IEA period must be the date that the consent was determined i.e. 22 August 2024, not the start of construction. The IEA must consider | | Compliant |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|--------------------------|---|----------------------------------|-------------------|
| | | | <p>and adjust the findings as necessary to accommodate this change in dates.</p> <ol style="list-style-type: none"> 2. Sections 2, and 3.3, and Executive Summary – the IEA report must reference the start of construction as 14 April 2025, which is the commencement of early construction critical works. The IEA must consider and adjust the findings as necessary to accommodate this change in dates. 3. Sections 2, and 3.3, and Executive Summary – the IEA report must discuss the works on site that occurred prior to 29 May 2025. It suggests that only road works occurred. However, other works also occurred including but not limited to substation bench development. <p>Furthermore, the Department requested that the following information be included in future IEAs:</p> <ol style="list-style-type: none"> 1. Section 4.5 – the auditor should allow sufficient time to review all aspects of environmental performance for the site inspection component of the audit, noting that the previous time on site was limited (1.5 hours), and additional works have occurred since the last audit. 2. Section 6.8 – the IEA provides no environmental management improvement opportunities for the project. The Department challenges the auditor to consider areas for improvement on the project. <p>IEA#01 report was amended and revised to V3 by the auditor on 04 December 2025 and provided to the Applicant for submission to the Department.</p> | | |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|--|---|----------------------------------|-------------------|
| | | | <p>DPHI inspected the site on 5 November 2025 and provided a letter dated 17 November 2025 ref: INS-98404214 included the following observations:</p> <ol style="list-style-type: none"> 1. Dust Management 2. Operation of a crusher and borrow pit in Stage 3 3. Operation of a concrete volumetrix/batching plant at the substation 4. Weed management 5. Road upgrade works 6. Wastewater treatment area 7. Spill response at TWA 8. Traffic Safety 9. Travel route compliance monitoring <p>The letter also details non-compliances against Conditions B7, B16, B21, and B30. These non-compliances have been captured as part of this audit. With regards to follow-up actions related to weed survey and control, Lightsource bp emailed DPHI on 25 November 2025 as sighted, providing detail of weed mapping and management.</p> <p>Additionally, a Warning Letter was issued by DPHI on 26 August 2025 to Lightsource bp for failing to submit Final Layout Plans prior to commencing construction (Schedule 2, Condition C8) - NSW Planning ref: ENF-91571464. No further action was noted during the audit period.</p> | | |
| 5. | A5 | The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A3(c) or A3(d). In the event | Lightsource bp confirmed during the audit interview as part of the V3 audit report update that there had been no inconsistencies, ambiguity or conflicts. | | Not Triggered |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|---|----------|---|--|----------------------------------|-------------------|
| | | of an inconsistency, ambiguity or conflict between any of the documents listed in condition A3(c) or A3(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict. | | | |
| BATTERY STORAGE RESTRICTION | | | | | |
| 6. | A6 | Unless the Planning Secretary agrees otherwise, the centralised battery storage associated with the development must not exceed a total energy storage capacity of 900MWh. | Lightsource bp confirmed during the audit interview that this condition was not applicable during the audit period as the battery storage has not yet been built / commissioned. | | Not Triggered |
| 7. | A7 | <p>Unless the Planning Secretary agrees otherwise, a single decentralised battery storage system location must:</p> <p>(a) not exceed 30 MWh of energy storage in collocated batteries; and</p> <p>(b) be separated by 25 metres from another decentralised battery storage system location.</p> <p>The total energy storage stored in all decentralised battery storage system location must not exceed 1,160 MWh.</p> <p>Note: Conditions A6 and A7 may be undertaken simultaneously. This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage in the future.</p> | Lightsource bp confirmed during the audit interview that this condition was not applicable during the audit period as the battery storage has not yet been built / commissioned. | | Not Triggered |
| UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE | | | | | |
| 8. | A8 | 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 | Lightsource bp confirmed during the audit interview that this condition was not applicable during the audit period. | | Not Triggered |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|--|--|----------------------------------|-------------------|
| | | the development to the Planning Secretary incorporating the proposed upgrades. | | | |
| 9. | A9 | <p>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 National Construction Code.</p> <p>Notes:</p> <ul style="list-style-type: none"> <i>Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development.</i> <i>Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.</i> | <p>The following evidence was presented:</p> <p>Vantage Consulting, Project Number. VC24004: Structural Engineering Design Statement, Rev 0 dated 7 August 2025. Notes the relevant Australian Standards: AS 1170 (series) - Structural design actions, AS 2159 - Piling – Design and installation, AS 3600 - Concrete structures, AS 4100 - Steel structures, AS2067(2016) - Section 2.3 - Substations and HV Installations Exceeding 1kV AC.</p> <p>Gateway Energy Structure Report for Goulburn Gantry, Report No. 250403-ENE- GOULBURN -STRUCTURE, Rev 1, 10 July 2025. Section 3.0 details the design specifications / standards.</p> <p>Hullcon Pty Ltd Certificate of Design Compliance for the Permanent Perimeter Fence for Goulburn River Solar Farm Project, Reference: AUS-GRSF-DTI-ENG-CIV-CER-1000, 12 August 2025.</p> <p>Silver Wolf Projects Pty Ltd Structural Design Certificate - NSW #1 for Pole Structure and Holding Down Bolts, Ref No. SWP 2507350, Rev A issued 31 July 2025.</p> <p>Transmission Line Engineering Design Statement by Enerven, 29 August 2025.</p> <p>The above were stamped by Pro Cert Group Pty Ltd, ref: 512/2024-03, 10 October 2025 as part of the construction certificate by registered builder BDC393.</p> | | Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2



The APP Group is now
proudly part of Bureau Veritas

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|--------------------------|---|----------------------------------|-------------------|
| | | | <p>Also sighted Pro Cert Group Pty Ltd Construction Certificates as issued Under Part 6 of the Environmental Planning and Assessment Act 1979:</p> <p>No. 512/2024-02 dated 1 September 2025 for Stage 2 – Perimeter Fencing & Gates</p> <p>No. 512/2024-03 dated 10 September 2025 for Stage 3 – Substation & Switching Station installation of Foundations for all Building Works and the installation of Fencing, Light Poles, Lightning Masts, and Structural Steel associated with the Gantries</p> <p>No. 512/2024-04 dated 1 October 2025 for Stage 4 – Building Works associated with Piling, Tracker & Module Installations</p> <p>No. 512/2024-05 dated 7 October 2025 for Stage 5 – Substation & Switching Station Installation of Structural Steel, High Voltage Equipment & Over Head Transmission Line.</p> <p>Additionally:</p> <p>Occupation Certificate for the temporary accommodation by GMA Certification Group – Part Occupation Certificate, Registration No. RBC00015 dated 23 October 2025.</p> <p>Certificate of Compliance for Proposed Building Work under the Building Act 1993, Section 238(1)(a), Building Regulations 2018, Regulation 126 as issued 31 August 2022.</p> | | |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|--|----------|---|--|----------------------------------|-------------------|
| DEMOLITION | | | | | |
| 10. | A10 | The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version. | <p>The Contractor has provided remaining documentation for the farmhouse demolition from 3rd – 5th June 2025 that wasn't available at the time of IEA#1:</p> <p>Asbestos removal notification of removal acknowledgement (940R-00438018-01) from Safe Work NSW 19/05/25. Lightsource bp confirmed during the audit interview that no demolition work has occurred since IEA#1.</p> | | Compliant |
| PROTECTION OF PUBLIC INFRASTRUCTURE | | | | | |
| 11. | A11 | <p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. <p>Note: This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.</p> | <p>Lightsource bp confirmed during the audit interview that road maintenance on public roads is being undertaken in accordance with Condition B8 and that this will be clearly addressed in the IEA #3 audit report. As such, no further action is considered necessary for the IEA #2 report.</p> <p>Lightsource bp also confirmed that: DTI repaired/ relocated or removed existing Telstra assets as part of the external road upgrades, since April 2025, being:</p> <ol style="list-style-type: none"> 1. Remove 160m of redundant Telstra 50pr cable, that conflicted with the NEW Wollara Rd pavement & widening (Ch.2+270 to Ch2+430) which occurred mid-May 2025 and falls outside this audit period. 2. Lowered and protected (<i>placed in duct</i>) existing Telstra direct buried 2pr to 20pr road crossings, that conflicted with the NEW Wollara Rd pavement and widening | | Not Triggered |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|---|----------|--|--|----------------------------------|-------------------|
| | | | <p>(Ch.2+880, Ch.3+465, Ch.4+180 & Ch.4+430), April through to early June 2025, outside this audit period.</p> <p>3. Lowered and protected (placed in new ducts and pits) existing Telstra 10pr cable, that conflicted with the upgraded twin pipe culvert on Ringwood Rd (Ch.5+495), occurred late November 2025</p> <p>Based on the above, this condition was not triggered as part of IEA #2.</p> | | |
| OPERATION OF PLANT AND EQUIPMENT | | | | | |
| 12. | A12 | <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>The following vehicle/plant maintenance records were provided:</p> <ul style="list-style-type: none"> • Case Skid Steer Loader TR270B 250hr service - 31/07/25 (Job# JB02188) • Kubota KX018-4 500hr service – 12/08/25 (Job# JB02307) • Kubota U55-4 Hydraulic Service – 11/08/25 (Job# JB02322) | | Compliant |
| APPLICABILITY OF GUIDELINES | | | | | |
| 13. | A13 | <p>References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.</p> <p>However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and</p> | <p>Guidelines and Australian Standards are as per management plans and Construction Certificate items listed under Condition A9.</p> <p>An existing approval (DPHI reference SSD-33964533-PA-36) issued on 12 September 2025, permits construction works to occur:</p> | | Compliant |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------------------|----------|--|--|----------------------------------|-------------------|
| | | management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them. | (a) 7:00am to 6:00pm Monday to Friday (b) 7:00am to 6:00pm Saturday and Sunday (excluding Public Holidays) As linked to Condition B17. Approval valid until 13 March 2026 (excludes public holidays). | | |
| COMPLIANCE | | | | | |
| 14. | A14 | The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development. | DTI GRSF induction presentation provided as evidence. The induction references the environmental consent and compliance management requirements. Copies of the following DTI toolbox talks covering environmental aspects were provided: <ul style="list-style-type: none"> • No-Go Zone Incident • Biodiversity: Protecting Fauna & Habitat • Boundary Fencing – Chainwire Installation • Heritage Awareness • Spill Response and Reporting • Managing Spoil Movement & Placement • Biosecurity: Weed and Pathogen Prevention • Compliance, Consequences & Community Impacts (01/09/25) Enerven GRSF Environmental Induction presentation provided (Version 1.3) as well as WHS Induction (Version 0.6). The environmental induction references the environmental consent and compliance management, whilst both inductions cover off all HSEQ risks. Copies of the following Enerven toolbox talks covering environmental aspects were provided: | | Compliant |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|---------------------------------|----------|--|---|----------------------------------|-------------------|
| | | | <ul style="list-style-type: none"> Site Access & Egress (11/11/25) Barricading (30/10/25) | | |
| EVIDENCE OF CONSULTATION | | | | | |
| 15. | A15 | <p>Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <ul style="list-style-type: none"> (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken including: <ul style="list-style-type: none"> (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved. | <p>Consultation actioned during the audit period was presented as per the following evidence:</p> <p>Condition B17 and B19: extended construction hours – confirmation email from Upper Hunter Shire Council dated 25 May 2025; TfNSW dated 21 May 2025 – notes items to be addressed. Sighted email from Lightsource bp dated 30 May 2025 to address TfNSW comments. Email also sighted from Lightsource bp to DPHI on 26 June 2025 for community consultation approach + internal Lightsource bp email confirming the community consultation letter box drop had been actioned, 2 July 2025. Copy of letter also sighted: “Re: Goulburn River solar farm project (SSD 33964533): Proposed change to construction hours” dated 2 July 2025. This followed with a letter from Lightsource bp to DPHI dated 28 August 2025 providing evidence of the consultation undertaken.</p> <p>Condition B1(b): increase in vehicle length. Email presented from Lightsource bp to Upper Hunter Shire Council on 18 June 2025 to request feedback on a proposed temporary increase in vehicle length. Council responded 23 June 2025 confirming no objection to increase. Additionally, consultation with Upper Hunter Shire Council regarding OSOM trial run as per email dated 28 October 2025; Council provided confirmation to support the temporary increase in vehicle lengths as per email response dated 29 October 2025. Also</p> | | Compliant |

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| | | | <p>sighted letter from Lightsource bp dated 12 November 2025 "Request for temporary increase to vehicle length under Development Consent condition B1(b) – response to TfNSW request for information" to TfNSW.</p> <p>Condition B40: updated Accommodation & Employment Strategy consultation actioned as per email from Lightsource bp to Mid-Western Regional Council (MWRC) dated 28 August 2025; Council responded 11 September 2025 which followed with Lightsource bp email issued 18 September 2025 to arrange a discussion with Council. Council then provided confirmation that they support the amended comments as per email dated 23 September 2025. Additionally consultation sighted from Lightsource bp to Upper Hunter Shire Council (UHSC) providing details of accommodation strategy as emailed on 3 September 2025. UHSC responded 10 September 2025 confirming no concerns or comments in relation to the strategy.</p> | | |
| COMMUNITY ENHANCEMENT | | | | | |
| 16. | A16 | <p>Prior to commencing construction, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with:</p> <ul style="list-style-type: none"> (a) Division 7.1 of Part 7 of the EP&A Act; and (b) the terms of the draft agreement between the Applicant and Council, as referenced in Council's correspondence dated 16 May 2024, which are summarised in Appendix 3. | <p>Voluntary Planning Agreement dated 20th December 2024 applies.</p> <p>Letter to Upper Hunter Shire Council dated 3/6/2025 proposing 14th April 2025 as the date for commencement of construction under clause 5.1(a) of the Goulburn River Solar Farm Voluntary Planning Agreement.</p> <p>Evidence as reviewed during the initial audit. Timing of this condition was not triggered as part of this audit.</p> | | Not Triggered |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|--|----------|---|---|--|-------------------|
| SCHEDULE 2, PART B ENVIRONMENTAL CONDITIONS - GENERAL | | | | | |
| TRANSPORT | | | | | |
| 1. | B1 | <p>Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions</p> <p>The Applicant must ensure that the:</p> <ul style="list-style-type: none"> (b) development does not generate more than: (i) 55 heavy vehicle movements a day (a maximum of 15 heavy vehicle movements per hour) during construction, upgrading or decommissioning; (ii) 24 movements of heavy vehicle requiring escort during construction, upgrading and decommissioning; and (c) length of any vehicles (excluding heavy vehicle requiring escort) used for the development does not exceed 19 metres, <p>unless the Planning Secretary agrees otherwise.</p> | <p>Heavy vehicle monitoring is included under section 2.3 of EPC Project Monthly Report.</p> <p>Non-compliance notification to DPHI dated 13 November and Lightsource bp investigation report dated 08/11/25 provided.</p> <p>Upon the monthly review of October 2025 traffic movements, it was identified that there were 57 heavy vehicle movements recorded on the 21/10/25 and 27/10/25.</p> <p>These occurrences were self-reported as one non-compliance on 6 November 2025, under SSD-33964533-PA-66</p> | <p>One non-compliance was self-reported and recorded as part of this audit as: GRSF-02_NC-32</p> <p>Refer to Appendix F of this report for details of Self-Reported Non-Compliances.</p> | Non-Compliant |
| 2. | B2 | The Applicant must keep accurate records of the number of heavy vehicles and vehicles requiring escort entering or leaving the site each day for the duration of the project. | Lightsource bp confirmed during the audit interview that no heavy vehicles required escort during the audit period. | | Not Triggered |
| 3. | B3 | <p>Access Route</p> <p>Unless otherwise agreed by the Planning Secretary, all heavy vehicles and heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway / Ringwood Road</p> | Traffic Management Plan section 3.5.2 "Oversize / Overmass Vehicle Routes" outlines the heavy vehicles route to and from site via the Golden Highway / Ringwood intersection. | Two (2) non-compliances were self-reported and recorded as part of this audit as: GRSF-02_NC-02 & NC-19. | Non-Compliant |

