

BARNETT & MAY

EnergyConnect PEC East Project SSI 9172452

April 2025 Construction Phase Independent
Environmental Audit

Prepared for
Secure Energy

Client representative
Rebecca Walker-Edwards

Date: 16 July 2025
Rev 1



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Prepared by — K. Holmes		Date 16 July 2025
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Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
a	Draft for client Review	K Holmes	M Holmes	K Holmes	20/06/2025
0	Final Report	K Holmes	K Holmes	K Holmes	13/07/25
1	Revision following provision of addition audit evidence	K Holmes	K Holmes	K Holmes	16/07/25

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1. Introduction

Barnett & May was engaged by Green Light Contractors PTY LTD, trading as Secure Energy (ABN 56 282 382 697) to conduct the fifth construction phase Independent Environmental Audit (IEA) of the Secure Energy PEC East Project.

The project consists of the construction of a 330 kV high voltage energy connector between Wagga Wagga and Buronga in Southern NSW. Transgrid is the Proponent, Secure Energy is the Construction Contractor.

The Project involves building around 375km of new 330kV transmission line between Buronga and the new Dinawan substation (Bundure), near Coleambally as well as just over 160km of 500kV transmission line infrastructure from Dinawan to Wagga Wagga. Upgrades are also currently underway at the existing substations at Buronga and Wagga Wagga.

The Infrastructure Approval (SSI 9172452) covers both the construction and operational phases of the Project. Condition D11 requires that *“Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary”*.

The audit was undertaken in accordance with the Barnett and May’s proposal dated 27 September 2023, and the requirements of the NSW of Planning and Environment (DPE) Independent Audit Post Approval Guidelines (May 2020). The Audit was commissioned 14 November 2023. DPHI approved the appointment of the Lead Auditor on 21 February 2025 and approved the appointment of the ecology specialist with Biodiversity Assessment Method accreditation on 5 May 2025.

1.1 Audit and Report Program

The audit was led by Ken Holmes (Accredited Lead Auditor) of Barnett & May. The Lead Auditor was supported by Principal Ecologist, Erin Lowe who focused on compliance against the biodiversity requirements of the Planning Approval. The audit site inspections commenced on 28 April and concluded on 1 May 2025, with the ecology element of the audit being undertaken between 2 June and 5 June 2025.

1.2 Project Description and Status of Construction

The EnergyConnect Project is being delivered by Secure Energy on behalf of Transgrid and consists of the construction and operation of a new electrical interconnector and network support option between NSW and SA, with an additional connection to Red Cliffs in north-west Victoria.

The interconnector is aimed at reducing the cost of providing secure and reliable electricity transmission between NSW and SA in the near term, while facilitating the transition of the energy sector across the National Electricity Market to low emission energy sources.

EnergyConnect involves constructing a new high voltage electricity interconnector, approximately 900km long, between the power grids of SA (starting at Robertstown) and NSW (finishing in Wagga Wagga). EnergyConnect comprises following sections:

- Victorian section, which extends from the NSW/Victoria border to an existing electricity facility at Red Cliffs
- NSW sections including:
- Western section (the subject area of this audit) which extends from: the SA/NSW border (near Chowilla in SA) to Buronga
- Buronga to the NSW/Victoria border at Monak (near Red Cliffs in Victoria)
- Eastern section, which extends from Buronga to Wagga Wagga
- SA section, which extends from Robertstown to the SA/NSW border.

TransGrid has two separate environmental planning approval applications for the sections within NSW these are for the:

- NSW – Western Section (Application Number SSI 10040)
- NSW – Eastern Section (Application Number SSI 9172452).

This Independent Environmental Audit covers the works on the eastern section under SSI 9172452.

The Project works involve the construction of the electricity transmission lines and associated access infrastructure, including:

- Establishment and operation accommodation camps
- Establishment other ancillary facilities on the transmission line construction corridor outside identified heritage risk zones
- Property adjustment work including adjustments to property fencing
- Access points, water supply points establishment and/or use
- Construction access tracks
- Transmission line construction
- Utility adjustments and protection
- Progressive site rehabilitation and landscaping.

1.3 Audit Objectives

The objectives of this Independent Environmental Audit, in accordance with the Post Approval Audit Guidelines, were to:

1. Assess compliance against the conditions required of the Project Approval.
2. Review all relevant post approval documentation by the Project Approval(s) including an assessment of the implementation of Environmental Management Plans and Sub-plans.
3. Review compliance against other environmental licences and approvals excluding any Environment Protection Licence issued under the Protection of the Environment Operations Act 1997.
4. Review the environmental performance of the development including:
 - a. A high-level comparison of actual impacts against predicted impacts as documented in the environmental impact assessment.
 - b. The physical extent of the development in comparison with the approved project boundaries.
 - c. Review of environmental incidents, non-compliances, and complaints relevant to the audit period.
 - d. Performance against any applicable environmental policy or environmental issue identified through consultation with the relevant Regulatory Authorities.
 - e. Feedback received from DPE, other Agencies or Stakeholders including the community Consultative Committee (or equivalent body if applicable) relating to environmental performance of the development.
5. Review of the status of non-compliances and recommendations made in the preceding Independent Environmental Audit.
6. A high-level assessment of the adequacy of the Environmental Management Plans and Sub-plans required by the Approval.
7. Review performance of the development against any other matters considered relevant by the auditor or the Department, considering relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

1.4 Audit Scope

The audit provides an assessment of the compliance of the project with the conditions of Project Approval SSI 9172452. Note that no other relevant environmental licences or approvals were identified for this development.

The scope of this audit was developed to meet the requirements of the NSW DPE Independent Audit Post Approval Guidelines May 2020 (as specified in the Approval). The audit scope was therefore developed with consideration of:

- Requirements of the Project Approval(s);
- Relevant correspondence from DPE (provided by the Auditee);
- Inputs provided by the Stakeholders consulted as part of this IEA;
- Review of the findings of the previous IEA; and
- The Auditor's experience in relation to relevant industry practices.

1.5 Audit Period

This audit of the construction phase of the project covers the period of 10 September 2024 to 29 April 2025.

1.6 Limitations of this Report

In preparing this Independent Environmental Audit Report, Barnett and May has assessed the activities appropriate and necessary to evaluate the compliance status against the conditions contained in the Auditee's Project Approval. Barnett and May has addressed the general technical matters which might reasonably be considered to be relevant to such an assessment.

The findings of this Independent Environmental Audit are based on observations of the site, interviews with personnel nominated by the Auditee and review of the documentation provided by the Auditee. Barnett and May has relied on the accuracy and completeness of the documentation and other information provided by the Auditee.


Barnett and May can only advise based on the information provided to them and therefore cannot dismiss the possibility that compliance or environmental performance issues, other than those presented in the report existed at the time of this Audit.

The audit findings presented in this report are professional opinions based solely upon Barnett and May's visual observations of the site, and upon Barnett and May's interpretation of the documentation reviewed, interviews and conversations with personnel nominated by the Auditee, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated. Opinions presented in this report apply to the site's conditions and features as they existed at the time of the audit, and those reasonably foreseeable. They necessarily cannot apply to conditions and features which Barnett and May is unaware of and has not had the opportunity to evaluate. This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation.

2. Definitions

Acronyms	Description
AQMP	Air Quality Management Plan
ASS	Acid Sulphate Soils
BCA	Australian Building Codes
BCS	Biodiversity, Conservation and Science Directorate (DPE)
BMP	Biodiversity Management Plan
CCS	Community Consultation Strategy
CEMS	Construction Environmental Management Strategy
CAQMP	Construction Air Quality Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CPTMP	Construction Pedestrian and Traffic Management Plan
CWMP	Construction Waste Management Plan
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DECC	Department of Environment and Climate Change (now DPHI)
DPE	Department of Planning and Environment (Now known as DPHI)
DPHI	Department of Planning, Housing and Infrastructure (formerly the Department of Planning and Environment / Department of Planning, Infrastructure and Environment)
EA	Environmental Assessment
EIS	Environmental Impact Statement
EP&A	Act Environmental Planning and Assessment Act 1979
EPA	NSW Environment Protection Authority
ER	Environmental Representative
ESD	Ecological Sustainable Development
HMP	Heritage Management Plan
IEA	Independent Environmental Audit
ICNG	EPA Interim Construction Noise Guideline
NVNP	Noise and Vibration Management Plan
OEH	NSW Office of Environment and Heritage
PEC	Project EnergyConnect
SSD	State Significant Development
TfNSW	Transport for New South Wales

3. Auditor Certification

Independent Audit Certification Form	
Development Name	EnergyConnect Project (NSW Eastern Section)
Application Number	SSI 9172452
Description of Development	High Voltage Electricity Transmission Line
Development Address	Southwestern NSW
Proponent	Transgrid
Title of Audit	EnergyConnect PEC East April 2025 Independent Environmental Audit
<p><i>I certify 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></p> <ul style="list-style-type: none"> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (May 2020).</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</i> <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <p><i>Note.</i></p> <p><i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p><i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	75-77 Foamcrest Avenue, Newport, NSW
Email Address	ken@baeckea.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	16 July 2025

3.1 Audit Details

Table 1 - Audit Details

Audit Title:	EnergyConnect (NSW – East Section) April 2025 Construction Phase Independent Environmental Audit
Site:	EnergyConnect (NSW – East Section)
Client Contact:	Rebecca Walker-Edwards
Position:	Environmental Manager
Client:	Transgrid
Client Address:	Level 19, 83 Clarence St Sydney NSW 2000
Client Phone Number:	+61 420974540
Client Email:	Rebecca.walker-edwards@elecnor.es
Auditor Team	Ken Holmes (Certified Lead Auditor) Erin Lowe (Principal Ecologist)
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baeckea.com.au
Date of Audit Commencement:	30 April 2025

4. Audit process

4.1 Audit Guidelines

This audit report has been prepared in accordance with the 'Independent Audit Guideline, May 2020 as required by the project approval and specifically with the audit frequency specified in that edition of the audit guidelines. For consistency with current audit scopes, this audit also satisfies the general scope specified in the current edition of the DPE Independent Audit Guidelines and the requirements of the Independent Audit Guidelines May 2020 (DP&E, May 2020)

Table 2 lists key requirements from the Audit Guidelines, the relevant Section of the Guidelines which references the requirement and indicates where each is addressed in this report.

