Independent Audit No.3

Goulburn River Solar Farm

Goulburn River Fund Pty Ltd

SSD-33964533

June 2026

Audit Details

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Auditors	Dylan Jones (Lead Auditor) Gary Selwyn (Alternate Lead Auditor / Technical Reviewer) Manya Narain (Assistant Auditor)
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Date:	25-Jun-26	**Date:**	25-Jun-26

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Inherent Limitations

This Report has been prepared at the request of Goulburn River Fund Pty Ltd ***(Lightsource bp)*** *in the Scope Section of KPMG's engagement letter dated 30th April 2026.*

The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently no opinions or conclusions intended to convey assurance have been expressed.

Due to the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected. Further, the internal control structure, within which the control procedures that have been subject to the procedures we performed operate, has not been reviewed in its entirety and, therefore, no opinion or view is expressed as to its effectiveness of the greater internal control structure. The procedures performed were not designed to detect all weaknesses in control procedures as they are not performed continuously throughout the period and the tests performed on the control procedures are on a sample basis. Any projection of the evaluation of control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by Goulburn River Fund Pty Ltd employees consulted as part of the process.

KPMG has indicated within this Report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the Report.

KPMG is under no obligation in any circumstance to update this Report, in either oral or written form, for events occurring after the Report has been issued in final form.

The findings in this Report have been formed on the above basis.

Third Party Reliance

This Report is solely for the purpose set out in the Audit Objectives and Scope Section and for Goulburn River Fund Pty Ltd.'s information and is not to be used for any other purpose or distributed to any other party without KPMG's prior written consent.

This Report has been prepared at the request of Goulburn River Fund Pty Ltd in accordance with the terms of KPMG's engagement letter dated 30th April 2026. Other than our responsibility to Goulburn River Fund Pty Ltd, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party. Any reliance placed is that party's sole responsibility.

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Executive Summary

Background

KPMG was engaged by Goulburn River Fund Pty Ltd (Lightsource bp) to undertake an Independent Environmental Audit (IEA) of the Goulburn River Solar Farm (GRSF) project. The IEA was undertaken in accordance with the *Independent Audit Post Approval Requirements 2020* (IAPAR 2020) as required by condition of approval (CoA) C15 of State Significant Development (SSD-33964533).

The project is located approximately 28 kilometres south-west of Merriwa in the Upper Hunter region of New South Wales and comprises a 585-megawatt solar farm with approximately one million solar photovoltaic panels, an integrated battery energy storage system and associated transmission infrastructure. This audit considered construction activities undertaken between 19 November 2025 and 14 May 2026 and assessed compliance with the development consent and the implementation of the project's environmental management framework across the works delivered by Lightsource bp and its principal contractors.

Lightsource bp has appointed two (2) Principal Contractors (PCs) to deliver the Project, with DT Infrastructure (DTI) as the head contractor responsible for civil and solar farm construction works, and Transgrid, which has appointed Enerven to be responsible for the design and construction of the substation and switching station components. Lightsource bp oversees the environmental performance and compliance of both of its PCs and generally acts as the principal point of contact for external stakeholder consultation.

Construction of the project commenced on 14 April 2025, and a program of IEAs is being undertaken on a six-monthly basis in accordance with IAPAR 2020. At the time of this audit program, two (2) IEAs had already been completed, with the most recent (IEA #2) undertaken on 19 November 2025. Subsequently, this IEA (IEA #3) was therefore required to be delivered prior to the 19 May 2026. The audit period was defined as being from the date of the previous IEA (19 November 2025) to the date of the IEA #3 site inspection (14 May 2026).

Based on the evidence provided, the observations made and compliance findings of this audit, the Project is considered to have demonstrated good environmental performance, with a number of key initiatives and positive observations provided in Section 4.12. The IEA identified 39 non-compliances during the audit period, including 35 that were self-reported (primarily relating to traffic violations), two (2) that were identified by DPHI and two (2) that were raised by the Auditor. Opportunities for improvement were also identified in relation to dangerous goods storage, erosion and sediment controls, concrete washout practices, dust monitoring and waste management.

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Audit Findings

Table E.1: *Summary of Audit Findings*

Reference	Requirement Details	Finding Details	Status
Non-compliance GRSF-03_NC-1	**A3 TERMS OF CONSENT** 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	The Auditor considers that CoA A3 (a) has not been complied with, given the: • 35-self-reported NCs; • Two (2) DPHI identified NCs; and • One (1) NC identified during IEA #3. **Recommendations** Nil	Open
Non-compliance GRSF-03_NC-2	**B5 Access Route** 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.	Self-reported non-compliance Date of event: 18/11/2025 Date notified to DPHI: 25/11/2025 DPHI Ref: SSD-33964533-PA-75	Closed
Non-compliance GRSF-03_NC-3	**B4 Access Route** All heavy 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; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 18/11/2025 Date notified to DPHI: 25/11/2025 DPHI Ref: SSD-33964533-PA-76	Closed
Non-compliance GRSF-03_NC-4		Self-reported non-compliance Date of event: 24/11/2025 Date notified to DPHI: 01/12/2025 DPHI Ref: SSD-33964533-PA-77	Closed
Non-compliance GRSF-03_NC-5	**B19 Variation of Construction Hours** The hours of construction activities specified in condition B17 of this	Self-reported non-compliance Date of event: 25/11/2025 Date notified to DPHI: 03/12/2025	Closed

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Reference	Requirement Details	Finding Details	Status
	approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be: (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 or 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 Interim Construction Noise Guideline (DECC, 2009), or latest version.	DPHI Ref: SSD-33964533-PA-78	
Non-compliance **GRSF-03_NC-6**	**B19 Variation of Construction Hours** 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: (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;	Self-reported non-compliance Date of event: 29/11/2025 Date notified to DPHI: 08/12/2025 DPHI Ref: SSD-33964533-PA-82	Closed

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Reference	Requirement Details	Finding Details	Status
	(c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Councils (and other relevant agencies) has been or 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 Interim Construction Noise Guideline (DECC, 2009), or latest version. **B4 Access Route** All heavy 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; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.		
Non-compliance GRSF-03_NC-7	**B4 Access Route** All heavy 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	Self-reported non-compliance Date of event: 02/12/2025 Date notified to DPHI: 09/12/2025 DPHI Ref: SSD-33964533-PA-86	Closed
Non-compliance GRSF-03_NC-8		Self-reported non-compliance Date of event: 03/12/2025 Date notified to DPHI: 09/12/2025 DPHI Ref: SSD-33964533-PA-87	Closed

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Reference	Requirement Details	Finding Details	Status
Non-compliance GRSF-03_NC-9	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.	Self-reported non-compliance Date of event: 08/12/2025 Date notified to DPHI: 15/12/2025 DPHI Ref: SSD-33964533-PA-89	Closed
Non-compliance GRSF-03_NC-10		Self-reported non-compliance Date of event: 11/12/2025 Date notified to DPHI: 16/12/2025 DPHI Ref: SSD-33964533-PA-91	Closed
Non-compliance GRSF-03_NC-11		Self-reported non-compliance Date of event: 12/12/2025 Date notified to DPHI: 18/12/2025 DPHI Ref: SSD-33964533-PA-92	Closed
Non-compliance GRSF-03_NC-12	**B4 Access Route** All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (c) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 18/12/2025 Date notified to DPHI: 22/12/2025 DPHI Ref: SSD-33964533-PA-93	Closed
Non-compliance GRSF-03_NC-13	**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.	Self-reported non-compliance Date of event: 21/01/2026 Date notified to DPHI: 29/01/2026 DPHI Ref: SSD-33964533-PA-102	Closed
Non-compliance GRSF-03_NC-14	**B4 Access Route** All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden	Self-reported non-compliance Date of event: 22/01/2026 Date notified to DPHI: 29/01/2026 DPHI Ref: SSD-33964533-PA-103	Closed

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Reference	Requirement Details	Finding Details	Status
	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; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.		
Non-compliance GRSF-03_NC-15	**B4 Access Route** All heavy 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; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 23/01/2026 Date notified to DPHI: 30/01/2026 DPHI Ref: SSD-33964533-PA-104	Closed
Non-compliance GRSF-03_NC-16		Self-reported non-compliance Date of event: 26/01/2026 Date notified to DPHI: 02/02/2026 DPHI Ref: SSD-33964533-PA-105	Closed
Non-compliance GRSF-03_NC-17		Self-reported non-compliance Date of event: 29/01/2026 Date notified to DPHI: 6/02/2026 DPHI Ref: SSD-33964533-PA-106	Closed
Non-compliance GRSF-03_NC-18		Self-reported non-compliance Date of event: 04/02/2026 Date notified to DPHI: 12/02/2025 DPHI Ref: SSD-33964533-PA-107	Closed
Non-compliance GRSF-03_NC-19		Self-reported non-compliance Date of event: 18/02/2026 Date notified to DPHI: 26/02/2026 DPHI Ref: SSD-33964533-PA-112	Closed
Non-compliance GRSF-03_NC-20		Self-reported non-compliance Date of event: 18/02/2026 Date notified to DPHI: 26/02/2026 DPHI Ref: SSD-33964533-PA-113	Closed
Non-compliance		Self-reported non-compliance Date of event: 18/02/2026 Date notified to DPHI: 25/02/2026	Closed

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Reference	Requirement Details	Finding Details	Status
GRSF-03_NC-21		DPHI Ref: SSD-33964533-PA-111	
Non-compliance GRSF-03_NC-22		Self-reported non-compliance Date of event: 20/02/2026 Date notified to DPHI: 26/02/2026 DPHI Ref: SSD-33964533-PA-114	Closed
Non-compliance GRSF-03_NC-23		Self-reported non-compliance Date of event: 04/03/2026 Date notified to DPHI: 10/03/2026 DPHI Ref: SSD-33964533-PA-116	Closed
Non-compliance GRSF-03_NC-24	**B4 Access Route** All heavy 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; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 07/03/2026 Date notified to DPHI: 13/03/2026 DPHI Ref: SSD-33964533-PA-118	Closed
Non-compliance GRSF-03_NC-25		Self-reported non-compliance Date of event: 09/03/2026 Date notified to DPHI: 17/03/2026 DPHI Ref: SSD-33964533-PA-119	Closed
Non-compliance GRSF-03_NC-26		Self-reported non-compliance Date of event: 09/03/2026 Date notified to DPHI: 17/03/2026 DPHI Ref: SSD-33964533-PA-120	Closed
Non-compliance GRSF-03_NC-27		Self-reported non-compliance Date of event: 10/03/2026 Date notified to DPHI: 17/03/2026 DPHI Ref: SSD-33964533-PA-122	Closed
Non-compliance GRSF-03_NC-28		Self-reported non-compliance Date of event: 10/03/2026 Date notified to DPHI: 17/03/2026 DPHI Ref: SSD-33964533-PA-121	Closed
Non-compliance GRSF-03_NC-29		Self-reported non-compliance Date of event: 17/03/2026 Date notified to DPHI: 25/03/2026 DPHI Ref: SSD-33964533-PA-124	Closed

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Reference	Requirement Details	Finding Details	Status
Non-compliance GRSF-03_NC-30		Self-reported non-compliance Date of event: 19/03/2026 Date notified to DPHI: 26/03/2026 DPHI Ref: SSD-33964533-PA-126	Closed
Non-compliance GRSF-03_NC-31		Self-reported non-compliance Date of event: 23/03/2026 Date notified to DPHI: 31/03/2026 DPHI Ref: SSD-33964533-PA-128	Closed
Non-compliance GRSF-03_NC-32	**B4 Access Route** All heavy 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; and (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 31/03/2026 Date notified to DPHI: 10/04/2026 DPHI Ref: SSD-33964533-PA-131	Closed
Non-compliance GRSF-03_NC-33		Self-reported non-compliance Date of event: 01/04/2026 Date notified to DPHI: 10/04/2026 DPHI Ref: SSD-33964533-PA-132	Closed
Non-compliance GRSF-03_NC-34		Self-reported non-compliance Date of event: 14/04/2026 Date notified to DPHI: 20/04/2026 DPHI Ref: SSD-33964533-PA-133	Closed
Non-compliance GRSF-03_NC-35		Self-reported non-compliance Date of event: 15/04/2026 Date notified to DPHI: 22/04/2026 DPHI Ref: SSD-33964533-PA-135	Closed
Non-compliance GRSF-03_NC-36		Self-reported non-compliance Date of event: 29/04/2026 Date notified to DPHI: 07/05/2026 DPHI Ref: SSD-33964533-PA-137	Closed
Non-compliance. GRSF-03_NC-37	**B16 Biodiversity Management Plan** Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.	**DPHI identified non-compliance** As per record the breach issued on 22 January 2026 following a DPHI site inspection on 5 November, with the breach record stating that: "The Department has recorded a breach against Schedule 2, Condition B16 for failing to undertake weed control, as identified during the 5 November site inspection. Please ensure weed management is undertaken in accordance the BMP".	Closed

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		The Auditor notes that at the time of the IEA #3 site inspection, weeds were being effectively managed, with evidence of herbicide use observed and evidence that a weed contractor had been engaged and had sprayed to majority of access roads and site boundaries. In respect to this DPHI identified non-compliance, the Auditor considers the matter as closed. **Recommendation** Nil	
Non-compliance. **GRSF-03_NC-38**	**B21 Dust** The Applicant must minimise the dust generated by the development.	**DPHI identified non-compliance** As per Penalty Notice dated 6 March 2026, the DPHI site inspection on 5 November identified a breach with CoA B21 due to failure to appropriately control dust. The non-compliance has been recorded within IEA #3 due to the enforcement outcome occurring in the audit period and considering that the non-compliance was not previously self-reported. The Auditor notes that at the time of the IEA #3 site inspection, dust was generally being effectively managed, with the exception of a single point source location as identified in audit finding GRSF-03_NC-38. In respect to this DPHI identified non-compliance, the Auditor considers the matter as closed. **Recommendation** Nil	Closed
Non-compliance. **GRSF-03_NC-39**	**B21 Dust** The Applicant must minimise the dust generated by the development.	Section 5 of DTIs Dust Action Management Plan (DAMP) sets out physical / engineering controls for stockpiles, including height limits of <2m, requirements to profile and compact batters and apply temporary covers such as soil binders, geofabric, hessian or hydromulch (where required). During the site inspection the Auditor observed an area which was being used to stockpile site won spoil, in preparation for screening to remove unsuitable rocks prior to being used as backfill. The stockpiles had been built over 2m high with no profiling or covers applied. Given the size and scale of the stockpiles, the Auditor considered them to present an air quality risk should a significant wind event occur. **Recommendation** It is understood that Lightsource bp and DTI are in the process of obtaining a planning modification to undertake screening of materials on Site, which will be followed by an Environmental Protection Licence (EPL) to undertake the activity. Given the uncertainty	Open

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Reference	Requirement Details	Finding Details	Status
		around the timeframes required to obtain these approvals before the screening activity can commence, the Auditor suggests that DTI should consider all feasible and reasonable methods to control dust emissions from the stockpile area.	
Opportunity for Improvement **GRSF-03_OFI-1**	**B33 Storage and Handling of Dangerous Goods** The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids 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.	During the site inspection the Auditor observed an instance where a diesel bulk above-ground storage tank (AST) utilised by a DTI subcontractor was leaking to the surrounding gravel hardstand. Upon further inspection there was approximately 3cm of liquid within the AST's secondary containment, indicating that the primary tank may be leaking. Additionally, in several instances surface staining was observed adjacent to diesel ASTs which were being used for refuelling within the DTI subcontractor area. Considering that the ASTs were located on a compacted pad, away from the Site boundary or any receiving ecosystems, the risk of material harm was considered by the Auditor to be low. **Recommendation** There is an opportunity for DTI to review subcontractor diesel management practices to ensure spills and leaks are appropriately managed to reduce environmental risk. The areas of local spills identified should be investigated and/or remediated via the removal of any impacted material, waste classification and offsite disposal, as required.	Open
Opportunity for Improvement **GRSF-03_OFI-2**	**B29 Operating Conditions** The Applicant must: (a) minimise any soil erosion and control sediment generation; (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 Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual and the Managing Urban Stormwater: Soils and construction - Volume 2A	Section 10.4 of the Enerven CEMP states that appropriate erosion and sedimentation controls should be installed and maintained in accordance with the Erosion and Sediment Control Plan developed in accordance with the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version. " During the site inspection the Auditor observed that the Erosion and Sediment Control Plan (ESCP) for the Enerven site had been developed for the bulk earthworks phase and was not reflective of current site conditions. Several controls were not being maintained in accordance with the ESCP, however given the erosion risk had significantly decreased since completion of the bulk earthworks phase, absence of controls was not considered to be a critical risk. **Recommendation** Enerven / Transgrid should update the ESCP to reflect current site activities and remove any redundant erosion and sediment controls.	Open

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Reference	Requirement Details	Finding Details	Status
	manual (Landcom, 2008), **or** their latest versions;		
Opportunity for Improvement **GRSF-03_OFI-3**	**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. This plan must: (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 (a) – (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 **(a)** The Applicant must implement the Soil and Water Management Plan	Section 10.4 of Enerven CEMP states that concrete washout facilities should be double-plastic lined. During the site inspection the Auditor observed Enerven undertaking concrete washout in dedicated trays, with concrete waste stockpiled on the adjacent ground. The concrete washout location was not developed in accordance with the Enerven CEMP. **Recommendation** Nil. Following the audit inspection Enerven undertook corrective actions including the construction of a dedicated concrete washout area on 28 May 2026, including a 0.3m high soil bund surrounding steel washout trays with double-lined black plastic and signage. Refer to Appendix D for photos.	Closed
Opportunity for Improvement **GRSF-03_OFI-4**	**B21 Dust** The Applicant must minimise the dust generated by the development.	DTI currently implements a dust monitoring plan, comprising the use of dust deposition gauges (DDG) in four (4) locations on the Site boundaries. The DDG allow for retrospective compliance assessment of dust loads against EPA criteria, however there was no real-time monitoring of dust being undertaken. **Recommendation** DTI also utilises SiteHive monitors for real-time noise monitoring. There is an opportunity to reutilise the SiteHive monitors for both noise and air quality, allowing for real-time monitoring of dust levels during construction. The Trigger Action Response Plan (TARP), attached to the DAMP included trigger actions in response to atmospheric conditions. Should the project utilise	Open

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Reference	Requirement Details	Finding Details	Status
		SiteHive for air quality monitoring, the TARP should be updated to include dust trigger levels based on real-time SiteHive data, whereby the project can respond to triggers immediately, with the aim of reducing offsite dust impacts.	
Opportunity for Improvement **GRSF-03_OFI-5**	**B34 Operating Conditions** For the solar and battery storage components of the development, the Applicant must: (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	During the site inspection the Auditor observed several instances where combustible fuel loads of timber and cardboard from packaging were stored in large stockpiles, potentially presenting a fire risk. It is understood that waste removal is limited by traffic movement constraints, and the project has utilised waste compactors to reduce the volume of timber and cardboard waste. However, waste appears to be accumulating on site awaiting disposal. **Recommendation** The project should seek to reduce volumes of stockpiled timber and cardboard before the bush fire risk season commences. Considering that heavy vehicle daily movement limits have recently been increased, there should be an increased ability to do so.	Open

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1 Introduction

1.1 Background

KPMG was engaged by Goulburn River Fund Pty Ltd (Lightsource bp) to undertake an Independent Environmental Audit (IEA) of the Goulburn River Solar Farm (GRSF) project. The IEA was undertaken in accordance with the *Independent Audit Post Approval Requirements 2020* (IAPAR 2020) as required by condition of approval (CoA) C15 of State Significant Development (SSD-33964533).

Construction of the project commenced on 14 April 2025, and a program of IEAs is being undertaken on a six-monthly basis in accordance with IAPAR 2020. At the time of this audit program, two (2) IEAs had already been completed, with the most recent (IEA #2) undertaken on 19 November 2025. Subsequently, this IEA (IEA #3) was therefore required to be delivered prior to the 19 May 2026. The audit period was defined as being from date from the previous IEA (19 November 2025) to the date of the IEA #3 site inspection (14 May 2026).

The purpose of the IEA was to assess compliance with the project's development consent (SSD-33964533) CoAs, and to evaluate the implementation and effectiveness of the project's environmental management plans, in line with the methodology set out in IAPAR 2020. The compliance assessment is inclusive of all construction activities undertaken during the audit period.

Any references to 'audit', 'independent', 'review' and / or 'verification' in this report have not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board. As such, no opinions or conclusions intended to convey assurance, or an audit opinion, have been expressed in this report.

The evidence used to test the compliance status with respect to each CoA has been documented in Appendix A with a summary of audit findings and recommendations provided in Section 4.13.

1.2 Project Details

The project received development consent as a State Significant Development (SSD-33964533) under the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) on 22 August 2024. There have been no planning modifications approved to date.

The project is located approximately 28 kilometres south-west of Merriwa, in NSW's Upper Hunter region, near to, but outside of the declared Central West Orana Renewable Energy Zones (CWO REZ). The project comprises the development of a 585-megawatt (MW) solar farm, including approximately 1 million solar photovoltaic (PV) panels and an integrated battery energy storage system (BESS), which will connect to an existing 500 MW transmission line. Upon completion, the project is expected to be the largest operational solar farm in Australia.

Lightsource bp has appointed two (2) Principal Contractors (PCs) to deliver the Project, with DT Infrastructure (DTI) as the head contractor responsible for civil and solar farm construction works, and Transgrid, which has appointed Enerven to be responsible for the design and construction of the substation and switching station components. Lightsource bp oversees the environmental

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performance and compliance of both of its PCs and generally acts as the principal point of contact for external stakeholder consultation.