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| | | intersection as shown in Figure 3 and Figure 4 in Appendix 4. | | Refer to Appendix F of this report for details of Self-Reported Non-Compliances. | |
| 4. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(c) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and</p> <p>(d) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.</p> | <p>Traffic Management Plan section 3.5 “Construction Vehicle Routes” outlines the route including the Golden Highway and Ringwood Road.</p> <p>Vehicle Movement Plan is included under appendix G.</p> <p>The following non-compliance notifications to DPHI were sighted for B24(a):</p> <ul style="list-style-type: none"> • 03/09/25 • 15/09/25 • 19/09/25 • 24/09/25 • 25/09/25 • 26/09/25 (x2) • 09/10/25 • 10/10/25 (x3) • 16/10/25 (x2) • 24/10/25 • 27/10/25 (x2) • 31/10/25 • 03/11/25 (x2) • 06/11/25 • 10/11/25 • 11/11/25 <p>The following non-compliance notifications to DPHI were sighted for B4(b):</p> <ol style="list-style-type: none"> 1. 03/11/25 2. 10/11/25 | <p>Twenty-two non-compliances were self-reported and recorded as part of this audit against B4(a) as:</p> <p>GRSF-02_NC-07, NC-08, NC-09, NC-10, NC-11, NC-12, NC-13, NC-15, NC-16, NC-17, NC-18, NC-21, NC-22, NC-23, NC-24, NC-25, NC-27, NC-28, NC-29, NC-30, NC-31, NC-33.</p> <p>Two non-compliances were self-reported and recorded as part of this audit against B4(b) as:</p> <p>GRSF-02_NC-26 & NC-34.</p> <p>Refer to Appendix F of this report for details of Self-Reported Non-Compliances.</p> | Non-Compliant |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|---|---|---|----------------------|
| 5. | B5 | All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4. | <p>Traffic Management Plan section 3.5 “Construction Vehicle Routes” outlines the turnaround facility on Barnett Street approximately 190m north Golden Highway.</p> <p>The turnaround facility 190m North of Golden Highway (approx. 4km west of Golden Highway / Ringwood Rd. intersection) is in place. This was sighted and used by the auditor after leaving site.</p> <p>The following non-compliance notifications to DPHI were sighted for B5:</p> <ol style="list-style-type: none"> 1. 22/07/25 2. 06/08/25 3. 13/08/25 4. 15/08/25 5. 07/11/25 6. 11/11/25 <p>The Department provided a Notice to Furnish Information to DTI on 1809//25 as sighted.</p> | <p>Six non-compliances were self-reported and recorded as part of this audit as:</p> <p>GRSF-02_NC-01, NC-03, NC-04, NC-05, NC-35, NC-36.</p> <p>Refer to Appendix F of this report for details of Self-Reported Non-Compliances.</p> | Non-Compliant |
| 6. | B6 | <p>Site Access</p> <p>All vehicles associated with the development must enter and exit the site via the Primary Access point off Wollara Road, as identified in Appendix 1.</p> <p>Note: Other site access points may be used for emergency purposes.</p> | <p>Traffic Management Plan section 3.5 “Construction Vehicle Routes” outlines the primary access point off Wollara Road.</p> <p>Site inspection confirmed that the primary site access is off Wollara Road as per Appendix 1 of the consent. Two secondary access points of Wollara Road are designated emergency access only.</p> | | Compliant |

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|-------|----------|---|--|--|-------------------|
| 7. | B7 | <p>Road Upgrades</p> <p>Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must complete the road upgrades detailed in Appendix 4.</p> <p>Unless the relevant roads authority agrees otherwise, these upgrades must comply with the current <i>Austrroads Guidelines, Australian Standards</i> (as amended by TfNSW supplements), and be carried out to the satisfaction of the relevant roads authority.</p> | <p>The following approvals from DPHI were noted regarding the road upgrades:</p> <ul style="list-style-type: none"> • Lightsource bp letter to DPHI, dated 8 October 2024, requesting approval for revised timing of the road upgrade works. • DPHI response to Lightsource bp, dated 10 October 2025, confirming approval of the revised timing for the road upgrades. • Lightsource bp letter to DPHI, dated 28 March 2025, requesting early access to the site for limited commencement of construction works prior to the completion of road upgrades. • DPHI response to Lightsource bp, dated 12 April 2025, granting approval for early site access to undertake limited construction works, subject to a restriction on daily traffic volumes to a maximum of 10 heavy vehicles and 20 light vehicles. | <p>Non-Compliance GRSF-02_NC-38:</p> <p>A non-compliance was identified by DPHI following an inspection of the site on 5 November 2025: Failure to undertake road upgrades within 6 months of commencing construction in relation to Wollara Road and Ringwood Road i.e. by 14 October 2025, as observed on 5 November 2025 (Schedule 2, Condition B7). This was recorded as a breach by DPHI as detailed in their letter dated 17 November 2025, ref: INS-98404214.</p> <p>This has therefore been captured as a non-compliance as part of this audit.</p> | Non-Compliant |
| 8. | B8 | <p>Road Maintenance</p> <p>The Applicant must, in consultation with the relevant roads authority:</p> <p>(a) undertake an independent dilapidation survey and report to assess the:</p> <p>(i) existing condition of Ringwood Road and Wollara Road on the transport route, prior to construction, upgrading or decommissioning works; and</p> <p>(ii) condition of Ringwood Road and Wollara Road on the transport route, following construction, upgrading or decommissioning works;</p> | <p>(a) Road Dilapidation Survey for Goulburn River Solar Farm, version 1, ref. AUS-GRSF-DTI-ENG-CIV-REP-0001, dated 13 January 2025, was reviewed. The survey was taken for Council Road "Ringwood Road & Wollara Road" and TfNSW Road "West Side of Barnett Street & East Side of Barnett Street". Section 6 of the survey "Conclusion" outlines the current condition of the roads.</p> <p>(b) The Dilapidation Survey was submitted to the Upper Hunter Shire Council on 23/06/25.</p> <p>(c) Lightsource bp advised during the audit interview that DTI has undertaken the</p> | | Not Triggered |

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| | | <p>(b) on completion of the dilapidation reports undertaken in B8(a)(i) and (ii) provide a copy to the relevant road authority;</p> <p>(c) repair the roads identified in condition B8(a) if dilapidation surveys identify that the road has been damaged due to development-related traffic during construction, upgrading or decommissioning works;</p> <p>If there is a dispute between the Applicant and the relevant roads authority about road repairs (including timeframes) required under this condition, then either party may refer the matter to the Planning Secretary for resolution.</p> | <p>following preventative & reactive maintenance of those sections of Ringwood & Wollara Rd, that were NOT upgraded: 1.2km section, BOTH lanes, Wollara Rd, north of the Binks Rd intersections (pavement rehabilitation & re-seal) – Jul/Aug 2025</p> <p>There have been no disputes with relevant road authorities for road repairs noted by Lightsource bp.</p> <p>Timing of this condition is no longer triggered.</p> | | |
| 9. | B9 | <p>Operating Conditions</p> <p>The Applicant must ensure:</p> <p>(a) the internal roads are constructed as all-weather roads;</p> <p>(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;</p> <p>(c) the capacity of the existing roadside drainage network is not reduced;</p> <p>(d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and</p> <p>(e) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the sealed public road network.</p> | <p>It was noted during the site inspection that:</p> <p>(a) Internal roads were under construction (currently gravel)</p> <p>(b) sufficient parking was available onsite</p> <p>(c) No impacts observed to existing roadside drainage with Lightsource bp confirming nil incidents during the audit interview</p> <p>(d) Vehicles contained onsite. Directional signage noted.</p> <p>(e) no tracking noted on roads.</p> | | Compliant |
| 10. | B10 | <p>Traffic Management Plan</p> <p>Prior to commencing road upgrades identified in condition B7, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW,</p> | <p>Traffic Management Plan Rev. 3 doc no. TEJ0416-RPT-0001 prepared by Turnbull Engineering, dated 18 December 2024. The Plan was prepared in consultation with TfNSW, Upper Hunter Shire Council</p> | | Compliant |

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| | | <p>Upper Hunter Shire Council and Mid-Western Regional Council, and to the satisfaction of the Planning Secretary. This plan must include:</p> <ul style="list-style-type: none"> (a) details of the transport route to be used for all development-related traffic; (b) details of the road upgrade works required by condition B7; (c) a reconciliation table to demonstrate all traffic-related management measures and recommendations identified in the EIS have been included in the plan; (d) monitor the compliance of vehicles using the access route described in conditions B3, B4 and B5; (e) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: <ul style="list-style-type: none"> (i) details of the dilapidation surveys required by condition B8 of this consent; (ii) temporary traffic controls, including detours and signage, in particular regarding the left in / left out arrangement at the Ringwood Road / Golden Highway intersection, and the turnaround point on Barnett Street; (iii) monitoring the bi-directional traffic volumes on the Golden Highway at the Ringwood Road intersection; (iv) limiting construction traffic associated with the development to ensure that vehicle movements along the Golden Highway do not exceed 380 vehicles per hour during the AM network peak hour; | <p>and Mid-Western Regional Council. The consultation details are included under appendix H “Stakeholder Consultation”.</p> <p>The TMP was conditionally approved by DPHI on 19 December 2024 ref. SSD-33459633-PA-2. The Department requested to resubmit the TMP for approval and include any changes to staging of management plans (where relevant) and project specific traffic management system for managing heavy vehicles requiring escort.</p> <p>DPHI letter states that <i>“The revised Traffic Management Plan must be updated and approved by the Planning Secretary:</i></p> <ul style="list-style-type: none"> • <i>prior to the movement of any heavy vehicles requiring escort;</i> • <i>prior to commencing construction (excluding road upgrades as detailed in the consent), upgrading or decommissioning;</i> • <i>following approval of any staging request;</i> • <i>following any additional consultation with TfNSW, Upper Hunter Shire Council and Mid-Western Regional Council; or</i> • <i>as required in accordance with the consent.”</i> <p>Lightsource bp confirmed that the December 2024 TMP was the current version being implemented.</p> <p>Compliance with this condition demonstrated below:</p> <ul style="list-style-type: none"> (a) details of routes included under section 3.3 and appendix G | | |

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| | | <ul style="list-style-type: none"> (v) scheduling the arrival and departure of heavy vehicles from the site to avoid the PM peak hour where practicable; (vi) notifying the local community about development-related traffic impacts; (vii) procedures for receiving and addressing complaints from the community about development-related traffic; (viii) minimising potential cumulative traffic impacts with other projects in the area during construction, upgrading or decommissioning works; (ix) minimising dirt tracked onto the public road network from development-related traffic; (x) details of any employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; (xi) measures for managing light vehicle peak numbers, including car-pooling or ride sharing by employees; (xii) scheduling of haulage vehicle movements to minimise convoy length or platoons, and to minimise conflict with light vehicles; (xiii) responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; | <ul style="list-style-type: none"> (b) details of road upgrades included under section 3.1; section 3.5; appendix A; Appendix B. (c) Traffic-related management measures and recommendations included under section 5 (d) Monitoring of compliance of vehicles included under section 5.6 (e) Implementation of measures to minimise traffic impacts as follows: <ul style="list-style-type: none"> (i) As per section 5.7.1 “Dilapidation Surveys”. (ii) As per section 3.1 “Early Works – Pre-construction; section 5.3 “Traffic Guidance Schemes”; section 5.6 “Management of Construction Vehicle Routes”. (iii) As per section 3.6.5 “Monitoring of Construction Traffic Volumes” (iv) As per section 3.6.5 “Monitoring of Construction Traffic Volumes” (v) As per section 3.6.3 “Construction Traffic” (vi) As per section 6.1 “Stakeholders” (vii) As per section 6.2 “Complaints Management” (viii) As per section 4.1 “Construction Impacts” (ix) As per section 5.7.2 “Tracking Dirt onto Public Roads” (x) As per section 3.6.4 “Employee Shuttle Bus Services” (xi) As per section 3.6.3 “Construction Traffic” | | |

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| | | <ul style="list-style-type: none"> (xiv) measures to minimise dust generated by construction traffic; (xv) responding to any emergency repair or maintenance requirements; and (xvi) a traffic management system for managing heavy vehicles requiring escort; (f) a driver's code of conduct that addresses: <ul style="list-style-type: none"> (i) driver fatigue; (ii) procedures to ensure that drivers adhere to the designated transport routes and speed limits; and (iii) procedures to ensure that drivers implement safe driving practices; and (g) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan. <p>Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.</p> | <ul style="list-style-type: none"> (xii) As per section 3.5.2 "Oversize / Overmass Vehicle Routes"; section 5.5 "Driver Code of Conduct" (xiii) As per section 5.5 "Driver Code of Conduct"; appendix F "Driver Code of Conduct" (xiv) As per section 5.7.5 "Air Quality"; appendix F "Driver Code of Conduct" (xv) As per section 5.7.4 "Emergency Road Repair" (xvi) As per section 5.9 "OSOM Vehicles" (f) Driver code of conduct is included under appendix F and addresses the following: <ul style="list-style-type: none"> (i) Section 3 "Driver Fatigue" (ii) Section 4 "Designated Transport Routes" (iii) Section 2 "Driving to and from the Project" (g) Section 5.5 "Driver Code of Conduct" outlines that the driver receives the suitable training. | | |
| LANDSCAPING | | | | | |
| 11. | B11 | <p>Vegetation Buffer</p> <p>Unless the Planning Secretary agrees otherwise, the Applicant must establish and maintain a vegetation buffer (landscape screening) as described in the EIS and at the locations adjacent Wollara Road identified in Appendix 5, which must:</p> <ul style="list-style-type: none"> (a) be planted prior to commencing operation; (b) be comprised of species that are endemic to the area; (c) be designed and maintained in accordance | <p>Figure 6-11 Draft landscaping Plan (031250_GRSF_LVIA_F6-11_draft_landscape_plan_230414_v02) developed by registered landscape architect (RLA#719 Australian Institute of Landscape Architects) by Envisage as presented as evidence.</p> <p>Three separate proposed landscape buffer zones have been proposed along the sites western boundary with Wollara Road.</p> | | Compliant |

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| | | <p>with RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent); and</p> <p>(d) be properly maintained with appropriate weed management;</p> <p>unless the Planning Secretary agrees otherwise.</p> | <p>A planting plan has been developed which includes planting schedule of native medium & small trees, shrubs & tall shrubs, tall grasses and climbers (<i>Acacia implexa</i>, <i>Callitris endlicheris</i>, <i>Allocasuarina distyla</i>, <i>Lomandra glauca</i> etc.)</p> <p>A landscape sub-contractor has been engaged, and planting is planned to commence in Q1 of 2026 in two of the designated areas.</p> | | |
| 12. | B12 | <p>Land Management</p> <p>Unless the Planning Secretary agrees otherwise, the Applicant must maintain the agricultural land capability of the site, including:</p> <p>(a) establishing the ground cover of the site within 3 months following completion of any construction or upgrading;</p> <p>(b) maintain ground cover at a minimum of 70% to prevent soil erosion; and</p> <p>(c) properly maintaining the ground cover with appropriate perennial species and weed management.</p> | <p>Ground cover establishment had commenced in some areas as noted during the site inspection. Timing of this condition to be triggered towards completion of areas.</p> | | Not Triggered |
| BIODIVERSITY | | | | | |
| 13. | B13 | <p>Vegetation Clearance</p> <p>The Applicant must not clear any native vegetation or fauna habitat located outside the approved development footprint described in the EIS.</p> | <p>Biodiversity Management Plan section 6.3 "Vegetation Clearance Procedures" specifies the total amount of vegetation clearance that is permitted by the Project. It also states that exclusion fencing, and signage will be used to protect vegetation and fauna habitat located outside of the approved disturbance areas.</p> <p>Pre-clearance surveys undertaken by Fauna Spotters Australia within the audit period:</p> | | Compliant |

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|-----------------------------|----------|---|---|----------------------------------|-------------------|--------|------------------------|--|--|--|-----------------------------|-----|-------|----------|---|--|---------------|
| | | | <ul style="list-style-type: none"> Killoe Creek and Bow River on 11/07/25 (report date 17/07/25) Stage 1, PCS 53-54-56-57-58 from 25/06/25 to 04/07/25 Stage 7, PCS 35, 42, 43, 44, 49, 50, 51, 52 from 24/08/25 to 29/08/25 Stage 1 PCS 55 and Stage 8 PCS 45, 46, 47, 59, 60, 61, 62, 63, 64 from 02/09/25 to 18/09/25 Stage 3, PCS 65, 66, 67, 68, 69, 70 from 29/08/25 to 31/08/25 | | | | | | | | | | | | | | |
| 14. | B14 | <p>Biodiversity Offsets</p> <p>Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below. The retirement of these credits must be carried out in accordance with the <i>NSW Biodiversity Offsets Scheme</i> and can be achieved by:</p> <ol style="list-style-type: none"> acquiring or retiring 'biodiversity credits' within the meaning of the <i>Biodiversity Conservation Act 2016</i>; making payments into an offset fund that has been developed by the NSW Government; and/or funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. <p>Table 1: Ecosystem Credit Requirements</p> <table border="1"> <thead> <tr> <th>Vegetation Community</th> <th>PCT ID</th> <th>Credits Required</th> <th>Timing</th> </tr> </thead> <tbody> <tr> <td colspan="4">Solar Farm Site</td> </tr> <tr> <td>Grey Box x White Box grassy</td> <td>483</td> <td>4,618</td> <td>Prior to</td> </tr> </tbody> </table> | Vegetation Community | PCT ID | Credits Required | Timing | Solar Farm Site | | | | Grey Box x White Box grassy | 483 | 4,618 | Prior to | <p>Biodiversity Offset Package – Road Upgrades provided to DPHI (SSD-33964533-PA-7) approved by DPHI 19/12/24.</p> <p>Timing of this condition was not triggered as part of this audit.</p> | | Not Triggered |
| Vegetation Community | PCT ID | Credits Required | Timing | | | | | | | | | | | | | | |
| Solar Farm Site | | | | | | | | | | | | | | | | | |
| Grey Box x White Box grassy | 483 | 4,618 | Prior to | | | | | | | | | | | | | | |