Table 2 - Post Approval Audit Guidelines

Section	Independent Audit Report Requirements	Addressed
4.1	Version Control <ol style="list-style-type: none"> 1) the application number of the project; 2) each version or revision number of the report; 3) the date on which the report was prepared and issued to the Department; and 4) the title and name of the person who certified the Independent Audit Report. 	Section 3 Page iii Page iii Section 3.1
4.2	Contents	
4.2.1	Introduction – a brief overview of the audit including: <ol style="list-style-type: none"> 1) background of the project; 2) the audit team (including qualifications and experience); 3) the objectives of the audit; 4) the audit scope; and 5) the temporal period covered by the audit. 	Section 1.1 Section 4.3.1 and Appendix E Section 1.2 Section 1.3 Section 1.4
4.2.2	Audit Methodology <ol style="list-style-type: none"> 1) documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 2) how the audit scope was developed; 3) a summary of the audit process adopted to determine the compliance status and assess if documents are adequate; 4) site personnel interviewed including their name and position title (and including if access was not granted or possible with any required personnel and why); 5) details of site inspections undertaken (including any areas where access was not granted or possible and why); 6) a summary of the consultation undertaken; and 7) meanings of compliance status descriptors used, as set out in this document. 	Appendix C Section 1.3 Section 4 Section 4.5.3 Section 4.5.2 Section 5 Section 4.6
4.2.3	Audit Findings <ol style="list-style-type: none"> 1) a list of the approvals and documents audited; 2) a summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period. Graphics can be used to summarise project performance in relation to compliance requirements; 3) a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period; 	Appendix A Section 6.1 Section 7.3

Section	Independent Audit Report Requirements	Addressed
4.2.3	4) exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance;	Section 6.2
	5) a brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action. Details must include the source of the action, reference (condition number), action proposed, proposed completion date, the status (date completed, if relevant) and the action complete.	Section 7.6
	6) a brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement;	Section 7.5
	7) a discussion of other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance;	Section 7.9
	8) documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation;	Section 5
	9) a summary of complaints, and the adequacy of the response to, and management of complaints;	Section 7.2
	10) details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents;	Section 7.1
	11) an assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the Environmental Planning and Assessment Act 1979;	Section 7.8
	12) evidence collected through site inspections undertaken during the audit;	Appendix A
	13) evidence to support compliance assessment provided by the personnel interviewed during the audit;	Appendix A
	14) a brief discussion of any continual environmental management improvement opportunities identified as part of the audit; and	Section 6.2
	15) key strengths of the development's environmental management and performance identified by the auditor.	Section 7.4
4.2.4	Recommendations and opportunities for Improvement	Section 6.3
4.2.5	Appendices	
	1) a completed Independent Audit Table with all relevant conditions of consent, identifying each requirement, compliance status assessed, documenting verified evidence and providing recommendations for any non-compliance that is identified;	Appendix A
	2) a copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s);	Appendix C
	3) documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee;	Appendix D
	4) completed and signed Independent Audit Declaration Form(s);	Section 3
	5) any reports prepared by the agreed technical specialist(s), as required; and	Appendix F
	6) site inspection photographs.	Appendix B

4.2 Overview

The audit process and methodology are summarised in this section, and comprised the following key undertakings:

- Preliminary planning activities;
- Review of information and preparation of a compliance register (audit protocol / checklist);
- Site inspection and interviews;
- Opening meeting;
- Review of relevant records;
- Review of additional information provided after the site inspection; and
- Preparation of this audit report.

4.3 Preliminary activities

Off-site planning for the site audit comprised:

- Initial discussions with client representative, to organise the site inspection and access to audit documentation;
- Update the audit compliance checklist;
- Completion of a project specific Risk Assessment;
- Review of online information;
- Submission of a preliminary document / record request; and
- Consultation with relevant agencies.

4.3.1 Approval of audit teams

Transgrid sought the Secretary's endorsement for the audit team to undertake this Independent Environmental Audit. The Secretary approved the appointment of the Auditor (Ken Holmes) on 21 February 2025 and the specialist ecologist (Erin Lowe) on 5 May 2025 (Appendix C).

4.3.2 Consultation with Agencies

The Auditor consulted with a wide range of agencies and the Registered Aboriginal Parties (RAPs). Emails were initially sent to each of the above agencies advising them of the audit and the scope of the audit and inviting them to provide comments/requirements or specific environmental issues they required the audit to target. Details of the responses from each group / organisation are provided in Section 5 with the Auditor's findings in relation to the issues raised in Section 7.9.

4.4 Information Review and Compliance Register

Prior to the site inspection the Auditor prepared a detailed audit checklist (spreadsheet) that was used to assess and track compliance. This spreadsheet formed the basis of the compliance register presented in Appendix A of this report.

4.5 Site audit

The site inspection components of the audit were undertaken between 30 April 2025 and 5 June 2025.

4.5.1 Opening Meeting

The opening meeting was held and attended by the following personnel:

- Rebecca Walker-Edwards – Environmental Manager
- Luke Fania - Transgrid
- Ken Holmes (Lead Auditor)

Introductions were made, and the purpose and scope of the audit was outlined. An explanatory presentation was given to summarise the overall audit process. That is, a site inspection, site interviews and detailed review of records to identify compliance with the approval conditions relevant to the current operations at the site.

4.5.2 Site Inspections

Two site inspections were undertaken during this audit. The Lead Auditor inspected the site from 30 April to 2 May, 2025 and the Biodiversity Specialist inspected the site from 2 June to 5 June 2025.

The site inspections included observation of:

- Site access and security;
- Typical areas of the transmission line easement cleared of vegetation;
- Tower construction sites on the easement;
- Creek crossings and associated clearing works;
- Soil and mulch stockpile areas;
- Surface water management infrastructure;
- Erosion and sediment controls;
- Accommodation Camps;
- Office and parking facilities;
- On-site maintenance facilities;
- Hazardous Materials Storage;
- Waste storage facilities; and
- Equipment Laydown areas.

4.5.3 Site Interviews

Audit interviews comprised of a series of discussions with Elecnor and Transgrid personnel listed in Table Table 3 :

Table 3 - Audit Interviews

Name	Company	Role
Ben Harper	Elecnor	Senior Environmental Advisor
Bobby Simpson	Elecnor	Environmental Advisor
Frank Team	Elecnor	Environmental Coordinator
Jule Vaillancourt	Elecnor	Environmental Advisor
Keeley Hartzer	Elecnor	Environmental Advisor – Biodiversity
Ozlem Anar	Elecnor	Environmental Coordinator
Rebecca Walker-Edwards	Elecnor	Environmental/Approvals Manager
Adam Elliot	NGH	Fauna Spotter Catcher
Latasha Painter	NGH	Ecologist
Alozie Agomoh	Transgrid	Senior Environmental Business Partner
Kim Lembke	Transgrid	Senior Biodiversity Business Partner
Luke Fania	Transgrid	Environment and Sustainability Manager

4.5.4 Closing Meeting

The closing meeting was held at the completion of the site inspection and attended by the following personnel:

- Rebecca Walker-Edwards – Environmental Manager
- Luke Fania - Transgrid
- Ken Holmes (Lead Auditor)

Preliminary audit findings were presented and tasks and timeline for completion of the audit agreed.

4.5.5 Document Review

Compliance related documents that were not available prior to were requested to be provided following the audit. The Auditee's personnel assisted with the provision of documentation following the audit, through secure file transfer mechanisms. The key documents reviewed during this audit are listed in the Compliance Registers against specific conditions.

4.6 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix B**. A summary of the non-compliances identified during this audit are provided in Table 6. The audit criteria used to determine compliance for this audit is defined in Table 3.

Table 4 - Compliance Assessment Matrix

Assessment	Criteria
Complies	<p>Compliance</p> <p>The site complies with the requirements of applicable pre-operational Consent Conditions.</p> <p>A judgment made by an auditor that the activities undertaken, and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.</p>
Non-Compliance	<p>Non-Compliance</p> <p>Clear evidence has been collected to demonstrate the requirement has not been complied with and is within the scope of the audit.</p> <p>Site displays little or no evidence of compliance with the requirements of the regulatory documentation.</p> <p>Note: Where the auditor has not been able to collect enough verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of enough verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. As the condition cannot be verified it is treated as a non-compliance.</p>
Not Triggered	<p>Not Applicable / Not Triggered</p> <p>The respective condition / requirement was not activated within the scope of the audit.</p>
Noted	<p>A statement or fact, where no assessment of compliance is required.</p>

Risk levels for each non-compliance identified have been assessed in accordance with Table 4.

Table 5 - Risk Assessment Matrix

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: <ul style="list-style-type: none"> • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences but is likely to occur.
Low	Non-compliance with: <ul style="list-style-type: none"> • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences but is likely to occur.
Administrative non-compliance	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

5. Stakeholder Consultation

The Stakeholder Consultation for both the PEC East and PEC West Independent Environmental Audits were undertaken together. Table 5 provides a summary of the Stakeholder Consultation undertaken by the Auditor.

Table 6 - Summary of Stakeholder Inputs

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	NSW Planning would like the below stakeholders to be consulted: EPA, BCS, Commonwealth DCCEE, TfNSW, Local Councils, DPI, Forestry, RFS, Fire and Rescue, Local Aboriginal Councils (RAPS), NPWS, Heritage NSW, heritage council, DPI and DPE Water, local lands service.	Please refer to Table 5.
		Areas to be focused to include: <ul style="list-style-type: none"> Evidence of compliance with commitments, reporting and monitoring in all management plans. 	Please refer to Appendix A.
		<ul style="list-style-type: none"> Evidence of any adaptive management identified/ implemented. 	Two heritage related compliance issues occurred during this audit period. These were associated with works occurring following the discovery of unexpected (potential) indigenous heritage finds. The potential non-compliances were reported to DPHI. As a result of these incidents, Elecnor reviewed their unexpected finds procedures, made changes and implemented the revised procedures and provided training to the relevant personnel.
		<ul style="list-style-type: none"> Evidence of compliance with approved footprint and current activities. 	During the last IEA, a Biodiversity specialist undertook a detailed review of the project and verified that clearing works complied with the Approval requirements. Most of the clearing was undertaken during previous audit periods. However, based on the Auditor's observations during this IEA and the review of the project clearing register, the works undertaken to date are contained within the approved project boundaries.

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	<ul style="list-style-type: none"> Erosion and sediment controls, management, monitoring and maintenance. 	The erosion and sediment controls observed during this audit were in accordance with the current ERS&D plans.
		<ul style="list-style-type: none"> Comparison between EA predictions and actual impacts. 	Please refer to Section 7.9
		<ul style="list-style-type: none"> Evidence (tracking documentation/measures implemented) to ensure compliance with clearing and disturbance limits c 23. 	The construction of the PEC East project is well progressed. During the IEA, a Biodiversity specialist undertook a detailed review of the project and verified that clearing works complied with the Approval requirements. A clearing register has been maintained. For further information refer to the Biodiversity Audit Report at Appendix F.
		<ul style="list-style-type: none"> Road maintenance/ monitoring and management and the interface /access onto road networks. 	Road dilapidation surveys were completed during this audit period and evidence of consultation with Councils across the project were sighted.
		<ul style="list-style-type: none"> Evidence of Progressive Rehabilitation. 	Progressive rehabilitation works were sighted during this audit, including at the Wagga Wagga Substation. Progressive rehabilitation is also progressing along the power line corridor, where stringing works have been completed.
		<ul style="list-style-type: none"> Detailed assessment (evidence) of compliance with the Biodiversity Management Plan including but not limited to the reporting/checks/monitoring committed to in the Biodiversity Management Plan (BMP) Condition c 26 (a) (ix) which states 	The construction of the PEC East project is well progressed. During the IEA, a Biodiversity specialist undertook a detailed review of the project and verified that the works complied with the Approval requirements. For further information refer to the Biodiversity Audit Report at Appendix F.
		<ul style="list-style-type: none"> monitor the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols; 	The construction of the PEC East project is well progressed. During the IEA, a Biodiversity specialist undertook a detailed review of the project and verified that the works complied with the Approval requirements. For further information refer to the Biodiversity Audit Report at Appendix F.

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Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	<ul style="list-style-type: none"> Evidence of compliance with partial clearing, clearing commitments (how is this tracked, managed and monitored). Is the current clearing (in particular partial clearing) activity being undertaken in accordance with the commitments within BMP, EA, BDAR and description of partial clearing. 	The construction of the PEC East project is well progressed. During the IEA, a Biodiversity specialist undertook a detailed review of the project and verified that the works complied with the Approval requirements. For further information refer to the Biodiversity Audit Report at Appendix F.
		<ul style="list-style-type: none"> Implementation of ACHMP and compliance with conditions and evidence of consultation with Local RAPS. 	Two heritage related incidents were identified during this IEA. All RAPs were given the opportunity to provide input to this IEA. No issues were raised by any RAP.
		Complaints management, monitoring and response.	Refer to Section 7.2.
Heritage NSW	Alison Lamond	<p>With respect to the scope of the audit for Project Energy Connect East, Heritage NSW notes the requirements under the Heritage Management Plan Energy Connect NSW (Eastern Section) Stage 1 and Stage 2, prepared by Elecnor, dated 7 February 2024. Including the requirements for management of newly identified Aboriginal sites during construction works.</p> <p>With respect to the scope of audit for Project Energy Connect West, Heritage NSW notes the requirements under the Heritage Management Plan Energy Connect (NSW - Western Section) prepared by Secure Energy dated 17 December 2021.</p> <p>It is recommended that the Department of Climate Change, Energy, the Environment and Water Compliance Team be contacted via info@environment.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.</p>	Two heritage related compliance issues occurred during this audit period. These were associated with works occurring following the discovery of unexpected (potential) indigenous heritage finds. The potential non-compliances were reported to DPHI. As a result of these incidents, Elecnor reviewed their unexpected finds procedures, made changes and implemented the revised procedures and provided training to the relevant personnel.