1.3 Audit Team

In accordance with CoA C15 of the development consent and the IAPAR 2020, Independent Auditors must be suitably qualified, experienced and independent of the project, and endorsed by the Planning Secretary prior to each IEA. Details of the KPMG audit team for this audit are as follows:

Table 1.1: *Audit Team Details*

Name	Company Title	Audit Position	Certifications
Dylan Jones	KPMG Director	Lead Auditor	Exemplar Global Lead Environmental Auditor – Certificate No. C-464532 M. Environmental Engineering Management B. Environmental Science & Management Certified Environmental Practitioner (CEnvP) Infrastructure Sustainability Accredited Professional (ISAP)
Gary Selwyn	KPMG Partner	Alternate Lead Auditor and Technical Reviewer	EPA Victoria Appointed Environmental Auditor (Industrial Facilities) Principal Environmental Auditor – Institute of Sustainability and Environmental Professionals (ISEP) MSc. Environmental Science BSc (Hons) Biological Sciences
Manya Narain	KPMG Consultant	Audit Team Member / Assistant	B. Biomedical Engineering (Hons)

Endorsement of the Audit Team was provided by DPHI on 15 April 2026 (refer to the Planning Secretary Audit Team Endorsement presented in Appendix B).

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2 Audit Objectives and Scope

2.1 Audit Objectives

The objective of this audit was to satisfy SSD-33964533 CoA C15 by undertaking an independent assessment of environmental performance and compliance against the project's conditions of approval and environmental mitigation measures.

2.2 Audit Scope

The scope of the audit included undertaking an assessment of compliance against the Project's CoAs of SSD-33964533 Schedule 2, Parts A, B and C as they apply to the construction phase of the project throughout the audit period.

An overview of the audit scope undertaken by the KPMG audit team includes the following:

- Review the implementation of management plans, including:
  - Lightsource bp overarching plans:
    - Environmental Management Strategy, Rev 1, dated 19 December 2024;
    - Biodiversity Management Plan, Rev 1, dated 18 December 2024;
    - Traffic Management Plan, Rev 7, dated 1 May 2026; and
    - Heritage Management Plan, Final, dated March 2025.
  - DTI:
    - Construction Environmental Management Plan, Rev G, dated 18 May 2026;
    - Air Quality Management Sub Plan, Rev E dated 18 May 2026;
    - Noise and Vibration Management Sub Plan, Rev E, dated 18 May 2026;
    - Flora and fauna Management Sub Plan, Rev G, dated 18 May 2026;
    - Soil and Water Management Sub Plan, Rev D, dated 18 May 2026; and
    - Waste management Sub Plan, Rev F, dated 18 May 2026.
  - Transgrid / Enerven:
    - Construction Environmental Management Plan, Rev 0.4, dated 10 March 2026.
- Site inspection conducted on 14 May 2026:
  - A high-level assessment of the effectiveness of environmental management plans.
  - Assess general environmental performance.
  - Review of records.

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- Conduct audit interviews with Lightsource bp, DTI and Transgrid / Enerven personnel both in-person while on site and remotely via MS Team on Monday 18 May 2026.

2.3 Audit Period

This is the third IEA undertaken on the Project and was designed to cover all activities from the date of the previous IEA (IEA #2) site inspection to the date of the current IEA site inspection. The audit period was therefore defined as the period between **19 November 2025 to 14 May 2026**.

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3 Audit Methodology

3.1 Endorsement of the Audit Team

The KPMG Audit team included:

- Dylan Jones – Lead Auditor;
- Gary Selwyn - Alternate Lead Auditor / Technical Reviewer; and,
- Manya Narain – Assistant Auditor.

Endorsement of the Audit Team was provided by DPHI on 15 April 2026 (refer to the Planning Secretary Audit Team Endorsement presented in Appendix B).

3.2 Audit Process

The following sections describe the processes that comprised the IEA, with site inspection and initial personnel interview components completed on 14 May 2026, subsequent interviews conducted remotely on 18 May 2026, followed by additional document reviews, consultation and reporting. The IEA process was aligned with the principles of *ISO 19011:2018 Guidelines for Auditing Management Systems* and the IAPAR 2020 requirements.

3.2.1 Audit Preparation

A kick off meeting was held between KPMG, Lightsource bp, DTI and Transgrid / Enerven on 28 April February 2026, ahead of the audit. The kick off meeting was used to establish project objectives, confirm dates, timelines and methods of communication. Following the kick off meeting the Lead Auditor prepared an Audit Plan/Agenda and Request for Information documents, which were distributed to the Lightsource bp team in preparation for the IEA (refer to Appendix E for the Audit Agenda). Upon receipt of documents from Lightsource bp and via review of documents publicly available on the GRSF project website, document assessment (refer to Section 3.2.6) commenced in advance of the audit.

3.2.2 Consultation

In accordance with Section 3.2 of the IAPAR 2020 and at DPHI's request, consultation request emails were sent to DPHI and all relevant stakeholders as identified in the development consent, including;

- Upper Hunter Shire Council
- Mid-Western Regional Council
- Australian Government Department of Climate Change, Energy, the Environment and Water (DCCEEW)(Biodiversity)
- NSW DCCEEW Biodiversity (Formerly Biodiversity Conservation Division)
- NSW EPA

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- Transport for NSW
- NSW DCCEEW, Water Group
- National Resources Access Regulator (NRAR)
- NSW DCCEEW, Environment and Heritage (Heritage NSW)
- Fire and Rescue NSW
- NSW Rural Fire Service (RFS)
- National Parks and Wildlife Service (NPWS)

Stakeholder consultation is summarised in Table 3.1, with contact details included in Appendix C.

Table 3.1: ***Consultation summary***

<table>
<tr><th>Stakeholder</th><th>Stakeholder Response</th><th>KPMG Response</th></tr>
<tr><td>DPHI</td><td>Please consult the following agencies:
• 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
Please also refer to the Department's correspondence (dated 23 April 2026) regarding revisions to the previous audit report (November 2025), for consideration in this current audit. Please also provide a thorough description of the stage of construction/status of the development in all areas of the site on the date of the audit inspection.</td><td>The audit scope included consultation requests with the agencies identified by DPHI and DPHI feedback on IEA #2 was considered. The following construction status at the time of the audit is provided:
<table><tr><th>Stage</th><th>Civil</th><th>Electrical</th><th>Mechanical</th></tr><tr><td>1</td><td>complete</td><td>0%</td><td>80%</td></tr><tr><td>2</td><td>complete</td><td>70%</td><td>80%</td></tr><tr><td>3</td><td>60%</td><td>0%</td><td>5%</td></tr><tr><td>4</td><td>50%</td><td>0%</td><td>0%</td></tr><tr><td>5</td><td>70%</td><td>10%</td><td>60%</td></tr><tr><td>6</td><td>70%</td><td>10%</td><td>70%</td></tr><tr><td>7</td><td>80%</td><td>80%</td><td>90%</td></tr><tr><td>8</td><td>70%</td><td>0%</td><td>60%</td></tr></table>
Transgrid substation – installation of ancillary infrastructure.</td></tr>
<tr><td>Upper Hunter Shire Council</td><td>N/A - No response received</td><td>Not applicable</td></tr>
</table>

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Midwestern Regional Council	N/A - No response received	Not applicable
DCCEEW	N/A - No response received	Not applicable
CHPR	Thank you for your request for comment from the NSW Department of Climate Change Energy the Environment and Water (DCCEEW) to support an independent audit by your consultancy. We have no new issues to raise for this audit.	Not applicable
EPA	Thank you for your email below seeking any comments or matters from the EPA in relation to the Goulburn River Solar Farm IEA. There are no issues or matters we would like to raise as part of this audit process.	Not applicable
TfNSW	TfNSW suggests that the Independent Environmental Audit scope consider: • Compliance with Instrument of Consent transport-related conditions • Implementation and enforcement of shuttle bus arrangements • Management of construction traffic volumes during AM and PM peak periods. • Any pre-construction minor works mitigation measures and associated Planning Secretary approvals. • Implementation of the Traffic Impact Assessment (TIA) and Traffic Management Plans (TMPs). • Commitments made within the Environmental Impact Statement (EIS). • Assumptions underpinning the assessed traffic task within the TIA, including traffic distribution assumptions. • Effectiveness of mitigation measures detailed within the TMP. • Alignment between assessed and actual traffic volumes and vehicle characteristics. • Suitability of existing intersection treatments under cumulative background and project traffic. • Ongoing appropriateness of approved OSOM routes for the configurations being utilised. • Any incidents of non-compliance with mitigation measures, commitments or assessed traffic volumes, and measures implemented in response. • Audit report outcomes and recommended actions relevant to the State road network.	The Auditor considered the matters raised by TfNSW, some of which fall outside the scope of the IEA as they do not relate to requirements of the development consent. There were over 30 traffic-related non-compliances raised during the audit, primarily relating to vehicles tuning right at the Golden Highway / Ringwood Road intersection. Refer to Section 4.13 and CoAs B4 and B5 in Appendix A for details. During the site inspection the Auditor observed that the shuttle bus was being utilised. It is the Auditors opinion that actual traffic impacts may be greater than those anticipated in the EIS based to the need to increase from 55 to 85 daily heavy vehicle movements. However, the total daily vehicle movements of 130 that were anticipated in the EIS remains unchanged, and impacts are mitigated via implementation of the Traffic Management Plan (refer to Section 4.1 for further details). The road upgrade works required by Appendix 7 of the development consent had been completed pending minor defect rectification at the request of Council. In May 2026 DPHI approved an updated TMP that detailed updated requirements relating to high-risk vehicles requiring an escort.

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DCCEEW, Water Group	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:
	• 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 available 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.
	• 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.
		The Auditor considered the matters raised by DCCEEW Water, some of which fall outside the scope of the IEA as they do not relate to requirements of the development consent.
		Groundwater is permitted to be collected in accordance with the Statement of Approval 20WA221721, dated 9 February 2026, made under the Water Management Act 2000 for DT Infrastructure Pty Ltd.
		In accordance with the Statement of Approval, there are no metering or reporting requirements, however, a logbook is required to be maintained.
		There are no specific groundwater dependent ecosystem management plans required by the development consent, or any other approval. Section 6.2 of the DTI a Soil and Water Management Sub Plan (SWMP) states that non-potable water demand for construction is 11.3 ML/month, which is obtained via use of dam water, groundwater bores and grey water.
		Reuse of sediment basin water and temporary use of groundwater for construction purposes is exempt from requiring a Water Access Licence (WAL).
		Surface water is managed via erosion and sediment control plans.
		Total water take and usage is tracked via the DTI water tracking spreadsheet.

Heritage NSW	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. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed.	Compliance against heritage requirements is outlined against CoA B24, B25 and B26 in Appendix A. There were no non-compliances raised against these conditions during the audit period. The Auditor is not aware of any required updates to the AHIMS register during the audit period.

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Fire & Rescue NSW	N/A - No response received	Not applicable
NSW RFS	N/A - No response received	Not applicable

Separately to the above consultation emails, KPMG and DPHI held an online meeting on 19 May 2026 to discuss the DPHI compliance matters that occurred during the audit period.

3.2.3 Opening Meeting

An opening meeting was held on site on 14 May 2026 with representatives from Lightsource bp, DTI, Enerven and Transgrid site operations and management teams, as per the Audit Attendance Sheet (refer to Appendix F). During the opening meeting the Auditor outlined the objective and the process of the IEA. DTI and Transgrid / Enerven provided the Auditor with a summary of current site activities including an overview of planned construction program. Key matters such as any environmental incidents, non-compliances, environmental issues and risks and stakeholder interactions were discussed.

3.2.4 Site Inspection

A site inspection was undertaken on 14 May 2026 at GRSF site with representatives from Lightsource bp, DTI, Transgrid / Enerven site operations and management teams. The site inspection was used to understand the nature of the operations and the extent to which environmental controls were implemented and managed across the site. The Auditor was provided full access to all areas requested for inspection. Given the size and extent of the site additional time was allocated to the inspection, with most of the audit interviews conducted on the following Monday 18 May 2026

Refer to details of the site inspection in Section 4.9 and photographs provided in Appendix D.

3.2.5 Interviews

Interviews were held with key personnel from Lightsource bp, DTI, and Transgrid / Enerven. These interviews focused on the management of environmental aspects, and, where areas of concern may exist, what proposed means of risk control are undertaken and proposed to account for these concerns. Additionally, the interviews assisted the Auditor to understand the nature of the activities undertaken at the sites and to identify focus areas for the audit. Table 3.2 provides details of the personnel interviewed during the IEA.

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Table 3.2: ***Personnel Interviewed***

Name	Organisation	Position
Michelle Housego	Lightsource bp	Senior HSE Advisor
Andrew Sampaklis	Transgrid	Environmental Business Partner
Brendan Toohey	DTI	Environmental Manager
Mathew Cheshire	Enerven	Environmental Advisor
Rachael Hannah	Lightsource bp	Environmental Advisor
Phil Cameron	Lightsource bp	HSE Advisor
Samuel Magennis	Enerven	Environmental Advisor

3.2.6 Document Assessment

Documentation relevant to the audit scope was collected and assessed by the audit team as evidence of compliance with a CoA. This included, but was not limited to, management plans, site induction forms and presentations, monitoring and sampling records, correspondence with stakeholders, emergency response plans, plant and equipment maintenance registers and pre-approval documentation such as the Environmental Impact Statement (EIS).

Refer to Appendix H for a full list of documents reviewed as part of the IEA.

3.2.7 Closing Meeting

A closing meeting was held virtually at 4:00pm on 20 May 2026 over Microsoft Teams. During the closing meeting the Lead Auditor presented the preliminary audit findings, including any identified potential non-compliances and opportunities for improvement. Where identified, additional documentary evidence was requested by the Auditor following the closing meeting to enable further assessment of compliance.

Refer to Appendix F for close out meeting attendees.

3.3 Compliance Evaluation

Considering the evidence gathered during audit execution, the IEA assessed and tested the compliance status of each condition from the development consent (SSD-33964533) in the Audit Table, through application of the compliance descriptors detailed in *Table 2* of the IAPAR, as listed in *Table 3.3.*

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Table 3.3: ***Compliance descriptors from Table 2 of the IAPAR***

Status	Description
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-Compliant	The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.[1]
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

1 *This includes non-compliances that occurred at some point within the audit period and were subsequently rectified, self-reported, and closed prior to the date of the audit.*

Where appropriate, the Auditor also identified opportunities for improvement and provided recommendations for Lightsource bp's consideration, details of which are provided in Section 4.13 and Appendix A.

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4 Audit Findings

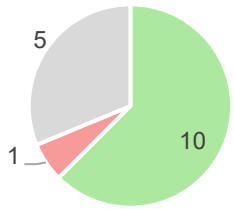
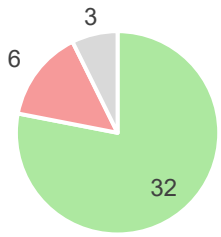
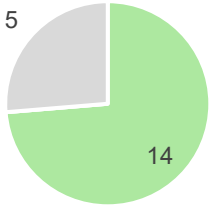
4.1 Approvals and Documents Audited

Refer to Appendix H for details of the primary documents assessed as part of the IEA.

4.2 Compliance Assessment Summary

The Project was audited against 76 Conditions of Approval (CoA), with non-compliances identified against seven (7) CoAs. An assessment of each CoA is provided in Appendix A and summarised in *Table 4.1*. Details of the non-compliances are provided in Section 4.13.

Table 4.1: ***Compliance assessment summary***

Part (total number of conditions)	Summary	
Schedule 2A- Administrative Conditions **(16)**	• Compliant - **10** • Non-Compliant - **1** • Not Triggered - **5**	
Schedule 2B – Environmental Conditions General **(41)**	• Compliant - **32** • Non-Compliant - **6** • Not Triggered - **3**	
Schedule 2C – Environmental Management, Reporting and Auditing **(19)**	• Compliant - **14** • Non-Compliant - **0** • Not Triggered - **5**	

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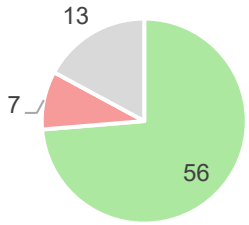
Part (total number of conditions)	Summary	
Total - **(76)**	• Compliant - **56** • Non-Compliant **- 7** • Not Triggered **- 13**	

4.3 Notices, Orders, Penalty Notices and Prosecutions

During the audit period there were 11 Notices to Furnish, seven (7) Show Cause, two (2) Warning Letters and two (2) Penalty Notices issued from DPHI to the GRSF project, including the Lightsource bp, DTI and Enerven or Transgrid entities. The Auditor reviewed these DPHI notices when determining the compliance status of the CoAs. If a DPHI investigation was in-progress at the time of the audit (14 May 2026), the compliance outcome, including the project's responses to the alleged breaches, will be considered in subsequent audits. A summary of the notices is provided in Table 4.1.

Table 4.2: ***Summary of DPHI Notices and Enforcement Actions***

Issue date	Type of notice	Description	DPHI reference	Status at time of IEA #3
12/11/2025	Notice to furnish	Dust management identified during DPHI site visit	INV-99220706	Closed - enforcement ENF-108114456
20/03/2026	Notice to furnish	Diesel Release incident 11/10/25	INV-100130708	Under DPHI assessment
20/03/2026	Notice to furnish	Whether rock crushing is in accordance with EIS	INV-99676473	Under DPHI assessment
27/03/2026	Notice to furnish	Stormwater discharge 3-5 Jan 2026	INV-108990214	Under DPHI assessment
26/03/2026	Notice to furnish	Whether disturbed area and internal roads are in accordance with EIS	INV-108963456	Lightsource bp to respond
26/03/2026	Notice to furnish	Whether disturbed area and internal roads are in accordance with EIS	INV-108963456	DTI to respond
26/03/2026	Notice to furnish	Wastewater discharge 20-22 Feb 2026	INV-111728238	Under DPHI assessment

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Issue date	Type of notice	Description	DPHI reference	Status at time of IEA #3
31/03/2026	Notice to furnish	Whether onsite volumetrics is in accordance with EIS	INV-99676476	Under DPHI assessment
31/03/2026	Notice to furnish	Whether onsite volumetrics is in accordance with EIS	INV-99676476	Under DPHI Assessment
16/04/2026	Notice to furnish	Wastewater overflow January 2026	INV-108993958	Under DPHI Assessment
8/05/2026	Notice to furnish	Diesel release at the Temporary Workers Accommodation	INV-100130708	Under DPHI Assessment
27/11/2025	Show cause	Show Cause issued to DTI Re. Dust Management	INV-99220706	Closed - enforcement ENF-108114456
04/03/2026	Show cause	Show Cause issued to DTI Re NC OOHW 25 May 25	INV-85959206	Closed - enforcementENF-111363239
13/03/2026	Show cause	Show Cause issued to DTI Re NC Clearing of NGZ (TWA)	INV-93501959	Under DPHI assessment
20/03/2026	Show cause	Show Cause issued to DTI re OOHW - 30/9/25 (Concrete pour Killoe Creek Culvert)	INV-100131956	Under DPHI assessment
29/04/2026	Show cause	Alleged two breaches: C3 - Staging C8 - Final Layout	INV-117219488	Lightsource bp to respond
29/04/2026	Show cause	Alleged three breaches (failure to submit prior to commence of construction) B39 - Camp MP B40 - AES C1 - EMS	INV-117195255	Lightsource bp to respond
11/05/2026	Show cause	Diesel Release BESS 10/3/26 - Alleged failure to implement SWMP	INV-115646738	DTI to respond
11/05/2026	Show cause	Diesel Release BESS 10/3/26 - Alleged failure to implement SWMP	INV-115646738	AEC to respond
20/11/2025	Warning Letter	Warning Letter to Lightsource bp (NC B1 (a), (i)) Re: exceedance of daily vehicle movement limits	ENF-99788963	Closed
06/03/2026	Warning Letter	Warning Letter to DTI (B26) Re: failure to implement unexpected finds protocol	ENF-107997961	Closed
06/03/2026	Penalty Notice	Penalty Notice issued to DTI ($15k) for failing to minimise dust on 5 November 2025, therefore	ENF-108114456	Closed

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Issue date	Type of notice	Description	DPHI reference	Status at time of IEA #3
		failing to comply with Schedule 2, Condition B21.		
26/03/2026	Penalty Notice	Penalty Notice ($15k) for a breach of Condition B17, relating to works undertaken outside the approved hours under the direction of DTI in May 2025. Incident reported in IEA#1	ENF-111363239	Closed

4.4 Incidents

There were seven (7) notifiable incidents during the audit period, as per the definition of an incident provided in the development consent

Details of the incidents are as follows:

- Incident 1 – concrete release offsite – 15 December 2025;
- Incident 2 – sediment laden water release – 5 January 2026;
- Incident 3 – wastewater overflow – 6 January 2026;
- Incident 4 – sediment laden water release – 22 February 2026;
- Incident 5 – diesel spill central laydown – 4 March 2026;
- Incident 6 – diesel spill (BESS) – 10 March 2026; and
- Incident 7 – disturbance outside of development boundary – 7 April 2026.

Except for Incident 1 (where DPHI referred matter to Upper Hunter Shire Council (UHSC) and took no further action) each of the above incidents resulted in DPHI submitting a Notice to Furnish, as outlined in Table 4.1. The compliance enforcement outcomes associated with the incidents were undetermined at the time of the audit.