Goulburn River Solar Farm

Independent Environmental Audit #2



The APP Group is now
proudly part of Bureau Veritas

| ID No | Req. No. | SSD 33964533 Requirement | | | Audit Evidence | Audit Findings / Recommendations | Compliance Rating | |
|--|----------|---|----------------------------------|----|-------------------------|----------------------------------|-------------------|--|
| | | open woodland on basalt hills in the Merriwa region, upper Hunter Valley | | | commencing construction | | | |
| | | Narrow-leaved Ironbark - Black Pine - Sifton Bush heathy open forest on sandstone ranges of the upper Hunter and Sydney Basin | 1661 | 59 | | | | |
| Road Upgrades | | | | | | | | |
| | | Grey Box x White Box grassy open woodland on basalt hills in the Merriwa region, upper Hunter Valley | 483 | 11 | | | | Prior to commencing road upgrade works |
| | | Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter | 1691 | 4 | | | | |
| | | Western Hunter Flats Red Gum Sedge Forest | 3334 | 1 | | | | |
| | | Central West Valleys White Box Forest | 3388 | 12 | | | | |
| | | Ulan Sandstone Ironbark-Pine Woodland | 3781 | 32 | | | | |
| Table 2: Species Credit Requirements | | | | | | | | |
| Species Credit Species | | Credits Required | Timing | | | | | |
| Solar Farm Site | | | | | | | | |
| Regent Honeyeater (<i>Anthochaera phrygia</i>) | | 1,424 | Prior to commencing construction | | | | | |
| Barking Owl (<i>Ninox connivens</i>) | | 6 | | | | | | |
| Road Upgrades | | | | | | | | |
| <i>Commersonia rosea</i> | | 14 | Prior to | | | | | |

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|--|----------|---|--|---|-------------------------------|--|---|---|----|--|----|--|---|---|----|--|----|--|---|--|----|---|----|--|--|--|
| | | <table border="1"> <tr> <td>Pine Donkey Orchid (<i>Diuris tricolor</i>)</td> <td>2</td> <td rowspan="10">commencing road upgrade works</td> </tr> <tr> <td>Regent Honeyeater (<i>Anthochaera phrygia</i>)</td> <td>9</td> </tr> <tr> <td>Large-eared Pied Bat (<i>Chalinolobus dwyeri</i>)</td> <td>85</td> </tr> <tr> <td>Giant Burrowing Frog (<i>Heleioporus australiacus</i>)</td> <td>25</td> </tr> <tr> <td>Pale-headed Snake (<i>Hoplocephalus bitorquatus</i>)</td> <td>3</td> </tr> <tr> <td>Broad-headed Snake (<i>Hoplocephalus bungaroides</i>)</td> <td>64</td> </tr> <tr> <td>Barking Owl (<i>Ninox connivens</i>)</td> <td>13</td> </tr> <tr> <td>Common Planigale (<i>Planigale maculate</i>)</td> <td>3</td> </tr> <tr> <td>Stripped Legless Lizard (<i>Delma impar</i>)</td> <td>27</td> </tr> <tr> <td>Eastern Cave Bat (<i>Vespadelus troughtoni</i>)</td> <td>14</td> </tr> </table> | Pine Donkey Orchid (<i>Diuris tricolor</i>) | 2 | commencing road upgrade works | Regent Honeyeater (<i>Anthochaera phrygia</i>) | 9 | Large-eared Pied Bat (<i>Chalinolobus dwyeri</i>) | 85 | Giant Burrowing Frog (<i>Heleioporus australiacus</i>) | 25 | Pale-headed Snake (<i>Hoplocephalus bitorquatus</i>) | 3 | Broad-headed Snake (<i>Hoplocephalus bungaroides</i>) | 64 | Barking Owl (<i>Ninox connivens</i>) | 13 | Common Planigale (<i>Planigale maculate</i>) | 3 | Stripped Legless Lizard (<i>Delma impar</i>) | 27 | Eastern Cave Bat (<i>Vespadelus troughtoni</i>) | 14 | | | |
| Pine Donkey Orchid (<i>Diuris tricolor</i>) | 2 | commencing road upgrade works | | | | | | | | | | | | | | | | | | | | | | | | |
| Regent Honeyeater (<i>Anthochaera phrygia</i>) | 9 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Large-eared Pied Bat (<i>Chalinolobus dwyeri</i>) | 85 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Giant Burrowing Frog (<i>Heleioporus australiacus</i>) | 25 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pale-headed Snake (<i>Hoplocephalus bitorquatus</i>) | 3 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Broad-headed Snake (<i>Hoplocephalus bungaroides</i>) | 64 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Barking Owl (<i>Ninox connivens</i>) | 13 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Common Planigale (<i>Planigale maculate</i>) | 3 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Stripped Legless Lizard (<i>Delma impar</i>) | 27 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Eastern Cave Bat (<i>Vespadelus troughtoni</i>) | 14 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15. | B15 | Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must provide evidence to the Planning Secretary that biodiversity credits have been retired. | <p>DPHI letter to Lightsource bp ref. SSD-33964533-PA-7, dated 19 December 2024, confirming the satisfaction with the offset package for road upgrades works.</p> <p>DPHI letter to Lightsource bp ref. SSD-33964533-PA-15, dated 13 March 2025, confirming that the project meets the offset requirements in terms of vegetation types, species and credits for the Solar Farm site.</p> <p>Evidence as presented for the previous audit period. Timing of this condition is no longer triggered.</p> | | Not Triggered | | | | | | | | | | | | | | | | | | | | | |
| 16. | B16 | <p>Biodiversity Management Plan</p> <p>Prior to carrying out any development that could directly or indirectly impact biodiversity values, the Applicant must prepare a Biodiversity Management Plan for the</p> | Biodiversity Management Plan Rev. Final prepared by Umwelt Australia, dated 18 December 2024. The Plan was prepared in consultation with BCS. The details of consultation are included under appendix 1 "Agency | <p>Non-Compliance GRSF-02_NC-39:</p> <p>The project is non-compliant with B16(b)(viii). This condition requires not only that the BMP is prepared in consultation with BCS and</p> | Non-Compliant | | | | | | | | | | | | | | | | | | | | | |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
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| | | <p>development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:</p> <p>(viii) be prepared in accordance with the Biodiversity Development Assessment Reports dated 11 January 2024 and 18 January 2024 provided in the Amendment Report;</p> <p>(ix) include a description of the measures and timeframes that would be implemented for:</p> <ol style="list-style-type: none"> a. protecting vegetation and fauna habitat outside the approved disturbance areas; b. managing and enhancing the remnant vegetation and fauna habitat on site; c. minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; d. minimising the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna; e. minimising the impacts to fauna on site and implementing fauna management protocols; f. rehabilitating and revegetating temporary disturbance areas with native species that are appropriate to the site's ecology and conditions; g. 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; h. controlling weeds, feral pests and | <p>Consultation. The BMP and approval letter are both on the project website.</p> <p>The DPHI approved the plan on 19 December 2024 ref. SSD-33964533-PA-4.</p> <p>The BMP has been updated to Rev. 2 (draft) and is currently undergoing internal review by Lightsource bp & DTI.</p> <p>Compliance with this condition demonstrated below:</p> <ol style="list-style-type: none"> (a) Section 1.1 "Purpose of this Biodiversity Management" (b) The plan includes a description of the measures and timeframes that would be implemented as follows: <ol style="list-style-type: none"> (i) As per section 6.3.2 "Exclusion fencing and No-go Zone Procedure" (ii) As per section 6.8 "Vegetation Management Zones"; section 6.9 "Rehabilitation and Restoration Procedure" (iii) As per section 6.3.1 "Monitoring the Total Clearing Footprint for the Project" (iv) As per section 6.3.6 "Tree Felling and Fauna Habitat Feature Removal Procedure" (v) As per section 6.4 "Fauna Handling Procedure" (vi) As per section 6.9 "Rehabilitation and Restoration Procedure" | <p>approved by the Planning Secretary, but that it "includes a description of the measures and timeframes <u>that would be implemented</u> for controlling weeds, feral pests and pathogens in consideration of the relevant Commonwealth threat abatement plans."</p> <p>Although pre-clearing ecological surveys were undertaken by the project ecologists in the early stages of the project, recent weed surveys conducted in September 2025 identified invasive weed species within Stage 1 and Stage 8. The surveys undertaken were utilised to identify areas requiring management, identifying areas of Priority and High Threat Weeds requiring management.</p> <p>The survey report provides treatment recommendations in Section 4.4.3 however there is no evidence of these recommendations being implemented.</p> <p>The audit recognises that the procurement of a weed sub-contractor has been challenging, with one only recently procured, and treatment to commence in early 2026. However, the procurement process should have commenced much earlier in order for the project to implement Biodiversity Mitigation and Management Measures for the Project (as per Table 6.1 of the BMP) within required timeframes.</p> | |

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| | | <p>pathogens in consideration of the relevant Commonwealth threat abatement plans; and</p> <p>i. minimising impacts on entities at risk of a serious and irreversible impact (SAII), including:</p> <p>i. securing an additional 23.5 hectares of Box Gum Woodland derived native grassland (DNG) within a Biodiversity Stewardship Agreement for the purposes of rehabilitating, enhancing and protecting, in perpetuity, this vegetation to a condition state commensurate with Box Gum Woodland;</p> <p>ii. undertaking a research program regarding the impacts of the development on the vegetation integrity of the Box Gum Woodland DNG retained onsite; and</p> <p>iii. providing \$25,000 per annum (over the first 5 years following commencement of construction) towards Regent Honeyeater conservation programs in consultation with the BCS;</p> <p>(x) include a program to monitor and report on the effectiveness of mitigation measures;</p> <p>(xi) include an incidental threatened species finds protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered on site;</p> <p>(xii) include details of who would be responsible for</p> | <p>(vii) As per section 6.9.2 “Salvage of Habitat Features and Vegetative Materials”</p> <p>(viii) As per section 6.6 “Weed and Pathogen Management Procedure”; section 6.7 “Pest Management Procedure”</p> <p>(ix) As per section 6.3 “Vegetation Clearance Procedures”</p> <ul style="list-style-type: none"> • As per section 6.13.2 “Box Gum Woodland Restoration” • As per section 6.12 “Vegetation Integrity Study” • As per section 6.10 “Regent Honeyeater Conservation” <p>(c) As per section 8.0 “Monitoring and Reporting”</p> <p>(d) As per section 6.5 “Unexpected Threatened Species Finds Protocol”</p> <p>(e) As per section 7.0 “Roles and Responsibilities”.</p> <p>Photos of prickly pear (<i>Opuntia spp.</i>) removal from Stages 2 & 8 and the BESS area, and coverage with black plastic were provided to demonstrate control of this weed species.</p> <p>DTI provided the following statement with regards to weed management on site:</p> <p><i>“The entire solar farm was comprehensively mapped for weeds during the pre-clearing ecological surveys undertaken by the project ecologists. These surveys included detailed, stage-by-stage mapping across the full development footprint. Sample reports have been</i></p> | <p>In particular, BMP Mitigation Measures 13 & 14 (BMP-13 and BMP-14) have not been implemented.</p> | |

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| | | <p>monitoring, reviewing and implementing the plan. Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> | <p><i>provided to demonstrate the level of detail and accuracy of the mapping completed.</i></p> <p><i>Securing a suitable weed-control contractor has been challenging. DTI's strong preference to support local procurement has narrowed the pool of available suppliers. The first procurement round did not receive any submissions, despite direct engagement with multiple local businesses. A second procurement round was issued and did attract interest from several contractors.</i></p> <p><i>DTI is now assessing these suppliers, including their capability, availability, and alignment with the Biodiversity Management Plan requirements. Based on current timeframes, we expect to appoint a contractor before the end of 2025, enabling broad acre spraying and follow-up treatments to commence in line with project needs."</i></p> <p>Weed surveys were undertaken between 2nd and the 18th September 2025, with the findings provided in Section 4 of the Pre-clearance report for Stage 1 PCS 55 and Stage 8 PCS 45, 46, 47, 59, 60, 61, 62, 63, 64 compiled by Fauna Spotters Australia (September 2025).</p> <p>A Weed Spray Calendar has been drafted by DTI (internal email 06/11/2025), however only accounts for weed treatment commencing in February 2026.</p> <p>The following Weed and Seed Inspections forms were provided:</p> <ul style="list-style-type: none"> A One Earthworks Caterpillar D9T (AOE106) 30/09/25 | | |

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| | | | <ul style="list-style-type: none"> A One Earthworks Terex TA30 (AOE507) 30/09/25 | | |
| AMENITY | | | | | |
| 17. | B17 | <p>Construction, Upgrading and Decommissioning Hours</p> <p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <ul style="list-style-type: none"> (g) 7 am to 6 pm Monday to Friday; (h) 8 am to 1 pm Saturdays; and (i) at no time on Sundays and NSW public holidays. | <p>Approval as sighted, DPHI reference SSD-33964533-PA-36 issued on 12 September 2025, permits construction works to occur:</p> <ul style="list-style-type: none"> (a) 7:00am to 6:00pm Monday to Friday (b) 7:00am to 6:00pm Saturday and Sunday (excluding Public Holidays) <p>Approval valid until 13 March 2026 (excludes public holidays).</p> | <p>One non-compliance was self-reported and recorded as part of this audit as: GRSF-02_NC-14</p> <p>Refer to Appendix F of this report for details of Self-Reported Non-Compliances.</p> | Non-Compliant |
| 18. | B18 | <p>Exceptions to Construction Hours</p> <p>The following activities may be undertaken outside the hours specified in condition B17 above:</p> <ul style="list-style-type: none"> (a) commissioning activities that are inaudible at non-associated residences; (b) the delivery or dispatch of materials as requested by the NSW Police Force or other authorities for safety reasons; or (d) emergency work to avoid the loss of life, property and/or material harm to the environment. | <p>Lightsource bp confirmed during the audit interview that no out-of-hours work occurred under Condition B18.</p> | | Not Triggered |

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| 19. | B19 | <p>Variation of Construction Hours</p> <p>The hours of construction activities specified in condition B17 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be:</p> <ul style="list-style-type: none"> (a) considered on a case-by-case or activity-specific basis; (b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; (c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Councils (and other relevant agencies) has been and will be undertaken; (d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and (e) accompanied by a noise impact assessment consistent with the requirements of the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or latest version. | <p>There is an updated request currently with DPHI requesting permission for construction on the Goulburn River Solar Farm Project to occur between 7am and 6pm Monday to Sunday, inclusive of public holidays.</p> <p>The updated request includes stakeholder engagement with sensitive receivers undertaken on 1st & 2nd July via letterbox drop, and email/phone call engagement from 17th to 21st July 2025.</p> <p>Both TfNSW and the Upper Hunter Shire Council have previously responded to consultation confirming no objection to the request.</p> <p>Sighted:</p> <ul style="list-style-type: none"> • Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval for extended construction hours under Development Consent condition B17 – version 3. (28/08/25). • DPHI approval to vary of the hours of construction activities to those detailed above, until 13 March 2026 and excludes public holidays (12/09/2025). | | Compliant |
| 20. | B20 | <p>Noise</p> <p>The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009) or its latest version; and | <ul style="list-style-type: none"> (a) Site Hive noise monitoring data from September and October 2025 at the following locations was presented as evidence: <ul style="list-style-type: none"> i. Stage 3 boundary (on site) ii. 2076 Wollara Road (off site) iii. 1930 Wollara Road (off site) (b) Operational phase has not yet been triggered. | | Compliant |

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| | | (b) ensure that the noise generated by the operation of the development during the night does not exceed 35 dB(A) LAeq, 15min to be determined in accordance with the procedures in the <i>NSW Noise Policy for Industry</i> (EPA, 2017) at any non-associated residence. | The project is being constructed in accordance with best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> as demonstrated through the provision of Site Hive data from September and October 2025 | | |
| 21. | B21 | <p>Dust</p> <p>The Applicant must minimise the dust generated by the development.</p> | <p>Dust suppression mitigation measures are included in Environmental Management Strategy under Appendix 3 “Consolidated Mitigation and Management Measures”.</p> <ul style="list-style-type: none"> Where construction works generate dust, all reasonable and practicable measures are to be undertaken to prevent dust and street sweepers to be used to remove sediment from sealed roads Areas are to be stripped progressively and only where it is necessary for works to occur Disturbed areas are to be stabilised as soon as practical. Disturbed areas are to be dampened with a light water spray as required. Vehicle movements are to be restricted to designated access roads. All loads are to be covered when transporting material where practical. <p>The project Water Tracking register (<i>AOE GRSF – Water Tracking</i>) was provided, showing water purchases and acquisitions for the purposes of dust suppression for the audit period.</p> | <p>Non-Compliance GRSF-02_NC-40:</p> <p>The Applicant is not minimising dust generation across the project. As aligned to DPHI’s comments following their inspection on the 5 November 2025, a non-compliance has been raised against Condition B21, further detailed as below.</p> <p>During the site inspection, multiple separate instances of dust generation from light vehicles, semi-trailers and moxix was witnessed across site. Wheel generated dust and wind generated dust from loads was clearly visible and remained suspended in the air for extended periods. There was no evidence of any loads being covered despite hot, dry and windy conditions on the day.</p> <p>The contractor advised that there were five water carts in constant circulation, however only one water cart was sighted during the site inspection. They also advised that a 20km/h speed limit had been enforced that day.</p> <p>The contractor also advised that polymer trials for haul road treatments had been discussed, however there is no evidence of these trials</p> | Non-Compliant |