Department	Contact	Stakeholder Comments	Auditor Comments
Transport for NSW	Emily Lu	<p>I have not come across any new concerns over the last six months, but looking at the conditions of consent and TMP, here are some items I would recommend you consider:</p> <ul style="list-style-type: none"> • Road upgrade/intersection treatment works are conducted as outlined within the Consent • Vehicle movements are aligned to numbers indicated in TIA • Heavy vehicles use only the access routes as described in the Consent (Appendix 2 for West, Appendix 3 for East) • Traffic control plan • Adherence to Drivers' Code of Conduct is appropriately monitored 	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Environment Protection Authority	Briohny Seaman	<p>The EPA understand that you are carrying out an independent audit of the NSW Eastern Section of the Project Energy Connect (Eastern and Western Sections).</p> <p>The EPA's interest in the project relates to the requirement for an Environment Protection Licence under section 43 and 48 of the Protection of the Environment Operations Act 1997 (POEO Act) for crushing, grinding or separating, clause 16 of Schedule 1 - for the upgrade of the Dinawan Substation (SSI-9172452) and the upgrade of the Buronga Substation (SS1-10040).</p> <p>The proponent should be aware that under section 120 of the POEO Act, it is an offence in NSW to pollute waters. During construction the proponent must take all necessary precautions and implement all practical measures that could be taken to prevent, control, abate or mitigate water pollution and protect human health and the environment from harm during the construction phase.</p> <p>The proponent should also be aware of the management of noise and vibration from the construction sites, ensuring that all practical measures that could be taken to prevent noise and vibration impacts on sensitive receptors are undertaken, including the scheduling of noisy activities.</p> <p>In addition, note should be taken on the management of dust from the work sites, in particular ensuring that all practical measures that could be taken to prevent dust moving from the work sites are being implemented.</p>	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
Conservation Programs, Heritage and Regulation Group DCCEEW	Andrew Fisher Senior Team Leader South West	<p>Thank you for the opportunity to provide input into the upcoming Independent Environmental Audits for PEC East CSSI.</p> <p>Noting the audit scope as outlined in section 3.3 of the Independent Audit Post Approvals Requirements (2020), South West Regional Delivery (RD) provide the following comments for consideration in your audit.</p> <p>RD has reviewed the PROJECT ENERGYCONNECT – EAST Biodiversity Technical Specialist Audit Report, FINAL February 2025 and make the following comments/recommendations.</p> <p>We note non compliance 3 that states ‘The Post Clearance Ecology Survey Reports sighted do not contain sufficient information on completed partial clearing to inform verification reporting (to confirm if any changes are required to the construction vegetation clearing protocols). A Verification Report has not been prepared as required’. We also note the Improvement Recommendations listed in Table 3.3, particularly Improvement Recommendation Biodiversity 4.</p> <p>RD supports the adoption of improvement recommendation Biodiversity 4 as listed below, with suggested additions in red. We would be interested to know the status of implementing this recommendation.</p> <p>The BMP should be updated to specify the requirements for partial clearing verification monitoring and reporting including:</p> <ul style="list-style-type: none"> - data collection requirements; - fixed point monitoring at representative locations matching 	

Department	Contact	Stakeholder Comments	Auditor Comments
Conservation Programs, Heritage and Regulation Group DCCEEW	Andrew Fisher Senior Team Leader South West	<p>BDAR plot locations and at locations where high densities of trees have been removed (as documented by the project arborist data);</p> <ul style="list-style-type: none"> - recording of clearing machinery types used; - Documentation of mulch cover and depth post clearing; - Fixed BAM plot monitoring of floristics and associated vegetation integrity scores. - calculation and reporting of actual tracking of VI scores against predicted targets for PCTs vegetation zones in the Revised BDAR. - for each vegetation zone, tracking of time between clearing and partial clearing verification monitoring. - comparison of post clearing floristic species richness and cover by growth form type for native species with pre-clearing plot data from the BDAR to identify any losses or gains in native species composition. - comparison of post-clearing cover and species richness for exotic flora species compared with pre-clearing plot data from the BDAR to identify any weed introductions or increases to exotic flora species cover. - recommendations for changes to clearing methods where appropriate, to ensure VI targets identified in the BDAR are likely to be achieved during Stage 3 (Operation). - confirmation of compliance with partial impact clearing requirements and reporting on any excessive clearing of partial impact zones. - Identify any locations where the VI predictions for partial clearing footprints are not likely to be met due to loss of understorey species and/or increase in exotic flora species cover related to excessive clearing. - verification reporting and monitoring to be undertaken by an appropriately experienced ecologist accredited under the BAM. - include BCS (now Conservation Programs, Heritage and Regulation) as a reviewer of Verification Reports. 	<p>Noted, refer to the Specialist Biodiversity Auditor Report (Appendix F)</p>

Department	Contact	Stakeholder Comments	Auditor Comments
		- verification reports to be provided to DPHI and CPHR within 3 months of monitoring.	
Conservation Programs, Heritage and Regulation Group DCCEEW	Andrew Fisher Senior Team Leader South West	If locations are identified where partial impact zones are not likely to meet VI predictions due to excessive clearing or disturbance, the VI difference and area of additional impact may need to be taken into account in the determination of final biodiversity offset requirements, as per Section 7 of Appendix A of the BMP which states that "Clearing of native vegetation will be monitored and recorded to inform any final biodiversity offset requirements within the biodiversity offset package".	Noted, refer to the Specialist Biodiversity Auditor Report (Appendix F)
		RD advises that partial clearing monitoring should exclude regenerating vegetation in the vegetation integrity scores. This is because regeneration is not reflective of the clearing impacts at the time of clearing, as required for the Biodiversity Offsets Scheme.	Noted, refer to the Specialist Biodiversity Auditor Report (Appendix F)
		RD notes that the audit findings indicate a lack of clarity in the project approval and subsequent BMP about monitoring and reporting and auditability of partial vegetation impacts. As the predicted retention of vegetation components from partial impact has a significant influence on a project's credit liability and the consequence of over-clearing is harm that has not been offset, RD supports including further audit recommendations to ensure transparent reporting (including to RD), monitoring, tracking, auditing, and consequence of partial impact thresholds and outcomes.	Noted, refer to the Specialist Biodiversity Auditor Report (Appendix F)

Department	Contact	Stakeholder Comments	Auditor Comments
DCCEEW Water Group	Tim Baker	NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:	A Soil and Water Management Plan has been prepared. The implementation of that plan was assessed during this audit.
		<ul style="list-style-type: none"> The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: <ul style="list-style-type: none"> Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. 	No non-compliances relating to soil and water management were identified during this audit period. The Soil and Water Management Plan has been prepared and implemented.
		<ul style="list-style-type: none"> Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan. 	Not applicable to this project.
		<ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> Water supply availability is clearly defined for the project. Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018. 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. 	<p>Rainwater (sediment laden) runoff is collected in on-site retention basins and used for dust suppression, all other water required is sourced from municipal supplies or from licenced bores (owned by others).</p> <p>No water access licences are required for this project by the Proponent. Evidence was sighted that Water Access Licences are held by the entities providing water for the project.</p> <p>Water take records were provided and are summarised in Section 7.9 of this report.</p>

Department	Contact	Stakeholder Comments	Auditor Comments
DCCEEW Water Group	Tim Baker	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 Planning Approval does not require annual reporting.
Local Land Services	Susie Holbery	Local Land Services did not respond to the consultation request	Noted
Crown Lands	Jarrold Smith	Crown Lands has no concerns with the project thus far. We have not received any complaints from landholders regarding this matter.	Noted
National Parkes and Wildlife Service	Jo Gorman / Simone Carmichael	The NPWS acknowledged receipt of the consultation request, however, did not provide any further input.	Noted
Rural Fire Service	Stephen Walker	The RFS acknowledged receipt of the consultation request, however, did not provide any further input.	Noted
Forestry NSW	Jarod Dashwood	Forestry did not respond to the consultation request	Noted
Commonwealth Department of Climate Change, Energy, the Environment and Water	Katrina Corby	I was involved in one compliance matter for EnergyConnect East but I don't have anything additional to what I had sent the approval holder representative. We do have an Audit section in our branch who may be able to assist you. I have cc'd them on this email.	Noted
Wentworth Council	Jarrold Roberts	Council did not respond to the consultation request.	Noted
Wagga Wagga Council	David Woods	One comment in relation to the works. We would like the auditor to review the tree removal at Gregadoo Waste Management Centre. The trees were to be removed and roots grubbed, however many of the trees were felled and there is evidence of regrowth. This has an impact on our grazing licence for the site.	This information has been onto the Proponent for action.
Balranald Council	Peter Bascomb	Balranald Shire Council has not identified any issues.	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
Berrigan Council	Sarah Griffiths	While the haulage route is not near Berrigan Shire, we note that heavy haulage vehicles will be travelling from VIC and Sydney to the site. Can you please ensure that your audits look at the impacts on infrastructure; environmental impacts resulting from heavy haulage; and impacts on local areas (EG as a result of camp sites used by traffic haulers, stopping mid journey) in terms of noise, fumes etc.	These concerns have been communicated to SecureEnergy and have been addressed in this report. It is noted that there are only four roads which the project uses through Berrigan. None are the roads or locations is referenced in Council's correspondence. It's likely that this comment is in relation to heavy vehicles in general, not for specifically for the PEC East project
Federation Council	Susan Appleyard	Council did not respond to the consultation request.	Noted
Edward River Council	General Manager	Council did not respond to the consultation request.	Noted
Hay Shire Council	David Webb	I can confirm that Hay Shire Council has no concerns to report. The project is well managed and in regular consultation / engagement with Council.	Noted
Lockhart Council	Austin Morris	I can confirm that Hay Shire Council has no concerns to report. The project is well managed and in regular consultation / engagement with Council.	Noted
Murray River Council	General Manager	Council acknowledged receipt of the consultation request, however, did not provide any further inputs.	Noted

Registered Aboriginal Parties			
Department	Contact	Stakeholder Comments	Auditor Comments
Bundyi Aboriginal Cultural Knowledge	Mark Saddler	The RAP did not respond to the consultation request	Noted
Miyagan Culture and Heritage	Robert Carrol	The RAP did not respond to the consultation request	Noted
Griffith Local Aboriginal Land Council	Steve Young	The RAP did not respond to the consultation request	Noted
Wagga Wagga Local Aboriginal Land Council	Lorriane Lyons	The RAP did not respond to the consultation request	Noted
Dareton Local Aboriginal Land Council	Pam Handy	The RAP did not respond to the consultation request	Noted
Murray Lower Darling Rivers Indigenous Nations	Rene Woods	The RAP did not respond to the consultation request	Noted
Barkandji Native Title Group Aboriginal Corporation	Derek Hardman	The RAP did not respond to the consultation request	Noted
Balranald Local Aboriginal Land Council	Louise Murray	The RAP did not respond to the consultation request	Noted
Deniliquin Local Aboriginal Land Council	Rose Dunn	The RAP did not respond to the consultation request	Noted
Hay Local Aboriginal Land Council	Ian Wood	The RAP did not respond to the consultation request	Noted
Narrandera Local Aboriginal Land Council	Therese Simpson	NLALC acknowledged receipt of the consultation request and requested clarification as to the nature of the project. The Auditor provided the requested information. NLALC did not provide any further input.	Noted
Sandhills Artefacts	Michael Lyons / Aloma Simpson	The RAP did not respond to the consultation request	Noted
Muragadi Heritage Indigenous Corporation	Jesse Johnson	The RAP did not respond to the consultation request	Noted
Merrigarn	Shaun Carrol	The RAP did not respond to the consultation request	Noted