4.5 Complaints

Lightsource bp maintains a Complaints Register on its project website. Review of the Complaints register identified that 44 complaints were received during the audit period, the majority of which were related to the condition of public roads and driver behaviour, except for five (5) complaints associated with dust and two (2) with water. No complaints were received in relation to noise or any other environmental topic.

4.6 Non-compliances

The IEA identified 39 non-compliances during the audit period, including 35 that were self-reported, two (2) that were identified by DPHI and two (2) that were raised by the Auditor.

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4.7 Previous Audit Findings

The previous audit report *Goulburn River Solar Farm, Assessment of Environmental System Compliance in accordance with SSD-33964533 Development Consent IEA #2, 20 May 2026*, identified 41 non-compliances, including 36 that were self-reported and five (5) that were raised as part of the audit. Two (2) opportunities for improvement were also raised in the previous audit report. Recommendations from the previous audit, and the status of close out actions are presented in *Table 4.2*, which excludes the self-reported non-compliances.

Table 4.3: *Previous audit findings*

Reference	Condition - Issue	Recommendation	Status as assessed during the audit
GRSF-02_NC-37	A3 - Compliance with development consent	No recommendations were provided in in IEA #2 in respect to the self-reported non-compliances.	All of the self-reported non-compliances had been reviewed by DPHI, with further information / actions required to address several of the non-compliances. **Open**
GRSF-02_NC-38	B7 – Road Upgrades were not completed within 6-months commencing construction.	No recommendations were provided in IEA #2.	Road upgrades have been confirmed as being completed by the revised deadline of 31 January 2026. Refer to Appendix A CoA B7 for further information. **Closed**
GRSF-02_NC-39	B16 - Failure to control weeds in accordance with recommendations provided in weed survey reports.	No recommendations were provided in IEA #2.	Goulburn River Solar, Weed Control Works Plan 2026, Rev 2, dated 5 May 2026 was updated to address the finding. LSPB and DTI were found to be implementing the 2026 Weed Control Works Plan. Evidence of weed suppression was observed during the audit. Refer to Appendix A CoA B16 for further information. **Closed**
GRSF-02_NC-40	B21 – Failure to minimise dust generation. Identified by the Auditor during IEA #2 and DPHI during an independent site inspection on 5 November 2025.	No recommendations were provided in IEA #2.	The project is implementing a range of dust mitigation measures. The status of the non-compliance raised in IEA #2 is **Closed**. Refer to Appendix A CoA B21 for details of non-compliances and opportunities for improvement raised during IEA #3.
GRSF-02_NC-41	B30 – During a site inspection DPHI found that spill kits were not available at the workers camp, and staff were not trained in response to the Soil and Water management Plan	No recommendations were provided in IEA #2.	Spill kits were found to be available at chemical storage locations at the workers camp. Evidence of erosion and sediment control training was provided. **Closed**

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GRSF-02_OFI-01	B39 - The Camp Management Plan had not been updated since construction commenced.	It was recommended that DTI review and update the Camp Management Plan	The Camp Management Plan was updated to Rev M on 3 March 2026. **Closed**
GRSF-02_OFI-02	C19 - The project complaints register lacked detail.	It was recommended to provide a more detailed complaints register on the website.	The Complaints Register was updated following IEA #2. **Closed**

4.8 Suitability of Environmental Management Plans

The Project is managed in accordance with the following management plans:

- Lightsource bp overarching plans:
  - Environmental Management Strategy, Rev 1, dated 19 December 2024;
  - Biodiversity Management Plan, Rev 1, dated 18 December 2024;
  - Traffic Management Plan, Rev 7, dated 1 May 2026; and
  - Heritage Management Plan, Final, dated March 2025.
- DTI
  - Construction Environmental Management Plan, Rev G, dated 18 May 2026;
  - Air Quality Management Sub Plan, Rev E dated 18 May 2026;
  - Noise and Vibration Management Sub Plan, Rev E, dated 18 May 2026;
  - Flora and fauna Management Sub Plan, Rev G, dated 18 May 2026;
  - Soil and Water Management Sub Plan, Rev D, dated 18 May 2026; and
  - Waste management Sub Plan, Rev F, dated 18 May 2026.
- Transgrid / Enerven
  - Construction Environmental Management Plan, Rev 0.4, dated 10 March 2026.

The Lightsource bp Environmental Management Strategy (EMS) is the overarching management plan for the Project, supported by topic-specific management plans and construction environmental management plans (CEMP) prepared by DTI and Transgrid / Enerven Principal Contractors (PCs). While not required by the development consent, Lightsource bp has implemented contractual obligations for its PCs to prepare their own environmental management documentation, including various obligations over and above those included in the development consent. Examples include the requirement to engage a Certified Professional in Erosion and Sediment Control (CPESC) to prepare erosion and sediment control plans (ESCPs) for the PC worksites. Lightsource bp is responsible for reviewing PC management plans to ensure that they appropriately reflect the overarching EMS requirements, the SSD CoAs (where applicable) and other project-specific obligations and commitments.

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The EMS, Traffic Management Plan (TMP), Heritage Management Plan (HMP) and Biodiversity Management Plan (BMP) have been approved by DPHI and, where required by the planning approval, prepared in consultation with relevant agencies.

As part of this audit, the Auditor reviewed the Lightsource bp EMS and PC CEMPs to assess their adequacy for the construction phase of works. When assessing the suitability of management plans, the Auditor undertook a high-level gap assessment of the EMS and CEMPs against the Department of Planning, Industry and Environment, *Post Approval Guidance, Environmental Management Plan Guideline* requirements (April 2020). The high-level assessment found that the EMS and CEMPs generally contained all the relevant requirements from the guideline including identification of requirements, targets, objectives and controls, roles and responsibilities, and commitments to continuous improvement (monitoring, reporting and corrective actions).

The Auditor tested implementation of the EMS and management plans via review of documentation, interviews and via the site inspection, with no major issues raised or non-compliances identified.

In general, the Auditor considers that the approach of having overarching Lightsource bp management plans, supported by PC prepared management plans that reference the development consent and include additional contractual obligations is an effective management system that appears to work well in practice. It is important that Lightsource bp maintains a high level of oversight of the implementation of the PC management plans to ensure that they are maintained and updated as required.

4.9 Audit Site Inspection

A site inspection was undertaken on Thursday 14 May 2026, starting at approximately 9am and ending at approximately 2:30 pm. Given the size and extent of the site additional time was allocated to the inspection, with most of the audit interviews conducted on the following Monday 18 May 2026.

At the time of the inspection weather conditions were mild, sunny and calm. The objective of the site inspection was to review the effectiveness of the environmental mitigation measures implemented at the site, assess areas where environmental incidents had previously occurred and to assess environmental performance generally.

The Lightsource bp Senior HSE Advisor, Environmental Advisor and HSE Advisor accompanied the Auditor during the site inspection, in addition to representatives from DTI and Transgrid / Enerven for their respective worksite locations. Areas and activities inspected included:

- DTI and Transgrid / Enerven site compounds;
- Internal access roads throughout the entire project;
- Solar farm – Stage 1, Stage 2, Stage 3, Stage 4, Stage 5 and Stage 6 – including drilling works for pole installation, detailed excavation for electrical components and bulk civil excavation for cut and fill in preparation of panel installation;
- Temporary Workers Accommodation (TWA) camp and water treatment plant;
- Transgrid / Enerven BESS pad and substation worksite;

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- Heritage and environmental no-go zones;
- Sediment basins and environmental controls; and
- Wollara Road / Ringwood Road.

All areas were made accessible to the Auditor upon request.

Five (5) audit findings were raised by the Auditor during the inspection:

- During the site inspection the Auditor observed an area which was being used to stockpile site won spoil, in preparation for screening to remove unsuitable rocks prior to being used as backfill. The stockpiles had been built over 2m high with no profiling or covers applied. Given the size and scale of the stockpiles, the Auditor considered them to present an air quality risk should a significant wind event occur. Refer to Section 4.13, finding **GRSF-03-NC-39** in relation to CoA B21 for further details (Photo 11).
- During the site inspection the Auditor observed an instance where a diesel bulk above-ground storage tank (AST) utilised by a DTI subcontractor was leaking to the surrounding gravel hardstand. Upon further inspection there was approximately 3cm of liquid within the AST's secondary containment, indicating that the primary tank may be leaking. Additionally, in several instances surface staining was observed adjacent to diesel ASTs which were being used for refuelling within the DTI subcontractor area. Refer to Section 4.13, **GRSF-03-OFI-1** in relation to CoA B33 for further details (Photos 17 and 18).
- During the site inspection the Auditor observed that the Erosion and Sediment Control Plan (ESCP) for the Enerven site had been developed for the bulk earthworks phase and was not reflective of current site conditions. Several controls were not being maintained in accordance with the ESCP, however given the erosion risk had significantly decreased since completion of the bulk earthworks phase, absence of controls was not considered to be a critical risk. Refer to Section 4.13, **GRSF-03-OFI-2** in relation to CoA B29 for further details.
- During the site inspection the Auditor observed Enerven undertaking concrete washout in dedicated trays, with concrete waste stockpiled on the adjacent ground. The concrete washout location was not developed in accordance with the Enerven CEMP which required a double-lined pit. Refer to Section 4.13, **GRSF-03-OFI-3** in relation to CoA B30 for further details (Photo 10).
- During the site inspection the Auditor observed several instances where combustible fuel loads of timber and cardboard from packaging were stored in large stockpiles, potentially presenting a fire risk. It is understood that waste removal is limited by traffic movement constraints, and the project has utilised waste compactors to reduce the volume of timber and cardboard waste. However, waste appears to be accumulating on site awaiting disposal. Refer to Section 4.13, **GRSF-03-OFI-5** in relation to CoA B34 for further details (Photo 21).

Additionally, the following observations were made:

- Completed road upgrades and maintenance works were observed along Ringwood Road / Wollara Road;

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- A gatekeeper controls vehicle movements entering and exiting the site, where vehicle details are collected for record keeping;
- Fixed and digital signage was present along Wollara Road and Ringwood Road notifying of the left turn requirements onto Golden Highway;
- Evidence of widespread application of polymer being applied to swale drains and cleared areas;
- Water carts were observed to be maintaining moisture on internal access roads and Wollara Road. No dust was observed as being generated from vehicles on any of the access roads inspected;
- Waste segregation with dedicated bins and sorted into separate piles;
- Sediment controls including sediment traps, rock checks and sediment fences were generally installed in accordance with approved plans;
- Active rehabilitation of previously disturbed surfaces was apparent at certain locations such as the 'farmers track';
- Generally, the site compounds were tidy, with good housekeeping noted.

Refer to Appendix D for additional photographs taken during the site inspection.

4.10 Actual versus Predicted Environmental Impacts

The Auditor has undertaken a qualitative assessment of the predicted impacts associated with the Project, as described within the following documentation, against the actual impacts observed during the audit process:

- Goulburn River Solar Farm, Environmental Impact Statement, Rev 2, dated 3 May 2023 (EIS);
- Goulburn River Solar Farm, Amendment Report, Rev 2, dated 12 December 2023.

Table E.1 and Chapter 6 of the EIS contained a summarised assessment of the predicted impacts of each environmental issue identified in the Secretary's Environmental Assessment Requirements (SEARs), issued on 1 February 2022. The EIS is supported by several technical assessments, included as appendices. The summarised assessments within the EIS were used by the Auditor as a comparison against actual impacts.

It is beyond the scope of this IEA to investigate each of the detailed studies and predictions undertaken as part of the EIS to make comparisons against actual measurements. As such, a qualitative assessment of key aspects has been undertaken, in respect to the current construction status of the project.

Biodiversity

The EIS predicted that the project would result in the loss of 699.63 ha of habitat listed under the NSW Biodiversity Conservation Act 2016 (BC Act) and 496.11 ha under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act). The Auditor is not aware of these estimates being exceeded. It is noted that biodiversity offset credits have been retired with no non-compliances identified. The project submits annual compliance reports as required by the EPBC approval. Review

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of the most recent EPBC annual compliance report did not identify any non-compliances associated with biodiversity impact, other than an administrative non-compliance raised in relation to errors with GIS shapefiles.

The Auditor noted that Lightsource bp has been able to reduce the actual disturbance of native vegetation via design refinements, reduction in the disturbance footprint and extension of no-go zones in the vicinity of Stage 4. Biodiversity is managed via implementation of the project BMP.

Heritage

An Aboriginal Cultural Heritage Assessment (ACHA) was undertaken as part of the EIS, including undertaking consultation with Aboriginal stakeholder organisations. Several artefacts were identified and salvaged prior to construction. During the previous audit period (IEA #2) the project identified an unexpected find consisting of an abandoned timber-lined well. The project continues to protect the heritage listed Slab Hut, including the provision of vibration monitoring during drilling and piling activities, with no damage being recorded to date.

Noise and Vibration

The EIS did not anticipate construction noise to exceed the Noise Management Limits (NMLs) at nearby residences. Traffic noise on Ringwood Road was anticipated to exceed NMLs, which warranted management via implementation of mitigation measures as per the TMP. The project has sought to extend standard construction hours to include Saturday and Sundays, which has been approved by DPHI subject to noise monitoring and exclusion of the use of Ringwood Road for construction vehicles during non-standard construction hours. No complaints have been received with respect to noise and vibration during the audit period.

Traffic and Transport

A Traffic Impact Assessment (TIA) was undertaken as part of the EIS that included traffic monitoring to understand the existing traffic conditions, and modelling of anticipated construction traffic impacts. On a daily basis, the EIS anticipated: 60 x 2-way Light Vehicle (LV) movements;15 x 2-way shuttle bus movements; and 55 x 2-way Heavy Vehicle (HV) movements per day.

The project has recently received approval to increase HV movements to 85 per day. It is understood that as part of the approval Lightsource bp consulted with UHSC and TFNSW who agreed to the increase.

There have been 33 self-reported non-compliances regarding traffic during the audit period, predominately against CoA B3 and B4 involving right turns at the Golden Highway / Ringwood Road intersection. These non-compliances do not necessarily relate to increased traffic impacts but are associated with potential safety risks.

It is the Auditor's opinion that the actual traffic impacts are greater than those anticipated in the EIS, evidenced by the recent approval to increase HV daily movements; however, the impacts can be appropriately mitigated via implementation of the TMP.

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Water

The EIS stated that non-potable water would be used for dust suppression during construction, plant establishment and site ablutions. The demand was expected to peak at 11.26 ML/month. Potable water was expected to be sourced from either rainwater or imported by water trucks. This is generally consistent with the water tracking spreadsheet being maintained by DTI. The DTI Soil and Water management Plan states that non-potable construction water demand is approximately 11.3 ML/month. The EIS also contemplated that surface water and runoff would be managed in accordance with ECP and CEMPs. There have been several surface water related incidents during the audit period (refer to Section 4.4); however, none are expected to have impacted any naturally occurring surface water bodies or resulted in pollution events as defined by Section 120 of the Protection of the Environment and Operations Act 1997 (POEO Act).

General

The Auditor noted that mitigation measures were generally being suitably implemented in accordance with approved management plans. The project boundaries are generally consistent with those presented in the EIS; however there have been minor encroachments of disturbance into no-go zones which were self-reported to DPHI as incidents. At the time of the audit, the Auditor understands that Lightsource bp will be submitting a planning modification with respect to widening internal access roads and to undertaking rock screening activities. DPHI will be responsible for determining the additional environmental impacts associated with these modifications and whether they are acceptable.

Based on the assessment of the environmental impacts identified in the EIS compared to actual impacts observed during the audit, the Auditor considers that current environmental impacts would likely be considered consistent with those anticipated within the EIS, with the exception of traffic volumes, which are considered to be greater than those anticipated in the EIS and are being managed in accordance with the approved TMP.

4.11 Previous Compliance Reporting Recommendations

Compliance reports are not a requirement of the SSD-33964533 planning approval.

4.12 Summary of Environmental Performance

Based on the evidence provided, the observations made and compliance findings of this audit, the following key initiatives and positive observations were noted:

- Waste compactors have been utilised across the project for different waste streams resulting in a significant reduction of waste volumes requiring offsite transport and disposal;
- Use of a dedicated septic truck to collect onsite waste for processing at the TWA water treatment plant, resulting in less waste transported offsite and the treated water being used for dust suppression;

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- Use of a biofeed processor at the TWA to reduce organic waste volumes requiring offsite transport and disposal;
- Recent engagement of a contractor to apply 'Dirt Glue', a specialised polymer designed for haul roads to reduce dust generation from vehicles;
- Evidence was provided to demonstrate multiple 'Red TARP' events, where weather conditions resulted in the DTI Environmental Manager instructing plant to stand down across the project to reduce dust generation;
- Polymer has been applied to over 20Ha of the project area in an effort to reduce dust generation;
- Use of external legal advisors to provide project-wide training and awareness in respect to the project's environmental compliance obligations, including individual responsibilities for staff;
- Daily 'Simultaneous Operations' (SIMOP) meetings are an effective method of forecasting and approving traffic forecasting to adhere to daily limits, evidenced by nil exceedances during the audit period;
- Principal Contractor environmental inspections have been undertaken at an appropriate frequency, either weekly or monthly including pre and post-rainfall events;
- Environmental controls were generally maintained to a good standard; and
- A high level of engagement across the Auditee organisations, evidenced by the attendees at the close out meeting (refer to Appendix F).

Acknowledging that there have been repeated non-compliances of CoA B4 in respect to traffic violations at the Golden Highway / Ringwood Road intersection, the project has implemented additional signage and reinforces the requirements at pre-start and toolbox meetings. Traffic compliance should remain a focus area for the project. Dust generation will also remain a focus area for the project, especially during the summer months.

There were several compliance matters that were either under assessment by DPHI, or were in the process of being responded to by Lightsource bp at the time of the audit. The Auditor will assess the outcomes of the compliance matters during subsequent IEAs.

The Auditor thanks the Lightsource bp, DTI and Transgrid / Enerven teams for their cooperation during the IEA process.

4.13 Audit Findings and Recommendations

Independent Audit findings were based on evidence collected during the audit process, which included:

- Relevant records, documents and reports (refer to Appendix A and Appendix H).
- Interviews of relevant site personnel (refer to Section 3.2.5 and Appendix A).
- Photographs (refer to Appendix D).

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- Figures and plans (refer to Appendix A and Appendix H).
- Site inspections of relevant locations, activities and processes (refer to Section 4.9).

The IEA identified 39 non-compliances during the audit period, including 35 that were self-reported, two (2) that were identified by DPHI and two (2) that were raised by the Auditor

A summary of Audit Findings is provided in *Table 4.3* below.

Table 4.4: *Summary of Audit Findings*

Reference	Requirement Details	Finding Details	Status
Non-compliance GRSF-03_NC-1	**A3 TERMS OF CONSENT** The development may only be carried out: (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	The Auditor considers that CoA A3 (a) has not been complied with, given the: • 35-self-reported NCs; • Two (2) DPHI identified NCs; and • One (1) NC identified during IEA #3. **Recommendations** Nil	Open
Non-compliance GRSF-03_NC-2	**B5 Access Route** 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.	Self-reported non-compliance Date of event: 18/11/2025 Date notified to DPHI: 25/11/2025 DPHI Ref: SSD-33964533-PA-75	Closed
Non-compliance GRSF-03_NC-3	**B4 Access Route** All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (c) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (d) must exit Ringwood Road by turning left on to the Golden	Self-reported non-compliance Date of event: 18/11/2025 Date notified to DPHI: 25/11/2025 DPHI Ref: SSD-33964533-PA-76	Closed
Non-compliance GRSF-03_NC-4		Self-reported non-compliance Date of event: 24/11/2025 Date notified to DPHI: 01/12/2025 DPHI Ref: SSD-33964533-PA-77	Closed

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Reference	Requirement Details	Finding Details	Status
	Highway only as shown in Figure 4 in Appendix 4.		
Non-compliance GRSF-03_NC-5	**B19 Variation of Construction Hours** 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: (f) considered on a case-by-case or activity-specific basis; (g) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; (h) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Councils (and other relevant agencies) has been or will be undertaken; (i) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and **(j)** accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009), or latest version.	Self-reported non-compliance Date of event: 25/11/2025 Date notified to DPHI: 03/12/2025 DPHI Ref: SSD-33964533-PA-78	Closed
Non-compliance GRSF-03_NC-6	**B19 Variation of Construction Hours** 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	Self-reported non-compliance Date of event: 29/11/2025 Date notified to DPHI: 08/12/2025 DPHI Ref: SSD-33964533-PA-82	Closed

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Reference	Requirement Details	Finding Details	Status
	alter the hours of construction must be: (f) considered on a case-by-case or activity-specific basis; (g) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; (h) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Councils (and other relevant agencies) has been or will be undertaken; (i) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and (j) accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009), or latest version. **B4 Access Route** All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (c) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (d) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.		