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| | | | <p>A copy of the Notice to Furnish Information and Records (12/11/25) from DPHI to DTI (ref: INV-99220706) was provided.</p> <p>The auditor sighted one water cart active during the site inspection and noted gradual haul road stabilisation treatment in Stage 1.</p> <p>Volumetric batch plant dust encapsulation implemented by Enerven was sighted during the site inspection.</p> | <p>being investigated for implementation in December 2026, as advised by the contractor.</p> <p>The auditor notes that a Notice to Furnish Information and Records request was sent to DTI on 12/11/25 with regards to site observations relevant to dust management made by DPHI during a site inspection on 05/11/25. The notice highlights similar dust management issues as the audit site inspection.</p> | |
| 22. | B22 | <p>Visual</p> <p>The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection; (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. | <p>Environmental Management Strategy section 4.1.2 “Visual Amenity” states that “<i>Visual impacts will be managed in accordance with Condition B22 of the Development Consent, the EIS (Umwelt 2023) and the Landscape Character and Visual Impact Assessment (Envisage 2023)</i>”.</p> <p>The mitigation measures for Visual id. EMS20 is included in the Environmental Management Strategy under Appendix 3 “Consolidated Mitigation and Management Measures”.</p> | | Compliant |
| 23. | B23 | <p>Lighting</p> <ul style="list-style-type: none"> (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: <ul style="list-style-type: none"> (i) is installed as low intensity lighting (except where required for safety or emergency purposes); (ii) does not shine above the horizontal; | <p>The mitigation measures for Social Amenity (lighting) id. EMS12 is included in Environmental Management Strategy under Appendix 3 “Consolidated Mitigation and Management Measures”:</p> <p><i>Where possible, Lightsource bp will aim to manage potential night lighting impacts by:</i></p> <ul style="list-style-type: none"> • <i>Locating common areas within the internal zone of the TWA Facility to contain light spill.</i> | | Compliant |

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| | | <p>(iii) complies with the good lighting design principles outlined in the <i>Dark Sky Planning Guideline (2023)</i>; and</p> <p>(iv) complies with <i>Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting</i>, or the latest version.</p> | <ul style="list-style-type: none"> • <i>Selecting and designing lights to avoid excessive light spill onto surrounding areas.</i> • <i>Encouraging the use of the TWA Facility shuttle</i> <p>The project is currently in the early phase of construction. Only two lighting sources are in use onsite:</p> <ul style="list-style-type: none"> • The Temporary Workers Accommodation Camp • The Site Office compound <p>No floodlighting, tower lighting, laydown lighting or construction area lighting has been established at this stage.</p> <p>An initial review of site lighting was undertaken against the <i>Dark Sky Planning Guideline (2023)</i> good practice principles. Existing lighting at the camp and office complies with or has been configured to comply with the following:</p> <ul style="list-style-type: none"> • Downward directed, fully shielded fittings to prevent upward light spill. • Warm colour temperature (<3000K) where practicable, reducing sky-glow. • Automatic timers / motion sensors used in low-traffic areas to avoid unnecessary lighting duration. • Low-lumen, task-specific lighting rather than broad area illumination. <p>Future Management:</p> | | |

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| | | | <p>Lighting requirements will increase later in the project during night works and commissioning phases. To ensure ongoing compliance:</p> <ul style="list-style-type: none"> • All future lighting installations will be reviewed against Part 4 – Good Lighting Design Principles prior to procurement. • The Lighting Plan will be updated as additional work fronts are developed. • Site induction and pre-start briefings will reinforce the “lights-only-when-required” operational control. • Any temporary lighting towers brought to site will be required to: <ul style="list-style-type: none"> ○ Be fitted with directional shrouds ○ Be positioned to avoid uplight ○ Be oriented away from the horizon <p>At the current project stage, lighting is minimal and controlled. The project is complying with the <i>Dark Sky Planning Guideline (2023)</i> through the application of good lighting design principles, downward-shielded fixtures, and operational controls limiting duration and intensity. A forward plan is in place to ensure ongoing compliance as the project progresses.</p> <p>Lighting direction was verified during the site inspection to be compliant – refer photos.</p> | | |
| HERITAGE | | | | | |
| 24. | B24 | <p>Protection of Heritage Items</p> <p>The Applicant must ensure the development does not cause any direct or indirect impacts on heritage items located outside the approved Development footprint.</p> | <p>Heritage Management Plan section 6 “Mitigation and Management” outlines the detailed management strategies to protect the heritage items located outside the approved development footprint.</p> | | Compliant |

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| 25. | B25 | The Applicant must maintain a 20m exclusion zone around the area of 'high potential' for historical archaeological artefacts associated with the original slab hut as identified by the red shading on Figure 11 in Appendix 6. | <p>Heritage Management Plan section 6.2.3.4 "Management of HS01" states that the permanent fence will be installed 20m exclusion zone around aboriginal heritage slab hut ruins (HS01) and managed in accordance with the recommendation set out in Aboriginal Cultural Heritage Assessment Report prepared by OzArk.</p> <p>Heritage Management Plan section 6.3 "Historical Heritage Management" outlines the management measures to protect the historical heritage values associated with HS01.</p> <p>Slab Hut and heritage item 37-01-1027 are flagged off. Slab hut heritage site inspected during site inspection, and photo of 37-01-1027 provided.</p> | | Compliant |
| 26. | B26 | <p>Heritage Management Plan</p> <p>Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development and to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with local Aboriginal stakeholders, and reviewed by Heritage NSW; (b) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> (i) protecting the heritage items identified in Table 1 of Appendix 6, and items located outside the approved development footprint; (ii) fencing / demarcation (as appropriate) of the identified heritage items prior to carrying out any development that | <p>Heritage Management Plan Rev. Final prepared by OzArk, dated March 2025. The plan was approved by DPHI on 9 April 2025 ref. SSD-33964533-PA-5.</p> <p>Compliance with this condition demonstrated below:</p> <ul style="list-style-type: none"> (a) The plan was prepared in consultation with local Aboriginal stakeholders and Heritage NSW. The consultation details are included under Section 5 "Consultation"; Appendix 1 "Government Stakeholder Consultation Records"; Appendix 2 "Aboriginal Stakeholder Consultation Records". (b) The description of measures that would be implemented are addressed as follows; <ul style="list-style-type: none"> (i) As per section 6.2.3.1 "Aboriginal sites that will not be harmed"; section 6.2.3.10 "Management of Community Interest | <p>One non-compliance was self-reported and recorded as part of this audit as: GRSF-02_NC-20</p> <p>Refer to Appendix F of this report for details of Self-Reported Non-Compliances.</p> | Non-Compliant |

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| | | <p>could directly or indirectly impact the identified heritage items;</p> <p>(iii) establishing the exclusion zone around the original slab hut as required under condition B25;</p> <p>(iv) recording and salvage collection of the heritage items located within the approved development footprint, as identified in Table 2 of Appendix 6;</p> <p>(v) further recording and investigation of the grinding groove site 'Killoe Creek GG1' (AHIMS site #37- 1-1033);</p> <p>(vi) a contingency plan and reporting procedure if:</p> <ul style="list-style-type: none"> • heritage items outside the approved development footprint are damaged; • previously unidentified heritage items are found; or • skeletal material is discovered; <p>(vii) 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</p> <p>(viii) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and</p> <p>(c) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> | <p>Trees"; section 6.4.5 "New Sites Outside the Development Footprint"</p> <p>(ii) As per section 6.2.3 "Measures to protect known Aboriginal objects; section 6.3 "Historical Heritage Management"</p> <p>(iii) As per section 6.2.3.3 "Additional investigation at 37-1-0053 (Poggy; Mt Misery;)"</p> <p>(iv) As per section 6.2.3.5 "Management of 37-1-1027); section 6.2.3.7 "Community Interest Trees that will be Harmed"</p> <p>(v) As per section 6.2.3.2 "Additional Investigation at 37-1-1033 (Killoe Creek GG1)"</p> <p>(vi) As per section 6.3.2 "Identification of Previously Unknown Historical Heritage Sites"; section 6.4.1 "Unanticipated heritage finds procedures, section 6.4.2 'Identification of Previously Unknown Historical Heritage Sites"; section 10 "Incident Reporting"</p> <p>(vii) As per section 7.2 "Cultural Heritage Awareness Training"</p> <p>(viii) As per section 5 "Consultation"; appendix 2 "Aboriginal Stakeholders Consultation Records"</p> <p>(c) Monitoring and Reporting procedures and details are included under section 7 "Monitoring and Reporting".</p> | | |

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| | | Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan. | | | |
| SOIL AND WATER | | | | | |
| 27. | B27 | <p>Water Supply</p> <p>The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.</p> <p>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.</p> | <p>Soil and Water Management Plan section 4.1.1.1 "Construction" outlines the water supply arrangements during construction phase. It also states that "<i>non-potable water will primarily be used for plant establishment, dust suppression and site ablutions</i>".</p> <p>Section 4.1.1.3 "Water Sourcing Strategy" outlines the strategy for sourcing potable and non-potable water.</p> <p>Water supply dockets from 11/07/25 to 19/09/25 were provided to support licensed cartage from third-party suppliers.</p> <p>DTI provided the following update:</p> <p><i>Water Supply Update – Groundwater Bores and Licensing:</i></p> <p><i>The project has approval in principle to develop up to four (4) groundwater bores for construction water supply. These bores are being progressed under a Water Supply Works Approval (WSWA) application, which remains under assessment with the Department of Climate Change, Energy, the Environment and Water (DCCEEW).</i></p> <p><i>No groundwater has been taken to date, and none of the bores (GW1–GW4) have been commissioned or connected.</i></p> | | Compliant |

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| | | | <p><i>The groundwater take associated with these bores will be exempt from requiring a Water Access Licence (WAL) under the Water Management (General) Regulation, as the intended extraction is solely for use within the same title on which the water is sourced and for project construction purposes. The project will continue to operate strictly within the scope of that exemption.</i></p> <p><i>Current Water Sources (Interim):</i></p> <p><i>To maintain compliance while the WSWA is finalised, the project is sourcing water from the following approved methods:</i></p> <ul style="list-style-type: none"> • <i>Treated effluent reuse from the Temporary Accommodation Camp</i> • <i>On-site dams managed under Harvestable Rights</i> • <i>Licensed cartage from third-party suppliers where required</i> <p><i>Planned Extraction Controls (Upon Bore Commissioning):</i></p> <p><i>Once the WSWA is approved and bores are operational, the following controls will apply:</i></p> <ul style="list-style-type: none"> • <i>Daily extraction recording (kL/ML) into the project Water Register</i> • <i>Weekly supervisory review of cumulative extraction against the exemption conditions</i> • <i>Monthly internal reporting and verification as part of environmental performance review</i> | | |

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| | | | <p><i>This ensures the project will maintain transparent and auditable tracking of water usage, aligned to the WSWA conditions and statutory exemption provisions.</i></p> <p><i>The project will not draw groundwater until all regulatory approvals are in place, and the extraction tracking system is fully implemented.</i></p> <p>Enervens are awaiting DTI water sourcing issues to be addressed. Enervens main use of water is for the concrete batch plant.</p> | | |
| 28. | B28 | <p>Water Pollution</p> <p>The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.</p> | <p>Lightsource bp confirmed during the audit interview that there have been no reported incidents of water pollution under Section 120 of the POEO Act.</p> | | Compliant |
| 29. | B29 | <p>Operating Conditions</p> <p>The Applicant must:</p> <ul style="list-style-type: none"> (c) minimise any soil erosion and control sediment generation; (d) ensure that construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual and the <i>Managing Urban Stormwater: Soils and construction - Volume 2A</i> manual (Landcom, 2008), or their latest versions; (e) ensure the solar panels and ancillary infrastructure are designed, constructed | <p>Soil and Water Management Plan addresses the following requirements:</p> <ul style="list-style-type: none"> (a) The details of erosion and sediment control design and controls are included under section 6 and section 7 of the SWMP. The following ESCP's were provided: <ul style="list-style-type: none"> i. 20250616_PESCP_Haul Road Phase 2 ii. 20251015_PESCP_Stage 4, 5 & 7 iii. 20250711_PESCP_Bow River Culvert Works iv. 20250711_PESCP_Killoe Creek Culvert Works v. 20250716_GRSF_PESCP_Stage 1 vi. 20250926_PESCP_Stage 2 vii. 20251008_PESCP_Stage 8 viii. PESCP_August_TWAF | <p>One non-compliance was self-reported and recorded as part of this audit as: GRSF-02_NC-06</p> <p>Refer to Appendix F of this report for details of Self-Reported Non-Compliances.</p> | Non-Compliant |

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| | | <p>and maintained to reduce impacts on localised flooding and groundwater at the site;</p> <p>(f) ensure the solar panels do not cause any increased water being diverted off the site or alter hydrology off site;</p> <p>(g) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site;</p> <p>(h) ensure all works within waterfront land is undertaken in accordance with <i>Guidelines for Controlled Activities on Waterfront Land</i> (DPE, 2022), unless the Planning Secretary agrees otherwise; and</p> <p>(i) ensure the design of all creek crossings (including internal tracks and MV cables) is in accordance with the document <i>Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (NSW Fisheries 2003) and the <i>Policy and Guidelines for Fish Habitat Conservation and Management</i> (Update 2013).</p> | <p>ix. GLS-CIV-SK001_00C x. GLS-CIV-SK002_00C xi. GLS-CIV-SK003_00C</p> <p>(b) The details of erosion and sediment control design and controls are included under section 6 and section 7. CPESC's undertake monthly site inspections on behalf of both DTI and Enerven to confirm compliance. Inspection 14 October 2025 by Treestone Environmental on behalf of DTI, and 17 October 2025 by Rubicon Enviro Pty Ltd on behalf of Enerven sighted.</p> <p>(c) Surface water management measures and controls details are outlined in section 4 and section 7.</p> <p>(d) Surface water management measures and controls details are outlined in section 4 and section 7.</p> <p>(e) Surface water management measures and controls details are outlined in section 4 and section 7.</p> <p>(f) The work in waters and on waterfront land management controls are outlined in section 7.8, however not triggered to date.</p> <p>(g) Stormwater Management and Access Track Management controls are outlined section 4.2 and section 7.4, however not triggered to date.</p> | | |
| 30. | B30 | <p>Soil and Water Management Plan</p> <p>Prior to commencing construction, the Applicant must prepare a Soil and Water Management Plan for the</p> | <p>Soil and Water Management Plan Rev. 3 prepared by Umwelt Australia, dated 13 February 2025.</p> <p>Evidence of consultation with DPE Water includes:</p> | <p>Non-Compliance GRSF-02_NC-41: A non-compliance was identified by DPHI as detailed under the site inspection letter dated 17 November 2025: Failure to implement the Soil</p> | Non-Compliant |

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| | | <p>development in consultation with DPE Water. This plan must:</p> <ul style="list-style-type: none"> (e) be prepared by suitably qualified and experienced persons; (f) include a description of the measures that would be implemented to ensure that the objectives of condition B29 (a) – (g) above are achieved; (g) include a program to monitor and report on the effectiveness of these measures; and (h) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. <p>The Applicant must implement the Soil and Water Management Plan.</p> | <ul style="list-style-type: none"> • Request to NSW DCCEEW for consultation on the Soil & Water management Plan (14/02/25) • Response from NSW DCCEEW (11/03/25) with two recommendations • Confirmation from Lightsource bp (01/04/25) that NSW DCCEEW recommendations are included in the SWMP. <p>Compliance with this condition demonstrated below:</p> <ul style="list-style-type: none"> (a) Section 1.1 states that “<i>This SWMP has been prepared by Melissa Swan, Principal Environmental Engineer, Umwelt. Melissa Swan is a Certified Professional in Erosion and Sediment Control (CPESC #8954)</i>”. (b) Objectives of condition B29 (a) to (g) are addressed in section 5, section 6 and section 7. (c) As per section 10 “Inspection, Maintenance and Monitoring”. (d) As per section 10.1 “Site Monitoring” and 10.3 “Water Quality Monitoring”. | <p>and Water Management Plan for failing to train staff and ensure spill kits were available and stocked at the TWA, as observed on 5 November 2025.</p> <p>This has been captured as a non-compliance as part of this audit.</p> | |
| HAZARDS | | | | | |
| 31. | B31 | <p>Fire Safety Study</p> <p>Prior to commencing construction of the battery storage facility (except for construction of those preliminary works that are outside the scope of the hazard studies), the Applicant must prepare and submit a Fire Safety Study for the battery storage, to the satisfaction of the Planning Secretary and that meets the requirements of FRNSW. The study must:</p> | <p>Lightsource bp confirmed that this is currently progressing and is in draft.</p> <p>This condition will be triggered prior to BESS construction.</p> | | Not Triggered |

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| | | <p>(a) be consistent with the Department's <i>Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline</i>;</p> <p>(b) be prepared in accordance with the <i>FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations</i>.</p> <p>(c) describe the final design of the battery storage;</p> <p>(d) include reasonable worst-case fire scenario to and from the battery storage and the associated fire management; and</p> <p>(e) identify measures to eliminate the expansion of any fire incident including:</p> <p>(i) adequate fire safety systems and appropriate water supply;</p> <p>(ii) separation and / or compartmentalisation of battery units; and</p> <p>(iii) strategies and incident control measures specific to the battery storage design.</p> <p>Following approval by the Planning Secretary, the Applicant must implement the measures described in the Fire Safety Study.</p> <p>Note: <i>'meets the requirements of FRNSW' above means confirmation in writing from FRNSW that the Study meets the requirements of FRNSW as required by the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline</i></p> | | | |
| 32. | B32 | <p>Storage and Handling of Dangerous Goods</p> <p>The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the</p> | <p>Diesel is stored on site in self-bunded tanks and separated from other flammable liquids as noted during the site inspection. It is therefore not considered to be potentially hazardous as per Appendix 4 of the</p> | | Compliant |