Registered Aboriginal Parties			
Department	Contact	Stakeholder Comments	Auditor Comments
Murrabidgee Mullangari	Ryan Johnson	The RAP did not respond to the consultation request	Noted
Nari Nari Tribal Council	Tara Dixon	The RAP did not respond to the consultation request	Noted
Balranald Mutthi Mutthi Traditional Owners	Kaleana Reyland	The RAP did not respond to the consultation request	Noted
Barkindji Maraura Elders Environment Team Limited	Arthur Kirby	The RAP did not respond to the consultation request	Noted
Riverina Murray Regional Alliance	John Fernando	The RAP did not respond to the consultation request	Noted
Hay Aboriginal working party	Ronald Goulding	The RAP did not respond to the consultation request	Noted
Yalmambirra	No contact provided	The RAP did not respond to the consultation request	Noted
Kureinji Nation	Michael Carter	The RAP did not respond to the consultation request	Noted

Registered Aboriginal Parties			
Department	Contact	Stakeholder Comments	Auditor Comments
Individual Registered Aboriginal Parties	Roley Williams	These RAPs did not respond to the consultation request	Noted
	Cheryl Penrith		
	Cherokee Dixon		
	Tiem Wilson		
	Jermaine Dixon		
	Mabel Fitzpatrick		
	Kerrie Parker		
	Richard Dixon		
	Jamie Woods		
	Sissy Petit Havea		
	Terrance Singh		
	Dalas Togo Singh		
	Zakk, Togo Singh		
	Jed Petit		
	Alvira Wighton		
	Alice Petit		
	Marie Murray		
	Edward Murray Smith		
	Daryl Singh		

6. Statutory Compliance and Recommendations

Compliance with the Conditions of Consent have been reviewed by assessing compliance against the various documentation related to project approval, as listed in section 2.2 of this report. The Compliance Register presented in Appendix A provides a detailed review of the compliance status of the site, including recommendations to address non-conformances.

6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 6 - Summary of Statutory Compliance. The number of conditions include sub-clauses within each approval document.

Table 7 - Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non-Compliant	Noted	Not Triggered
Project Approval 9172452	178	136	3	26	13

6.2 Non-Compliances and other recommendations

Non-compliances identified during the site inspection, interviews and document reviews are recorded in detail in the Compliance Registers in **Appendix A** and are summarised in Table 7. Recommendations have been made to address all identified Non-Compliances and Observations (recommendations for improvement).

Table 8 - Statutory Non-Compliances, Observations and Recommendations

No.	Condition	Finding	Recommendation	Risk Level
Project Approval SSI 9172452				
A13	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A12, as well as the complaints register for any complaints received (on the day they are received).	Transgrid advised DPHI of the failure to advise the ER of a complaint relating to a traffic incident on 4 December 2024. Correspondence from Elecnor to the ER advising the ER of the receipt of other complaints was reviewed. The correspondence reviewed indicated that the ER was advised on the day the complaint was received.	Ensure that the ER is advised on all complaints received.	Administrative non-compliance

No.	Condition	Finding	Recommendation	Risk Level
B2	<p>NC1 *Specialist Biodiversity Audit Report (Appendix F)</p> <p>Related to BMP measure BD14 which requires pre-clearing or clearing activities in areas of Plains-wanderer habitat to be undertaken in accordance with the Plains-wanderer Protocol in Appendix F of the BMP.</p>	<p>Overall, sufficient evidence was sighted that requirements relating to pre-clearing or clearing activities in areas of Plains-wanderer habitat are undertaken in accordance with the Plains-wanderer Protocol in Appendix F of the BMP.</p> <p>Non-compliance:</p> <p>Relates to green flagging that was observed to be down at Line 2, Tower 154, Plains Wanderer habitat.</p>	<p>Flagging to be inspected regularly and maintained to appropriately to protect Plains Wanderer Habitat until construction is complete.</p> <p>It is acknowledged that the project has encountered disturbance to flagging and pegs by landholders and/or livestock and ongoing maintenance of pegs and flagging can therefore be challenging, especially at the location (Tower 154) where the non-compliance was noted.</p> <p>Adaptive management (the use of both temporary fencing and green flagging) is being applied to address landholder livestock concerns at this location.</p> <p>The evidence provided to the auditor, relating to the flagging register and monitoring of flagged sites, is noted. The auditor is satisfied that there are suitable checks in place prior to construction activities commencing, meaning that Plains Wanderer Habitat would be protected prior to construction activities (which were not occurring at the time of the audit).</p>	Low

No.	Condition	Finding	Recommendation	Risk Level
C28	The Proponent must: b) implement all reasonable and feasible measures to avoid and minimise harm to Aboriginal heritage items and PADs within the development area; and	Two compliance incidents relating to protection of Aboriginal Heritage were recorded during this audit period. The incidents relate to the unexpected heritage finds on Line 2 at Tower 430 (21/11/24) and Tower 485 (23/11/24). Works undertaken prior to the release of the hold point associated with the unexpected finds. Subsequent investigations found that the artefact(s) at Tower 430 were not of heritage significance. The works at Tower 485 did not impact the heritage artefact found.	Detailed investigations were undertaken and actions taken, including training and procedure updates. No further actions have been identified by the Auditor.	Medium
Observations and Recommendations for Improvement				
C41	The Proponent must ensure that the storage, handling, and transport of dangerous goods is undertaken in accordance with the relevant Australian Standards and guidelines, particularly AS1940 The storage and handling of flammable and combustible liquids and AS/NZS 1596:2014 The storage and handling of LP Gas, the Dangerous Goods Code, and the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.	All fuels and chemicals observed were stored appropriately and there was no evidence of spills or leakages in any storage locations inspected. However, it was noted that, as is common practice on construction and industrial sites, that drummed liquids (20l to 1000l) are often stored on bunded pallets (See photograph 12). It is noted that bunded pallets do not meet the requirements of AS1940 for the storage of flammable and combustible materials as those pallets are not designed to prevent the escape of containerised liquids when the side of the container is accidentally penetrated. See recommendations for improvement in Section 6.2	Transition from the storage of containerised liquids (drums or IBCs) on bunded pallets to storage in temporary (temporary bunding is commercially available) to permanently bunded areas.	Recommendation for Improvement
C23a	Unless otherwise agreed with the Planning Secretary, the Proponent must: a) ensure that clearing does not exceed the limits identified in Appendix 2; and	Calculations in predicted versus actual clearing were not undertaken by the biodiversity auditor due to the size of the dataset and limited time for the audit. Transgrid confirmed that a third-party check (WSP) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery.	It is recommended that a report by the third-party reviewer should be provided to the auditor during the next audit period, to satisfy that auditor that clearing has not exceeded the limits specified in the BMP.	Recommendation for Improvement

7. Independent Audit Post Approval Requirements

This audit focused on the compliance requirements established by the Conditions of Approval. This section of the report covers the specific requirements contained in the DPE Guidelines.

7.1 Summary of Environmental Incidents

The Auditor was provided with a copy of the Incident Register. Four reportable incidents were recorded during this audit period, two were reported to DPHI as required under the Conditions D6 and D7 of the Approval and two were reported to the Commonwealth under the requirements of the project's EPBC approval. The EPBC related incidents did not trigger a non-compliance against the Planning Approval. Note that two non-compliances (that were included in the incident register), were reported to DPHI under Condition D7 of the Approval. A summary of the reportable incidents recorded during the audit period is provided in Table 9.

The Incident Register also included forty-one incidents, typical on any linear infrastructure project, that were not classified as reportable incidents. The non-reportable incidents included:

- Twenty-two minor hydrocarbon spills (all were cleaned and did not result in a material impact);
- Fourteen biodiversity incidents (minor unplanned vegetation disturbance, within the Approved disturbance areas and included the two EPBC related incidents)
- Three minor water / wastewater spillage incidents
- One failure to follow an internal procedure
- One air quality related incident

Table 9 - Summary of Reportable Incidents

Date of Incident	Reported	Description	Response	Notes
21 /11/2024 and 23/11/2024	28/ 11/2024 to DPHI.	Earthing works undertaken at Tower 485, directly adjacent to a hearth. This hearth is part of a cluster identified on 9th October 2024, during an assessment initiated in response to UXF0017.	On 21 November 2024 and 23 November 2024, it was identified that part works had commenced in the location of an unexpected find prior to the release of the unexpected find. The location of the part works was on Line 2 at Tower 430 and Tower 485, respectively. This Cultural Heritage event and was reported to the Department.	This is the heritage related incident which was reported to the Department as a non-conformance.
18/11/2024	10/01/2025 to DPHI	Works undertaken at Tower 430 while the area was under a potential unexpected find (UXF0032-E)	Investigation undertaken	Reported to DPHI as a non-compliance. No documentation was available to the Auditor in relation to this incident

7.1.1 Incident Response Assessment

The system implemented as documented in the EMS includes:

- Incident reporting;
- Implementation of immediate response actions;
- Incident investigation;
- Development of corrective and preventative actions;
- Reporting (internal and external); and
- Incident record management.

The incident management system is being implemented as documented.

7.2 Summary of Complaints

Seventy-two complaints related to the construction of the project were recorded by the Proponent over the Audit Period. A summary of the complaints received that were extracted from Transgrid's complaints Register is provided in Table 10.

Note that some of the complaints covered multiple issues, for example several complaints were received relating to gates being left open and biosecurity protocols not being completed. Thus, the total of seventy-seven issues listed below.

The compliant categories were:

- Property Access (25)
- Gates left open - 8
- Unapproved access - 5
- Survey pegs and potential damage to farm equipment – 5
- Dissatisfaction with works on their property - 4
- Track Maintenance – 3
- Biosecurity (vehicle cleaning prior to private land access) – 17
- Traffic (speeding / dangerous driving by project vehicles) – 12
- Other (8)
- Team members' behaviour - 7
- Work camp location - 1
- Waste Management (plastic waste left of private property) - 6
- Unapproved Out of Hours Works – 4
- Cultural Heritage (lack of RAP engagement) – 2
- Noise – 1
- Dust (vehicle speeding on private land) – 1
- Surface Water – 1

7.2.1 Compliant Management System Assessment

The complaints management system as documented in the EMS includes:

- Complaint reporting;
- Communication protocol (initial and on-going contact with complainants);
- Compliant investigation;
- Development of corrective and preventative actions (where appropriate);
- Reporting (internal and external); and
- Complaint record management.

With the exception of one instance where the ER was not advised of a complaint received, the Auditor is satisfied that the project is implemented that complaint management system.