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Reference	Requirement Details	Finding Details	Status
Non-compliance GRSF-03_NC-7	**B4 Access Route** All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (d) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (e) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 02/12/2025 Date notified to DPHI: 09/12/2025 DPHI Ref: SSD-33964533-PA-86	Closed
Non-compliance GRSF-03_NC-8		Self-reported non-compliance Date of event: 03/12/2025 Date notified to DPHI: 09/12/2025 DPHI Ref: SSD-33964533-PA-87	Closed
Non-compliance GRSF-03_NC-9		Self-reported non-compliance Date of event: 08/12/2025 Date notified to DPHI: 15/12/2025 DPHI Ref: SSD-33964533-PA-89	Closed
Non-compliance GRSF-03_NC-10		Self-reported non-compliance Date of event: 11/12/2025 Date notified to DPHI: 16/12/2025 DPHI Ref: SSD-33964533-PA-91	Closed
Non-compliance GRSF-03_NC-11		Self-reported non-compliance Date of event: 12/12/2025 Date notified to DPHI: 18/12/2025 DPHI Ref: SSD-33964533-PA-92	Closed
Non-compliance GRSF-03_NC-12	**B4 Access Route** All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (f) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 18/12/2025 Date notified to DPHI: 22/12/2025 DPHI Ref: SSD-33964533-PA-93	Closed
Non-compliance GRSF-03_NC-13	**B3 Access Route** Unless otherwise agreed by the Planning Secretary, all heavy vehicles and heavy vehicles	Self-reported non-compliance Date of event: 21/01/2026 Date notified to DPHI: 29/01/2026	Closed

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Reference	Requirement Details	Finding Details	Status
	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.	DPHI Ref: SSD-33964533-PA-102	
Non-compliance GRSF-03_NC-14	**B4 Access Route** All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (c) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (d) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 22/01/2026 Date notified to DPHI: 29/01/2026 DPHI Ref: SSD-33964533-PA-103	Closed
Non-compliance GRSF-03_NC-15	**B4 Access Route** All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (c) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (d) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 23/01/2026 Date notified to DPHI: 30/01/2026 DPHI Ref: SSD-33964533-PA-104	Closed
Non-compliance GRSF-03_NC-16		Self-reported non-compliance Date of event: 26/01/2026 Date notified to DPHI: 02/02/2026 DPHI Ref: SSD-33964533-PA-105	Closed
Non-compliance GRSF-03_NC-17		Self-reported non-compliance Date of event: 29/01/2026 Date notified to DPHI: 6/02/2026 DPHI Ref: SSD-33964533-PA-106	Closed
Non-compliance GRSF-03_NC-18		Self-reported non-compliance Date of event: 04/02/2026 Date notified to DPHI: 12/02/2025 DPHI Ref: SSD-33964533-PA-107	Closed

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Reference	Requirement Details	Finding Details	Status
Non-compliance GRSF-03_NC-19		Self-reported non-compliance Date of event: 18/02/2026 Date notified to DPHI: 26/02/2026 DPHI Ref: SSD-33964533-PA-112	Closed
Non-compliance GRSF-03_NC-20		Self-reported non-compliance Date of event: 18/02/2026 Date notified to DPHI: 26/02/2026 DPHI Ref: SSD-33964533-PA-113	Closed
Non-compliance GRSF-03_NC-21		Self-reported non-compliance Date of event: 18/02/2026 Date notified to DPHI: 25/02/2026 DPHI Ref: SSD-33964533-PA-111	Closed
Non-compliance GRSF-03_NC-22		Self-reported non-compliance Date of event: 20/02/2026 Date notified to DPHI: 26/02/2026 DPHI Ref: SSD-33964533-PA-114	Closed
Non-compliance GRSF-03_NC-23		Self-reported non-compliance Date of event: 04/03/2026 Date notified to DPHI: 10/03/2026 DPHI Ref: SSD-33964533-PA-116	Closed
Non-compliance GRSF-03_NC-24	**B4 Access Route** All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (c) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (d) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 07/03/2026 Date notified to DPHI: 13/03/2026 DPHI Ref: SSD-33964533-PA-118	Closed
Non-compliance GRSF-03_NC-25		Self-reported non-compliance Date of event: 09/03/2026 Date notified to DPHI: 17/03/2026 DPHI Ref: SSD-33964533-PA-119	Closed
Non-compliance GRSF-03_NC-26		Self-reported non-compliance Date of event: 09/03/2026 Date notified to DPHI: 17/03/2026 DPHI Ref: SSD-33964533-PA-120	Closed
Non-compliance GRSF-03_NC-27		Self-reported non-compliance Date of event: 10/03/2026 Date notified to DPHI: 17/03/2026	Closed

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Reference	Requirement Details	Finding Details	Status
		DPHI Ref: SSD-33964533-PA-122	
Non-compliance GRSF-03_NC-28		Self-reported non-compliance Date of event: 10/03/2026 Date notified to DPHI: 17/03/2026 DPHI Ref: SSD-33964533-PA-121	Closed
Non-compliance GRSF-03_NC-29		Self-reported non-compliance Date of event: 17/03/2026 Date notified to DPHI: 25/03/2026 DPHI Ref: SSD-33964533-PA-124	Closed
Non-compliance GRSF-03_NC-30		Self-reported non-compliance Date of event: 19/03/2026 Date notified to DPHI: 26/03/2026 DPHI Ref: SSD-33964533-PA-126	Closed
Non-compliance GRSF-03_NC-31		Self-reported non-compliance Date of event: 23/03/2026 Date notified to DPHI: 31/03/2026 DPHI Ref: SSD-33964533-PA-128	Closed
Non-compliance GRSF-03_NC-32	**B4 Access Route** All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (c) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (d) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Self-reported non-compliance Date of event: 31/03/2026 Date notified to DPHI: 10/04/2026 DPHI Ref: SSD-33964533-PA-131	Closed
Non-compliance GRSF-03_NC-33		Self-reported non-compliance Date of event: 01/04/2026 Date notified to DPHI: 10/04/2026 DPHI Ref: SSD-33964533-PA-132	Closed
Non-compliance GRSF-03_NC-34		Self-reported non-compliance Date of event: 14/04/2026 Date notified to DPHI: 20/04/2026 DPHI Ref: SSD-33964533-PA-133	Closed
Non-compliance GRSF-03_NC-35		Self-reported non-compliance Date of event: 15/04/2026 Date notified to DPHI: 22/04/2026 DPHI Ref: SSD-33964533-PA-135	Closed

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Reference	Requirement Details	Finding Details	Status
Non-compliance **GRSF-03_NC-36**		Self-reported non-compliance Date of event: 29/04/2026 Date notified to DPHI: 07/05/2026 DPHI Ref: SSD-33964533-PA-137	Closed
Non-compliance. **GRSF-03_NC-37**	**B16 Biodiversity Management Plan** Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.	**DPHI identified non-compliance** As per record the breach issued on 22 January 2026 following a DPHI site inspection on 5 November, with the breach record stating that: "The Department has recorded a breach against Schedule 2, Condition B16 for failing to undertake weed control, as identified during the 5 November site inspection. Please ensure weed management is undertaken in accordance the BMP". The Auditor notes that at the time of the IEA #3 site inspection, weeds were being effectively managed, with evidence of herbicide use observed and evidence that a weed contractor had been engaged and had sprayed to majority of access roads and site boundaries. In respect to this DPHI identified non-compliance, the Auditor considers the matter as closed. **Recommendation** Nil	Closed
Non-compliance. **GRSF-03_NC-38**	**B21 Dust** The Applicant must minimise the dust generated by the development.	**DPHI identified non-compliance** As per Penalty Notice dated 6 March 2026, the DPHI site inspection on 5 November identified a breach with CoA B21 due to failure to appropriately control dust. The non-compliance has been recorded within IEA #3 due to the enforcement outcome occurring in the audit period and considering that the non-compliance was not previously self-reported. The Auditor notes that at the time of the IEA #3 site inspection, dust was generally being effectively managed, with the exception of a single point source location as identified in audit finding GRSF-03_NC-38. In respect to this DPHI identified non-compliance, the Auditor considers the matter as closed. **Recommendation** Nil	Closed
Non-compliance. **GRSF-03_NC-39**	**B21 Dust** The Applicant must minimise the dust generated by the development.	Section 5 of DTIs Dust Action Management Plan (DAMP) sets out physical / engineering controls for stockpiles, including height limits of <2m, requirements to profile and compact batters and apply temporary covers such as soil binders, geofabric, hessian or hydromulch (where required).	Open

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Reference	Requirement Details	Finding Details	Status
		During the site inspection the Auditor observed an area which was being used to stockpile site won spoil, in preparation for screening to remove unsuitable rocks prior to being used as backfill. The stockpiles had been built over 2m high with no profiling or covers applied. Given the size and scale of the stockpiles, the Auditor considered them to present an air quality risk should a significant wind event occur. **Recommendation** It is understood that Lightsource bp and DTI are in the process of obtaining a planning modification to undertake screening of materials on Site, which will be followed by an Environmental Protection Licence (EPL) to undertake the activity. Given the uncertainty around the timeframes required to obtain these approvals before the screening activity can commence, the Auditor suggests that DTI should consider all feasible and reasonable methods to control dust emissions from the stockpile area.	
Opportunity for Improvement **GRSF-03_OFI-1**	**B33 Storage and Handling of Dangerous Goods** The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (c) the requirements of all relevant Australian Standards; and (d) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids 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.	During the site inspection the Auditor observed an instance where a diesel bulk above-ground storage tank (AST) utilised by a DTI subcontractor was leaking to the surrounding gravel hardstand. Upon further inspection there was approximately 3cm of liquid within the AST's secondary containment, indicating that the primary tank may be leaking. Additionally, in several instances surface staining was observed adjacent to diesel ASTs which were being used for refuelling within the DTI subcontractor area. Considering that the ASTs were located on a compacted pad, away from the Site boundary or any receiving ecosystems, the risk of material harm was considered by the Auditor to be low. **Recommendation** There is an opportunity for DTI to review subcontractor diesel management practices to ensure spills and leaks are appropriately managed to reduce environmental risk. The areas of local spills identified should be investigated and/or remediated via the removal of any impacted material, waste classification and offsite disposal, as required.	Open
Opportunity for Improvement **GRSF-03_OFI-2**	**B29 Operating Conditions** The Applicant must: (c) minimise any soil erosion and control sediment generation; (d) ensure that construction,	Section 10.4 of the Enerven CEMP states that appropriate erosion and sedimentation controls should be installed and maintained in accordance with the Erosion and Sediment Control Plan developed in accordance with the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version. "	Open

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Reference	Requirement Details	Finding Details	Status
	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 Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual and the Managing Urban Stormwater: Soils and construction - Volume 2A manual (Landcom, 2008), **or** their latest versions;	During the site inspection the Auditor observed that the Erosion and Sediment Control Plan (ESCP) for the Enerven site had been developed for the bulk earthworks phase and was not reflective of current site conditions. Several controls were not being maintained in accordance with the ESCP, however given the erosion risk had significantly decreased since completion of the bulk earthworks phase, absence of controls was not considered to be a critical risk. **Recommendation** Enerven / Transgrid should update the ESCP to reflect current site activities and remove any redundant erosion and sediment controls.	
Opportunity for Improvement **GRSF-03_OFI-3**	**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. This plan must: (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 **(b)** The Applicant must implement the Soil and Water Management Plan	Section 10.4 of Enerven CEMP states that concrete washout facilities should be double-plastic lined. During the site inspection the Auditor observed Enerven undertaking concrete washout in dedicated trays, with concrete waste stockpiled on the adjacent ground. The concrete washout location was not developed in accordance with the Enerven CEMP. **Recommendation** Nil. Following the audit inspection Enerven undertook corrective actions including the construction of a dedicated concrete washout area on 28 May 2026, including a 0.3m high soil bund surrounding steel washout trays with double-lined black plastic and signage. Refer to Appendix D for photos.	Closed

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Reference	Requirement Details	Finding Details	Status
Opportunity for Improvement **GRSF-03_OFI-4**	**B21 Dust** The Applicant must minimise the dust generated by the development.	DTI currently implements a dust monitoring plan, comprising the use of dust deposition gauges (DDG) in four (4) locations on the Site boundaries. The DDG allow for retrospective compliance assessment of dust loads against EPA criteria, however there was no real-time monitoring of dust being undertaken. **Recommendation** DTI also utilises SiteHive monitors for real-time noise monitoring. There is an opportunity to reutilise the SiteHive monitors for both noise and air quality, allowing for real-time monitoring of dust levels during construction. The Trigger Action Response Plan (TARP), attached to the DAMP included trigger actions in response to atmospheric conditions. Should the project utilise SiteHive for air quality monitoring, the TARP should be updated to include dust trigger levels based on real-time SiteHive data, whereby the project can respond to triggers immediately, with the aim of reducing offsite dust impacts.	Open
Opportunity for Improvement **GRSF-03_OFI-5**	**B34 Operating Conditions** For the solar and battery storage components of the development, the Applicant must: (b) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	During the site inspection the Auditor observed several instances where combustible fuel loads of timber and cardboard from packaging were stored in large stockpiles, potentially presenting a fire risk. It is understood that waste removal is limited by traffic movement constraints, and the project has utilised waste compactors to reduce the volume of timber and cardboard waste. However, waste appears to be accumulating on site awaiting disposal. **Recommendation** The project should seek to reduce volumes of stockpiled timber and cardboard before the bush fire risk season commences. Considering that heavy vehicle daily movement limits have recently been increased, there should be an increased ability to do so.	Open

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Appendix A – Audit Compliance Table

Appendix A – Audit Compliance Table

Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 2, Part A: Administrative Conditions				
A1	**NETWORK CONNECTION WORKS** 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: (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.	Previously assessed as Compliant in IEA Report #2. No changes during the audit period.		Compliant
A2	**OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT** 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.	Based on the evidence reviewed, including the implementation of environmental mitigation measures identified during the site inspection, and the monitoring, evaluation and reporting being undertaken by the Project, the Auditor considers that reasonable and feasible measures are being implemented.		Compliant
A3	**TERMS OF CONSENT** The development may only be carried out: (i) in compliance with the conditions of this consent; (j) in accordance with all written directions of the Planning Secretary. (k) generally in accordance with the EIS; and (l) generally in accordance with the Development Layout in Appendix 1	The Auditor notes the following: a) There have been 39 breaches to the conditions of consent during the audit period, as detailed in this audit report. b) The proponent, and its PCs have responded to several written directions from the Secretary. c) The activities observed during the audit generally appeared to be in accordance with the EIS; and d) The development layout was unable to be determined by the Auditor given that only 250,000 of 1,000,000 solar PV panels had been installed, however based on plans and imagery provided the development layout was generally in accordance with Appendix 1, subject to detailed design	**Non-compliance** **GRSF-03_NC-01** 39 non-compliances have been identified during the audit period: NC ID / CoA GRSF-03_NC-01 / A3 GRSF-03_NC-02 / B5 GRSF-03_NC-03 / B4 (a) GRSF-03_NC-04 / B4 (a) GRSF-03_NC-05 / B19	**Non-compliant**

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations		Compliance Status
		changes.	GRSF-03_NC-06	B19	
			GRSF-03_NC-07	B4 (a)	
			GRSF-03_NC-08	B4 (a)	
			GRSF-03_NC-09	B4 (a)	
			GRSF-03_NC-10	B4 (b)	
			GRSF-03_NC-11	B4 (a)	
			GRSF-03_NC-12	B4 (a)	
			GRSF-03_NC-13	B4 (a)	
			GRSF-03_NC-14	B3	
			GRSF-03_NC-15	B4 (a)	
			GRSF-03_NC-16	B16	
			GRSF-03_NC-17	B4 (a)	
			GRSF-03_NC-18	B4 (a)	
			GRSF-03_NC-19	B4 (a)	
			GRSF-03_NC-20	B4 (a)	
			GRSF-03_NC-21	B4 (a)	
			GRSF-03_NC-22	B4 (a)	
			GRSF-03_NC-23	B4 (a)	
			GRSF-03_NC-24	B4 (b)	
			GRSF-03_NC-25	B4 (a)	
			GRSF-03_NC-26	B4 (b)	
			GRSF-03_NC-27	B4 (b)	
			GRSF-03_NC-28	B4 (b)	
			GRSF-03_NC-29	B4 (b)	

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			GRSF-03_NC-30 B4 (a) GRSF-03_NC-31 B4 (b) GRSF-03_NC-32 B4 (b) GRSF-03_NC-33 B4 (b) GRSF-03_NC-34 B4 (b) GRSF-03_NC-34 B4 (b) GRSF-03_NC-35 B4 (b) GRSF-03_NC-36 B4 (b) GRSF-03_NC-37 B16 GRSF-03_NC-38 B21 GRSF-03_NC-39 B21 Details of each non-compliance are provided against their respective CoA in Appendix A and in Section 4.13.	
A4	The Applicant must comply with any requirements of the Planning Secretary arising from the Department's assessment of: (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.	Evidence sighted: • Correspondence from DPHI to Lightsource bp, dated 23 April 2026. Re. Goulburn River Solar Farm (SSD-33964533) - Construction IEA January 2026. Ref: SSD-33964533-PA-101. DPHI requested that several amendments be made to IEA #2 report to satisfy the IAPAR 2020. The Auditor understands that at the time of drafting this audit report Lightsource bp was in the process of revising IEA #2. During the audit period the transport Management Plan (TMP) was updated to include an alternate OSOM route. DPHI requested that UHSC was consulted with as part of the updated TMP.		Compliant

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
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 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.	Not applicable. There are no known instances of inconsistency, ambiguity or conflict between the documents listed in CoA A3.		Compliant
A6	**BATTERY STORAGE RESTRICTION** Unless the Planning Secretary agrees otherwise, the centralised battery storage associated with the development must not exceed a total energy storage capacity of 900MWh.	Construction of the BESS has not commenced and is subject to a Modification request that will be submitted to DPHI for approval.		Not Triggered
A7	Unless the Planning Secretary agrees otherwise, a single decentralised battery storage system location must:. (a) not exceed 30 MWh of energy storage in collocated batteries; and (b) be separated by 25 metres from another decentralised battery storage system location The total energy storage stored in all decentralised battery storage system location must not exceed 1,160 MWh *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*	Construction of the BESS has not commenced and is subject to a Modification request that will be submitted to DPHI for approval.		Not Triggered
A8	**UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE** The Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved Development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Planning Secretary incorporating the proposed upgrades	Lightsource bp has not been required to upgrade or replace any solar panels to date.		Not Triggered
A9	**STRUCTURAL ADEQUACY** 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.	Evidence sighted: • Construction Certificate No. 512/2024-07, dated 11 February 2026.		Compliant

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	Notes: *• Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development.* *• Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.*	The Construction Certificate was provided for 'Goulburn River Solar Farm Stage 7 - Installation of Foundations associated with the Power Conversion Stations (PCS), Operations & Management (O&M) Transformer & Generator, Met Stations, Lighting Poles, Closed Circuit Television (CCTV) and Network Control Units (NCU). It is understood that additional Construction Certificates will be provided as construction progresses.		
A10	**DEMOLITION** 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.	Demolition works occurred during the IEA #1 audit period. Previously assessed as Compliant in IEA Report #2. No demolition occurred during the audit period.		Compliant
A11	**PROTECTION OF PUBLIC INFRASTUCTURE** Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. *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.*	DTI has removed and/or relocated Telstra cables that were associated with the Wollara Road pavement upgrades and widening works that are captured under CoA B7. Accordingly, CoA A11 has not been triggered.		Not Triggered
A12	**OPERATION OF PLANT AND EQUIPMENT** All plant and equipment used on site, or in connection with the development, must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. .	Evidence sighted: • DTI Employee / Subcontractor Profile and Competency for GRSF, completed 26 February 2026 • Photocopies of employee industry tickets / qualifications for employee from 'Straight Up Cranes and Rigging'. • DTI and Enerven – daily pre-start plant checks.		Compliant
A13	**APPLICABILITY OF GUIDELINES** References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols,	The Auditor was not made aware of any instances where DPHI has requested that updated guidelines, protocols,		Not Triggered

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	Standards or policies in the form they are in as at the date of this consent. 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 management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	standards or policies be adopted for ongoing monitoring and management obligations.		
A14	**COMPLIANCE** 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.	Evidence sighted: • Legal Briefing presentation slides titled: 'Environmental Compliance at Goulburn River Solar Farm, prepared by Minter Ellision. • Legal briefing attendance record, dated 4 September 2025. • Email correspondence from DTI to project stakeholders (Lightsource bp, sub-contractors) including the Legal Briefing presentation slides, dated 9 April 2016. • Enerven Site Visitor Form (as signed by the Auditor on 14 May 2026). Legal Briefing, prepared by Minter Ellision, clearly identified the legal compliance requirements of the project, including obligations under the EP&A Act 1979 (including the development consent), the POEO Act 1997 and the CLM Act 1997. It instructed employees of their obligations and provided advice on how to prevent environmental harm and maintain compliance. The Enerven Site Visitor form included a specific section on driver code of conduct, including the requirement for all drivers to only turn left when accessing or leaving the Golden Highway / Wollara Road.		Compliant
A15	**EVIDENCE OF CONSULTATION** Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval;	Evidence sighted: CoA B10 – Traffic Management Plan • Email correspondence from TfNSW to Lightsource bp, dated 13 February 2026. Goulburn River Solar Farm		Compliant

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	and (b) provide details of the consultation undertaken including: 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.	High Risk OSOM TMP. • Email correspondence from TfNSW to Lightsource bp, dated 2 April 2026. Re, Confirmation UHSC have no objections: SSD-33964533 Goulburn River solar farm: Consultation on Traffic Management Plan (B10) Goulburn River Solar Farm High Risk OSOM TMP. • Email correspondence from MWRC to Lightsource bp, dated 27 March 2026. Re. SSD-33964533 Goulburn River solar farm: Consultation on update to Traffic Management Plan (B10). • Email correspondence from UHSC to Lightsource bp, dated 2 April 2026. Re. SSD-33964533 Goulburn River solar farm: Consultation on update to Traffic Management Plan (B10). Both Councils (MWRC and UHSC) did not raise any objections to proposed OSOM routes. TfNSW confirmed on 2 April 2026 that all comments were closed. Evidence of stakeholder consultation was attached to the Accommodation and Employment Strategy required by CoA B40 and the Emergency Plan required by CoA B35; however, there was no other consultation undertaken during the audit period.		
A16	**COMMUNITY ENHANCEMENT** Prior to commencing construction, unless the Planning Secretary agrees otherwise, the Applicant must enter into a VPA with Mid-Western Regional Council in accordance with: (a) Division 7.1 of Part 7 of the EP&A Act; and (b) The terms of the correspondence dated 7 December 2023, which are summarised in Appendix 4.	Previously assessed as Compliant in IEA Report #2. No changes during the audit period. Community benefits committee to be established under the VPA. To be further assessed during IEA #4.		Compliant
Schedule 2, Part B: Environmental Conditions - General				
B1	**TRANSPORT** **Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions** The Applicant must ensure that the: (a)	Evidence sighted; CoA B1 (a) • Excel spreadsheet titled "HV_movements_rev02"		Compliant

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	i. development does not generate more than: ii. 55 heavy vehicle movements a day (a maximum of 15 vehicle movements per hour) during construction, upgrading, or decommissioning; iii. 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.	The spreadsheet contained a log of daily HV movements from 20 November 2025 to 9 May 2026. The data was also presented graphically and confirmed that there had been no exceedances of the daily limit of 55 HV movements during the audit period. The process of tracking HV movements is tracked by the logistics manager who tracks scheduling. Further consultation with sub-contractors 1 week out to confirm forecasts. Daily discussions of traffic movements at Sim Ops meeting that lock in numbers the day ahead which is communicated to security who track vehicles and escalate when vehicle numbers reach 40 and then 50. Evidence sighted • Daily pre-start meeting, dated 18 May 2026. • Refer to second pre-start from folder. • DPHI approval of TMP increased 85 HV movements and a total HV and LV of 130 daily movements. CoA B1 (b) • Correspondence from Lightsource bp to DPHI, dated 15 December 2025. Re. Goulburn River Solar Farm (SSD-33964533): Request for temporary increase to vehicle length under Condition B1(b). Lightsource bp requested that DPHI approve up to 38 two-way HV movements of up to 26.5 metres in length over a 12-month period. The request included evidence on consultation with UHSC and TfNSW, who supported the request. The request also included a swept path analysis. • Correspondence from DPHI to Lightsource bp, dated 22 December 2025. Re. Goulburn River Solar Farm – Request to temporarily increase length of heavy vehicles. Ref: SSD-33964533-PA-88. DPHI approved the request to increase HV length until 21 December 2026.		