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| | | Department's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times. | <p>Hazardous and Offensive Development Application Guidelines.</p> <p>100KL threshold quantity was verified to be included under Appendix 4 of the Hazardous and Offensive Development Application Guidelines.</p> <p>Refer to Condition C11 and Appendix 7 regarding the incident relevant to the diesel spill.</p> | | |
| 33. | B33 | <p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <ul style="list-style-type: none"> (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> if the chemicals are liquids. <p>In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p> | <p>Dangerous goods were noted to be stored correctly on site with correct segregation and security, as sighted during the site inspection.</p> <p>A copy of the DTI Hazardous Substance Register was provided.</p> <p>A copy of the DTI GRSF Manifest was provided (04/11/25)</p> <p>A copy of the Enerven SDS register was provided (09/2025)</p> | | Compliant |
| 34. | B34 | <p>Operating Conditions</p> <p>For the solar and battery storage components of the development, the Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; (b) ensure that the development: <ul style="list-style-type: none"> (i) complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent) and Standards for Asset Protection Zones; and (ii) is suitably equipped to respond to any | <p>The auditor verified compliance with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent) and Standards for Asset Protection Zones – refer to condition B35 as reviewed during the audit. The Local Emergency Management Committee (LEMC) have been engaged and are regularly updated. The LEMC was on site on the day of the site inspection.</p> | | Compliant |

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| | | <p>fires on site, including provision of a 10,000 litre water supply tanks fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection;</p> <p>(iii) includes a 10 metre defensible space around the perimeter that permits unobstructed vehicle access, and assists the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(iv) is managed as an asset protection zone (including the defensible space);</p> <p>(c) assist the RFS, FRNSW and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(d) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.</p> | | | |
| 35. | B35 | <p>Emergency Plan</p> <p>Prior to commencing construction, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, including an evacuation plan for the accommodation camp, and provide a copy of the plan to the local Fire Control Centre and FRNSW. The plan must:</p> <p>(a) be updated in accordance with the findings of the Fire Safety Study required under Condition B31 of Schedule 2;</p> | <p>Emergency Plan (EP) Rev. 1 prepared by Riskcon Engineering, dated 10 March 2025. The EP was submitted to the NSW Rural Fire Service (RFS) via email on 12 March 2025. The RFS responded on 1 April 2025 confirming their satisfaction with the plan. Copies of all correspondence was sighted by the auditor.</p> <p>Compliance with condition B35 as follows:</p> <p>(a) As per section 2.3.2.3 "BESS Facility"</p> <p>(b) As per section 1.1 "Purpose of Emergency Response Plan"</p> | | Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2



The APP Group is now
proudly part of Bureau Veritas

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| | | <p>(b) be consistent with the Department’s Hazardous Industry Planning Advisory Paper No. 1, <i>‘Emergency Planning’</i> and RFS’s <i>Planning for Bushfire Protection 2019</i> (or equivalent);</p> <p>(c) be consistent with the NSW RFS document: <i>A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan</i>;</p> <p>(d) include details on how the battery storage and sub-systems can be safely isolated in an emergency;</p> <p>(e) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;</p> <p>(f) include availability of fire suppression equipment, access and water;</p> <p>(g) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;</p> <p>(h) include fire and bushfire emergency management planning, including:</p> <ul style="list-style-type: none"> (i) details of the location, management and maintenance of the Asset Protection Zone; (ii) a list of works that must not be carried out during a total fire ban; (iii) details of how RFS would be notified, and procedures that would be implemented, in the event that: <ul style="list-style-type: none"> • there is a fire on-site or in the vicinity of the site; • there are any activities on site that would have the potential to | <p>(c) As per section 1.1 “Purpose of Emergency Response Plan”</p> <p>(d) As per section 2.3.2.3 “BESS Facility”</p> <p>(e) As per section 3.2.1 “Fire and Explosion Hazards and Management”</p> <p>(f) As per section 3.2.1.4 “Fire and Emergency Management Measures”</p> <p>(g) As per appendix A “Emergency Contact Numbers”</p> <p>(h) Fire and bushfire emergency planning as follows:</p> <ul style="list-style-type: none"> (i) As per section 3.2.1.2 “Bushfire/Grass Fire” (ii) As per section 3.2.1.3 “Construction Hotwork” (iii) As per section 3.2.1 “Fire and Explosion Hazards and Management” <p>(i) As per section 3.2.4 “Natural Events”</p> <p>(j) As per section 3.2.4 “Natural Events” and appendix B “Emergency Services Information Package”</p> <p>(k) As per appendix B “Emergency Services Information Package”</p> <p>Ongoing Emergency Management Plan consultation evidence provided:</p> <ul style="list-style-type: none"> • Goulburn River Solar Farm – Master Emergency Plan Consultation – record of consultation from NSW RFS for Revision 3, August 2025, dated 09/10/25 • Consultation approach Goulburn River Solar Farm - EP & ESIP - Next Revision Review request dated 20/08/25 | | |

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| | | <ul style="list-style-type: none"> ignite surrounding vegetation; or • there are any proposed activities to be carried out during a bushfire danger period; <p>(i) detail specific response measures in the case of flood to ensure site safety;</p> <p>(j) describe the specific emergency exit routes to be used in the case of flood and include evidence of access agreements with relevant landowners (e.g. right of carriageway); and</p> <p>(k) include an Emergency Services Information Package in accordance with <i>Emergency services information package and tactical fire plans</i> (FRNSW, 2019), to the satisfaction of FRNSW and RFS.</p> | <ul style="list-style-type: none"> • Consultation approach Goulburn River Solar Farm - EP & ESIP - Next Revision Review response from RFS dated 17/10/25 <p>Goulburn River Solar Farm – Master Emergency Plan Rev. 4 (November 2025) provided.</p> <p>A baseline Emergency Plan (Goulburn River Solar Farm – Master Emergency Plan Rev. 4 (November 2025)) is now in place.</p> | | |
| 36. | B36 | <p>The Applicant must:</p> <p>(a) implement the Emergency Plan and Emergency Services Information Package for the duration of the development; and</p> <p>(b) following commencement of commissioning of the battery storage, keep two copies of the Emergency Plan and Emergency Services Information Package on-site in a prominent position adjacent to the site entry points at all times.</p> | <p>Compliance with condition B36 as follows:</p> <p>(a) Emergency Plan section 8 “Plan Implementation and Distribution” as sighted</p> <p>(b) Commissioning of the battery storage has not yet occurred. This was not triggered as part of this audit.</p> | | Compliant |
| WASTE | | | | | |
| 37. | B37 | <p>The Applicant must:</p> <p>(a) minimise the waste generated by the development;</p> | <p>As the project is in early stages of construction, waste generation is minor. As such, office waste is removed to the Merriwa site office and disposed of</p> | | Compliant |

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| | | <p>(b) classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version);</p> <p>(c) store and handle all waste on site in accordance with its classification;</p> <p>(d) not receive or dispose of any waste on site; and</p> <p>(e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal (including consultation with Council for use of Council facilities).</p> | <p>At the time of audit, 8.38T of general and demolition waste has been disposed of to landfill, and 131.7T of demolition waste has been recycled.</p> <p>All waste has been removed as per the Waste Classification Guidelines.</p> <p>The site has not received or disposed of any waste on site.</p> <p>Two licensed waste contractors have serviced the site to date.</p> <p>A copy of the Waste Register was provided, current up to 08/10/25.</p> <p>Enerven have been working under DTI as Principal Contractor and have not had any waste removed.</p> <p>Once the substation bench has been handed over from DTI to Transgrid/Enerven they will be responsible for waste removal from site.</p> <p>Remondis will be the waste contractor with onboarding nearing completion at the time of the audit.</p> | | |
| ACCOMMODATION CAMP | | | | | |
| 38. | B38 | <p>Operating Conditions</p> <p>For the accommodation camp components of the development, the Applicant must:</p> <p>(a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;</p> <p>(b) ensure that the development:</p> <p>(i) complies with the relevant asset</p> | <p>For the accommodation camp components of the development, the auditor verified compliance with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent) and <i>Standards for Asset Protection Zones</i> – refer to condition B35 above as reviewed during the audit.</p> <p>The Local Emergency Management Committee (LEMC) have been engaged and are regularly updated. The LEMC was on site on the day of the site inspection.</p> | | Compliant |

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| | | <p>protection requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent) and <i>Standards for Asset Protection Zones</i>;</p> <p>(ii) internal roads and utilities are provided in accordance with the requirements of the bushfire assessment report produced by Umwelt (Australia) Pty Limited (dated May 2024);</p> <p>(iii) includes a defensible space around the perimeter being a minimum 20 metres on all sides, that permits unobstructed vehicle access; and</p> <p>(iv) is managed as an asset protection zone (including the defensible space);</p> <p>(c) assist the RFS, FRNSW and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(d) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.</p> | | | |
| 39. | B39 | <p>Accommodation Camp Management Plan</p> <p>Prior to commencing construction of the accommodation camp, the Applicant must prepare an Accommodation Camp Management Plan in consultation with Council. The plan must:</p> <p>(a) ensure utilities at the accommodation camp, including water, wastewater, waste and electricity, are designed and located in accordance with Council specifications and relevant standards;</p> | <p>Camp Management Plan Rev. K prepared by DT Infrastructure, doc no. AUS-GRSF-DTI-PMT-PLN-PLN-0010, dated 16 May 2025. The plan was prepared in consultation with Upper Hunter Shire Council. The final response from Council was received on 11 June 2025 confirming that plan looks fine.</p> <p>Compliance with condition B39 as follows:</p> <p>(a) As per section 3.3 "Utilities"</p> <p>(b) Section 8.1 refer to Emergency Plan – Emergency Plan complies with condition B38</p> | <p>Opportunity for Improvement GRSF-02_OFI-01:</p> <p>The Camp Management Plan has not been updated since operation commenced. It is strongly recommended that DTI review & update Camp Management Plan as soon as possible.</p> | Compliant |

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| | | <p>(b) ensure the accommodation camp complies with condition B38;</p> <p>(c) ensure any treated wastewater from the accommodation camps used for dust suppression during construction:</p> <p>(i) complies with the Australian and New Zealand Environment and Conservation Council (ANZECC) and Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) <i>Guidelines for irrigation water quality</i>;</p> <p>(ii) meets the requirements of the Public Health Act 2010;</p> <p>(d) include measures for dust suppression within the accommodation camp;</p> <p>(e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and</p> <p>(f) include measures to support local suppliers in servicing the camp where possible.</p> <p>The Applicant must implement the Accommodation Camp Management Plan.</p> | <p>(c) As per section 3.3 “Utilities”</p> <p>(d) As per section 3.3 “Utilities”</p> <p>(e) As per section 3 “Camp Layout and Facilities”</p> <p>(f) As per section 6.1.1, the contractor DTI will secure a long-term contract with Merriwa Fuel Supplies (CRT) for the fuel supply contract for camp. A copy of the GRSF Local Spend register provides a breakdown of local suppliers across the project, including the accommodation camp. Merriwa Fuel Supplies have provided >\$50k worth of fuel to the project to date.</p> | | |
| 40. | B40 | <p>Accommodation and Employment Strategy</p> <p>Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council. This strategy must:</p> <p>(a) propose measures to ensure there is sufficient accommodation for the workforce associated with the development, generally consistent with the Accommodation and Employment Strategy dated</p> | <p>Accommodation and Employment Strategy Rev. Amended prepared by Umwelt, dated 23 May 2025.</p> <p>Details of consultation with local councils is within Section 3 of the plan. Consultation includes:</p> <ul style="list-style-type: none"> • UHSC 12/10/23 & 08/11/23 • Muswellbrook Shire Council 12/10/23 • Mid-Western Shire Council 19/10/23 <p>Compliance with condition B40 as follows:</p> | | Compliant |

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| | | <p>May 2024;</p> <p>(b) consider the cumulative impacts associated with other State significant projects in the area;</p> <p>(c) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and</p> <p>(d) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction.</p> <p>The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary prior to commencement of construction and implement the plan throughout construction and operation of the accommodation camp.</p> | <p>(a) As per section 4.4 “Accommodation Actions and Mitigation Strategies”</p> <p>(b) As per section 2.6 “Cumulative Social Impacts”</p> <p>(c) As per section 5.2.1 “Employment Profile and Opportunity Across the Social Locality”</p> <p>(d) As per section 5.4 “Employment Actions and Mitigation Strategies” and section 6 “Conclusion”.</p> <p>The Accommodation and Employment Strategy was acknowledged by DPHI on 13/03/25 confirming that DPHI has no comments.</p> <p>A copy of the updated (draft) Accommodation and Employment Strategy Implementation Plan – Final – October 2025 was sighted.</p> <p>The project has updated the Accommodation and Employment Strategy to the Accommodation and Employment Strategy Implementation Plan – Final – October 2025. This plan is currently undergoing internal distribution and review (including DTI & Enerven) before being finalised for submission to DPHI.</p> | | |
| DECOMMISSIONING AND REHABILITATION | | | | | |
| 41. | B41 | <p>Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3.</p> | <p>This condition will be triggered following decommissioning of the project.</p> | | Not Triggered |

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| | | Table 3: Rehabilitation Objectives | | | | | | | | | | | | | |
| | | <table border="1"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>Site</td> <td> <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 </td> </tr> <tr> <td>Solar farm and ancillary infrastructure</td> <td> <ul style="list-style-type: none"> All infrastructure including above and below ground to be decommissioned and removed to a depth of 500mm unless the Planning Secretary agrees otherwise. </td> </tr> <tr> <td>Land use</td> <td> <ul style="list-style-type: none"> Restore land capability to pre-existing use (Land Capability Class 4 to 6) </td> </tr> <tr> <td>Community</td> <td> <ul style="list-style-type: none"> Ensure public safety at all times. Ensure long-term access through the site for NPWS. </td> </tr> </tbody> </table> | Feature | Objective | Site | <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 | Solar farm and ancillary infrastructure | <ul style="list-style-type: none"> All infrastructure including above and below ground to be decommissioned and removed to a depth of 500mm unless the Planning Secretary agrees otherwise. | Land use | <ul style="list-style-type: none"> Restore land capability to pre-existing use (Land Capability Class 4 to 6) | Community | <ul style="list-style-type: none"> Ensure public safety at all times. Ensure long-term access through the site for NPWS. | | | |
| Feature | Objective | | | | | | | | | | | | | | |
| Site | <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 | | | | | | | | | | | | | | |
| Solar farm and ancillary infrastructure | <ul style="list-style-type: none"> All infrastructure including above and below ground to be decommissioned and removed to a depth of 500mm unless the Planning Secretary agrees otherwise. | | | | | | | | | | | | | | |
| Land use | <ul style="list-style-type: none"> Restore land capability to pre-existing use (Land Capability Class 4 to 6) | | | | | | | | | | | | | | |
| Community | <ul style="list-style-type: none"> Ensure public safety at all times. Ensure long-term access through the site for NPWS. | | | | | | | | | | | | | | |

SCHEDULE 2, PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING

ENVIRONMENTAL MANAGEMENT

| | | | | | |
|----|----|---|---|--|-----------|
| 1. | C1 | <p>Environmental Management Strategy</p> <p>Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <ul 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 | <p>Environmental Management Strategy Rev. Final prepared by Umwelt, dated 19 December 2024. The Department conditionally approved the Strategy on 19 December 2024 ref. SSD-33964533-PA-6.</p> <p>The Department requested to submit a revised strategy that includes the following:</p> <ul style="list-style-type: none"> • An Unexpected Finds Procedure no longer than 4 weeks from the completion of consultation with local Aboriginal stakeholders and Heritage NSW. Evidence of this consultation is to be provided to the Department. | | Compliant |
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| | | <p>involved in the environmental management of the development.</p> <p>(d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development. (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and <p>(e) include:</p> <ul style="list-style-type: none"> (i) references to any strategies, plans and programs approved under the conditions of this consent; and (ii) a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p> | <ul style="list-style-type: none"> • A detailed scope for all management plans and strategies for the staging of the project within 4 weeks of obtaining approval from the Planning Secretary. <p>The updated strategy is currently under revision and is yet to be completed and re-submitted.</p> <p>Compliance with condition C1 as follows:</p> <ul style="list-style-type: none"> (a) As per section 1.3 "Strategic Environmental Management Framework" (b) As per section 2 "Statutory Context" (c) As per section 4 "EMS Implementation" (d) Procedures that would be implemented are addressed as follows: <ul style="list-style-type: none"> (i) As per section 6 "Communication" (ii) As per section 6.3.1 "Complaints Procedure" (iii) As per section 6.3.1.1 "Dispute Resolution" (iv) As per section 10.1.2 "Non-Compliance Notification" (v) Section 12 "References" refers to Emergency Plan. (e) Includes: <ul style="list-style-type: none"> (i) As per section 1.3.3 (ii) As per section 7.2 | | |
| 2. | C2 | <p>Revision of Strategies, Plans and Programs</p> <p>The Applicant must:</p> <ul style="list-style-type: none"> (a) update the strategies, plans or programs required under this consent to the satisfaction of the | <p>A copy of the Lightsource bp_ GRSF_Management Plan Review Register was provided showing regular Management Plan Reviews being undertaken since IEA#1.</p> | | Compliant |