Table 10 - Summary of Complaints

Date	Summary	Response and Investigation	Category
10-Sep-24	A complaint was raised with the Land Access Manager regarding the use of inappropriate language in the presence of landholder189 when a construction staff member was asked to clean the vehicle before entering the property.	The Land Access Manager acknowledged the complaint and will investigate the issue with the Construction Team Leader. The Construction Team advised the Engagement Manager that the complaint is not accurate. The Land Access Manager issued an apology to the landholder on behalf of the project and highlighted that courteous dealings with all stakeholders is an expected behaviour on the project.	Miscellaneous
22-Sep-24	The Land Access Officer received a text in the morning (Sunday) from landholder124 expressing concerns about survey pegs remaining in cropping areas. The landholder believes the 100mm protruding above the surface represents a risk to cropping machinery and safety.	The Land Access Officer acknowledged the complaint via text and notified the Construction Team. A solution will be investigated on Monday and next steps advised to the landholder. 1/10 - Construction team have actioned the temporary removal of pegs to allow harvesting activities.	Land Access
23-Sep-24	landholder 176 called the community1800 line complaining about the emerging H&S risk with the heritage bunting and star pickets in the crop	The Engagement Team member acknowledged the complaint and advised the landholder that the issue will be raised with the Land Access and Construction Teams. The next steps will be advised once the mitigation has been addressed. 4/10 - Construction team have actioned the temporary removal of pegs to allow harvesting activities.	Land Access
23-Sep-24	The Land Access Officer received a call from H082 who was complaining that the fence connecting the gate between structures 147 and 148 was not tensioned properly. As a consequence, the posts were bent over and the lower wire was loose. The landholder also indicated that he came across a project worker climbing over the mesh fence near the tank farm.	The Land Access Officer will investigate with the Construction Team and advise the landholder on next steps with the repair. 1/10 - Repairs undertaken by Construction Team and a meeting planned for 4 Oct.	Land Access
25-Sep-24	The Land Access Officer received an after-hours call from landholder H176 advising of his concern that foundation spoil is being placed in the centre of the tower pads on his property. As the landholder will be cropping in these areas in the future he previously requested that the spoil be placed elsewhere. This request was reflected in the Property Advice Statement (PAS) and Property Management Plan (PMP).	The Land Access Office advised he will raise the issue with the Construction Team and respond accordingly with next steps. 2/10 - Construction Team agreed to address pad issue by re-grading site and reduce the profile and remove surplus soli. Works scheduled for w/c 7 October.	Land Access

Date	Summary	Response and Investigation	Category
27-Sep-24	A sensitive receiver to the Cobb Highway camp emailed to advise of the increase in noise from the camp. They also said they had been told inaccurate information in relation to the number of personnel at the camp. They also raised the issue of light from the camp being seen from their home.	The Engagement Team has raised the issue with Construction and Environment Teams and they will respond with next steps. 11/10 - The Environment Team is arranging noise monitoring at the community member's property to validate noise levels. The Community Stakeholder Lead is now liaising with the resident to agree on a preferred time.	Noise
05-Oct-24	Land Access Officer received a call from landholder177 advising that a survey vehicle had been seen using an access track off-easement. The driver claimed he was lost. landholder advised that if this continues he will only allow access when requested and will lock the gate in between these instances.	The Land Access Officer acknowledged the complaint. The issue will be raised with the Construction Team, who will then re-iterate the surveyors can only access the property easement by the approved tracks. 16/10 - Land Access Officer advised the landholder that the Construction Leader has been instructing staff at morning pre-starts not to use tracks off-easement and to access towers along the easement only. The landholder advised the Land Access Office he was with this action.	Land Access
10-Oct-24	Transgrid Community Team emailed the Elecnor Engagement Team with a complaint lodged from a community member alleging a concrete truck collided with his box camper trailer on Brookong Creek Road near Urana on Thursday 9th October, and then drove off.	The Engagement Manager acknowledged the complaint with the community member and also inquired with the Construction Team and Concrete Contractor. The incident has been recorded and will be investigated next week by the Contractor and Safety Teams. 10/10 - The concrete contractor is now liaising with the community member. The investigation is underway and they the parties will agree on the accident resolution process once the investigation is complete. Elecnor will remain as the escalation point for the community member who agreed to this approach.	Traffic
14-Oct-24	EA First Nations Participation Manager received an email complaint from a Local Aboriginal Land Council at 5.30pm. The concerns raised related to alleged breaches of engagement protocols such as the use of Wiradjuri language in the naming of Camp 3 and non-engagement of labour services.	The First Nations Participation Manager acknowledged the email later that evening and actioned the complaint escalation the following business today with Elecnor's client. A meeting invitation has been extended to the CEO of the LALC for next week where the issues raised will be discussed. 28/10 - Meeting conducted with the CEO and discussed the issues. Transgrid and Elecnor will look for opportunities engage going forward which may include for example TG's Community Partnership program, Cultural Heritage Training on the project. Monthly meetings have also been set going forward.	Heritage engagement

Date	Summary	Response and Investigation	Category
17-Oct-24	Transgrid received a complaint on their Community Line regarding a construction vehicle narrowly missing a bus when turning out of an intersection on Boree Creek Road.	Following an investigation of the vehicle rego number by the Elecnor Construction Team, it was confirmed that the vehicle was part of a PEC subcontractor fleet. The construction worker driving the vehicle turned out of the intersection without looking left and due to the narrow width of the road, a bus had to brake suddenly and swerve off the side of the road. The Construction team confirmed they will reiterate at pre-starts the need for safe driving practices. The Project Interface team confirmed they will inquire with the local council about the possibility of additional signage at the intersection. These steps were communicated to the complainant who was comfortable with the investigation and steps to be taken.	Traffic
17-Oct-24	Land Access Officer received a text from H210 advising that a gate off Renmark Road was left unlocked by PEC work crews. Vehicle hygiene sheets are also not being signed. The property lessee is concerned as he has cattle on the property and indicated that crews must adhere to gate protocols or the issue will be escalated.	The Land Access Officer advised he will raise this with Construction crews and have the message communicated at pre-starts. The lessee advised he is happy with this action.	Land Access
17-Oct-24	A small group of about 10 people, some wearing PPE attended the Spirit of the Land Festival on Saturday night where they observed to be intoxicated and acting inappropriately in front of community members.	No action recorded	Miscellaneous
24-Oct-24	LH188 lodged a complaint via the TG Community line regarding the TG property area and contractors conducting works on his property.	The TG Community Team acknowledged the complaint and forwarded the correspondence to EA Engagement Team. The Land Access Officer to investigate the issues raised with the landholder. 5/11 - Land Access Officer is arranging a meeting with landholder to go through each issue.	Land Access
24-Oct-24	A Balranald community member sent an email to PEC's Camp 5 onsite manager complaining about driver behaviour. The issue raised was that some drivers who turn right out of the camp and travel along Church Street are not giving way as they cross over River or Bank Streets - raising the safety risk to pedestrians or other road users.	The Camp Manager acknowledged the complaint and advised the resident that they will forward the complaint to the H&S Manager. The H&S Manager raised the issue with the Community Engagement, Construction and wider H&S teams. The safe driving message will be communicated at Camp 5 pre-starts and crews will be instructed to turn left out of the camp to avoid the residential areas. The resident was comfortable with the actions taken and how the complaint was escalated	Traffic
25-Oct-24	Land Access Officer received a text from H210 advising that a gates at Structure 1 have been left open and vehicle hygiene sheets have not been signed. The property lessee is concerned as he has cattle on the property and some may wonder onto the Boiling Down Road if the gate is left un attended for any length of time. The Lessee said he will lock the gate if not addressed.	The Land Access Officer acknowledged the complaint and contacted the Construction Team. The issue will be raised pre-starts again. Following the pre-start, the EA Civil Superintendent will call a meeting with Supervisors, Superintendents, Managers, and Leading Hands of all delivery partners to address this matter.	Biosecurity and Land Access

Date	Summary	Response and Investigation	Category
26-Oct-24	H122 called the Land Access Officer requesting that all plastic to be picked up out of his paddocks left from work crews. He is concerned his expensive cattle may be at risk if they began to eat the plastic.	The Land Access officer contacted the Construction Team and advised them of the issue. The Superintendent deployed a work crew to the property to clean the site and secure boxes. The issue was flagged through pre-start to all A&E crews that boxes must be contained and sites left tidy each day.	Waste Management
26-Oct-24	Land Access Officer received a voicemail from H181 complaining that plastic sheets were left in his paddocks. Landholder collected these and gave them to an Elecnor employee who was onsite.	Land Access officer contacted Construction Team advising of the issues. The matter will be investigated and teams will be informed. The construction crew attend the matter by collecting plastic. The issue was flagged through pre-start to all A&E crews that boxes must be contained and sites left tidy each day.	Waste Management
27-Oct-24	The landholder's representative (H176) phoned to advise that Elecnor contractors were working on the property on Sunday 27/10/2024 without seeking permission from the Landholder to work outside of the agreed working hours. They also advised that this situation has occurred on a number of occasions over the last few weeks. They mentioned that they felt they were not being treated with respect by the Contractor	The landholder understood that the approved working hours for the project are 7-6 Mon-Fri; Sat 8-1 and no work outside of this. This is what the EIS team advised him years ago. These works are however, approved under the OOHW process and have been undertaken in accordance with the approval. The land access team have explained this to the landholder however, Elecnor are avoiding working outside standard hours as much as possible	OOHW / Land Access
29-Oct-24	landholder for H047, 48, 50 advised Land Access Officer that his grain harvester's comb and knife was damaged after striking a survey peg when cutting the crop within project area. landholder advised he would be seeking costs for repairs and delays.	Land Access Officer acknowledged the complaint and will follow up with the Construction, Environment and Commercial Teams to determine next steps. The Land Access Officer spoke with the landholder who advised that he was busy and would like to discuss the matter after harvesting activities and whether he would seek replacement of the cutting knives.	Land Access
31-Oct-24	Complaint made by a Hay Council employee to Transgrid about the etiquette shown in the community gym by construction workers from Camp 4. Transgrid have forwarded the complaint to Elecnor and asked to follow up.	PEC Community Engagement Team will investigate the complaint with the Camps Team and follow-up with the complainant. 5/11- The Camps Construction team advised the subcontract group who were utilising the local gym have demobilized from site last week and will not be returning to site.	Miscellaneous
31-Oct-24	Land Access Officer received a text from LH 188 regarding a vehicle he had to turn away from his property due to vehicle hygiene. landholder expressed bio security concerns. The vehicle returned for a second time but was rejected again.	Land Access Officer acknowledged the complaint and will raise an investigation with the Construction Team to identify the sub contractor and driver. 4/11 - Complaint entered into incident reporting system and escalated to Environment Team. Land Access Officer contacted landholder who was happy with the escalation process.	Biosecurity

Date	Summary	Response and Investigation	Category
02-Nov-24	Land Access Officer returned a missed call from H176 and was advised that Elecnor were working outside of agreed construction hours on Saturday. The Site Supervisor removed the crew from Tower 90.	The landholder understood that the approved working hours for the project are 7-6 Mon-Fri; Sat 8-1 and no work outside of this. This is what the EIS team advised him years ago. These works are however, approved under the OOHW process and have been undertaken in accordance with the approval. The land access team have explained this to the landholder however, Elecnor are avoiding working outside standard hours as much as possible	OOHW / Land Access
03-Nov-24	Land Access Officer received a text from LH 188 regarding Land Survey Vehicles and concrete trucks he had to turn away from his property due to not meeting minimum vehicle hygiene standards. landholder expressed bio security concerns and would like vehicles inspected before leaving camp as he is spending time completing the task himself.	Land Access Officer acknowledged the complaint and will work with the Construction Team to identify a process that mitigates this issue. 4/11 - Complaint entered into incident reporting system and escalated to Environment Team. Land Access Officer contacted landholder who was happy with the escalation process.	Biosecurity
04-Nov-24	Land Access Officer received a text from LH 188 regarding Land Survey Vehicles and concrete trucks he had to turn away from his property due to not meeting minimum vehicle hygiene standards.	Land Access Officer acknowledged the complaint. The issue was also logged in Elecnor's incident management system. The Construction Team are investigation enhanced protocols to ensure vehicle hygiene standards. 4/11 - Complaint entered into incident reporting system and escalated to Environment Team. Land Access Officer contacted landholder who was happy with the escalation process.	Biosecurity
06-Nov-24	The Land Access Officer met landholder 196 following a report that he had contacted Safe Work NSW about the condition of his access track. landholder has previously requested the edges of the track to be made-safe for quad bikes and LV to cross. Berns also need to be installed to slow water run off and to stop erosion. Instruction for the track to be made safe within 7 days.	Land Access Officer acknowledged the complaint and contacted the Construction Team. The Engagement Manager has advised Safety and issue is now being attended to. 19/11 Construction Team completed mediation works to the track. landholder satisfied with the result.	Land Access
06-Nov-24	Land Access Officer received a text from LH 188 regarding Land Survey Vehicles and concrete trucks he had to turn away from his property due to not meeting minimum vehicle hygiene standards.	Land Access Officer acknowledged the complaint. The complaint will be added to the other reported non-conformance incidents as part of the investigation 18/11 - Land Access and Construction Team met with landholder to discuss recent vehicle issues. New mitigations proposed included extra equipment at washdown bay and the appointment of a dedicated supervisor to oversee vehicle inspections and bio security conformance.	Biosecurity