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
B2	The Applicant must keep accurate records of the number of heavy vehicles requiring escort and heavy vehicles entering or leaving the site each day for the duration of the project.	Evidence sighted; • Excel spreadsheet titled "HV_movements_rev02" The spreadsheet contained a log of daily HV movements from 20 November 2025 to 9 May 2026. The Auditor tested the process of capturing and recording vehicle movements on the project. It was identified that traffic and vehicle movements were recorded manually by security team at the main gate. The data is then digitally converted by the DTI safety team which is stored centrally.		Compliant
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.	Evidence sighted: • Correspondence from Lightsource bp to DPHI, dated 15 April 2025. Re. Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval under Condition B3 (Access Route). • Correspondence from DPHI to Lightsource bp dated, 30 April 2026. Re. Goulburn River Solar Farm – Request to vary Condition B3 (access route). Ref: SSD-33694533-PA-83. The correspondence detailed DPHI's approval of alternate access routes for construction vehicles where vehicles can arrive to Site from the west and OSOM deliveries will have their access routes approved by the National Heavy Vehicle Register (NHVR).	**Self-reported non-compliance** **GRSF-03_NC-13** Lightsource bp self-reported a non-compliance against CoA B3 on 29 January 2026. The Auditor understands that DPHI recorded the breach with no further action.	**Non- compliant**
B4	All heavy vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (e) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and (f) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Evidence of mitigation measures: • driver code of conduct must be signed by all • Electronic signage displayed on Wollara Road / Ringwood Road; • Toolbox talks and pre-starts; • Evidence of logistics team meeting with suppliers to discuss traffic requirements; • There have been instances where sub-contractors have been offboarded from the project due to repeat	**Self-reported non-compliance** • **GRSF-03_NC-3** • **GRSF-03_NC-3** • **GRSF-03_NC-4** • **GRSF-03_NC-6** • **GRSF-03_NC-7** • **GRSF-03_NC-8**	**Non- compliant**

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		occurrences of not adhering to the TMP. Evidence sighted: • Email from FTI to Lightsource bp dated 5 December confirming subcontractors have been offboarded due to failure to adhere to TMP. • Toolbox talk – Traffic Management delivered on 6 December including TMP requirements. • 2 x pre-starts that all include TMP requirements. There were multiple instances where construction traffic did not adhere to left-in, left-out requirements at the Golden Highway / Ringwood Road intersections, resulting in 33 self-reported non-compliances against CoA B4.	• **GRSF-03_NC-9** • **GRSF-03_NC-10** • **GRSF-03_NC-11** • **GRSF-03_NC-12** • **GRSF-03_NC-14** • **GRSF-03_NC-15** • **GRSF-03_NC-16** • **GRSF-03_NC-17** • **GRSF-03_NC-18** • **GRSF-03_NC-19** • **GRSF-03_NC-20** • **GRSF-03_NC-21** • **GRSF-03_NC-22** • **GRSF-03_NC-23** • **GRSF-03_NC-24** • **GRSF-03_NC-25** • **GRSF-03_NC-26** • **GRSF-03_NC-27** • **GRSF-03_NC-28** • **GRSF-03_NC-29** • **GRSF-03_NC-30** • **GRSF-03_NC-31** • **GRSF-03_NC-32** • **GRSF-03_NC-33**	

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			• **GRSF-03_NC-34** • **GRSF-03_NC-35** • **GRSF-03_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.	Lightsource bp self-reported a non-compliance against CoA B5 on 25 November 2025. The Auditor understands that DPHI recorded the breach with no further action.	**Self-reported non-compliance** • **GRSF-03_NC-2** Lightsource bp self-reported a non-compliance against CoA B5 on 25 November 2025. The Auditor understands that DPHI recorded the breach with no further action.	**Non- compliant**
B6	**Site Access** 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. *Note: Other site access points may be used for emergency purposes.*	Evidence sighted: • Site inspection observations Site inspection observations confirmed that the only access point was in accordance with Appendix 1 of the development consent. Emergency access points were identified during the site inspection, which were evidently not being used for construction purposes.		Compliant.
B7	**Road Upgrades** Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must complete the road upgrades detailed in Appendix 4. Unless the relevant road authority agrees otherwise, these upgrades must comply with the current Austroads Guidelines, Australian Standards (as amended by TfNSW supplements), and be carried out to the satisfaction of the relevant roads authority.	Evidence sighted: • Correspondence from Lightsource bp to DPHI, dated 17 December 2025. Re. Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval to extend completion. Lightsource bp noted that DPHI had previously approved a 6-month extension to complete road upgrade works, ending on 28 November 2025. Lightsource bp sought an additional extension to 31 January 2026 due to delays in TfNSW issuing practical completion. • Correspondence from DPHI to Lightsource bp, dated 19 December 2025. Re. Goulburn River Solar Farm - Extension Request for Timing of Road Upgrades. Ref: SSD-33964533-PA-72.		Compliant

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		DPHI approved the extension to complete road upgrades until 31 January 2026; however, it was noted that the previous 6-month extension to complete road upgrades ended on 14 October 2025 (6-months from when DPHI consider the commencement of construction), prior to the approval of the second extension request. Accordingly, Lightsource bp were non-compliant between 14 October 2026 when the original request ended and the 19 December 2025 when the second request was approved. The Auditor reviewed correspondence between DPHI and Lightsource bp, dated 5 May 2026, regarding DPHI feedback on IEA #2. This correspondence confirmed that the non-compliance would be included in a revised IEA #2 audit report as it occurred during that audit period. Accordingly, the non-compliance has not been recorded within his audit report. • Correspondence from UHSC to Lightsource bp, dated 20 May 2026. Re. Goulburn River Solar Farm. The correspondence from UHSC states that the UHSC confirms that Lightsource bp has successfully completed road upgrades as per SSD-33964566, Condition B7 and Appendix 4, noting that the upgrades were substantially completed prior to 30 January 2026 and there is a list of minor defects being worked through.		
B8	**Road Maintenance** The Applicant must, in consultation with the relevant roads authority: (a) undertake an independent dilapidation survey and report to assess the: i. existing condition of Ringwood Road and Wollara Road on the transport route, prior to construction, upgrading or decommissioning works; and ii. or decommissioning works; (b) on completion of the dilapidation reports undertaken in B8(a)(i) and (ii) provide a copy to the relevant road authority; (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	Evidence sighted: • Site inspection observation confirmed several areas on Wollara Road that had been subject to recent maintenance / upgrade works. The following road maintenance works have been undertaken by DTI, which do not relate to the road upgrades required by CoA B7. • 1.2km section, BOTH lanes, Wollara Rd, north of the Binks Rd intersections (pavement rehabilitation & re-seal) – Jul/Aug 2025 • 1km section, BOTH lanes, Ringwood Rd, north of the NEW Bow River culvert, towards Flight Springs Rd		Compliant

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	or decommissioning works 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.	(pavement rehabilitation & re-seal) – Nov/Dec 2025 • Approx. 3,500m^2, heavy patches & re-seal, along Ringwood & Wollara Roads, outside of areas listed under Items 1 & 2 above – Nov/Dec 2025. • 7.5km section, full width, Wollara Road, south of Hulks Road – Project engaged UHSC to undertake major re-trim of unsealed gravel surface – Dec 2025. • 7.5km section, full width, Wollara Road, south of Hulks Road – Project engaged UHSC to undertake minor re-trim of unsealed gravel surface – Jan/Feb 2026 • Approx. 3,800m^2, preventative re-seal along Ringwood & Wollara Roads, outside of areas listed under Items 1, 2 & 3 above – PENDING late May 2026. • 7.5km section, full width, Wollara Road, south of Hulks Road – Project is awaiting UHSC to undertake minor re-trim of unsealed gravel surface – PENDING May/Jun 2026		

B9	**Operating Conditions**
	The Applicant must ensure:
	(a) the internal roads are constructed as all-weather roads;
	(b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site;
	(c) the capacity of the existing roadside drainage network is not reduced;
	(d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and
	(e) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the public road network.
		Evidence sighted:
		• DTI internal email correspondence, dated 10 May 2026. Re. Internal Audit – All weather access roads.
		The email included pavement specifications for internal roads. The specification included a map of internal access roads that were defined as either Main Road / Type 1 or Secondary Road Type 2. Pavement details were included for Type 1 and Type 2 roads.
		• Site inspection observations confirmed:
		  • There were some internal access roads that were in the process of being developed as all-weather roads.
		  • No mud tracking leaving the site onto Wollara Road.
		  • Sufficient onsite parking with no vehicles parked outside of the project.
				Compliant

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		• All vehicles were leaving site in a forward direction. • Vehicle wash bay to clean vehicles at front of site and DTI sub-contractors have their own vehicle wash down bays.		
B10	**Traffic Management Plan** Prior to commencing road upgrades identified in condition B7, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Upper Hunter Shire Council and Mid-Western Regional Council, and to the satisfaction of the Planning Secretary. This plan must include: (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, including: (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: 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	Evidence sighted: • Goulburn River Solar Farm, Traffic Management Plan, Rev 07, dated 1 May 2026. • Correspondence from DPHI to Lightsource bp, dated 6 May 2026. Re. Goulburn River Solar Farm – Traffic Management Plan. Ref: SSD-33964533-PA-123 (DPHI approval letter of TMP). • Driver Code of Conduct forms part of the TMP. Evidence of implementation: • Interviews with DTI and Enerven regarding daily SIMOP meeting to discuss vehicle movements to ensure vehicle movement limits are not exceeded. • Evidence of contractor onboarding including enforcement of the Driver Code of Conduct. • Visitor inductions include TMP and Driver Code of Conduct requirements. • Cameras installed on the Ringwood Road / Golden Highway intersection. • Electronic signboards used on Wollara Road.		Compliant

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	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; 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 scheduling of heavy vehicle movements to minimise convoy length or platoons, and to minimise conflict with light vehicles; 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;			

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	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; 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: 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 the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan. Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.			
B11	**LANDSCAPING** **Vegetation Buffer** 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: (a) be planted prior to commencing operation;	Evidence sighted: • Figure 6-11 of Draft Landscape Plan, developed by Landscape Architect Envisage, showing proposed planting specifications as per Appendix 5 of the development consent.		Compliant

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	(b) be comprised of species that are endemic to the area; (c) be designed and maintained in accordance with RFS's Planning for Bushfire Protection 2019 (or equivalent); and (d) be properly maintained with appropriate weed management; Unless the Planning Secretary agrees otherwise.	There are three (3) locations on Wollara Road that require landscaping as per the EIS. No planting has been undertaken to date.		
B12	**Land Management** Unless the Planning Secretary agrees otherwise, the Applicant must maintain the agricultural land capability of the site, including: (a) establishing the ground cover of the site within 3 months following completion of any construction or upgrading; (b) maintain ground cover at a minimum of 70% to prevent soil erosion; and (c) properly maintaining the ground cover with appropriate perennial species and weed management.	Evidence sighted: • GIS mapping indicating that >70% ground cover remains. Note – while not explicitly stated as such, the Auditor has assumed that CoA B12 relates to operations only.		Not triggered
B13	**BIODIVERSITY** **Vegetation Clearance** The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	Evidence sighted: • Correspondence from Lightsource bp to DPHI, dated 7 April 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification. • Correspondence from Lightsource bp to DPHI, dated 11 May 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Investigation Report No Go Zone Encroachment: MC-60 (access track to Stage 4. On 7 April 2026 Lightsource bp notified DPHI of an incident in accordance with CoA C11, involving the disturbance of native vegetation outside the approved Development Footprint at MC-60 internal access road. The disturbance was noted as being identified by Lightsource bp by way of an internal review of Stage 4 works; however the incident was raised following a Notice to Furnish (Ref: INV-108963456) received from DPHI on 26 March 2026 . The reason for the disturbance was noted as being due to discrepancies between Lightsource bp and DTI's GIS data. The incident report identified a potential non-compliance with CoA B13 and CoA B16b (i). The Auditor has reviewed the circumstances and has determined that native		Compliant

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		vegetation was cleared outside of the approved disturbance areas, constituting a non-compliance against CoA B13; however, because the event was notified as an Incident, it does not meet the definition of 'non-compliance' provided within the development consent, which states "An occurrence, set of circumstances or development that is a breach of this consent but is not an incident." Accordingly, the Auditor has not raised a non-compliance against CoA B13. Additionally, the Auditor notes that Lightsource bp and DTI were required to respond to the Notice to Furnish by 18 May 2026, which is outside of the audit period. The outcome of any compliance action taken in response to the Notice to Furnish will be included in IEA #4.		
B14	**Biodiversity Offsets** 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 NSW Biodiversity Offsets Scheme and can be achieved by: (a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016 (b) making payments into an offset fund that has been developed by the NSW Government; or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. ***Table 1: Ecosystem Credit Requirements*** *Vegetation Community* | *PCT ID* | *Credits Required* | *Timing* *Solar Farm Site* *Grey Box x White Box grassy open woodland on basalt hills in the Merriwa region, upper Hunter Valley* | *483* | *4618* | *Prior to commencing construction*	Previously assessed as compliant in IEA #2. No changes during the audit period.		Compliant

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	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***			
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.	Previously assessed as compliant in IEA #2. No changes during the audit period.		Compliant
B16	**Biodiversity Management Plan** 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: (a) be prepared in accordance with the revised Biodiversity Development Assessment Reports dated 11 January 2024 and 18 January 2024 provided in the Amendment Report; (b) include a description of the measures and timeframes that would be implemented for: i. protecting vegetation and fauna habitat outside the	Evidence sighted: • Goulburn River Solar Farm, Biodiversity Management Plan, Rev 2, dated March 2026. • Post Approval Form_20260402024044 – Evidence of submission of updated BMP to DPHI. • Goulburn River Solar Farm, Microbat Management Protocol, dated 30 January 2026. • Fauna Spotters Australia, Protocol for the Exclusion of Large Fauna Species.	**DPHI identified non-compliance** • **GRSF-03_NC-37** As per the record the breach issued on 22 January 2026. following a DPHI site inspection on 5 November, with the breach record stating that: "The Department has recorded a breach against Schedule 2, Condition B16 for failing to	**Non-compliant**

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	approved disturbance areas; ii. managing and enhancing the remnant vegetation and fauna habitat on site; iii. minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; iv. minimising the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna; v. minimising the impacts to fauna on site and implementing fauna management protocols. vi. maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and vii. controlling weeds feral pests and pathogens in consideration of the relevant Commonwealth threat abatement plans; and viii. minimising impacts on entities at risk of a serious and irreversible impact (SAII), including: - 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; - undertaking a research program regarding the impacts of the development on the vegetation integrity of the Box Gum Woodland DNG retained onsite; and - providing $25,000 per annum (over the first 5 years following commencement of construction) towards Regent Honeyeater conservation programs in consultation with the BCS; (c) include a program to monitor and report on the effectiveness of mitigation measures	• Goulburn River Solar, Weed Control Works Plan 2026, revision 2, dated 5 May 2026. • Weed spay map, dated 13 May 2026. The weed spray map showed areas where herbicide has been used across the project. It was apparent that haul roads and site boundaries had been the focus of the herbicide use. • Fauna Spotters Australia, Bat Roost Fly-out, Survey of Historical Well. The bat roost fly out surveys were undertaken by Ecologists between the 3 and 5 March 2026, The Auditor confirmed that the BMP was being effectively implemented. During the audit period, DPHI recorded a non-compliance against CoA B16.	undertake weed control, as identified during the 5 November site inspection. Please ensure weed management is undertaken in accordance the BMP. The Auditor notes that at the time of the IEA #3 site inspection, weeds were being effectively managed, with evidence of herbicide use observed and evidence that a weed contractor had been engaged and had sprayed to majority of access roads and site boundaries. In respect to this DPHI identified non-compliance, the Auditor considers the matter as closed. **Recommendation** • Nil	

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	(d) 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; and (e) include details of who would be responsible for monitoring, reviewing and implementing the plan. Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.			
B17	**AMENITY** **Construction, Upgrading and Decommissioning Hours** Unless the Planning Secretary agrees otherwise, The Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities (excluding blasting) may only be undertaken between: (a) 7 am to 6 pm Monday to Friday; (b) 8 am to 1pm Saturdays; and (c) At no time on Sundays and NSW public holidays;	Evidence sighted: • Correspondence from DPHI to LSP, dated 12 September 2025. Re. Goulburn River Solar – Out of Hours Request. Ref: SSD-33964533-PA-36. DPHI approved the request for extended construction hours (including 7am-6pm seven (7) days a week) until 13 March 2026. There were 10 conditions of approval, including that HV movements were limited to standard construction hours and that noise monitoring was required to be undertaken. • Correspondence from Lightsource bp to UHSC, dated 17 December 2025. Re. Three (3) month review of out of hours. • Correspondence from DPHI to Lightsource bp , dated 21 November 2025. Re: Goulburn River Solar Farm – Out of Hours Request and Variation to Access Route for Concrete Pour. Ref: SSD-33964533-PA-67. DPHI approval for two (2) concrete pours, starting at 2am. • Correspondence from Lightsource bp to DPHI, dated 9 December 2025. Re. Request for Planning Secretary approval for out of hours works under development consent Condition B19 (for works on 10/11 December). The request sought to vary the previously approved OOH request to undertake two (2) concrete pours, starting at 2am. • DPHI Penalty Notice, dated 26 March 2026 Re. Penalty Notice – Breach of Section 4.2 of the Environmental Planning and Assessment Act 1979.		Compliant

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		On 26 March 2026 DPHI issued DTI with a penalty Notice relating to undertaking road construction activities outside of standard construction hours. The unapproved construction works occurred on 25 May 2025 and the non-compliance was self-reported in IEA #1. Accordingly, the Auditor has not raised the non-compliance in IEA #3.		
B18	**Exceptions to Construction Hours** The following activities may be carried outside the hours specified in condition B17 above: (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 public authorities for safety reasons; or (c) emergency work to avoid the loss of life, property or prevent material harm to the environment	There have been no activities listed against CoA B18 undertaken outside of standard construction hours to date.		Not triggered.
B19	**Variation of Construction Hours** 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: (k) considered on a case-by-case or activity-specific basis; (l) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; (m) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Councils (and other relevant agencies) has been or will be undertaken; (n) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and (o) accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009), or latest version.	Evidence sighted: • Correspondence from DPHI to LSP, dated 12 September 2025. Re. Goulburn River Solar – Out of Hours Request. Ref: SSD-33964533-PA-36. DPHI approved the request for extended construction hours (including 7am-6pm seven (7) days a week) until 13 March 2026. There were 10 conditions of approval, including that HV movements were limited to standard construction hours and that noise monitoring was required to be undertaken. • Correspondence from Lightsource bp to UHSC, dated 17 December 2025. Re. Three (3) month review of out of hours. • Correspondence from DPHI to Lightsource bp, dated 21 November 2025. Re: Goulburn River Solar Farm – Out of Hours Request and Variation to Access Route for Concrete Pour. Ref: SSD-33964533-PA-67. DPHI approval for two (2) concrete pours, starting at 2am. • Correspondence from Lightsource bp to DPHI, dated 9 December 2025. Re. Request for Planning Secretary	**Self-reported non-compliance** • **GRSF-03_NC-5** • **GRSF-03_NC-6** Lightsource bp self-reported a non-compliance against CoA B19 on 3 December 2025 and another on 8 December 2025. The Auditor understands that DPHI recorded the breaches with no further action\ taken	**Non-compliant**