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|-------|----------|---|--|----------------------------------|-------------------|
| | | <p>Planning 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 Planning Secretary within 1 month of the:</p> <p>(i) submission of an incident report under condition C11 of Schedule 2;</p> <p>(ii) submission of an audit report under condition C15 of Schedule 2; or</p> <p>(iii) any modification to the conditions of this consent.</p> | <p>Additionally, the following Management Plans have since been updated and submitted to DPHI via the MPP:</p> <ul style="list-style-type: none"> Biodiversity Management Plan (SSD33964533 GRSF_BMP_FINAL.V2) Heritage Management Plan (SSD33964533 GRSF_HMP_FINAL.V2) <p>Soil & Water Management Plan (SSD33964533_GRSF_SWMP_Final.V4)</p> | | |
| 3. | C3 | <p>Updating and Staging of Strategies, Plans or Programs</p> <p>With the approval of the Planning Secretary, the development may be staged and the Applicant may:</p> <p>(a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</p> <p>(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</p> <p>(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</p> | <p>A Staging Request was submitted to the Department on 6/06/25 and receipt acknowledged on the same date.</p> <p>Details of the staging request include:</p> <ul style="list-style-type: none"> Stage 1: Road upgrades and associated culvert works. Stage 2 (a): Site preparation and construction of the TWA. Stage 2 (b): Construction and commissioning of the 585MWp solar farm, including the solar array, substation, and all ancillary infrastructure. Stage 2 (c): Construction of 80MWp/1160MWh decentralised battery energy storage system (BESS) (DC coupled). Stage 2 (d): Construction of 450MWp/900MWh centralised BESS (AC coupled). Stage 3: Operation of the Goulburn River Solar Farm. | | Compliant |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
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| | | | <ul style="list-style-type: none"> Stage 4: Decommission and rehabilitation at end of life. <p>A copy of the request acknowledgement from DPHI dated 06/06/25 via the Major Project portal was sighted (SSD-33964533-PA-8). The Department acknowledged receipt of this request on 06/06/25 but had yet to respond to this request at the time of the audit.</p> | | |
| 4. | C4 | If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent. | Lightsource bp advised during the audit interview that this has not been required to date. | | Not Triggered |
| 5. | C5 | If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program. | Lightsource bp advised during the audit interview that updates to plans were in progress, noting that the current approved versions were still in use. This condition will become triggered following any updates to plans. | | Not Triggered |
| 6. | C6 | If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage. | Lightsource bp advised during the audit interview that this has not been required to date. | | Not Triggered |
| TRANSPORT | | | | | |
| 7. | C7 | <p>Notification of Department</p> <p>Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase.</p> | Notification of construction commencement was sent to the Department on 28/05/2025, notifying that construction would commence on 29/05/2025. The Department acknowledged this on 03/06/2025. | | Compliant |

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| | | <p>If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage and clearly identify the development that would be carried out during the relevant stage.</p> | <p>Copies of the correspondence was provided as evidence to support notification of the commencement of construction.</p> | | |
| 8. | C8 | <p>Final Layout Plans</p> <p>Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website including details on the siting of solar panels and ancillary infrastructure.</p> | <p>First layout provided to DPPI on 14/4/25, prior to commence of limited construction works on site, followed by 80% layout submitted on the 13 June 2025 in response to DPPI RFI-84968980.</p> <p>A Warning Letter was issued to Lightsource bp on 26 August 2025 from DPPI for failing to submit the Final Layout Plans prior to commencing construction (Schedule 2, Condition C8).</p> <p>Sighted NSW Planning letter ref: ENF-91571464 which notes that</p> <ul style="list-style-type: none"> • Lightsource bp has not received approval by NSW Planning for staging the project, including submission of final layout plans. • There is further information required to be submitted in relation to the final layout plans to satisfy the requirements of Condition C8, including additional GIS files, and further information to address the variation in cadastral boundary. <p>Sighted: email from DPPI dated 13 November 2025 “Communication regarding Final Layout Plans Cond C8 SSD-33964533-PA-19” acknowledging layout plan for early access critical construction activities associated with the solar farm, submitted on 14 April 2025 in accordance with Condition C8, and that Lightsource bp</p> | | Compliant |

Goulburn River Solar Farm

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| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|--|--|----------------------------------|-------------------|
| | | | is to submit revised layout plans prior to the commencement of each stage. Noted that this was still in progress during the audit period. | | |
| 9. | C9 | The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans. | Lightsource bp confirmed during the audit interview that this was not triggered for this audit period. | | Not Triggered |
| 10. | C10 | <p>Work as Executed Plans</p> <p>Prior to commencing 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 via the Major Projects website.</p> | Timing of this condition was not triggered during this audit. WAE plans have not yet been completed. | | Not Triggered |
| 11. | C11 | <p>Incident Notification</p> <p>The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7.</p> | <p>Two incidents within the audit period were notified to DPHI. Evidence of the following incidents confirming reporting timeframes have been provided:</p> <ol style="list-style-type: none"> 1. Three designated No-Go Zones near the Temporary Workers Accommodation (TWA) were compromised. Incident occurred 01/09/25 and DPHI notified in writing on 02/09/25. An investigation was undertaken following the incident with details provided to DPHI as per Lightsource bp report dated 29 September 2025. 2. An estimated 1,500 litres of diesel was released across approximately 100 m2 of compacted gravel within the camp generator compound. Incident occurred 11/10/25 and DPHI notified in writing on 13/10/25. DTI notified NSW EPA on 12/10/25 via the EPA Hotline (Incident# 537911). The EPA confirmed they did not require an investigation. A follow up report was provided | | Compliant |

Goulburn River Solar Farm

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|-------|----------|---|--|----------------------------------|-------------------|
| | | | <p>from Lightsource bp to DPHI on 10/11/25 with details of the investigation and outcome, an attached environmental investigation report, waste disposal evidence at licenced facility, and photos of replenished spill kits.</p> <p>Refer to Appendix 7 for further details.</p> | | |
| 12. | C12 | <p>Non-Compliance Notification</p> <p>The Department must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance.</p> | <p>A copy of the Lightsource bp GRSF Non-compliance Register was provided which indicates that the non-conformances against Conditions B1(a)(i), B3, B4(a), B4(b), B5, B17, B26 and B29 were all reported within the required timeframes upon becoming aware of each non-compliance. There have been 36 non-compliances reported to DPHI to date, notified under 34 lodgements.</p> <p>Evidence presented for 2 x samples as follows:</p> <p>Non-compliance with Condition B4(a) – following review of DTI intersection footage on 17 October 2025 capturing events of the previous day (16 October 2025), a sub-contractor turned right onto Ringwood Rd from the Golden Hwy which is a breach of Condition B4(a) requirements. Notified as per portal receipt SSD-33964533-PA-56 on 24 October 2025, within 7-days of becoming aware of the non-compliance.</p> <p>Non-compliance with Condition BB4(a) – following review of DTI intersection footage on 28 October 2025 capturing events of the previous day (27 October 2025), a sub-contractor turned right onto Ringwood Rd from the Golden Hwy which is a breach of Condition B4(a) requirements. Notified as per portal receipt SSD-33964533-PA-62 on 3 November 2025, within 7-days of becoming aware of the non-compliance.</p> | | Compliant |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|--|----------|---|---|----------------------------------|-------------------|
| 13. | C13 | A non-compliance 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, or will be, undertaken to address the non-compliance. | <p>Non-compliance notified under SSD-33964533-PA-56 on 24 October 2025 with Lightsource bp letter sighted and includes the following details:</p> <ul style="list-style-type: none"> Goulburn River Solar Farm (SSD 33964533), Non-compliance with Condition B4 (a) Identification of Non-compliance Investigation Summary Involved Parties (includes timeline of events) Remedial Action - changes implemented, or to be implemented, to prevent a reoccurrence in the future. <p>The non-compliance as notified under SSD-33964533-PA-62 on 3 November 2025 was also reviewed and confirmed to address the condition requirements.</p> | | Compliant |
| 14. | C14 | A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance. | Non-compliance samples sighted during the audit were not identified as incidents. Two incidents have been reported separately as per Condition C11. | | Compliant |
| INDEPENDENT ENVIRONMENTAL AUDIT | | | | | |
| 15. | C15 | Independent Audits of the development must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> . | IEA#01 Audit Report V3 and this IEA#2 were conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> . | | Compliant |
| 16. | C16 | <p>In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements (2020)</i>, the Applicant must:</p> <p>(a) review and respond to each Independent Audit Report prepared under condition C15 of this consent, or where notice is given by the Planning Secretary;</p> | <p>IEA#1 was completed 04 August 2025.</p> <p>The report was submitted to DPHI on 12/08/2025 via the Major Project Portal (SSD-33964533-PA-32).</p> | | Compliant |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|------------------------------|----------|--|--|--|-------------------|
| | | <ul style="list-style-type: none"> (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. unless otherwise agreed by the Planning Secretary. | <p>Lightsource bp provided a Response to Independent Environmental Audit Findings (18 June 2025) to DPPI on 12/08/25.</p> <p>DPPI provided feedback on the IEA#1 report to Lightsource bp on 11/11/25 (ref: SSD-33964533-PA-32) requiring amendments to the report and suggested improvements for IEA#2. These comments were included in amended IEA#1 audit report V2 dated 04/12/25 and provided to Lightsource bp on 04/12/25 for submission to DPPI.</p> | | |
| 17. | C17 | Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approval Requirements (2020)</i> unless otherwise agreed by the Planning Secretary. | Lightsource bp provided a Response to Independent Environmental Audit Findings (18 June 2025) to DPPI on 12/08/25, within 2-months of the audit site inspection. | | Compliant |
| 18. | C18 | Notwithstanding the requirements of the <i>Independent Audit Post Approval Requirements (2020)</i> , the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance. | Operational phase audits have not yet been triggered. | | Not Triggered |
| ACCESS TO INFORMATION | | | | | |
| 19. | C19 | <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"> a. the EIS; | <p>The project website is Goulburn River solar Lightsource bp Australia.</p> <ul style="list-style-type: none"> (a) The following information is available on project website: <ul style="list-style-type: none"> (i) EIS; | <p>Opportunity for Improvement GRSF-02_OFI-02:</p> <p>A complaints register is kept up to date for the project; however, more detail could be included to describe each complaint, what</p> | Compliant |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|--|--|--|-------------------|
| | | <ul style="list-style-type: none"> b. the final layout plans for the development; c. current statutory approvals for the development; d. approved strategies, plans or programs required under the conditions of this consent (other than the Fire Safety Study and Emergency Plan); e. the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; f. how complaints about the development can be made; g. a complaints register; h. compliance reports; i. any independent environmental audit, and the Applicant's response to the recommendations in any audit; and j. any other matter required by the Planning Secretary; and <p>(b) keep this information up to date.</p> | <ul style="list-style-type: none"> (ii) Early Access Layout Plan; (iii) Statutory approvals; (iv) Environmental Management Strategy, Biodiversity Management Plan, Traffic Management Plan, Heritage Management Plan; (v) N/A; (vi) Information under Get involved section; (vii) Complaints Register current up to 29/10/2025 but requires more detail; (viii) not triggered (ix) IEA#1 audit report is available on the website (x) No other matters required by the Planning Secretary; <p>(b) The information was reviewed and confirmed to be current and up to date.</p> | <p>actions were taken to resolve each complaint and close out.</p> <p>It is recommended that a more detailed complaints register be uploaded to the website.</p> | |

APPENDIX 3: GENERAL TERMS OF THE APPLICANTS VPA OFFER

| | | | | | | | |
|----------------|------------------------|--|----------------|------------------------|--|--|---------------|
| 1. | A3.1 | <p>The VPA must include provisions for the payment, collection, management and distribution of the contributions under the agreement, with a focus on funding community enhancement in the area surrounding the project site.</p> <table border="1" data-bbox="241 1302 848 1342"> <tr> <td>Council</td> <td>Payment Details</td> </tr> </table> | Council | Payment Details | <p>The initial VPA with UHSC was sighted during the previous audit. Lightsource bp noted confirmed during the audit interview that there will be no further payments required until July 2026. This condition was not triggered as part of this audit period</p> | | Not Triggered |
| Council | Payment Details | | | | | | |

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| | | Upper Hunter Shire Council Annual contributions at the greater of: \$346 (increased by CPI) multiplied by the number of megawatts installed; or \$190,000 (increased by CPI). | | | |

APPENDIX 4: ROAD UPGRADES AND SITE ACCESS

| 1. | A4.1 | <table border="1"> <thead> <tr> <th>Road / Intersection</th> <th>Location</th> <th>Upgrade Requirements</th> </tr> </thead> <tbody> <tr> <td>Golden Highway/Ringwood Road intersection</td> <td>Figure 5</td> <td>Construction of a new 325m acceleration / merge lane for the left turn from Ringwood Road onto Golden Highway for westbound vehicles. Extension of the existing Golden Highway westbound and Ringwood Road left-in deceleration lane taper to 30 m. Relocate the safety barrier to ensure complaint BAR treatment.</td> </tr> <tr> <td>Barnett Street</td> <td>Figure 6</td> <td>Sealing of the first 30m of Barnett St from the intersection with Golden Highway.</td> </tr> <tr> <td>Ringwood Road</td> <td>Figure 7</td> <td>Widening and resealing of a 1.8 km section of Ringwood Road between Bow River and Killoe Creek. Upgrade/replace culverts at Bow River and Killoe Creek as required.</td> </tr> <tr> <td>Ringwood Road</td> <td>Figure 7</td> <td>Realignment, widening and sealing of an additional 1.6 km section of Ringwood Road between Killoe Creek and Binks Road.</td> </tr> <tr> <td>Wollara Road</td> <td>Figure 8</td> <td>Realignment, widening and sealing of a 4.7 km unpaved section of Wollara Road between the Goulburn River National Park boundary and 1621 Wollara Road.</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> Refer to Figure 5 to Figure 8 in this Appendix for the location of the road upgrades. | Road / Intersection | Location | Upgrade Requirements | Golden Highway/Ringwood Road intersection | Figure 5 | Construction of a new 325m acceleration / merge lane for the left turn from Ringwood Road onto Golden Highway for westbound vehicles. Extension of the existing Golden Highway westbound and Ringwood Road left-in deceleration lane taper to 30 m. Relocate the safety barrier to ensure complaint BAR treatment. | Barnett Street | Figure 6 | Sealing of the first 30m of Barnett St from the intersection with Golden Highway. | Ringwood Road | Figure 7 | Widening and resealing of a 1.8 km section of Ringwood Road between Bow River and Killoe Creek. Upgrade/replace culverts at Bow River and Killoe Creek as required. | Ringwood Road | Figure 7 | Realignment, widening and sealing of an additional 1.6 km section of Ringwood Road between Killoe Creek and Binks Road. | Wollara Road | Figure 8 | Realignment, widening and sealing of a 4.7 km unpaved section of Wollara Road between the Goulburn River National Park boundary and 1621 Wollara Road. | <p>Timing of Road Upgrades – revised timing of road upgrades under Condition B7.</p> <p>As captured under Condition B7, a non-compliance was identified by DPHI following an inspection of the site on 5 November 2025: Failure to undertake road upgrades within 6 months of commencing construction in relation to Wollara Road and Ringwood Road i.e. by 14 October 2025, as observed on 5 November 2025 (Schedule 2, Condition B7). This was recorded as a breach by DPHI as detailed in their letter dated 17 November 2025, ref: INS-98404214.</p> <p>Lightsource bp advised that Section 138 approvals were obtained as follows:</p> <ul style="list-style-type: none"> Geotechnical Investigation on Killoe Creek and Bow River, 19 December 2024 Wollara Road, 7 January 2025 Ringwood Road, 7 January 2025 Culverts Upgrade, N/A Excavation Permit (main site), 15 June 2025 <p>Based on the conditions of Appendix 4, Lightsource bp appeared to have met the requirements relevant to location, upgrades and obtaining the relevant Section 138 approvals.</p> | Compliant |
|---|----------|---|---------------------|----------|----------------------|---|----------|--|----------------|----------|---|---------------|----------|--|---------------|----------|---|--------------|----------|--|---|-----------|
| Road / Intersection | Location | Upgrade Requirements | | | | | | | | | | | | | | | | | | | | |
| Golden Highway/Ringwood Road intersection | Figure 5 | Construction of a new 325m acceleration / merge lane for the left turn from Ringwood Road onto Golden Highway for westbound vehicles. Extension of the existing Golden Highway westbound and Ringwood Road left-in deceleration lane taper to 30 m. Relocate the safety barrier to ensure complaint BAR treatment. | | | | | | | | | | | | | | | | | | | | |
| Barnett Street | Figure 6 | Sealing of the first 30m of Barnett St from the intersection with Golden Highway. | | | | | | | | | | | | | | | | | | | | |
| Ringwood Road | Figure 7 | Widening and resealing of a 1.8 km section of Ringwood Road between Bow River and Killoe Creek. Upgrade/replace culverts at Bow River and Killoe Creek as required. | | | | | | | | | | | | | | | | | | | | |
| Ringwood Road | Figure 7 | Realignment, widening and sealing of an additional 1.6 km section of Ringwood Road between Killoe Creek and Binks Road. | | | | | | | | | | | | | | | | | | | | |
| Wollara Road | Figure 8 | Realignment, widening and sealing of a 4.7 km unpaved section of Wollara Road between the Goulburn River National Park boundary and 1621 Wollara Road. | | | | | | | | | | | | | | | | | | | | |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|--|----------------|----------------------------------|-------------------|
| | | <ul style="list-style-type: none"> Upgrades must comply with the Austroads Guide to Road Design (as amended by TfNSW supplements). Under Part 4.4.2 of the EP&A Act, the Applicant is required to obtain consent under section 138 of the Roads Act 1993 from the relevant road authority prior to commencing the road upgrades. | | | |

APPENDIX 7: INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS, WRITTEN INCIDENT NOTIFICATION REQUIREMENTS

| | | | | | |
|----|------|--|---|--|-----------|
| 1. | A7.1 | <p>A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under Condition C11 or, having given such notification, subsequently forms the view that an incident has not occurred.</p> | <p>Two incidents within the audit period were notified to DPHI. Evidence of the following incidents confirming reporting timeframes have been provided:</p> <ol style="list-style-type: none"> Three designated No-Go Zones near the Temporary Workers Accommodation (TWA) were compromised. Incident occurred 01/09/25 and DPHI notified in writing on 02/09/25. An investigation was undertaken following the incident with details provided to DPHI as per Lightsource bp report dated 29 September 2025. An estimated 1,500 litres of diesel was released across approximately 100 m2 of compacted gravel within the camp generator compound. Incident occurred 11/10/25 and DPHI notified in writing on 13/10/25. DTI notified NSW EPA on 12/10/25 via the EPA Hotline (Incident# 537911). The EPA confirmed they did not require an investigation. A follow up report was provided from Lightsource bp to DPHI on 10/11/25 with details of the investigation and outcome, an attached environmental investigation report, waste disposal evidence at licenced facility, and photos of replenished spill kits. | | Compliant |
|----|------|--|---|--|-----------|