Date	Summary	Response and Investigation	Category
11-Nov-24	landholder 173 contacted Land Access Officer advising that while harvesting the canola crop, the machinery picked up a wooden block. The block was removed from the header elevators and no major damage detected. The landholder found six more blocks lying in the crop, which caused a 2.5 hour delay to operations.	Construction supervisors to be notified of the incident. Site inspection & cleanup to be instigated. 20/11 - Land Access Officer completed a site inspection and found no other timber in the crop. Raised the issue at pre-start on 13/11/2024	Land Access
14-Nov-24	Land Access Officer received a text from LH 190 regarding project vehicles she had to turn away from her property (access neighbouring property) due to not meeting minimum vehicle hygiene standards.	Land Access Officer acknowledged the complaint and has advised the Construction Team. He also advised of upcoming improvement mitigations. 18/11 - Land Access and Construction Team met with landholder to discuss recent vehicle issues. New mitigations proposed included extra equipment at washdown bay and the appointment of a dedicated supervisor to oversee vehicle inspections and bio security conformance/H advised she was comfortable with the new mitigation approach.	Biosecurity
14-Nov-24	Land Access Officer received a call from LH 188 regarding project vehicles he had to turn away from his property due to not meeting minimum vehicle hygiene standards. landholder requested meeting to discuss issue and work through mitigations	18/11 - Land Access and Construction Team met with landholder to discuss recent vehicle issues. New mitigations proposed included extra equipment at washdown bay and the appointment of a dedicated supervisor to oversee vehicle inspections and bio security conformance. landholder advised he was comfortable with the new mitigation approach.	Biosecurity
15-Nov-24	Land Access Officer received a text from LH190 regarding sub-contractor vehicles that she rejected from accessing her property due to not meeting hygiene standards.	Land Access Officer acknowledged the complaint and advised the Construction Team. Land Access Officer also met with subcontractor crew highlighting the requirement for minimum vehicle hygiene standards. The contractor's Construction Lead advised that the crew would return tomorrow with washed vehicles. 18/11 - Land Access and Construction Team met with landholder to discuss recent vehicle issues. New mitigations proposed included extra equipment at washdown bay and the appointment of a dedicated supervisor to oversee vehicle inspections and bio security conformance. landholder advised she was comfortable with the new mitigation approach.	Biosecurity
18-Nov-24	Land Access Officer received a call from H195 complaining that the access track diverted the water from recent rains away from the nearby dam and into a recently planted crop. The waterlogged area may impact seed germination.	The Land Access Officer acknowledged the complaint and then inspected the site with the landholder's representative. The Construction team were notified, and they will instruct the sub-contractor to complete remedial works. 19/11/2024 - Rectification works commenced and was completed in three days resolving the water flow restriction issue. Landholder advised he was comfortable with the solution.	Water Management

Date	Summary	Response and Investigation	Category
20-Nov-24	A truck driver contacted the 1800 community information number to advise he had witnessed a speeding driver on the Lockhart Road to Urana,	PEC's Fleet Manager has confirmed this vehicle number is used by subcontractors. A meeting with this subcontractor has taken place to discuss issue and safe driving reiterated at daily pre-starts.	Traffic
21-Nov-24	Land Access Officer received a phone call from H176 complaining about a PEC employee using an internal property track instead of the easement. landholder approached the employee who advised he is new to the project and thought he was following the supplied map.	The Land Access Officer apologised to the landholder and advised the new employee of the correct access track to the easement. Staff member's supervisor also advised of landholder's complaint and requirement to stay on easement.	Land Access
28-Nov-24	Land Access Manager received a phone call from H013 advising that a PEC water truck travelling on Arumpo Road did not slow on when he saw livestock on the side of the road. Consequently, lambs split from the mob and damaged a fence.	The Complaint has been acknowledged and will be investigated. Issue to be raised with Camp 6 Construction Team and highlighted at pre-starts.	Traffic
28-Nov-24	A near neighbour to the Cobb Highway Camp has been sent a notification advising the Cobb Highway camp will open next week. The near neighbour is unhappy about the location of the camp, lighting and the number of people staying at the camp.	The near neighbour has advised us not to contact her until the camp is closed.	Miscellaneous
01-Dec-24	landholder188 lodged a complaint via the project's community website from raising easement and construction issues.	The complaint was forwarded to the contractor to assist with the investigation upon the project re-opening in the New Year. The Construction team agreed to rectify wheel track marks at the same time equipment is on site to construct and access track. Other issues raised in the original complaint and now being managed with the landholder via the proponent's legal team under a separate resolution process.	Land Access
02-Dec-24	Land Access Officer informed of a verbal exchange between H189 and PEC worker after access was denied given weather conditions. A complaint was escalated to local authorities to undertake investigation.	The incident was communicated to the Construction team and lodged in PEC's complaint system. The construction program to resume when weather conditions are more favourable. Onsite meeting with Construction PM scheduled in New Year to discuss incident and determine access protocols.	Miscellaneous
05-Dec-24	Land Access Officer received phone call from landholder representative regarding gates left open between H075 and H081.	Land Access Officer acknowledged complaint and advised that 'open/close' gate signs will be installed and construction. On 11/12/2024 Land Access officer installed nine high visible gates signs on the property and landholder satisfied with the initiative	Land Access

Date	Summary	Response and Investigation	Category
09-Dec-24	A member of the public witnessed a PEC employee in uniform and during working hours drinking at Coleambally pub in late November.	The Project Construction team has investigated this matter and spoken to the employee involved on several occasions. IVMS has been used to locate the worker's movements.	Miscellaneous
11-Dec-24	Land Access Officer advised today that he received a call yesterday evening from landholder181 regarding two perished head of cattle. It is alleged that this incident was a result of the cattle eating loose plastic that had been left on the PEC work site. landholder seeking compensation.	Land Access Officer acknowledged the complaint and advised the Construction Team to investigate the incident. 20/12 - landholder agreed to meet with PEC team on-site in the new year where a re-imbursement will be negotiated. Construction team re-iterating site protocols in pre-starts.	Waste Management
13-Dec-24	Land Access Officer received a call from landholder069 regarding the installation of a gate on the easement that was not in line previous discussions and without consultation.	Land Access Officer met with the Construction team to raise the matter and investigate the issue. An onsite meeting took place with landholder where a decision was made to relocate the gate position to the satisfaction of landholder that would also meet project requirements.	Land Access
13-Dec-24	A representative of H090 emailed the PEC Land Access Officer advising spiny burr presence along access tracks and tower pad edges. Also raised the issue of still awaiting installation of brush down bays.	Land Access Manager called landholder representative and lodged issue with the Construction team to explore mitigations. 20/12 - PEC team agreed to a herbicide spraying program. Construction Team agreed to install temporary brush down bays in the New Year. landholder's Operation Manager please satisfied with the response.	Biosecurity
06-Jan-25	LH141 posted Facebook a video expressing his dissatisfaction that a lock had been placed on gates which were in place prior to the construction. The padlock had to be removed to allow livestock to enter the property. He also drew attention to gates which were installed as part of the construction which were not locked.	The Land Access team acknowledged the complaint with the landholder and agreed to remove the padlock and leave the gate latched but not locked. Construction Team notified that the gate is to remain closed and latched at all times.	Land Access
08-Jan-25	Land Access Officer received a call from landholder134 regarding a construction vehicle entering the site without a bio-security inspection. The PEC worker was asked to leave and the gate locked until a meeting takes place with the Land Access Team.	Complaint acknowledged. The Land Access team notified the Construction team and re-iterated bio security protocols on the property. The proponent's Land Access team met with the landholder and agreed to new mitigations including a dedicated construction supervisor responsible for vehicle inspections. Additionally, a new protocol was agreed to where vehicles are not to travel between the boundaries of H134 and H136 without prior communication via the construction supervisors.	Biosecurity
10-Jan-25	landholder 196 issued a complaint indicating that the project had not provided copies of the vehicle log-in sheets as part of the property's bio-security protocols. (requested 11/12). Consequently, the landholder has locked the gate until a response and supply of log-in sheets are provided.	The Land Access Officer acknowledged the complaint and actioned the request by supplying copies of the log-in sheets from the Construction Team. A meeting is to be scheduled with the landholder when he returns from Leave to discuss his administration requests going forward and confirm the bio-security protocols in place.	Biosecurity

Date	Summary	Response and Investigation	Category
12-Jan-25	Land Access Officer received a phone call from landholder176 on Sunday morning advising he saw a PEC vehicle accessing his property. landholder considers this entry a breach of agreed access conditions and unlawful. landholder advised the police of entry.	<p>The Land Access Officer immediately notified the Construction team. The Construction Manager then instructed the worker to exit the property, and spoke with the police to explain project activities and access requirements to the property.</p> <p>The GPS mapping has been updated in the IVMS software to ensure correct routes are taken when accessing the property. The Construction workforce to be reminded at pre-starts of land access requirements.</p> <p>A meeting will be held with the landholder to discuss and confirm access protocols and the permits currently in place. .</p>	Land Access
16-Jan-25	Land Access Officer spoke with landholder176 to regarding the PEC construction crew performing works on Sunday15th, which is outside of agreed working hours. The landholder had to subsequently interrupt his spraying program for the safety of staff and now seeking reimbursement of associated costs.	The landholder understood that the approved working hours for the project are 7-6 Mon-Fri; Sat 8-1 and no work outside of this. This is what the EIS team advised him years ago. These works are however, approved under the OOHW process and have been undertaken in accordance with the approval. The land access team have explained this to the landholder however, Elecnor are avoiding working outside standard hours as much as possible	OOHW / Land Access
17-Jan-25	The Engagement Team received a call centre complaint lodged on 16th of January from a community member who witnessed a construction worker acting indecently in public. The community member recorded the incident and has provided licence plate details of the vehicle.	The incident was investigated and verified worker involved. The worker has been disciplined and an apology has been put forward by the Construction Manager and worker to the community member.	Miscellaneous
31-Jan-25	Land Access Officer received a complaint from landholder082 regarding heritage and environmental survey flagging that has fallen over onto the ground within his paddock. He also indicated that plastic has blown across into paddocks from the project site and could pose a health risk to his livestock.	The complaint was acknowledged by the Land Access Officer. The Environment Team sent a crew to collect the plastics and rectified the survey flagging. Alternative fencing for survey areas being considered.	Waste Management
09-Feb-25	A sensitive receiver on Line 5 phoned to ask if construction work would cease on their property as they are listed as sensitive receivers with no out of hours work permitted.	The complaint was acknowledged by a site supervisor and work was immediately stopped. A check of the permit showed the caller was a sensitive receiver. The construction team had not referred back to their documentation correctly.	OOHW / Land Access