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		approval for out of hours works under development consent Condition B19 (for works on 10/11 December). The request sought to vary the previously approved OOH request to undertake two (2) concrete pours, starting at 2am. Lightsource bp identified two (2) non-compliances against CoA B19 during the audit period.		
B20	**Noise** The Applicant must: (a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009) or its latest version; (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 NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence	Evidence sighted: • Attended Verification Noise Monitoring report, dated 25 September 2025. Unattended and attended noise monitoring is undertaken on Wollara Road as required by OOH approvals. • Goulburn River Solar farm, Vibration Monitoring Report, dated 4 February 2026. Vibration monitoring was undertaken for heritage listed structures (the original slab hut) during nearby hydraulic drilling works. The report found that minimum working distances were adhered to and there were no exceedances of nominated criteria. The Auditor is not aware on any noise and vibration complaints or incidents during the audit period.		Compliant
B21	**Dust** The Applicant must minimise the dust generated by the development.	Evidence sighted: • DTI – Dust Management Action Plan. • DTI – Goulburn River Solar Farm – Dust Monitoring Plan. The Dust Management Action Plan (DAMP) sets out a Trigger Action Response Plan (TARP) with categories for Business as usual (green), Level 1 Low Risk (yellow), Level 2 Moderate Risk (amber) and Level 3 High Risk (red). Each category contains thresholds and required actions. The Dust Monitoring Plan sets out location of dust deposition gauges. Evidence of implantation of the DAMP and TARP:	**DPHI identified non-compliance** • **GRSF-03_NC-38** As per Penalty Notice dated 6 March 2026, the DPHI site inspection on 5 November identified a breach with CoA B21 due to failure to appropriately control dust. The non-compliance has been recorded within IEA #3 due to the enforcement outcome occurring in the audit period and considering that the non-	**Non-compliant**

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		• In response to red tarp events on 22, 21, 17, 10, 11, 12 April 2026 the DTI enviro team stood down plant on Site. • Dust deposition gauges (DDGs) are used on site boundaries to measure dust deposition against EPA guidelines. • DTI have applied over 20Ha of soil binder to reduce dust emissions. • Several water carts were observed on site during the inspection. • The Auditor sighted email correspondence with Kuranya (contractor), dated April 2026. Re. planning to onboard a new polymer Dirt Glue product to apply polymer to access routes. The Auditor considers that the project is generally mitigating dust as far as reasonably practicable; however, a non-compliance has been raised in relation to stockpile management and there is an opportunity for improvement in relation to use of real time dust monitoring.	compliance was not previously self-reported. The Auditor notes that at the time of the IEA #3 site inspection, dust was generally being effectively managed, with the exception of a single point source location as identified in audit finding GRSF-03_NC-38. In respect to this DPHI identified non-compliance, the Auditor considers the matter as closed. **Recommendation** • Nil **Non-compliance** • **GRSF-03_NC-39** Section 5 of DTI's Dust Action Management Plan (DAMP) sets out physical / engineering controls for stockpiles, including height limits of <2m, requirements to profile and compact batters and apply temporary covers such as soil binders, geofabric, hessian or hydromulch (where required). During the site inspection the Auditor observed an area which was being used to stockpile site won spoil, in preparation for screening to remove unsuitable rocks prior to being used as backfill. The stockpiles had been built over 2m high with no profiling or covers applied. Given the size and scale of the stockpiles, the Auditor	

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			considered them to present an air quality risk should a significant wind event occur. **Recommendation** It is understood that Lightsource bp and DTI are in the process of obtaining a planning modification to undertake screening of materials on Site, which will be followed by an Environmental Protection Licence (EPL) to undertake the activity. Given the uncertainty around the timeframes required to obtain these approvals before the screening activity can commence, the Auditor suggests that DTI should consider all feasible and reasonable methods to control dust emissions from the stockpile area. **Opportunity for Improvement** • **GRSF-03_OFI-4** DTI currently implements a dust monitoring plan, comprising the use of dust deposition gauges (DDG) in four (4) locations on the Site boundaries. The DDG allow for retrospective compliance assessment of dust loads against EPA criteria, however there was no real-time monitoring of dust being undertaken. **Recommendation**	

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			DTI also utilises SiteHive monitors for real time noise monitoring. There is an opportunity to reutilise the SiteHive monitors for both noise and air quality, allowing for real time monitoring of dust levels during construction. The Trigger Action Response Plan (TARP), attached to the DAMP included trigger actions in response to atmospheric conditions. Should the project utilise SiteHive for air quality monitoring, the TARP should be updated to include dust trigger levels based on real time SiteHive data, whereby the project can respond to triggers immediately, with the aim of reducing offsite dust impacts.	
B22	**Visual** The Applicant must: (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	No advertising signs or logos were identified during the site inspection. No risk in relation to visual amenity were identified. There is potential for glare to be generated from solar panels; however, in the absence of sensitive receivers this is not considered to present a risk.		Compliant
B23	**Lighting** The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: i. is installed as low intensity lighting	Evidence sighted: • Eagles Engineers, Goulburn River Solar farm Detailed Design, Electrical Basis of Preparation Report. • Email correspondence from Eagles Engineers to DTI, dated 13 May 2026. Re. IEA Audit Query.		Compliant

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	(except where required for safety or emergency purposes); ii. does not shine above the horizontal iii. complies with the good lighting design principles outlined in the Dark Sky Planning Guideline (2023); and iv. complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.	The email correspondence confirmed that because there were no residences within proximity to the development, the project met the requirements of AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting as there were no visual impacts being caused. The Auditor reviewed the principles of the Dark Sky Planning Guidelines (2023) against the electrical design basis of preparation report and generally considered that the principals had been achieved.		
B24	**HERITAGE** **Protection of Heritage Items** The Applicant must ensure the development does not cause any direct or indirect impacts on heritage items located outside the approved development footprint.	Evidence sighted: • Goulburn River Solar farm, Vibration Monitoring Report, dated 4 February 2026. Vibration monitoring was undertaken for heritage listed structures (the original slab hut) during nearby hydraulic drilling works. The report found that minimum working distances were adhered to and there were no exceedances of nominated criteria.		Compliant
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.	The Auditor inspected the original slab hut as per Figure 11 and Appendix 6 of the development consent, and confirmed that a 20m buffer zone had been adhered to.		Compliant
B26	**Heritage Management Plan** 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: (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 i. protecting the heritage items identified in Table 1 of Appendix 6, and items located outside the approved development footprint;	Evidence sighted: • Goulburn River Solar farm, Heritage Management Plan, Rev 2, dated March 2026. • Post-approval Form_20260325231108 for HMP Rev 2. The HMP was prepared in consultation with local Aboriginal stakeholders and was reviewed by Heritage NSW. Rev 2 of the HMP was submitted to DPHI on 25 March 2026. • Briefing Note, dated 21 November 2025. Re. Goulburn River Solar Farm – Unexpected Find #1 – Preliminary Assessment. The unexpected find related to the identification of a partially collapsed square timber lined well within an open paddock.		Compliant

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	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: - heritage items outside the approved development footprint are damaged; - previously unidentified heritage items are found; or - skeletal material is discovered; 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	• Goulburn River Solar Farm Site Induction, including references to HMP requirements.		

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	(c) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.			
B27	**SOIL AND WATER** **Water Supply** 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. *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.*	Evidence sighted: • DTI water tracking spreadsheet. • Statement of Approval #20WA221721, dated 9 February 2026. Made under the Water Management Act 2000 for DT Infrastructure Pty Ltd. Water is sourced via several sources, including: • Potable water is sourced via Merriwa Council, Russells contractor, CRE contractor, Gulgong Water or A One contractor, which is stored onsite in tanks. • Grey water is collected onsite from the temporary workers camp water treatment plant and used for dust suppression on haul roads. • Rainwater is captured for onsite in tanks and dams for reuse. • Groundwater taken from an onsite standpipe. Groundwater is permitted to be collected in accordance with the Statement of Approval which allows for four (4) groundwater bores to be utilised. No meter or reporting is required, however a logbook is required to be maintained.		Compliant
B28	**Water Pollution** The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	The Auditor is not aware of any pollution events as defined by S120 of the POEO Act. There were five (5) notifiable incidents during the audit period which related to sediment laden water releases from site and diesel spills; however, they did not result in water pollution.		Compliant
B29	**Operating Conditions** The Applicant must: (e) minimise any soil erosion and control sediment generation;	Evidence sighted: • DTI Goulburn River Solar Farm, Progressive Erosion and Sediment Control Plans (PESCP) for Stage 1, Stage	**Opportunity for Improvement** • **GRSF-03_OFI-2**	Compliant

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	(f) 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 Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual and the Managing Urban Stormwater: Soils and construction - Volume 2A manual (Landcom, 2008), or their latest versions; (g) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to reduce impacts on localised flooding and groundwater at the site; (h) ensure the solar panels do not cause any increased water being diverted off the site or alter hydrology of site; (i) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; (j) ensure all works within waterfront land is undertaken in accordance with Guidelines for Controlled Activities on Waterfront Land (DPE, 2022), unless the Planning Secretary agrees otherwise; and (k) ensure the design of all creek crossings (including internal tracks and MV cables) is in accordance with the document Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (NSW Fisheries 2003) and the Policy and Guidelines for Fish Habitat Conservation and Management (Update 2013).	2, Stage 3, Stage 4, Stage 8, Stage 4 Spoil Area and Established Sand Storage Pad. • Temporary Controls foe Area Below Crushing Plant – Stage 3. • DTI Soil and Water Management Sub Plan, Rev D, dated 18 March 2026. • DTI GRSF Post-Rainfall Inspection 260106. • DTI GRSF Post-Rainfall Inspection 260224. • DTI GRSF Post-Rainfall Inspection 251129. • DTI GRSF Post-Rainfall Inspection 260218. • DTI GRSF Post-Rainfall Inspection 260307. • DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 260503. • DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 260510. • DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 251206. • DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 251219. • DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 260215. • DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 260426.\ • Enerven Construction Environmental Management Plan, Goulburn River Solar Farm 500kV Connection – Substation scope. • Enerven Goulburn River Solar farm – Transgrid Substation – progressive ESCP No. 2 • Enerven Site Environmental Checklist 07022026	Section 10.4 of the Enerven CEMP states that appropriate erosion and sedimentation controls should be installed and maintained in accordance with the Erosion and Sediment Control Plan developed in accordance with the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version " During the site inspection the Auditor observed that the Erosion and Sediment Control Plan (ESCP) for the Enerven site had been developed for the bulk earthworks phase and was not reflective of current site conditions. There were several controls that were not maintained in accordance with the ESCP, however given the erosion risk had significantly decreased since completion of the bulk earthworks phase, absence of controls was not critical. **Recommendation** Enerven / Transgrid should update the ESCP to reflect current site activities and remove any redundant erosion and sediment controls.	

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		• Enerven Site Environmental Checklist 24042026 • Enerven Pre-rainfall Inspection 26032026 All PESCPs are prepared by a Certified Practitioner Erosion and Sediment Control (CPESC) who routinely undertakes site visits. DTI and Enerven undertake routine inspection of Erosion and Sediment (ERSED) controls via weekly, pre and pos-rainfall inspections. DTI have prepared their own Soil and Water Management Plan (SWMP) in accordance with the approved Lightsource bp SWMP. There are no dedicated creek crossing as the onsite creeks are not considered		
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. This plan must: (i) be prepared by suitably qualified and experienced persons; (j) include a description of the measures that would be implemented to ensure that the objectives of condition B29 (a) – (g) above are achieved; (k) include a program to monitor and report on the effectiveness of these measures; and (l) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions The Applicant must implement the Soil and Water Management Plan	Evidence sighted: • Goulburn River Solar Farm, Soil and Water Management Plan, Rev 4, dated 9 December 2025. • Correspondence from DPHI to Lightsource bp, dated 12 January 2026. Re. Goulburn River Solar Farm – Soil and Water Management Plan. Ref: SSD-33964533-PA-71 (DPHI approval letter of TMP). Evidence of implementation: • As per routine inspections listed against CoA B29.	**Opportunity for Improvement** **GRSF-03_OFI-3** Section 10.4 of Enerven CEMP states that concrete washout facilities should be double-plastic lined. During the site inspection the Auditor observed Enerven undertaking concrete washout in dedicated trays, with concrete waste stockpiled on the adjacent ground. The concrete washout location was not developed in accordance with the Enerven CEMP. **Recommendation** Nil. Following the audit inspection Enerven undertook corrective actions including the construction of a dedicated concrete washout area on 28 May 2026, including a 0.3m high soil bund surrounding steel	

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			washout trays with double-lined black plastic and signage. Refer to Appendix D for photo.	
B31	**HAZARDS** **Fire Safety Study** 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 (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline; (b) be prepared in accordance with the FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations. (c) describe the final design of the battery storage; (d) include reasonable worst-case fire scenario to and from the battery storage and the associated fire management; and (e) identify measures to eliminate the expansion of any fire incident including: i. adequate fire safety systems and appropriate water supply; ii. separation and / or compartmentalisation of battery units; and iii. strategies and incident control measures specific to the battery storage design. Following approval by the Planning Secretary, the Applicant must implement the measures described in the Fire Safety Study. *Note: 'meet the requirements of FRNSW' above, means confirmation in writing from FRNSW that the Study meets the requirements of FRNSW as required by*	Evidence sighted: • Fire Safety Study (FSS), Lightsource BP – Goulburn River Solar Farm Project, Operation of the Goulburn River Solar Farm Phase 1 DC-BESS, Rev 2, dated 16 April 2026. The FSS is stated as having been prepared in accordance with FRNSW's Fire Safety Guidelines (D22/107002). Construction of the BESS had not commenced at the time of the Audit. Accordingly, the Auditor will assess evidence of DPHI's satisfaction of the FSS in subsequent audits, prior to the commencement of construction of the BESS.		Compliant

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	the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline.			
B32	**Storage and Handling of Dangerous Goods** The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Evidence sighted: • DTI Fuel Tracking Spreadsheet for GRSF. • Lightsource bp SEPP 33 Dangerous Good Screening Review – Fuel, LPG and Dangerous Good Storage Assessment. The review considered whether SEPP 33 screening thresholds had been triggered on the project. Where screening thresholds are exceeded, the project may constitute a "potentially hazardous industry" under SEPP 33. The following findings were made in the review: • Diesel is stored across 21 separate locations with a total listed quantity of approximately 174,600 Litres. • The closest diesel storage was located 54m from the project boundary. • Lightsource bp concluded that based on the information reviewed, the project is capable of operating within the SEPP 33 screening framework, provided that the layout and configuration does not change. Diesel is considered treated as a C1 combustible liquid (not a class 2 flammable liquid under SEPP-33) meaning it doesn't have a quantity trigger, rather a location requirement. The Auditor will continue to monitor dangerous goods manifests and diesel storage locations during upcoming audits.		
B33	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (e) the requirements of all relevant Australian Standards; and (f) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids	Diesel was identified as being stored in above-ground storage tanks (ASTs) in numerous locations across the project. The Auditor reviewed the notifiable incidents that occurred on the 4 and 11 March 2026 which resulted in DPHI issuing a Notice to Furnish (Ref: TWA Diesel Spill Incident – Goulburn River Solar Farm (SSD-33964533) – NOTICE TO FURNISH INFORMATION AND RECORDS). The	**Opportunity for Improvement** • **GRSF-03_OFI-1** During the site inspection the Auditor observed an instance where a diesel bulk above-ground storage tank (AST)	Compliant

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	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.	due date to respond to the Notice to Furnish was 17 April 2026 (outside of the audit period); accordingly, any enforcement outcome taken by DPHI in response to the incidents will be reported in subsequent IEA reports when Lightsource bp's response is better understood. The Auditor has made several observations regarding diesel storage and has raised an Opportunity for Improvement in response to the observations.	utilised by a DTI subcontractor was leaking to the surrounding gravel hardstand. Upon further inspection there was approximately 3cm of liquid within the AST's secondary containment, indicating that the primary tank may be leaking. Additionally, in several instances there was surface staining adjacent to diesel ASTs which were being used for refuelling within the DTI subcontractor area. Considering that the ASTs were located on a compacted pad, away from the Site boundary or any receiving ecosystems, the risk of material harm was low. **Recommendation** There is an opportunity for DTI to review subcontractor diesel management practices to ensure spills and leaks are appropriately managed to reduce environmental risk. The areas of local spills identified should be investigated and/or remediated via the removal of any impacted material, waste classification and offsite disposal, as required.	
B34	**Operating Conditions** For the solar and battery storage components of the development, the Applicant must: (c) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	Evidence sighted: • Internal DTI email correspondence dated 10 May 2026.	**Opportunity for Improvement** **GRSF-03_OFI-5** During the site inspection the Auditor observed several instances where combustible	Compliant

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	(d) ensure that the development: i. complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; and ii. is suitably equipped to respond to any fires on site, including provision of a minimum 10,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection; iii. includes a 10 metre defendable space between the vegetation hazard and the infrastructure, that permits unobstructed vehicle access; and iv. is managed as an asset protection zone (including the defendable space); (e) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and (f) Notify the relevant Local Emergency Management Committee following construction of the development, and prior to commencing operations.	Email correspondence confirmed that presence of a dedicated two-man crew for the previous 5-months, creating fire buffer for the site. • DTI TWA Site Plan – Fire Services and Alarms • DTI GRSF – Manifest – Site Wide Map. The map identifies the locations of firefighting equipment and C1 chemical storage locations. The Auditor identified water tanks for fire fighting exceeding the required 10,000L capacity requirement. There were no fires during the audit period that required the RFS to attend the site. The Auditor identified stockpiles of timber and cardboard which were considered to present a potential fire risk, resulting in an Opportunity for Improvement being raised.	fuel loads of timber and cardboard from packaging where stored in large stockpiles, potentially presenting a fire risk. It is understood that waste removal is limited by traffic movement constraints, and the project has utilised waste compactors to reduce the volume of timber and cardboard waste; however, there appears to be a 'backlog' was waste waiting for removal. **Recommendation** The project should seek to reduce volumes of stockpiled timber and cardboard before the bush fire risk season commences. Considering that heavy vehicle daily movement limits have recently been increased, there should be an increased ability to do so.	
B35	**Emergency Plan** Prior to commencing commissioning, 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:: (a) be updated in accordance with the findings of the Fire Safety Study required under Condition B31 of Schedule 2; (b) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent); (c) be consistent with the NSW RFS document: A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan; (d) include details on how the battery storage and sub-systems	Previously assessed as compliant in IEA #2. The original Emergency Response Plan (ERP) was submitted to FRSNW on 12 March 2025. Evidence sighted: • Goulburn River Solar Farm – Master Emergency Plan, Rev 5, dated January 2026 • Correspondence from FRNSW to Lightsource bp, dated 6 May 2026. Re. Emergency Plan (EP) Re-Submission (Condition of Consent) - Goulburn River Solar Farm – 2771 Wollara Road Merriwa NSW 2329. FRNSW acknowledged the submission of the ERP on 15 January 2026.		Compliant

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	can be safely isolated in an emergency; (e) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; (f) include availability of fire suppression equipment, access and water (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; (h) include fire and bushfire emergency management planning, including: i. details of the location, management and maintenance of the Asset Protection Zone; ii. a list of works that should 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: - 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 ignite surrounding vegetation; or - there are any proposed activities to be carried out during a bushfire danger period; and (i) Detail specific response measures in the case of flood to ensure site safety; (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 (k) include an Emergency Services Information Package in accordance with Emergency services information package and tactical fire plans (FRNSW, 2019), to the satisfaction of FRNSW and RFS.			