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|--|--|----------------------------------|-------------------|
| | | | <p>The two incidents were notified within the 7-day timeframe as evidenced:</p> <ul style="list-style-type: none"> - Incident No. 1 dated 1 September 2025, notified as per portal receipt ref SSD-33964533-PA-37 on 2 September 2025 - Incident No. 2 dated 11 October 2025, notified as per portal receipt ref SSD-33964533-PA-52 on 13 October 2025 | | |
| 2. | A7.2 | <p>Written notification of an incident must:</p> <ol style="list-style-type: none"> (a) identify the development and application number; (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); (c) identify how the incident was detected; (d) identify when the applicant became aware of the incident; (e) identify any actual or potential non-compliance with conditions of consent; (f) describe what immediate steps were taken in relation to the incident; (g) identify further action(s) that will be taken in relation to the incident; and (h) identify a project contact for further communication regarding the incident. | <p>Incident No. 1:</p> <ol style="list-style-type: none"> (a) Incident Notification: Goulburn River Solar Farm (SSD 33964533) (b) Incident Summary + Incident Details (c) Incident Details – How the incident was detected: <i>Identified during an on-site inspection 28th September 2025 (correct date 28-Aug-25). Confirmed as an incident following a survey review commissioned by DTI to verify exclusion boundaries.</i> (d) Incident Details – When the applicant became aware: <i>5:50pm, 1st September 2025</i> (e) Incident Details – Actual or Potential non-compliances (Condition A2, B13, B16) (f) Incident Details – Immediate Actions Taken: • <i>Work in the affected areas ceased immediately • Exclusion fencing reinstated and additional signage installed • Toolbox sessions held with site staff and sub-contractors to reinforce No Go Zone obligations</i> (g) Incident Details – Further Actions Planned: • <i>A formal investigation is underway to</i> | | Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2



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| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|---|---|----------------------------------|-------------------|
| | | | <p><i>determine cause and accountability • Project ecologists will undertake a detailed assessment of biodiversity values affected including an independent arborist review to assess tree health and provide any remediation recommendations • A remediation plan is being developed to remove the stockpiles, reinstate the disturbed areas, and stabilise ground surfaces. • A review of the boundary demarcation process is being undertaken to strengthen controls on site and prevent recurrence</i></p> <p>(h) Senior HSE Advisor details provided.</p> <p>Incident No. 2 was reviewed and confirmed to have been reported as per above format and verified to address the condition requirements.</p> | | |
| 3. | A7.3 | <p>Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.</p> | <p>Investigation reports were actioned as per the following evidence presented:</p> <p>Incident No. 1 Investigation Report dated 23 September 2025 and provided 29 September 2025 to DPHI. Incident occurred 1 September 2025 and was notified to DPHI 2 September 2025. Report provided within 30-days of the incident.</p> <p>Incident No. 2 Investigation Report dated 10 November 2025. Incident occurred 11 October 2025 and was notified to DPHI 13 October 2025. Report provided within 30-days of when the incident was notified – see note.</p> | | Compliant |

| ID No | Req. No. | SSD 33964533 Requirement | Audit Evidence | Audit Findings / Recommendations | Compliance Rating |
|-------|----------|--|--|----------------------------------|-------------------|
| 4. | A7.4 | <p>The Incident Report must include:</p> <ul style="list-style-type: none"> (a) a summary of the incident; (b) outcomes of an incident investigation, including identification of the cause of the incident; (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) details of any communication with other stakeholders regarding the incident. | <p>Incident No.1 Investigation Report was reviewed and confirmed to include:</p> <ul style="list-style-type: none"> (a) A summary of the incident in the opening paragraphs + as part of the Environmental Incident Report ref GRF-EIR-2025-005 report dated 23 September 2025 – 1. Summary of Incident (b) Environmental Incident Report ref GRF-EIR-2025-005 report dated 23 September 2025 – 2. Investigation Outcomes and Causes (c) Environmental Incident Report ref GRF-EIR-2025-005 report dated 23 September 2025 – 3. Corrective and Preventative Actions. Includes table of 7 actions. (d) Environmental Incident Report ref GRF-EIR-2025-005 report dated 23 September 2025 – 4. Stakeholder Communication <p>Incident No. 2 Investigation Report dated 10 November 2025 addresses the condition requirements as follows:</p> <ul style="list-style-type: none"> (a) Incident Summary (b) Cause and Contributing Factors (c) Investigation Outcome (d) Consultation <p>The report also includes an environmental investigation report dated 2 November 2025.</p> | | Compliant |

Appendix F – Self-Reported Non-Compliances

Goulburn River Solar Farm

Independent Environmental Audit #2 – Self-Reported Non-Compliances



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| ID No | Req. No. | SSD 33964533 Requirement | Self-Reported Non-Compliance Details | Audit Finding Reference | Compliance Rating |
|--|----------|---|---|-------------------------|-------------------|
| SCHEDULE 2, PART B ENVIRONMENTAL CONDITIONS - GENERAL | | | | | |
| 1. 1. | B5 | All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4 | <p>A driver under DTI's responsibility did not follow the required route as per Condition B5. A Notice to Furnish was issued by DPHI on 18 September 2025. This was followed with an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required. This non-compliance was reviewed by the auditor during the audit.</p> <p>A self-reported non-compliance was notified against Condition B5 on 22 July 2025, under SSD-33964533-PA-29.</p> | GRSF-02_NC-01 | Non-Compliant |
| 2. | B3 | <p>Access Route</p> <p>Unless otherwise agreed by the Planning Secretary, all heavy vehicles and heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway / Ringwood Road intersection as shown in Figure 3 and Figure 4 in Appendix 4.</p> | <p>The Upper Hunter Shire Council (UHSC) received a call on Thursday 31 July 2025, time not confirmed, from a local resident that a heavy vehicle was blocking O'Briens Crossing on Wollara Road.</p> <p>UHSC representatives attended the location and confirmed that the heavy vehicle was associated with the Goulburn River Solar Farm project and appeared to have travelled to the project site on an unapproved travel route.</p> <p>The self-reported non-compliance was notified against Condition B3 on 31 July 2025, under SSD-33964533-PA-31.</p> <p>Post-audit note:</p> <p>The Project has prepared a Request to the Planning Secretary under this condition to clearly communicate how vehicles originating in the west are to approach the site. This has been consulted on with both Council and TfNSW and is currently with DPHI for their assessment. Draft request letter dated 09/12/2025 provided.</p> | GRSF-02_NC-02 | Non-Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2 – Self-Reported Non-Compliances



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|-------|----------|---|---|-------------------------|-------------------|
| 3. | B5 | All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4 | <p>A driver under DTI's responsibility did not follow the required route as per Condition B5. A Notice to Furnish was issued by DPHI on 18 September 2025. This was followed with an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required. This non-compliance was reviewed by the auditor during the audit.</p> <p>A self-reported non-compliance was notified against Condition B5 on 6 August 2025, under SSD-33964533-PA-33.</p> | GRSF-02_NC-03 | Non-Compliant |
| 4. | B5 | All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4 | <p>A driver under DTI's responsibility did not follow the required route as per Condition B5. A Notice to Furnish was issued by DPHI on 18 September 2025. This was followed with an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required. This non-compliance was reviewed by the auditor during the audit.</p> <p>A self-reported non-compliance was notified against Condition B5 on 13 August 2025, under SSD-33964533-PA-34.</p> | GRSF-02_NC-04 | Non-Compliant |
| 5. | B5 | All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4 | <p>A driver under DTI's responsibility did not follow the required route as per Condition B5. A Notice to Furnish was issued by DPHI on 18 September 2025. This was followed with an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required. This non-compliance was reviewed by the auditor during the audit.</p> <p>A self-reported non-compliance was notified against Condition B5 on 15 August 2025, under SSD-33964533-PA-35.</p> | GRSF-02_NC-05 | Non-Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2 – Self-Reported Non-Compliances



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|-------|----------|---|---|-------------------------|-------------------|
| 6. | B29 | <p>Operating Conditions</p> <p>The Applicant must:</p> <p>(a) minimise any soil erosion and control sediment generation;</p> <p>(b) ensure that construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual and the <i>Managing Urban Stormwater: Soils and construction - Volume 2A</i> manual (Landcom, 2008), or their latest versions;</p> <p>(c) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to reduce impacts on localised flooding and groundwater at the site;</p> <p>(d) ensure the solar panels do not cause any increased water being diverted off the site or alter hydrology off site;</p> <p>(e) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site;</p> <p>(f) ensure all works within waterfront land is undertaken in accordance with <i>Guidelines for Controlled Activities on Waterfront Land</i> (DPE, 2022), unless the Planning Secretary agrees otherwise; and</p> <p>(g) ensure the design of all creek crossings</p> | <p>A self-reported non-compliance was raised against B29(b) on 03/09/25 under SSD-33964533-PA-39:</p> <p>On Wednesday, 27 August, at approximately 12:00 noon, the Lightsource bp Senior Health and Safety Advisor observed concentrated surface water runoff from the haul road (MC10) at a location where sediment controls were not in place.</p> <p>The haul road (MC10) is the primary access route on site, and, due to ongoing traffic at the time, it was unsafe to stop to investigate further. However, the Lightsource bp Senior Health and Safety Advisor on return to the office compound verbally informed the Engineering, Procurement and Construction (EPC) contractor, DT Infrastructure (DTI), and requested further investigation be undertaken immediately.</p> <p>DTI promptly inspected the site and arranged for the installation of a rock-armoured bed level crossing in the affected area of the haul road. This measure is designed to separate groundwater discharge from the traffic interface, thereby minimising sediment dispersal.</p> <p>DPHI requested further information which was provided on 15/09/25 with the Department advising on 18/09/25 that no further action will be taken.</p> <p>Documents relating to the non-conformance provided include:</p> <ul style="list-style-type: none"> • Non-compliance Notification with Condition B29 (b) – 03/09/25 • DPHI RFI (undated – Major Projects Portal message from Ann Hagerthy) • NC RFI response 15/09/25 • DPHI RFI response (email dated 18/09/25) | GRSF-02_NC-06 | Non-Compliant |

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Independent Environmental Audit #2 – Self-Reported Non-Compliances



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|-------|----------|--|---|-------------------------|-------------------|
| | | (including internal tracks and MV cables) is in accordance with the document <i>Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (NSW Fisheries 2003) and the <i>Policy and Guidelines for Fish Habitat Conservation and Management</i> (Update 2013). | | | |
| 7. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a). A Notice to Furnish was issued by DPHI on 18 September 2025. This was followed with an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 28 August 2025, under SSD-33964533-PA-38.</p> | GRSF-02_NC-07 | Non-Compliant |
| 8. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a). A Notice to Furnish was issued by DPHI on 18 September 2025. This was followed with an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 8 September 2025, under SSD-33964533-PA-40.</p> | GRSF-02_NC-08 | Non-Compliant |
| 9. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a). A Notice to Furnish was issued by DPHI on 18 September 2025. This was followed with an Advisory Letter on 21</p> | GRSF-02_NC-09 | Non-Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2 – Self-Reported Non-Compliances



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|-------|----------|---|--|-------------------------|-------------------|
| | | <p>from the Golden Highway only, as shown in Figure 4 in Appendix 4; and</p> <p>(b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.</p> | <p>October 2025 advising a traffic breach had been recorded with no further action required.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 11 September 2025, under SSD-33964533-PA-41.</p> | | |
| 10. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and</p> <p>(b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.</p> | <p>A driver under Transgrid/Enerven's responsibility did not follow the required route as per Condition B4(a). DPHI issued an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 16 September 2025, under SSD-33964533-PA-42.</p> | GRSF-02_NC-10 | Non-Compliant |
| 11. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and</p> <p>(b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.</p> | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a). DPHI issued an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 18 September 2025, under SSD-33964533-PA-43.</p> | GRSF-02_NC-11 | Non-Compliant |
| 12. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left</p> | <p>A driver under Transgrid/Enerven's responsibility did not follow the required route as per Condition B4(a). DPHI issued an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required.</p> | GRSF-02_NC-12 | Non-Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2 – Self-Reported Non-Compliances



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|-------|----------|---|---|-------------------------|-------------------|
| | | <p>from the Golden Highway only, as shown in Figure 4 in Appendix 4; and</p> <p>(b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.</p> | <p>A self-reported non-compliance was notified against Condition B4(a) on 18 September 2025, under SSD-33964533-PA-45.</p> | | |
| 13. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and</p> <p>(b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.</p> | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a). DPHI issued an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 19 September 2025, under SSD-33964533-PA-44.</p> | GRSF-02_NC-13 | Non-Compliant |
| 14. | B17 | <p>Construction, Upgrading and Decommissioning Hours</p> <p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <p>(a) 7 am to 6 pm Monday to Friday;</p> <p>(b) 8 am to 1 pm Saturdays; and</p> <p>(c) at no time on Sundays and NSW public holidays.</p> | <p>On Tuesday 30 September 2025, concrete curing operations for the culvert upgrade works at Killoe Creek continued until approximately 9:15 pm, outside of the approved standard hours.</p> <p>Although the Planning Secretary has granted approval for certain out-of-hours works (OOHW), this approval does not extend to the road upgrade works.</p> <p>The non-compliance was self-reported and notified to DPHI on 7 October 2025 ref. SSD-33964533-PA-46:</p> <ul style="list-style-type: none"> Goulburn River Solar Farm (SSD 33964533) Non-compliance with Condition B17 notification (07/10/25) Major Projects Portal Post Approval Form 20251007051513 (ref. SSD-33964533-PA-46) Response to DPHI RFI (07/11/25) | GRSF-02_NC-14 | Non-Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2 – Self-Reported Non-Compliances



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|-------|----------|--|---|-------------------------|-------------------|
| 15. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under Transgrid/Enerven's responsibility did not follow the required route as per Condition B4(a). DPHI issued an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 2 October 2025, under SSD-33964533-PA-47.</p> | GRSF-02_NC-15 | Non-Compliant |
| 16. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under Transgrid/Enerven's responsibility did not follow the required route as per Condition B4(a). DPHI issued an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 3 October 2025, under SSD-33964533-PA-51.</p> | GRSF-02_NC-16 | Non-Compliant |
| 17. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a). DPHI issued an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 3 October 2025, under SSD-33964533-PA-49.</p> | GRSF-02_NC-17 | Non-Compliant |

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Independent Environmental Audit #2 – Self-Reported Non-Compliances



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|-------|----------|--|---|-------------------------|-------------------|
| 18. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a). DPHI issued an Advisory Letter on 21 October 2025 advising a traffic breach had been recorded with no further action required.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 4 October 2025, under SSD-33964533-PA-50.</p> | GRSF-02_NC-18 | Non-Compliant |
| 19. | B3 | <p>Access Route</p> <p>Unless otherwise agreed by the Planning Secretary, all heavy vehicles and heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway / Ringwood Road intersection as shown in Figure 3 and Figure 4 in Appendix 4.</p> | <p>At approximately 2:04 pm on Wednesday, 8th October, site security observed a heavy vehicle turning left from Wollara Road into the site entrance.</p> <p>The self-reported non-compliance was notified against Condition B3 on 8 October 2025, under SSD-33964533-PA-53.</p> <p>Post-audit note:</p> <p>The Project has prepared a Request to the Planning Secretary under this condition to clearly communicate how vehicles originating in the west are to approach the site. This has been consulted on with both Council and TfNSW and is currently with DPHI for their assessment. Draft request letter dated 09/12/2025 provided.</p> | GRSF-02_NC-19 | Non-Compliant |
| 20. | B26 | <p>Heritage Management Plan</p> <p>Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development and to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with local Aboriginal stakeholders, and reviewed by Heritage NSW; | <p>A self-reported non-compliance was notified against Condition B26 on 10 October 2025, under SSD-33964533-PA-48.</p> <p>On 16 August 2025, ecologists from Fauna Spotters Australia identified an apparent 'well' in the vicinity of the slab hut (HS01), a location of known archaeological potential. The area was marked with temporary flagging, but a full 20-metre exclusion zone was not established, and Lightsource bp was not notified at the time.</p> | GRSF-02_NC-20 | Non-Compliant |

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| | | <p>(b) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> (i) protecting the heritage items identified in Table 1 of Appendix 6, and items located outside the approved development footprint; (ii) fencing / demarcation (as appropriate) of the identified heritage items prior to carrying out any development that could directly or indirectly impact the identified heritage items; (iii) establishing the exclusion zone around the original slab hut as required under condition B25; (iv) recording and salvage collection of the heritage items located within the approved development footprint, as identified in Table 2 of Appendix 6; (v) further recording and investigation of the grinding groove site 'Kiloe Creek GG1' (AHIMS site #37- 1-1033); (vi) a contingency plan and reporting procedure if: <ul style="list-style-type: none"> • heritage items outside the approved development footprint are damaged; • previously unidentified heritage items are found; or • skeletal material is discovered; | <p>DTI informally advised of the find during an onsite inspection with Lightsource bp and DPPI on 23 September 2025. Following DPPI's request for further information, the matter was reviewed and determined to be non-compliant with the unexpected finds protocol in the HMP (Section 6.3.2.1), and by extension, a breach of Condition B26.</p> <p>Documentation provided in support of B26(b)(vii) includes:</p> <ul style="list-style-type: none"> • ACH training presentation and attendance 30th & 31st July 2025 • GRSF Heritage Management and GED training 05/08/25 • DTI Heritage toolbox 11/11/25 <p>Documentation provided in relation to the non-conformance:</p> <ul style="list-style-type: none"> • Notification of non-conformance to DPPI (10.10/25) • Post Approval Form_20251010022008 | | |