Date	Summary	Response and Investigation	Category
13-Feb-25	On 4th Dec 2024, landholder196 advised PEC Land Access Officer of a safety incident - PEC HV moving east on Oxley Bridge Rd was on the wrong side of the road while travelling around a bend. landholder was forced to drive off to the side of the road.	The incident was lodged in the project's safety management system. The investigation concluded that the road is suitable for single carriage only, and does not have adequate width for two vehicles to pass in opposite directions at the same time - without the left-hand side tyres of the passing vehicles being placed into the gravel section of the road while passing each other. IVMS records indicate that the driver of HV was not speeding, showing a maximum speed of 15km/hr. A copy of the investigation findings were emailed to the landholder.	Traffic
13-Feb-25	A Land Access Officer on Humelink received a communication from a landholder advising of an incident whilst travelling on Boiling Down Road. The incident occurred near the PEC substation site at Wagga Wagga and involved three dark vehicles driving towards him with little line of sight due to dust. The Land Access officer then advised PEC Engagement on 7th Feb inquiring if there are any dust mitigations in place.	The Incident was investigated by the PEC where it was concluded the vehicles were not PEC related. Boiling Down Road is a government controlled, unsealed Road. During the day this road is used by members of the public, along with numerous heavy vehicles utilising the nearby refuse depot. PEC will notify the council of the issue.	Not related to project
15-Feb-25	landholder210 sent SMS to Land Access Officer advising the gate off Redbank Rd at structure 4 was left unlocked - potentially exposing his cattle to the public. The landholder advised that these gates are to be locked at the end of each day.	Construction Team placed a lock on the gate and advised that a Site Supervisor will be made responsible to lock the gate after each work shift.	Land Access
21-Feb-25	A local landholder (not on PEC) claims he was forced off the road on the intersection of Country Boundary Road and Slys Lane Milbrulong by a subcontractor vehicle on Project EnergyConnect. A hose was seen hanging from one side of the vehicle. The unrestrained and oversized load also had no signage, flagging and or escort.	An investigation was carried out indicating that the subcontractor's vehicle was complying with safety standards and no unsafe behaviour was exhibited.	Traffic
21-Feb-25	Landholder 096 property boundary fence not being closed, the landholder's bull is missing. The landholder advised this was the second time his gates had been left open. In the previous incident, ten days ago, the landholder had to muster about 90 sheep back to his adjoining neighbour's property.	Construction team was advised, and an apology was given to the landholder. Issue raised at the prestart meeting on Monday, 24 February 2025. The bull has not been located at this stage.	Land Access

Date	Summary	Response and Investigation	Category
27-Feb-25	Land Access team reported a complaint issued by H134. Issues include potential foreign soil and seed being introduced to the property on stringing equipment, plastic waste left on site, survey pegs left on the ground posing risk to landholder machinery, and steel star pickets also posing safety risk.	A full site clean-up, including the easement, was completed. The pull winch and break winch were adjusted to prevent the spread of weed seeds or vegetation between neighbouring properties. A ground cover sheet was placed under the winch to capture and dispose of any foreign material.	Biosecurity
05-Mar-25	A near neighbour to the project claims Project EnergyConnect vehicles travelling at 100kms an hour is causing dust issues to his property. The neighbour has asked if drivers could slow down.	Construction team notified and the team has been advised at Prestart to slow down. Construction has also advised they will use a water truck regularly along this unsealed road to help reduce the impact of dust.	Dust
07-Mar-25	H081 emailed concerns via legal representative regarding consultation, information requested not being provided and heritage concerns about vegetation clearing.	Construction and Land Access team met with landholder to discuss concerns. Solution in place regarding construction notifications, protocols of tree felling, and access requirements. Commercial Team addressing formal correspondence.	Heritage engagement
10-Mar-25	The complainant emailed her concerns about Booorooban Tchelery Road, especially the grid crossings. The caller also raised issues around poor driver behaviour with crews not slowing down and leaving enough room for other vehicles to pass.	Construction team alerted the Council who will be undertaking grid repairs. Safety alert issued to construction teams regarding driver behaviour, and crews at L2 advised of driving protocols including the area raised in the complaint.	Traffic
19-Mar-25	landholder069 texted PEC Engagement team complaining about the driving behaviour of a water truck operator on Booorooban Tchelery Road.	Safety Team identified the driver and highlighted expected driving protocols on the local roads. The Safety team issued pre-start messages to the Construction team. landholder contacted and he stated he has already seen an improvement in driving behaviour.	Traffic
24-Mar-25	landholder 189 called the Land Access Officer advising that a vehicle was denied entry to the property as it was not complied with the come clean, go clean procedure. landholder requested a meeting to discuss the bio-security protocol.	Land Access and Construction teams met with landholder on the 27/3 to discuss bio-security resourcing and inspection protocols. The Construction Team agreed to appoint new personnel to manage vehicle inspections. The landholder was satisfied with the suggested action.	Biosecurity
27-Mar-25	landholder50 issued a complaint to a PEC Land Access Manager regarding range of construction and land access issues caused by the project. Examples include disused survey pegs remaining on site, damage caused to equipment by the pegs, access track construction, timber clearing instructions, rubbish left on site.	Transgrid and Elecnor met with the landholder and raised a series of commitments and mitigations to address the outstanding issues. Transgrid will manage the Lease Negotiations separately with the landholder.	Land Access
01-Apr-25	A member of the community emailed the team about the discourteous and intimidating behaviour of an Elecnor driver. The rego and vehicle number have been supplied.	The investigation revealed that this was not a PEC vehicle. The complaint was advised that the matter was handed over to Elecnor's H&S Australian team where the driver will be disciplined.	Not related to project

Date	Summary	Response and Investigation	Category
01-Apr-25	landholder090 emailed the Land Access Team advising that a PEC-related vehicle had travelled off easement and entered a no-go construction zone near towers 40-41, and that the presence of Spiny Bur throughout the paddock is a breach of bio-security protocols.	The Land Access team advised the team who commissioned the supplier of the correct property entry protocols. A spraying program is scheduled to address weed issues.	Biosecurity
03-Apr-25	LH62 issued a complaint regarding a gate left unlocked. landholder seeking reimbursement costs for travel and time to rectify.	The Construction Team have agreed to several new mitigation including the gate will be locked at 5pm each day with photographic evidence to be provided. A sign has been placed at the gate and another toolbox has been implemented to all personnel.	Land Access
03-Apr-25	A community member notified the Land Access Officer issuing a complaint that he encountered a PEC vehicle was travelling too slowly on Tchelery Road causing the driver to be late for an appointment.	The community member was advised that the vehicle operator was travelling carefully on a single carriage road. The Construction team was notified and will issue pre-start messages reminding the workforce of courteous driving behaviour when travelling on local roads.	Traffic
10-Apr-25	landholder189 190 issued a complaint to the Land Access Manager regarding finding littered cigarette butts on the property left by PEC construction workers. Additionally, the landholder observed a PEC employee attempt to kick the door of a slow-moving vehicle passing on hanging Rock Rd	Construction crews reminded of site access protocols. Staff were provided butt bins for vehicles and butt belts for staff. landholder happy with outcome.	Waste Management
11-Apr-25	LH104 issued a complaint regarding the access gates being continual left open by PEC work crews - posing a risk of an accident should stock walk onto Coonong Road.	The Construction Team advised the crew working at that location of the correct access protocols. Reminders at the workforce prestart meeting were issued the following day.	Land Access
11-Apr-25	A community member was driving cattle along the Newell Highway reported to PEC workers that a PEC sub-contractor truck driver displayed discourteous behaviour when travelling through the walking cattle herd.	The Land Access Officer met with the community member and apologised on behalf of the project. The Manager of the driver had a one-on-one discussion where the behaviour was addressed.	Traffic
20-Apr-25	H176 advised the PEC Land Access Officer of a vehicle entering the property on Sunday without prior access approval.	The Construction Team was notified, and the vehicle operator was asked to exit the property. EA installed signs on landholder property communicating access hours. EA contacted landholder who was comfortable with mitigation.	Land Access
23-Apr-25	landholder190 issued a complaint in relation to khaki seeds found on a PEC vehicle attempting to enter the property.	The vehicle was cleaned and the seeds bagged. Further communication issued to construction teams - recruitment of dedicated vehicle inspectors in progress.	Biosecurity
23-Apr-25	H118 issued a complaint to the PEC Land Access Officer about the deteriorating condition of roads within his local area	The Council Interface and Construction Teams were notified. Graders and water carts deployed to the identified roads to address the issues.	Traffic

Date	Summary	Response and Investigation	Category
24-Apr-25	landholder190 issued a complaint in relation to khaki seeds found on a PEC bus and workforce footwear while attempting to enter the property. The vehicle was turned away.	The Construction Team implemented new mitigations address cleaning protocols of the bus prior to property entry. landholder happy with this action.	Biosecurity
28-Apr-25	Land Access Officer received a phone call from the project team that gates between towers 84/85 had been locked by landholder177. The landholder was frustrated that gate was left open as it presents a risk to the welfare of his stock should they wander into the adjoining paddock.	High visibility closure signs have been installed on the access gates and reminders provided to crews. Landholder satisfied mitigations put in place and lock removed.	Land Access

7.3 Summary of Notices

SecureEnergy reported that no compliance-related notices, orders, penalty notices or prosecutions were issued to the project during the audit period.

7.4 Project Environmental Management System

The project operates in accordance with the Construction Environmental Management Plan (CEMP) that was prepared in accordance with the requirements of the Project Approval.

The Auditor has concluded that the degree of compliance identified in this audit indicates the CEMP is appropriate and is generally being implemented. The Auditor notes that access to documentation during the evidence assessment stage of the audit was problematic, resulting in delays to the completion of this report.

7.5 Implementation of the Environmental Management Plan and Sub-plans

The Conditions of Approval required the preparation and implementation of the following management plans for the construction phase of the project:

- Construction Environmental Management Plan
- Biodiversity Management Plan
- Soil and Water Management Plan
- Heritage Management Plan
- Traffic and Transport Management Plan
- Noise and Vibration Management Plan

During the document review phase of the project the contents of each of the plans were reviewed and were found to reflect the requirements of the Approval. All Plans and Programs adequately identified the relevant project risks and proposed appropriate risk management controls.

7.6 Status of Previous IEA Findings

The previous Independent Environmental Audit was undertaken by Barnett and May, and the audit report was finalised on 13 June 2024. The status of the finds from that audit are summarised in Table 11 and Table 12.

Table 11 – Status of previous IEA Findings.

Ref.	March 2024 Audit Finding	March 2024 Audit Recommendation	Auditee Response / Observation	Status
S2 C14	<p>The Proponent must:</p> <p>a) minimise erosion and control sediment generation; and</p> <p>b) ensure all land disturbances have appropriate drainage and erosion, and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008);</p>	<p>Appropriate erosion and sediment (surface water management) controls were in place at all sites inspected during this IEA.</p> <p>Routine environmental inspections are undertaken (monthly, weekly and pre-rain) and these are recorded on standard checklists.</p> <p>The weekly environmental checklist includes confirmation of the operation and maintenance of vehicle wash facilities and other devices including shaker / rumble grids.</p> <p>An external ERSED specialist undertakes additional inspections and provides advice to the project.</p> <p>The management of erosion and sediment control is being undertaken in general accordance with the approved management plan.</p> <p>Generally, sediment tracking onto public roads from the Camps was acceptable (at the time of this IEA site inspection). However, significant sediment and gravel tracking on to the Cobb Highway were observed. There were no controls in place at this location to minimise sediment tracking and no sweeper available to clean the impacted area. Elecnor provided a copy of a receipt for hire of a sweeper for that camp, however the sweeper was not on-site at the time of the site inspection.</p> <p>Recommendation: In order to minimise the tracking and sediment and mud onto sealed public roads from major site access points and camps, it is recommended that:</p> <ol style="list-style-type: none"> 1. The procedure for vehicle washdown, including heavy vehicles be reviewed with the aim of reducing the tracking of sediment for vehicles that have not been cleaned onto public roads. 2. Develop a standard approach to the assessment of sediment accumulation at site access points and provide a trigger for road sweeping based on sediment load. 3. Consideration be given to the installation of shaker / rumble grids at all significant site access points, including construction camps where construction traffic accesses public roads. 	<p>All construction camps have washdowns, which include both rumble grids and vehicle washbays. Rock gravel is installed at the entry points. As Camp 4 was in the construction phase, the washdown had not yet been installed, however other measures were in place such as the street sweeper.</p> <p>Any potential vehicle tracking onto roads is constantly monitored by the environmental team, not just during the weekly inspections, but daily when accessing and egressing the camp sites. Where sediment build up through tracking is identified, the concern will be raised immediately with the construction team.</p> <p>During prestart meetings, all personnel are directed to use washbays by the Superintendent or Supervisors.</p> <p>An external soil conservationist is also engaged to regularly review erosion and sedimentation on the project.</p> <p>To date, the project has never received a complaint in relation to tracking of sediment onto a public road (whether from the public or any of the councils).</p> <p>The controls at Camp 4 will be reviewed and upgraded if the washbay, rock or rumble grid have not yet been installed.</p> <p>If the street sweeper is to be used (i.e., controls not yet installed), then use of the streetsweeper will be reviewed and increased to address any potential tracking.</p>	Closed
S2D2	<p>The Proponent must review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 months of the submission of an incident report under condition E6;</p>	<p>Two reportable (Heritage) incidents occurred in the latter stages of the last audit period. A review of the associated management plan (heritage) should have been undertaken during this audit period.</p> <p>The Auditor was provided with a copy of the “updates Register”, and while the register indicates that the HMP was revised, the revision work was related to updating the plan to the current SecureEnergy plan template.</p> <p>No evidence was available to verify that the Heritage Management Plan was reviewed as a result of the reportable incidents that occurred during the last audit period.</p> <p>Recommendation: Ensure that following the submission of an incident report to DPHI that a review of all relevant plans is undertaken and those reviews documented.</p>	<p>There were two events that related to heritage during the latter stage of the previous reporting period, however only one was an incident - this related to PAD29. The second event related to PEC-E-75 and was reported as a noncompliance.</p> <p>The PAD29 incident triggered the requirement to review, and if necessary, revise the HMP under condition D2.</p> <p>The project maintains two registers relating to the update of management plans. These are:</p> <ol style="list-style-type: none"> 1. the Management Plan Review Register; and 2. the PEC East CEMP and subplan updates register. <p>The HMP was reviewed within three months of the incident and this was detailed within the ‘PEC East CEMP and subplan updates register’. The register notes that the review of the HMP and results of the investigation of the PAD29 incident determined that an update to the plan was not required.</p> <p>The PEC East CEMP and subplan updates register has been updated to include further detail to assist with providing evidence of the review. It also now includes the review register in separate tabs, so that these registers directly correlate with one another.</p>	Closed