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B36	The Applicant must: (a) implement the Emergency Plan and the Emergency Services Information Package for the duration of the development; and (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.	Implementation of the ERP was evidenced via review of various emergency site plans.		Compliant
B37	**WASTE** The Applicant must: (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version); (c) store and handle all waste on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.	Evidence sighted: • DTI Waste Tracker Spreadsheet. • DTI waste disposal dockets. • Enerven Project Waste Register. • Enerven waste disposal dockets. • Central Waste Station, Merriwa Resource Recovery Report, December 2025 to January 2026. The Auditor observed the use of waste compactors to reduce waste volumes for offsite disposal, use of a biofeed processor to reduce food waste disposal volumes and use of an onsite septic truck to transport septic waste to the wastewater treatment plant. The Auditor considers that the project is effectively tracking waste streams and has implemented several initiatives to reduce waste generation at the project.		Compliant
B39	**ACCOMDATION CAMP MANAGEMENT PLAN** Prior to commencing construction of the accommodation camp, the Applicant must prepare an Accommodation Camp Management Plan in consultation with Council. The plan must: (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;	Evidence sighted: • Camp Management Plan, Rev M, dated 3 March 2026. • DPHI Show Cause notice, dated 29 April 2026. Ref: INV-117195255. The Show Cause alleged that construction of the Temporary Workers Accommodation (TWA) camp commenced on 14 April 2025 and that UHSC did not provide comments on the Accommodation Camp Management Plan until 11 June 2025. DPHI alleged that Lightsource bp failed to prepare an		Compliant

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	(b) ensure the accommodation camp complies with condition B38; (c) ensure any treated wastewater from the accommodation camps used for dust suppression during construction: 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) Guidelines for irrigation water quality; ii. meets the requirements of the Public Health Act 2010; (d) include measures for dust suppression within the accommodation camp; (e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and (f) include measures to support local suppliers in servicing the camp where possible. The Applicant must implement the Accommodation Camp Management Plan	Accommodation Camp Management Plan in consultation with UHSC prior tot construction of the accommodation camp on 14 April 2025. At the time of undertaking the audit, Lightsource bp had not yet formally responded to the Show Cause. Accordingly, the Auditor will assess any enforcement outcome taken by DPHI in response to the Show Cause in subsequent IEA reports, when the details of Lightsource bp's response are understood.		
B40	**ACCOMODATION AND EMPLOYMENT STRATEGY** Prior to commencing construction, the Applicant must prepare and implement an Accommodation and Employment Strategy for the development in consultation with Council. This strategy must: (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 May 2024 (b) consider the cumulative impacts associated with other State significant development projects in the area; (c) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and (d) include a program to monitor and review the effectiveness	Evidence sighted: • Goulburn River Solar Farm project, Accommodation and Employment Strategy Implementation Plan, Final, dated October 2025. • Email correspondence from Upper Hunter Shire Council and Mid-Western Regional Council Re. feedback on the AESIP • GRSP Accommodation Tracker spreadsheet. The accommodation tracker included details of worker offsite accommodation. • Correspondence from DTI to A One Earthworks, dated 18 February 2026.		Compliant

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	of the strategy over the life of the development, including regular monitoring and review during construction 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.	The correspondence detailed that the onsite TWA was at capacity and that the contractor was to find suitable alternative accommodation. • DPHI Show Cause notice, dated 29 April 2026. Ref: INV-117195255. The Show Cause alleged that the Accommodation and Employment Strategy did not include a program to monitor and review the effectiveness of the strategy, as required by CoA B40 (d). At the time of undertaking the audit, Lightsource bp had not yet formally responded to the Show Cause. Accordingly, the Auditor will assess any enforcement outcome taken by DPHI in response to the Show Cause in subsequent IEA reports, when the details of Lightsource bp's response are understood.		
B41	**DECOMMISSIONING AND REHABILIATION** Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to comply with the objectives in Table 3. ***Table 3: Rehabilitation Objectives*** ***Features*** — ***Objective*** Site — • 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 — • 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 — • Restore land to pre-existing use	Not triggered and decommissioning and rehabilitation works have not yet occurred.		Not triggered

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	(Land Capability Class 4 to 6) Community: • Ensure public safety at all times. • Ensure long-term access through the site for NPWS			
Schedule 2, Part C – Environmental Management, Reporting and Auditing				

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C1	**ENVIRONMENTAL MANAGEMENT** **Environmental Management Strategy** Prior to the commencement of construction, the Applicant shall prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (d) describe the procedures that would be implemented to: 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 (e) include: 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. Following approval, the Applicant shall implement the Environmental Management Strategy.	Evidence sighted: • Goulburn River Solar Farm, Environmental Management Strategy, Final, dated 19 December 2024. • Correspondence from DPHI to Lightsource bp, dated 19 December 2024. Re. Goulburn River Solar Farm – Environmental Management Strategy. Ref: SSD-33964533-PA-6. DPHI approved the EMS on 19 December 2024, requesting that Lightsource bp submit a revised EMS including an Unexpected Finds Procedure no longer than 4 weeks following completion of consultation with local Aboriginal Stakeholders and Heritage NSW. DPHI also requested that the revised EMS include details of all management plans and strategies for the proposed staging of the project, to be submitted within 4 weeks of obtaining approval from the Secretary. As per 'Breach 3' of DPHI Show Cause Letter, dated 29 April 2026, INV-117195255, DPHI alleged that Lightsource bp failed to submit a revised EMS within the timeframes outlined in the EMS approval letter. The Auditor understands that the Unexpected Finds Protocol (UFP) that was submitted as part of the original EMS to DPHI included evidence of consultation with Heritage NSW and local Aboriginal Stakeholders and there has been no need to subsequently revise the UFP. Additionally, the Auditor understands that the staging request has not yet been approved by the Secretary. Therefore, the timeframes to submit a revised EMS have not been triggered.		Compliant
C2	**Revision of Strategies, Plans and Programs** The Applicant must: (a) Update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning	In response to IEA #2, the Camp Management Plan was updated in March 2026. The Auditor understands that a modification request has been submitted to DPHI and should the request be		Compliant

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	activities on site; and an independent environmental audit report under condition 6 below; or (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: i. submission of an incident report under condition C11 of Schedule 2; ii. submission of an audit report under condition C15 of Schedule 2; or iii. any modification to the conditions of this consent.	approved, there may be requirements to update plans and strategies.		
C3	**Updating and Staging of Strategies, Plans or Programs** With the approval of the Planning Secretary, the development may be staged and the Applicant may: (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); (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 (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).	Evidence sighted: • Correspondence from Lightsource bp to DPHI, dated 20 April 2026. Re. Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval for staging of the development under Development Consent condition C3. • Correspondence from DPHI to Lightsource bp, dated 29 April 2026. Re. Fail to Submit Management Plans – Goulburn River Solar Farm (SSD-33964533) – SHOW CAUSE. Ref: INV-117219488. The Staging Request proposed to stage the development across multiple construction and operational stages and stated that management plans would be developed and/or updated in accordance with their relevant CoA. Table 2 of the Staging Request outlined the applicability of each management plan to each stage of construction or operation. With the exception of the fire safety study, the operational management plan and the decommissioning management plan, all plans were required to be developed prior to Stage 2 (construction of the Temporary Workers Accommodation), with Stage 1 relating to external road works. The Staging Request advised that final layout plans (as required by CoA C8) would be updated as design		Compliant

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		refinements progress throughout construction and may not necessarily align with stage commencement. At the of the audit the Staging Request had not been approved by DPHI. On 29 April 2026 DPHI issued a SHOW CAUSE notice that alleged that Lightsource bp had staged the implementation of management prior to receiving DPHI's approval to do so. The Auditor reviewed the status of all management plans that were required for the construction activities undertaken during the audit period. It was identified that the construction phase management plans had been prepared in accordance with the timing requirements of their respective CoAs and had not been staged. Accordingly, the Auditor has not identified a non-compliance against CoA C3, however it is understood that DPHI is separately investigating the matter and the outcome of such investigation will be captured in the subsequent IEA report. Updates made to existing management plans during the audit period included the Traffic Management Plan Addendum (12 December 2025).		
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	At the time of the Audit, DPHI had not approved the Lightsource bp Staging Request.		Not triggered
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	At the time of the Audit, DPHI had not approved the Lightsource bp Staging Request.		Not triggered
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.	At the time of the Audit, DPHI had not approved the Lightsource bp Staging Request.		Not triggered
C7	**NOTIFICATIONS** **Notification of Department**	Lightsource bp notified DPHI that construction commenced on the 28 May 2025, however DPHI consider that construction commenced on 14 April 2025 as part of 'early critical works'.		Compliant

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	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. 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.	The project is not approved to be staged, therefore there has been no staged notifications in relation to the commencement of construction. Previously assessed as Compliant in IEA Report #2. No changes during the audit period.		
C8	**Final Layout Plans** 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.	Previously assessed as compliant in IEA #2. The Auditor understands that a layout plan for the area in which the early works activities were to occur in was submitted to DPHI on 14 April 2025. A revised 'final layout plan' (80% design; figure and spatial files) was submitted to DPHI on 13 June 2025, including details on the siting of solar panels and ancillary infrastructure. On 26 August 2025 DPHI issued a Warning Letter to Lightsource bp for failure to submit final layout plans prior to the commencement of construction. On 29 April 2026 DPHI issued a Show Cause to Lightsource bp regarding the same matter. Breach 2 of the Show Cause stated that on 14 April 2025 Lightsource bp submitted 80% Design Layout Plans; however, DPHI considered that "80% Design Layout Plans did not constitute Final Layout Plans." The Auditor understands that Lightsource bp submitted additional plans 'Final Layout Plans' to DPHI on 15 May 2026 (outside of the IEA #3 audit period). The Auditor also understands that Lightsource bp was in the process of responding to the Show Cause at the time of IEA #3. Accordingly, the compliance outcome of the Show Cause will be assessed during IEA #4, and the Auditor will assess the CoA as being Compliant until Lightsource bp's response to the Show Cause, and the outcome of the DPHI investigation is understood.		Compliant
C9	The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans	The Auditor assessed that the development footprint generally aligned with the 80% Design layout Plans and will assess against the Final Layout Plans in IEA #4.		Compliant

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
C10	**Work as Executed Plans** 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.	There have been no operations or upgrades of any solar panels.		Not Triggered.
C11	**Incident Notification** The Department 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.	There were seven (7) incidents notified to DPHI during the audit period. The following evidence was sighted: Incident 1 – concrete release offsite – 15 December 2025 • Correspondence from Lightsource bp to DPHI, dated 18 December 2025. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification. • Correspondence from Lightsource bp to DPHI, dated 14 January 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Investigation Report – (Ref: SSD-33964533-PA-90). Incident 2 – sediment laden water release – 5 January 2026 • Correspondence from Lightsource bp to DPHI, dated 7 January 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification. • Correspondence from Lightsource bp to DPHI, dated 13 January 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification – Ref: SSD-33964533-PA-95. Incident 3 – wastewater overflow – 6 January 2026 • Correspondence from Lightsource bp to DPHI, dated 7 January 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification. • Correspondence from Lightsource bp to DPHI, dated 6 February 2026. Re. Goulburn River Solar Farm (SSD 33964533) SSD-33964533-PA-94 – Request for Information (investigation report included) Incident 4 – sediment laden water release – 22 February 2026 • Correspondence from Lightsource bp to DPHI, dated 23		Compliant

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		February 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification. • Correspondence from Lightsource bp to DPHI, dated 20 March 2026. Re. Goulburn River Solar Farm (SSD 33964533) SSD-33964533-PA-110 – Request for Information – Investigation Report. Incident 5 – diesel spill central laydown – 4 March 2026 • Correspondence from Lightsource bp to DPHI, dated 5 March 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification. • Correspondence from Lightsource bp to DPHI, dated 2 April 2026. Re. Goulburn River Solar Farm (SSD 33964533)SSD-33964533-PA-115 – Request for Information – Investigation Report. Incident 6 – diesel spill (BESS) – 10 March 2026 • Correspondence from Lightsource bp to DPHI, dated 11 March 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification. • Correspondence from Lightsource bp to DPHI, dated 9 April 2026. Re. Goulburn River Solar Farm (SSD 33964533) C11 – Investigation Report Incident 7 – disturbance outside pf development boundary – 7 April 2026 • Correspondence from Lightsource bp to DPHI, dated 7 April 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification. • Correspondence from Lightsource bp to DPHI, dated 11 May 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Investigation Report No Go Zone Encroachment: MC-60 (access track to Stage 4. The Auditor reviewed the timeframe requirements and reporting detail requirements set out in Appendix 7 of the development consent and was satisfied that the incident		

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		notifications and investigation reports generally satisfied the requirements. Details of the environmental incidents are provided in Section 4.4.		
C12	**Non-Compliance Notification** The Planning Secretary must be notified in writing via the Major Projects website within seven (7) days after the Applicant becomes aware of any non-compliance.	Evidence sighted: • Lightsource bp non-compliance register. 35 self-reported non-compliance notifications that were submitted by Lightsource bp to DPHI during the audit period,. As documented in CoA A3 of Appendix A of this report. The Auditor did not identify any instances where the seven (7) day reporting timeframe had not been complied with.		Compliant
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	All self-reported non-compliance notifications contained the information required by this CoA.		Compliant
C14	A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	It is noted that the notifiable incident that occurred on 7 April 2026 involving disturbance outside of the approved development footprint also resulted in a non-compliance against CoA B13.		Compliant
C15	**INDEPENDENT ENVIRONMENTAL AUDIT** Independent Audits of the development must be conducted and carried in accordance with the Independent Audit Post Approval Requirements (2020).	The Independent Environmental Audit (IEA #3) has been prepared in accordance with the Independent Audit Post Approval Requirements (2020).		Compliant
C16	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C15 of Schedule 2 of this consent, or where notice is given by the Planning Secretary; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the	IEA #2 report was submitted to DPHI within the required timeframes, including Lightsource bp's responses to audit findings.		Compliant

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	Planning Secretary, unless otherwise agreed by the Planning Secretary.			
C17	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (2020) unless otherwise agreed by the Planning Secretary.	IEA #2 report was submitted to DPHI within the required timeframes, including Lightsource bp's responses to audit findings.		Compliant
C18	Notwithstanding the requirements of the Independent Audit Post Approvals Requirements (2020), 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.	Lightsource bp has not requested that operational IEAs are ceased		Not triggered.
C19	The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: i. the EIS; ii. the final layout plans for the development; iii. current statutory approvals for the development; iv. approved strategies, plans or programs required under the conditions of this consent (other than the Fire Safety Study and Emergency Plan); v. the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; vi. how complaints about the development can be made; vii. a complaints register; viii. compliance reports; ix. any independent environmental audit, and the Applicant's response to the recommendations in any audit; and	The Auditor reviewed the GRSF project website and confirmed that all information required under CoA C19 was available and up to date.		Compliant

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Condition ID.	Compliance Requirement[1] / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	x. any other matter required by the Planning Secretary; and (b) keep this information up to date.			

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Appendix B – Planning Secretary Audit Team Endorsement

Appendix B – Planning Secretary Audit Team Endorsement

Department of Planning, Housing and Infrastructure

Reference: SSD-33964533-PA-133

Michelle Housego
Senior HSE Advisor
LIGHTSOURCE DEVELOPMENT SERVICES AUSTRALIA PTY LTD
15/04/2026

Sent via the Major Projects Portal only

Subject: Goulburn River Solar Farm (SSD-33964533) - Proposed IEA team - 2026

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 13 April 2026.

The Department has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

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 from KPMG:

- Mr Dylan Jones (Lead Auditor)
- Mr Gary Selwyn (Alternate Lead 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.
- Construction Audits – The above audit team is approved for the duration of construction and the initial operational audit of the development. However, the Department reserves the right to request an alternate auditor or audit team at any time.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150 www.dphi.nsw.gov.au 1
Locked Bag 5022, Parramatta NSW 2124

Department of Planning, Housing and Infrastructure

- Endorsed experts/specialists must attend the site inspection component of the audit unless otherwise agreed by the Planning Secretary.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit, and shall be no later than 19 May 2026.

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

Heidi Watters
Team Leader - Hunter
Compliance

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Appendix C – Consultation Records

Appendix C – Consultation Logs

Agency	Contact / email	Response Received
DPHI	compliance@planning.nsw.gov.au *Ann Hagerthy* ann.hagerthy@planning.nsw.gov.au	Yes
Upper Hunter Shire Council	council@upperhunter.nsw.gov.au	No
Mid-Western Regional Council	*Kristie Vaughan - Town Planner – State Significant Development* Kristie.Vaughan@midwestern.nsw.gov.au	No
DCCEW	environment.compliance@dcceew.gov.au	No
CHPR	*Kirsten Mcwhirter* Kirsten.McWhirter@dcceew.nsw.gov.au	Yes
EPA	info@epa.nsw.gov.au	Yes
TfNSW	development.renewables@transport.nsw.gov.au	Yes
DCCEEW, Water Group	water.enquiries@dcceew.nsw.gov.au *Patricia Borges - Assistant Projects Officer* *patricia.borges@dcceew.nsw.gov.au*	Yes
Heritage NSW	alison.lamond@dcceew.nsw.gov.au *Alison Lamond - Strategic Manager – Major Projects*	Yes
Fire & Rescue NSW	info@fire.nsw.gov.au	No
NSW RFS	webmaster@rfs.nsw.gov.au	No

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Example consultation request email

Dear Sir / Madam,

Please note that KPMG has been appointed by Lightsource bp to undertake an independent environmental audit (IEA) of the Goulburn River Solar Farm project. The Department of Planning, Housing and Infrastructure (DPHI) has endorsed the Audit Team, including myself as Lead Auditor. The IEA is planned to be undertaken on 14 May 2026 and will focus on construction related activities and compliance with requirements of the state significant development consent during the previous 6-month period (Audit Period - 18 November 2015 to 14 May 2026).

In accordance with condition C15 of the development consent (SSD-33964533), the Auditor is required to consult with relevant agencies during the audit.

Accordingly, please feel free to contact me directly via email or phone should you like to raise any matters (relevant to the Audit Period) for the Auditor to consider as part of the audit process.

Regards,

Dylan Jones

Director

ESG Advisory & Assurance

Climate Change & Sustainability

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Appendix D – Site Inspection Photographs

Appendix D – Site Inspection Photographs

Observations from the site inspection are provided in the following table. The Auditor was escorted around the site by Project personnel who made themselves available for this purpose.

Site Inspection Details	
Site Location:	Wollara Road, Merriwa NSW
Inspection Date / Time Period:	14 May 2026 - 9.00 AM – 2 PM
Weather Conditions:	Mild, sunny, calm.
The Auditee:	Lightsource bp DTI Transgrid / Enerven

Photo 1	Completed road upgrade works on Ringwood Road / Wollara Road

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Photo 2	Project signage at main site entrace.

Photo 3	Signage on Wollara Way regarding left turn requirements on Golden Highway.

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Photo 4	Electronic signage on Ringwood Road regarding left turn requirements on Golden Highway.

Photo 5	Camera to monitor traffic movements at the Ringwood Road / Golden Highway intersection.

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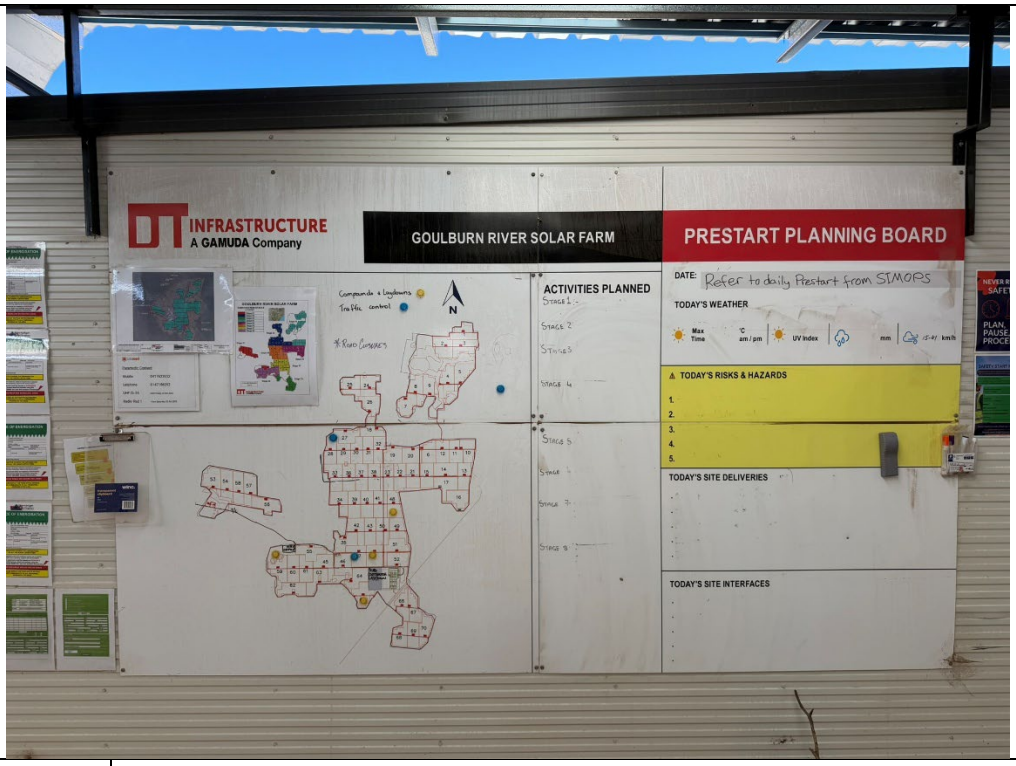

Photo 6	DTI pre-start area, environmental policies are displayed.

Photo 7	One of several waste compactors on the site to reduce waste volumes and minimise traffic movements.

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Photo 8	View from DTI compound, looking west over Stage 1 of the solar farm.

Photo 9	Transgrid / Enerven compound, showing diesel generator and AST.

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Photo 10	Transgrid / Enerven worksite, showing concrete washout using trays rather than a dedicated double-lined pit.

Photo 11	View from Transgrid / Enerven worksite, showing non-conforming stockpiles awaiting rock screening.

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Photo 12	DTI compound, evidence of waste segregation.

Photo 13	Temporary workers camp, showing polymer applied to swales and rock checks as ERSED controls.

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Photo 14	Wastewater treatment plant adjacent to workers camp.

Photo 15	One of several water trucks observed on site.

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Photo 16	Dedicated concrete washout area at DTI subcontractor compound.

Photo 17	Diesel AST at DTI subcontractor site, showing evidence of leaks to surrounding gravel hardstand.

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Photo 18	Diesel AST at DTI subcontractor site, showing evidence of surface spills from refuelling activities.

Photo 19	Stage 4, showing recently cleared surfaces and steep contours.

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Photo 20	Stage 4, recently stabilised internal acces roads.

Photo 21	Timber pallet and carboard storage, awaiting removal from site.

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Appendix E – Audit Agenda

Appendix E – Audit Agenda

Note - The audit agenda was varied on the day to allow more time to complete site inspections, with the close out meeting moved to 20 May 2026 to allow for additional document review.