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| | | <ul style="list-style-type: none"> (vii) 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 (viii) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and (c) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. <p>Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.</p> | | | |
| 21. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a).</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 10 October 2025, under SSD-33964533-PA-54.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-21 | Non-Compliant |
| 22. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a).</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 10 October 2025, under SSD-33964533-PA-55.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-22 | Non-Compliant |

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|-------|----------|--|---|-------------------------|-------------------|
| | | Figure 4 in Appendix 4. | | | |
| 23. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a). Following review of DTI intersection footage on 17 October 2025 capturing events of the previous day (16 October 2025), a sub-contractor turned right onto Ringwood Rd from the Golden Hwy which is a breach of Condition B4(a) requirements.</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 16 October 2025, under SSD-33964533-PA-56.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-23 | Non-Compliant |
| 24. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a).</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 19 October 2025, under SSD-33964533-PA-57.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-24 | Non-Compliant |
| 25. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a).</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 20 October 2025, under SSD-33964533-PA-58.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-25 | Non-Compliant |

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| | | Figure 4 in Appendix 4. | | | |
| 26. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under Transgrid/Enerven's responsibility did not follow the required route as per Condition B4(b).</p> <p>A self-reported non-compliance was notified against Condition B4(b) on 24 October 2025, under SSD-33964533-PA-60.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-26 | Non-Compliant |
| 27. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a). Following review of DTI intersection footage on 28 October 2025 capturing events of the previous day (27 October 2025), a sub-contractor turned right onto Ringwood Rd from the Golden Hwy which is a breach of Condition B4(a) requirements</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 27 October 2025, under SSD-33964533-PA-63.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-27 | Non-Compliant |
| 28. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a). A self-reported non-compliance was therefore notified against Condition B4(a) on 27 October 2025, under SSD-33964533-PA-62.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-28 | Non-Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2 – Self-Reported Non-Compliances



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| ID No | Req. No. | SSD 33964533 Requirement | Self-Reported Non-Compliance Details | Audit Finding Reference | Compliance Rating |
|-------|----------|--|---|-------------------------|-------------------|
| | | Figure 4 in Appendix 4. | | | |
| 29. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a).</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 27 October 2025, under SSD-33964533-PA-61.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-29 | Non-Compliant |
| 30. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under Transgrid/Enerven's responsibility did not follow the required route as per Condition B4(a).</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 29 October 2025, under SSD-33964533-PA-64.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-30 | Non-Compliant |
| 31. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under Transgrid/Enerven's responsibility did not follow the required route as per Condition B4(a).</p> <p>A self-reported non-compliance was notified against Condition B4(a) on 3 November 2025, under SSD-33964533-PA-65.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-31 | Non-Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2 – Self-Reported Non-Compliances



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| ID No | Req. No. | SSD 33964533 Requirement | Self-Reported Non-Compliance Details | Audit Finding Reference | Compliance Rating |
|-------|----------|--|---|-------------------------|-------------------|
| 32. | B1 | <p>Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions</p> <p>The Applicant must ensure that the:</p> <ul style="list-style-type: none"> (a) development does not generate more than: <ul style="list-style-type: none"> (i) 55 heavy vehicle movements a day (a maximum of 15 heavy vehicle movements per hour) during construction, upgrading or decommissioning; (ii) 24 movements of heavy vehicle requiring escort during construction, upgrading and decommissioning; and (b) length of any vehicles (excluding heavy vehicle requiring escort) used for the development does not exceed 19 metres, unless the Planning Secretary agrees otherwise. | <p>Upon the monthly review of October 2025 traffic movements by DTI, it was identified that there were 57 heavy vehicle movements recorded on the 21/10/25 and 27/10/25, exceeding the limits under Condition B1(a)(i).</p> <p>These occurrences were self-reported as one non-compliance on 6 November 2025, under SSD-33964533-PA-66 against Condition B1(a)(i).</p> | GRSF-02_NC-32 | Non-Compliant |
| 33. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> <ul style="list-style-type: none"> (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4. | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(a).</p> <p>A self-reported non-compliance was notified against Condition B4(a), B4(b) and B5 on 7 November 2025, under SSD-33964533-PA-68, capturing 3 x non-compliances under the notification.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | GRSF-02_NC-33 | Non-Compliant |
| 34. | B4 | <p>All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:</p> | <p>A driver under DTI's responsibility did not follow the required route as per Condition B4(b).</p> | GRSF-02_NC-34 | Non-Compliant |

Goulburn River Solar Farm

Independent Environmental Audit #2 – Self-Reported Non-Compliances



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| ID No | Req. No. | SSD 33964533 Requirement | Self-Reported Non-Compliance Details | Audit Finding Reference | Compliance Rating |
|-------|----------|---|--|-------------------------|-------------------|
| | | <p>(a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and</p> <p>(b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.</p> | <p>A self-reported non-compliance was notified against Condition B4(a), B4(b) and B5 on 7 November 2025, under SSD-33964533-PA-68, capturing 3 x non-compliances under the notification.</p> <p>At the time of the audit, no further correspondence was received from DPHI in response to the notified non-compliance.</p> | | |
| 35. | B5 | All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4 | <p>A self-reported non-compliance was notified against Condition B4(a), B4(b) and B5 on 7 November 2025, under SSD-33964533-PA-68, capturing 3 x non-compliances under the notification.</p> <p>A driver under DTI's responsibility did not follow the required route as per Condition B5. This non-compliance was reviewed by the auditor during the audit.</p> | GRSF-02_NC-35 | Non-Compliant |
| 36. | B5 | All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4 | <p>A self-reported non-compliance was notified against Condition B5 on 11 November 2025, under SSD-33964533-PA-73.</p> <p>A driver under DTI's responsibility did not follow the required route as per Condition B5. This non-compliance was reviewed by the auditor during the audit.</p> | GRSF-02_NC-36 | Non-Compliant |

Appendix G – Consultation

RE: Independent Environmental Audit - SSD-33964533 - Goulburn River Solar Farm - Consultation

From Ann Hagerthy <Ann.Hagerthy@planning.nsw.gov.au>

Date Mon 11/10/2025 1:47 PM

To Grant Brown <Grant.Brown@app.com.au>

Cc Heidi Watters <Heidi.Watters@Planning.nsw.gov.au>

EXTERNAL

Hi Grant,

Following a review of your last audit conducted for the Goulburn River Solar Farm (August 2025), I note that no other stakeholders were consulted with. In the absence of me providing you a specific list for the last/initial audit, I had assumed that you would have consulted with the standard stakeholders and those listed in the consent. However, I note this was not the case.

As a result, can you please consult with the following stakeholders for the upcoming audit scheduled for 19 November 2025:

- Upper Hunter Shire Council
- Mid-Western Regional Council
- Australian Government DCCEEW (Biodiversity)
- NSW DCCEEW, CHPR (Formerly Biodiversity Conservation Division)
- NSW EPA
- Transport for NSW
- NSW DCCEEW, Water Group
- NRAR
- NSW DCCEEW, Environment and Heritage (Heritage NSW)
- Fire and Rescue NSW
- NSW RFS
- NPWS

Thanks,

Ann Hagerthy

Senior Compliance Officer

Compliance | Development Assessment and Sustainability

Department of Planning, Housing and Infrastructure

T (02) 6575 3407 E ann.hagerthy@planning.nsw.gov.au

516 High St, Maitland NSW 2320

dpie.nsw.gov.au

From: Grant Brown <Grant.Brown@app.com.au>
Sent: Wednesday, 8 October 2025 9:12 AM
To: Ann Hagerthy <Ann.Hagerthy@planning.nsw.gov.au>
Subject: Re: Independent Environmental Audit - SSD-33964533 - Goulburn River Solar Farm - Consultation

Hi Ann,

Thanks for your feedback. I will ensure these items are looked at closely.

Regards,

Grant Brown

Senior Environmental Consultant



0499 978 339 | grant.brown@app.com.au | app.com.au
Turrbal and Jagera Country | 29B, 10 Eagle Street Brisbane 4000



**Learn more about The APP Group
and Bureau Veritas**

The APP Group acknowledges Aboriginal and Torres Strait Islander Peoples as the Traditional Custodians of the Land, Rivers and Sea. We acknowledge and pay our respects to Elders past and present.

This email and any files transmitted with it are confidential and intended solely for the use of the individual to whom it is addressed. If you have received this email in error, please inform the postmaster@app.com.au or the sender.

APP Corporation Pty Limited, ABN 29 003 764 770.

From: Ann Hagerthy <Ann.Hagerthy@planning.nsw.gov.au>
Sent: Wednesday, October 8, 2025 7:56 AM

To: Grant Brown <Grant.Brown@app.com.au>

Subject: RE: Independent Environmental Audit - SSD-33964533 - Goulburn River Solar Farm - Consultation

EXTERNAL

Hi Grant,

In addition to the consent conditions and a review of adequacy of management plans, please place additional focus on management of development footprint boundary and heritage management.

Thanks,

Ann Hagerthy

Senior Compliance Officer

Compliance | Development Assessment and Sustainability

Department of Planning, Housing and Infrastructure

T (02) 6575 3407 E ann.hagerthy@planning.nsw.gov.au

516 High St, Maitland NSW 2320

dpie.nsw.gov.au



From: Grant Brown <Grant.Brown@app.com.au>

Sent: Monday, 29 September 2025 3:16 PM

To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Subject: Independent Environmental Audit - SSD-33964533 - Goulburn River Solar Farm - Consultation

Dear Sir/Madam,

I am writing to advise that The APP Group – HSEQ Systems and Auditing (APP) will be conducting the Independent Environmental Audit of the Goulburn River Solar Farm project as a requirement of Consent Conditions SSD-33964533.

The second audit is scheduled to be conducted on the 19th November 2025 and will review compliance in accordance with SSD-33964533 Schedule 2 Parts A, B, C, and Appendix 1 - 7, as applicable.

In line with the consultation requirements of the *Independent Audit Post Approval Requirements* (IAPAR 2020), Section 3.2, APP seeks your input into the scope of the audit and advice on any particular areas where you would like us to focus on.

Please also advise if you wish for any stakeholders to be contacted to obtain their input into the scope of this audit.

Regards,

Grant.

Grant Brown

Senior Environmental Consultant



0499 978 339 | grant.brown@app.com.au | app.com.au

Turrbal and Jagera Country | 29B, 10 Eagle Street Brisbane 4000



**Learn more about The APP Group
and Bureau Veritas**

The APP Group acknowledges Ab original and Torres Strait Islander Peoples as the Traditional Custodians of the Land, Rivers and Sea. We acknowledge and pay our respects to Elders past and present.

From: Tim Mitchell <Tim.Mitchell@transport.nsw.gov.au>
Sent on: Thursday, November 27, 2025 1:55:47 AM
To: Grant Brown <Grant.Brown@ppp.com.au>
Subject: RE: Independent Environmental Audit - SSD-33964533 - Goulburn River Solar Farm - Consultation

EXTERNAL

Hi Grant,

In regards to the independent audit of Goulburn River Solar Farm, the focus areas which relate to TfNSW are within Schedule 2 of the conditions of consent within the Transport section from conditions B1 to B10.

In particular review of the compliance with the left in/ out arrangement of Golden Highway/ Ringwood Road intersection for construction traffic. Also compliance of using Golden Highway/Garnett St to head east when leaving the site.

Also please ensure that any secondary request that have been approved are considered in the audit.

Kind Regards,

Tim Mitchell

Development Services Case Officer - Renewables
Transport Planning
Planning Integration and Passenger
Transport for NSW

P 1300 819 680 | development.renewables@transport.nsw.gov.au

transport.nsw.gov.au

Development Services Renewables will prioritise responding to projects within the Major Projects Portal until 24th of December 2025. Any requests or responses outside the Major Projects Portal will be reviewed and allocated to a team member to respond to your enquiry or request within 21 days. Note that design reviews for strategic designs require 14 days for internal review, and meetings will be prioritised for projects within the assessment phase or nearing determination.



Transport
for NSW

From: Alison Larned <alison.larned@dcccr.nsw.gov.au>
Sent on: Monday, November 17, 2025 12:24:28 AM
To: Grant Brown <Grant.Brown@ppp.com.au>
Subject: RE: Independent Environmental Audit - SSD-33964533 - Goulburn River Solar Farm - Consultation

EXTERNAL

Hello Grant

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for your project. Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project. If you have any questions regarding these comments, please contact heritage@mailbox@environment.nsw.gov.au.

Kind regards,

Alison Larned BSc, BA (Hons), (Heritage)
A/ Strategic Manager - Major Projects
Heritage NSW
Department of Climate Change,
Energy, the Environment and Water

M 0413 702 918 | alison.larned@dcccr.nsw.gov.au

dcccrc.nsw.gov.au

Level 3, 6 Stewart Ave
Newcastle West NSW 2303

Locked Bag 1002, Dangar NSW 2309

Working days Monday to Friday, 9:00am - 5:00pm





Grant Brown
Senior Environmental Consultant
The APP Group
29B, 10 Eagle Street
Brisbane 4000

By email: grant.brown@app.com.au

Dear Grant,

Subject: Independent Environmental Audit (IEA) of Goulburn River Solar Farm (SSD-33964533)

Thank you for your email request dated 10 November 2025 seeking input and advice from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) on focus areas for the Independent Environmental Audit (IEA) of Goulburn River Solar Farm (SSD-33964533).

CPHR recommends the IEA concentrates on the biodiversity requirements listed in Schedule 2, Part B of the development consent, with particular focus on the items listed under consent condition B16 – Biodiversity Management Plan.

CPHR has provided recommendations on the Goulburn River Solar Farm Biodiversity Management Plan (BMP) (Umwelt, 2024). The BMP was amended and additional detail provided as per CPHR's recommendations (refer Appendix 1 Agency Consultation of the BMP, <https://lightsourcebp.com/au/project/goulburn-river-solar/>).

The IEA should provide specific information to determine if obligations as stated within the BMP have been met. Details with reference to evidence of outcomes should be provided regarding each biodiversity mitigation and management measure for the project as outlined in Table 6.1 of the BMP.

If you have any further questions about this issue, please contact our Hunter Central Coast Planning Team at huntercentralcoast@environment.nsw.gov.au.

Yours sincerely,

Joe Thompson
Director Hunter Central Coast
Conservation, Programs, Heritage and Regulation Group

2 December 2025



NSW Department of Climate Change, Energy, the Environment and Water

Our ref: OJ 125/14867

Grant Brown
29B, 10 Eagle Street
Brisbane 4000
grant.brown@app.com.au

14/11/2025

Subject: Goulburn River Solar Farm – Consultation -SSD-33964533 - IEA

Dear Grant Brown,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.

- Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025. Consideration is also to be given to the relevance of excluded works at the site with reference to the factsheet at the following link: https://water.dppe.nsw.gov.au/_data/assets/pdf_file/0008/554444/ta-interpreting-excluded-works-dams-fact-sheet.pdf
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at water.assessments@dcceew.nsw.gov.au

Yours sincerely,



Tim Baker
Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

Appendix H – Audit Photos

Goulburn River Solar Farm Audit Photos – 19 November 2025



Golden Highway & Ringwood Road intersection upgrade



Site entrance

Goulburn River Solar Farm Audit Photos – 19 November 2025

WGS84 ±10m -32.29399, 150.10334 Δ m ±6m 433 Δ T ±21 SE129



Transgrid Pad and Bess Pad

WGS84 ±4m -32.29558, 150.10610 Δ m ±3m 438 Δ T ±12 E88



Volumetric location – concrete storage awaiting recycling

Goulburn River Solar Farm Audit Photos – 19 November 2025

WGS84 ±5m -32.29594, 150.10648 440 m ±3m °T ±13 N10



Volumetric location

WGS84 ±3m -32.29592, 150.10665 439 m ±3m °T ±12 E102



Drainage around Transgrid pad

Goulburn River Solar Farm Audit Photos – 19 November 2025

WGS84 $\pm 7m$ -32.29350, 150.10332 Δ m $\pm 6m$ 434 ∇ T ± 19 NE31



A One go-line in the process of demobilising

WGS84 $\pm 15m$ -32.29351, 150.10331 Δ m $\pm 7m$ 435 ∇ T ± 19 SE133



A One go-line in the process of demobilising

Goulburn River Solar Farm Audit Photos – 19 November 2025

WGS84 ±5m -32.27984, 150.09906 Δ m ±4m 439 Δ T ±19 NE73



Dust generation from earthworks

WGS84 ±31m -32.29643, 150.10665 Δ m ±13m 435 Δ T ±15 SE152



Dust generation from earthworks

Goulburn River Solar Farm Audit Photos – 19 November 2025



Dust generation from earthworks



Weed growth along access tracks

Goulburn River Solar Farm Audit Photos – 19 November 2025



Boundary fencing



Biodiversity fencing installed

Goulburn River Solar Farm Audit Photos – 19 November 2025



Slab hut heritage site No-Go Zone demarcation



Survey pegs and flagging



The APP Group

app.com.au