Independent Environmental Audit – Goulburn River Solar Farm	
Project	**Goulburn River Solar Farm – Independent Audit #3**
Planning Approval	SSD – 33964533
Proponent	Lightsource Development Services Australia Pty Ltd (Lightsource bp)
Auditee(s)	Lightsource bp DT Infrastructure Transgrid / Enerven
Location of Audit	Between Wollara and Merriwa, on Wollara Road, in the Upper Hunter NSW
Date of Audit	14 May 2026 (Day 1) 18 May 2026 (Day 2)
Audit Team	Dylan Jones (Lead Auditor) Manya Narain (Auditor Assistant)
Site Contact	Michelle Housego, Senior HSE Advisor
Audit Criteria	Conditions of consent SSD-33964533 Schedule 2, Parts A, B and C, and Appendices, in accordance with Independent Audit Post Approval Requirements 2020.
Audit Period	19 November 2025 (date of Independent Audit #2) to 14 May 2026
Audit Objectives	Assess compliance with SSD-33964533 conditions of approval.

Agenda – Day 1	**Date - 14 May 2026**		
Item	**Time**	**Attendees**	**Location**
Opening Meeting • Introductions. Confirm audit scope, audit period, objectives. • Discuss project overview / construction activities. View aerial images to assist with project familiarization.	8:30 AM - 9:00 AM	KPMG Lightsource bp DT Infrastructure Transgrid / Enerven	GRSF (in person)
Site Inspection • Auditees to provide escorted site access to all areas requested by the Auditor. • Auditor to sight current site activities and assess the implementation of mitigation measures and effectiveness of management plan requirements.	9:00 AM - 10:00 AM	KPMG Lightsource bp Transgrid / Enerven	
	10:00 AM -1:00 PM	KPMG Lightsource bp DT Infrastructure	

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Identify environmental aspects, impacts, controls and onsite documentation.			
Site Inspection Debrief / Lunch Break	1:00 PM - 1:30 PM		
Review Compliance with Consent Conditions			
• Part A – Administrative Conditions	1:30 AM – 2:30 PM	KPMG Lightsource bp	GRSF (in person)
• Part B – Environmental Conditions – General	2:00 PM – 3:00 PM	KPMG Lightsource bp Transgrid / Enerven	
• Part B – Environmental Conditions – General	3:00 PM – 4:00 PM	KPMG Lightsource bp DT Infrastructure	GRSF (in person)
• Day 1 Debrief and Next Steps	4:00 PM – 4:15 PM	KPMG Lightsource bp	
Agenda – Day 2	**Date - 18 May 2026**		
Item	**Time**	**Attendees**	**Location**
• Part B – Environmental Conditions – General (Continued)	12:00 PM – 12:30 PM	KPMG Lightsource bp Transgrid / Enerven	Online via MS Teams
• Part C –Environmental Management, Reporting and Auditing	12:30 PM – 1:30 PM		
• Part B – Environmental Conditions – General (Continued)	1:30 PM – 2:30 PM	KPMG Lightsource bp DT Infrastructure	
• Part C –Environmental Management, Reporting and Auditing	2:30 PM – 3:30 PM		
Break	3:30 PM – 4:30 PM	KPMG	
Closing Meeting • Discuss preliminary outcomes of the audit including details of any non-compliances and opportunities for improvement. Confirm next steps including additional requests for information and timelines	4:30 PM – 5:30 PM	KPMG Lightsource bp DT Infrastructure Transgrid / Enerven	Online via MS Teams

Responsibilities		
Roles	**Name**	**Responsibilities**

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Lead Auditor	Dylan Jones	• Schedule audit, prepare audit materials and manage resources • Provide Audit Agena to Lightsource bp, including confirmation on a scope and timeframes • Attend the site visits • Lead interviews with key personnel • Lead the Opening and Closing Meetings • Prepare the Independent Audit Report
Auditor Assistant	Manya Narain	• Support the lead auditor by preparing audit materials such as Audit Plan, schedules, interview questions and report drafting. • Attend interviews remotely. • Support preparation of the Independent Audit Report
Audit Specialists	N/A	N/A
Auditees	Michelle Housego – Senior HSE Advisor	• Liaise with Principal Contractors (DT Infrastructure and Transgrid / Enerven) to attend site inspection and audit interviews, as required • Provide WH&S supervision to KPMG staff while on site • Provide meeting rooms for audit interviews • Respond to request for information prior to, during and following the day of the audit, as required.
	Site Manager (TBC)	• Provide WH&S supervision to KPMG staff while on site • Provide meeting rooms for audit interviews • Respond to request for information prior to, during and following the day of the audit, as required.

Notes
1 The audit will cover the construction requirements in accordance with Conditions of Consent SSD-33964533 Schedule 2A, 2B and 2C.
2 The audit will cover a sampling of records relevant to the scope. KPMG auditors will apply their professional judgment based on the information made available during the audit.
3 KPMG 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 Triggered, with the option to raise any Opportunities for Improvement.
4 KPMG will issue a Request for Information (RFI) document separately to this agenda. To enable an efficient audit, it is requested that information is provided prior to the audit.

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Appendix F – Audit Attendance Sheet

Appendix F – Audit Attendance Sheet

Opening Meeting

KPMG

Audit Attendance Sheet

Project	Goulburn River Solar Farm	**Audit Ref.**	GRSF-IEA-03
Auditee	Lightsource bp	**Lead Auditor**	Dylan Jones
Location	Wollara Road, Merriwa NSW		
Opening Meeting Date / Time	14 May 2026 8:30 am		
Closing Meeting Date / Time	20 May 2026 4:00pm / MS Teams		

Name	Organisation	Position	Signature	
			Opening Meeting	Closing Meeting
Dylan Jones	KPMG	Lead Auditor		
Michelle Mourego	LSbp	Senior HSE Advisor		
Rachael Hannah	LSbp	Enviro Advisor		
Mathew Cashmire	Enerven	Enviro Advisor		
Samuel Magennis	Enerven	Enviro Advisor		
ANDREW SAMPAKLIS	TRANSGRID	ENVIRO BUS PARTNER		
AMIL CAMERON	LSBP	HSE ADVISOR		
Brenda Tooby	DTI	ENV. MANAGER		
Manya Marain	KPMG	Auditor		

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Document Classification: KPMG Confidential

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Closing Meeting

1. Summary					
Meeting title	GRSF - IEA#3 Preliminary Finds & Closeout				
Attended participants	17				
Start time	5/20/26, 3:57:29 PM				
End time	5/20/26, 4:21:24 PM				
Meeting duration	23m 54s				
Average attendance time	20m 4s				
2. Participants					
Name	**Company**	**Role**	**First Join**	**Last Leave**	**In-Meeting Duration**
Michelle Housego	Lightsource bp	Senior HSE Advisor	5/20/26, 3:57:34 PM	5/20/26, 4:21:19 PM	23m 45s
Glenn Tilley	Lightsource bp	Senior Project Manager	5/20/26, 3:58:31 PM	5/20/26, 4:21:24 PM	22m 52s
Diana Mitchell	Lightsource bp	Director of Planning, ANZ	5/20/26, 3:58:33 PM	5/20/26, 4:21:17 PM	22m 44s
Phil Cameron	Lightsource bp	HSE Advisor	5/20/26, 3:58:33 PM	5/20/26, 4:21:21 PM	22m 47s
Andrew Sampaklis	Transgrid	Environmental Business Partner	5/20/26, 3:59:08 PM	5/20/26, 4:21:19 PM	22m 11s
Brendan Toohey	DTI	Environmental Manager	5/20/26, 3:59:08 PM	5/20/26, 4:21:18 PM	22m 9s
Mathew Cheshire	Enerven	Environmental Advisor	5/20/26, 3:59:08 PM	5/20/26, 4:01:36 PM	2m 27s
Peter Sommer	DTI	Project Director, Goulburn River Solar Farm	5/20/26, 3:59:51 PM	5/20/26, 4:21:19 PM	21m 27s
Rachael Hannah	Lightsource bp	Environmental Advisor	5/20/26, 4:00:10 PM	5/20/26, 4:21:20 PM	21m 9s
Narain, Manya	KPMG	Auditor	5/20/26, 4:00:16 PM	5/20/26, 4:21:19 PM	21m 2s
Jones, Dylan	KPMG	Lead Auditor	5/20/26, 4:00:23 PM	5/20/26, 4:21:19 PM	20m 56s
Dan Owens	Transgrid	Environmental Business Partner	5/20/26, 4:00:29 PM	5/20/26, 4:21:18 PM	20m 49s
Amy Williams	DTI	Environmental & Sustainability Manager, NSW	5/20/26, 4:00:35 PM	5/20/26, 4:21:16 PM	20m 41s
Samuel Magennis	Enerven	Environmental Advisor	5/20/26, 4:00:39 PM	5/20/26, 4:21:18 PM	20m 39s
Mat Morris	DTI	National Environmental & Sustainability Manager	5/20/26, 4:02:06 PM	5/20/26, 4:21:18 PM	19m 11s
Andrew Borg	Transgrid	Senior Project Manager - Delivery	5/20/26, 4:02:33 PM	5/20/26, 4:21:18 PM	18m 44s
Khalid Schellen	Transgrid	Project Engineer Grade 2 - Delivery	5/20/26, 4:03:47 PM	5/20/26, 4:21:20 PM	17m 32s

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Appendix G – Independent Audit Declarations

Appendix G – Independent Audit Declarations

Independent Audit Report Declaration Form	
Project Name	Goulburn River Solar Farm
Consent Number	SSD-33964533
Description of Project	Construction and operation of a 585 MW solar farm and battery energy storage system.
Project Address	28 kilometres south-west of Merriwa, NSW
Proponent	Lightsource Development Services Australia Pty Ltd
Title of Audit	Independent Audit No.3
Date	25-Jun-26

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 Compliance Requirements (Department 2019);
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 audit, or by relationship as spouse, partner, sibling, parent, or child;
vi I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
vii neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to DPE 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

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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 Auditor	Dylan Jones
Signature	
Qualification	**Lead Auditor** B. Env. Sci. & Mgt. M. Env. Eng. Mgt. Exemplar Global Lead Auditor: Environmental Management Systems
Company	KPMG

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Appendix H – Documents Reviewed

Appendix H – Documents Reviewed

- (Lightsource bp) - Environmental Management Strategy, Rev 1, dated 19 December 2024;
- (Lightsource bp) - Biodiversity Management Plan, Rev 1, dated 18 December 2024;
- (Lightsource bp) - Traffic Management Plan, Rev 7, dated 1 May 2026; and
- (Lightsource bp) - Heritage Management Plan, Final, dated March 2025.
- (DTI) - Construction Environmental Management Plan, Rev G, dated 18 May 2026;
- (DTI) - Air Quality Management Sub Plan, Rev E dated 18 May 2026;
- (DTI) - Noise and Vibration Management Sub Plan, Rev E, dated 18 May 2026;
- (DTI) - Flora and fauna Management Sub Plan, Rev G, dated 18 May 2026;
- (DTI) - Soil and Water Management Sub Plan, Rev D, dated 18 May 2026; and
- (DTI) - Waste management Sub Plan, Rev F, dated 18 May 2026.
- Transgrid/Enerven - Construction Environmental Management Plan, Rev 0.4, dated 10 March 2026.
- Transgrid/Enerven - Consultation responses from DPHI, Mid-Western Regional Council, TfNSW, FRNSW, Heritage NSW and DCCEEW
- Correspondence from DPHI to Lightsource bp, dated 23 April 2026
- Construction Certificate No. 512/2024-07, dated 11 February 2026
- DTI Employee / Subcontractor Profile and Competency for GRSF, completed 26 February 2026
- Photocopies of employee industry tickets
- DTI and Enerven – daily pre-start plant checks
- Enerven Site Visitor Form
- Legal Briefing presentation slides titled Environmental Compliance at Goulburn River Solar Farm
- Legal briefing attendance record, dated 4 September 2025
- Email correspondence from DTI to project stakeholders (Lightsource bp, subcontractors), dated 9 April 2016
- Excel spreadsheet titled "HV_movements_rev02" - a log of daily HV movements from 20 November 2025 to 9 May 2026
- Daily pre-start meeting, dated 18 May 2026.
- DPHI approval of TMP increased 85 HV movements and a total HV and LV of 130 daily movements.
- Correspondence from Lightsource bpto DPHI, dated 15 December 2025. Re. Goulburn River Solar Farm (SSD-33964533): Request for temporary increase to vehicle length under Condition B1(b).
- Correspondence from DPHI to Lightsource bp, dated 22 December 2025. Re. Goulburn River Solar Farm – Request to temporarily increase length of heavy vehicles. Ref: SSD-

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33964533-PA-88

- Correspondence from Lightsource bp to DPHI, dated 15 April 2025. Re. Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval under Condition B3 (Access Route).
- Correspondence from DPHI to Lightsource bp dated, 30 April 2026. Re. Goulburn River Solar Farm – Request to vary Condition B3 (access route). Ref: SSD-33694533-PA-83.
- Toolbox talks and pre-starts;
- Email from FTI to Lightsource bp dated 5 December confirming subcontractors have been offboarded due to failure to adhere to TMP.
- Toolbox talk – Traffic Management delivered on 6 December including TMP requirements.
- 2 x pre-starts that all include TMP requirements.
- Correspondence from Lightsource bp to DPHI, dated 17 December 2025. Re. Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval to extend completion
- Correspondence from DPHI to Lightsource bp, dated 19 December 2025. Re. Goulburn River Solar Farm - Extension Request for Timing of Road Upgrades. Ref: SSD-33964533-PA-72.
- Correspondence from UHSC to Lightsource bp, dated 20 May 2026. Re. Goulburn River Solar Farm.
- DTI internal email correspondence, dated 10 May 2026. Re. Internal Audit – All weather access roads
- Driver Code of Conduct forms part of the TMP.
- Figure 6-11 of Draft Landscape Plan, developed by Landscape Architect Envisage, showing proposed planting specifications as per Appendix 5 of the development consent.
- DTI GIS mapping.
- Correspondence from Lightsource bp to DPHI, dated 7 April 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification.
- Correspondence from Lightsource bp to DPHI, dated 11 May 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Investigation Report No Go Zone Encroachment: MC-60 (access track to Stage 4.
- Goulburn River Solar Farm, Biodiversity Management Plan, Rev 2, dated March 2026.
- Post Approval Form_20260402024044 – Evidence of submission of updated BMP to DPHI.
- Goulburn River Solar Farm, Microbat Management Protocol, dated 30 January 2026.
- Goulburn River Solar, Weed Control Works Plan 2026, revision 2, dated 5 May 2026.
- Weed spay map, dated 13 May 2026.
- Fauna Spotters Australia, Bat Roost Fly-out, Survey of Historical Well.
- Correspondence from DPHI to LSP, dated 12 September 2025. Re. Goulburn River Solar – Out of Hours Request. Ref: SSD-33964533-PA-36.
- Correspondence from Lightsource bp to UHSC, dated 17 December 2025. Re. Three

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(3) month review of out of hours.

- Correspondence from DPHI to Lightsource bp, dated 21 November 2025. Re. : Goulburn River Solar Farm – Out of Hours Request and Variation to Access
- Correspondence from Lightsource bp to DPHI, dated 9 December 2025. Re. Request for Planning Secretary approval for out of hours works under development consent Condition B19 (for works on 10/11 December).
- DPHI Penalty Notice, dated 26 March 2026 Re. Penalty Notice – Breach Of Section 4.2 of the Environmental Planning and Assessment Act 1979.
- Correspondence from DPHI to Lightsource bp, dated 12 September 2025. Re. Goulburn River Solar – Out of Hours Request. Ref: SSD-33964533-PA-36.
- Correspondence from Lightsource bp to UHSC, dated 17 December 2025. Re. Three (3) month review of out of hours.
- Correspondence from DPHI to Lightsource bp, dated 21 November 2025. Re. : Goulburn River Solar Farm – Out of Hours Request and Variation to Access Route for Concrete Pour. Ref: SSD-33964533-PA-67.
- Goulburn River Solar Farm, Vibration Monitoring Report, dated 4 February 2026.
- DTI – Dust Management Action Plan.
- DTI – Goulburn River Solar Farm – Dust Monitoring Plan.
- Eagles Engineers, Goulburn River Solar farm Detailed Design, Electrical Basis of Preparation Report.
- DTI water tracking spreadsheet.
- Statement of Approval #20WA221721, dated 9 February 2026. Made under the Water Management Act 2000 for DT Infrastructure Pty Ltd.
- DTI Goulburn River Solar Farm, Progressive Erosion and Sediment Control Plans (PESCP) for Stage 1, Stage 2, Stage 3, Stage 4, Stage 8, Stage 4 Spoil Area and Established Sand Storage Pad.
- Temporary Controls foe Area Below Crushing Plant – Stage 3.
- DTI Soil and Water Management Sub Plan, Rev D, dated 18 March 2026.
- DTI GRSF Post-Rainfall Inspection 260106.
- DTI GRSF Post-Rainfall Inspection 260224.
- DTI GRSF Post-Rainfall Inspection 251129.
- DTI GRSF Post-Rainfall Inspection 260218.
- DTI GRSF Post-Rainfall Inspection 260307.
- DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 260503.
- DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 260510.
- DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 251206.
- DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 251219.
- DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly

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Checklist 260215.

- DTI GRSF – Environmental Inspection Form – Environmental Inspection Weekly Checklist 260426.\
- Enerven Construction Environmental Management Plan, Goulburn River Solar Farm 500kV Connection – Substation scope.
- Enerven Goulburn River Solar farm – Transgrid Substation – progressive ESCP No. 2
- Enerven Site Environmental Checklist 07022026
- Enerven Site Environmental Checklist 24042026
- Enerven Pre-rainfall Inspection 26032026
- Fire Safety Study (FSS), Lightsource BP – Goulburn River Solar Farm Project, Operation of the Goulburn River Solar Farm Phase 1 DC-BESS, Rev 2, dated 16 April 2026.
- Goulburn River Solar Farm, Soil and Water Management Plan, Rev 4, dated 9 December 2025.
- DTI Fuel Tracking Spreadsheet for GRSF.
- Lightsource bp SEPP 33 Dangerous Good Screening Review – Fuel, LPG and Dangerous Good Storage Assessment
- Internal DTI email correspondence dated 10 May 2026.
- Goulburn River Solar Farm – Master Emergency Plan, Rev 5, dated January 2026
- Correspondence from FRNSW to Lightsource bp, dated 6 May 2026. Re. Emergency Plan (EP) Re-Submission (Condition of Consent) - Goulburn River Solar Farm – 2771 Wollara Road Merriwa NSW 2329.
- Camp Management Plan, Rev M, dated 3 March 2026.
- DPHI Show Cause notice, dated 29 April 2026. Ref: INV-117195255.
- Goulburn River Solar Farm project, Accommodation and Employment Strategy Implementation Plan, Final, dated October 2025.
- Email correspondence from Upper Hunter Shire Council and Mid-Western Regional Council Re. feedback on the AESIP
- GRSP Accommodation Tracker spreadsheet.
- Goulburn River Solar Farm, Environmental Management Strategy, Final, dated 19 December 2024.
- Correspondence from DPHI to Lightsource bp, dated 19 December 2024. Re. Goulburn River Solar Farm – Environmental Management Strategy. Ref: SSD-33964533-PA-6.
- Correspondence from Lightsource bp to DPHI, dated 20 April 2026. Re. Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval for staging of the development under Development Consent condition C3.
- Correspondence from DPHI to Lightsource bp, dated 29 April 2026. Re. Fail to Submit Management Plans – Goulburn River Solar Farm (SSD-33964533) – SHOW CAUSE. Ref: INV-117219488.
- Correspondence from Lightsource bp to DPHI, dated 18 December 2025. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification.
- Correspondence from Lightsource bp to DPHI, dated 14 January 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Investigation Report – (Ref: SSD-33964533-PA-90).

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- Correspondence from Lightsource bp to DPHI, dated 7 January 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification.
- Correspondence from Lightsource bp to DPHI, dated 13 January 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification – Ref: SSD-33964533-PA-95.
- Correspondence from Lightsource bp to DPHI, dated 7 January 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification.
- Correspondence from Lightsource bp to DPHI, dated 6 February 2026. Re. Goulburn River Solar Farm (SSD 33964533) SSD-33964533-PA-94 – Request for Information (investigation report included)
- Correspondence from Lightsource bp to DPHI, dated 23 February 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification.
- Correspondence from Lightsource bp to DPHI, dated 20 March 2026. Re. Goulburn River Solar Farm (SSD 33964533) SSD-33964533-PA-110 – Request for Information – Investigation Report
- Correspondence from Lightsource bp to DPHI, dated 5 March 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification.
- Correspondence from Lightsource bp to DPHI, dated 2 April 2026. Re. Goulburn River Solar Farm (SSD 33964533)SSD-33964533-PA-115 – Request for Information – Investigation Report.
- Correspondence from Lightsource bp to DPHI, dated 11 March 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification.
- Correspondence from Lightsource bp to DPHI, dated 9 April 2026. Re. Goulburn River Solar Farm (SSD 33964533) C11 – Investigation Report
- Correspondence from Lightsource bp to DPHI, dated 7 April 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Incident Notification.
- Correspondence from Lightsource bp to DPHI, dated 11 May 2026. Re. Goulburn River Solar Farm (SSD 33964533) Condition C11 – Investigation Report No Go Zone Encroachment: MC-60 (access track to Stage 4
- Lightsource bp non-compliance register.

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