Table 12 - Biodiversity Report Status of Recommendations

Improvement recommendation ID	Source	Improvement recommendation	Corrective action proposed by proponent	Proposed completion date	Status (current audit)
Biodiversity 1	Infrastructure Approval: C23(a)	It is recommended that clearing pegs and flagging be regularly maintained until the completion of construction, as required under the BMP. It is noted that the Project has encountered disturbance to flagging and pegs by landholders and/or livestock and ongoing maintenance of pegs and flagging can therefore be challenging.	The project will continue to focus inspections on identifying any maintenance required for the flagging and ensuring rectification.	Not specified	Sufficient evidence sighted that efforts are ongoing. See recommendation in the Specialist Biodiversity Report (Appendix F) (Section 3.8).
Biodiversity 2	Infrastructure Approval: C23(a)	Update BMP to require progressive reporting on all items identified in Appendix A, Section 7 of the BMP. It is recommended that this information be made available for review every 26 weeks at the commencement of future audits, to demonstrate progressive tracking and assist audit reporting within the mandatory timeframe requirements. It is recommended that shapefiles be provided to BCS to support the totals provided in the clearing register. It is also recommended that a BAM Accredited Biodiversity Specialist be required for future audits.	Works have commenced on the update of the BMP. Shapefiles have been provided to DPHI to support the totals provided in the clearing register. A BAM Accredited auditor will be engaged for the upcoming audit.	Not specified	Sufficient evidence sighted. See recommendation in the Specialist Biodiversity Report (Appendix F) (Section 3.8).
Biodiversity 3	Infrastructure Approval: C23(b)	It is noted that a Trigger Action Response Plan (TARP) and Improvement Report has been prepared to address non-compliance related to nest box installation requirements. The Project should continue to seek and identify any challenges that exist to installing nest boxes as required and address barriers to installation where possible. Installation of Squirrel Glider nest boxes should be prioritised prior to clearing in areas of mapped Squirrel Glider habitat.	A TARP has been prepared and is being implemented to accelerate the delivery and installation of the nest boxes.	As soon as possible	Sufficient evidence sighted that nest boxes are being provided to offset the loss of tree fauna habitat in accordance with a Supplementary Hollow and Nest Strategy.
Biodiversity 4	Infrastructure Approval: C23(b)	The BMP should be updated to specify the requirements for partial clearing verification monitoring and reporting including: <ul style="list-style-type: none"> • data collection requirements • fixed point monitoring at representative locations matching BDAR plot locations and at locations where high densities of trees have been removed (as documented by the project arborist data) • recording of clearing machinery types used • documentation of mulch cover and depth post clearing • fixed BAM plot monitoring of floristics and associated vegetation integrity scores • tracking of VI scores against predicted targets for plant community types (PCTs) in the revised BDAR • comparison of post clearing floristic species richness and cover by growth form type for native species with pre-clearing plot data from the BDAR to identify any losses or gains in native species composition • comparison of post-clearing cover and species richness for exotic flora species compared with pre-clearing plot data from the BDAR to identify any weed introductions or increases to exotic flora species cover • recommendations for changes to clearing methods where appropriate, to ensure VI targets identified in the BDAR are likely to be achieved during Stage 3 (Operation) • confirmation of compliance with partial impact clearing requirements and reporting on any excessive clearing of partial impact zones • identify any locations where the VI predictions for partial clearing footprints are not likely to be met due to loss of understorey species and/or increase in exotic flora species cover related to excessive clearing • verification reporting and monitoring to be undertaken by an appropriately experienced ecologist accredited under the BAM • include BCS (now Conservation Programs, Heritage and Regulation) as a reviewer of Verification Reports. • If locations are identified where partial impact zones are not likely to meet VI predictions due to excessive clearing, this may need to be taken into account in the determination of final biodiversity offset requirements, as per Section 7 of Appendix A of the BMP which states that "Clearing of native vegetation will be monitored and recorded to inform any final biodiversity offset requirements within the biodiversity offset package". 	Works have commenced on the update of the BMP. The project will complete a verification report.	31 May 2025	Verification report completed, see Section 3.7 of this report for further detail. See recommendation in the Specialist Biodiversity Report (Appendix F) (Section 3.8).

Improvement recommendation ID	Source	Improvement recommendation	Corrective action proposed by proponent	Proposed completion date	Status (current audit)
Biodiversity 5	BMP: BD6	Update BMP to require progressive reporting on all items identified in Appendix A, Section 7 of the BMP. It is recommended that this information be made available for review every 26 weeks at the commencement of future audits, to demonstrate progressive tracking and assist audit reporting within the mandatory timeframe requirements.	Works have commenced on the update of the BMP. Shapefiles have been provided to DPHI to support the totals provided in the clearing register. A BAM Accredited auditor will be engaged for the upcoming audit.	31 May 2025	Verification report completed, see Section 3.7 of the Specialist Biodiversity Report (Appendix F) for further detail.
Biodiversity 6	BMP: BD23	Update BMP Appendix B Unexpected Threatened Species Finds Procedure to include appropriate and specific mandatory assessment and threshold requirements for both EPBC Act and Biodiversity Conservation Act 2016 (BC Act) listed species for determining agency consultation triggers for unexpected threatened species finds.	Works have commenced on the update of the BMP. The BMP will be updated to state that the significance assessment will also occur for unexpected threatened species identified under the BC Act.	Not specified	Sufficient evidence sighted that a significance assessment (WSP, 2024) has been undertaken for the Eleocharis Obici that was unexpectedly found during the previous audit period.
Biodiversity 7	BD39	Update BMP to include annual reporting for annual nest box monitoring.	Works have commenced on the update of the BMP. Annual reporting will be included.	Not specified	Sufficient evidence sighted that nest boxes are being provided to offset the loss of tree fauna habitat in accordance with a Supplementary Hollow and Nest Strategy.
Biodiversity 8	BMP: BD40	The clearing register should be updated to provide details of completed partial clearing and total clearing footprints, with comparison to the partial and total clearing extents provided in the BDAR for PCTs and threatened species. Determination of areas of partial and total clearing should be informed by a verification report and post-clearing land survey and/or GIS mapping informed by post clearing orthorectified aerial imagery.	None	31 May 2025	Verification report completed, see Section 3.7 of the Specialist Biodiversity Report (Appendix F) for further detail.
Biodiversity 9	BMP: BD29 BD30	A review of weed management practices should be undertaken and improvements made as necessary to remove and manage existing outbreaks of weeds onsite and limit the spread of weeds through improvements to rehabilitation and site stabilisation practices.	None	Not specified	Sufficient evidence sighted that no new infestations of notifiable weeds were detected by Elecnor / TransGrid during the audit period.

7.7 Specialist Auditor Reports

As part of this IEA, a biodiversity specialist with Biodiversity Assessment Method accreditation, Erin Lowe was commissioned to undertake a detailed review of the implementation of the Biodiversity Management Plan and compliance with the biodiversity elements of the Conditions of Approval. The specialist report is provided in Appendix F.

7.8 Environmental Impacts

The assessment of construction impacts against those predicted in the Environmental Impact Assessment, prepared by WSP (13 January 2022), are summarised in [Table 9](#).

Table 13 - Predicted vs Actual Impacts

Category	Predicted Impact	Actual Impacts to Date
Biodiversity	<p>The main impacts on biodiversity during construction would be:</p> <ul style="list-style-type: none"> • Direct impacts on six threatened ecological communities, seven under the BC Act; two of the threatened ecological communities are listed as serious and irreversible impacts. • Direct impacts on seven threatened ecological communities listed under the (Commonwealth) Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). • Direct impacts to threatened flora species including nine threatened flora species listed under the BC Act and two serious and irreversible impacts. • Direct impacts on four threatened flora species listed under the EPBC Act. • Direct impacts to candidate threatened fauna species including six threatened fauna species listed under the BC Act with one listed as serious and irreversible impact. • Direct impacts on four threatened fauna species listed under the EPBC Act. • Impacts to threatened aquatic species, ecological communities or their habitats are unlikely. • Impacts to groundwater dependant ecosystems are unlikely • Impacts to wetlands of national or international importance are unlikely • The proposal would be unlikely to lead to a significant impact on any threatened species or their habitat, or migratory birds (and their habitat) listed under the EPBC Act 	<p>The clearing to date has occurred within the approved project footprint. Clearing records indicate that the extent of vegetation removal has to date been consistent with that predicted in the EIS.</p>

Category	Predicted Impact	Actual Impacts to Date
Landuse	Private landowners may be impacted while construction activities are underway on or in proximity to their property, through the temporary loss of access to parts of their property, a potential loss of privacy and amenity (dust/noise/visual) impacts. Given the short duration of construction works, these potential impacts will be of limited duration. It is also expected that no residents would be required to relocate during the construction phase of the Project. All construction works along the transmission pipeline alignment will take place within the proposed construction footprint.	Construction impacts to date are consistent with those predicted in the EIA.
Hydrology and Flooding	Impacts to flooding from construction of the proposal are anticipated to be limited to temporary and localised impacts due to the progressive nature of the construction activities. Potential impacts would also be limited to periods of flooding, which have a low likelihood of occurring during construction on flood prone areas. Potential impacts to water quality are anticipated to be limited to temporary and localised impacts due to the progressive nature of the construction activities.	No material flooding or surface water impacts have been identified during the audit period.
Hazardous Materials	During construction, potential hazards and risks to the surrounding community or environment may be associated with: <ul style="list-style-type: none"> the on-site storage, handling and transport of dangerous and hazardous goods, contaminated soil and hazardous waste potential interaction with existing utilities potential bushfire risks changes to emergency egress and excavation routes. 	During this audit period, no bushfire or hazardous materials related incidents were recorded.
Historical Heritage	No direct impacts on the Yanga Pastoral Station Complex. A significant impact was predicted on the sheep yards in the Willows Precinct. Potential for impacts on: <ul style="list-style-type: none"> survey marker Bundure Railway Station Nyingay Station	No impacts unapproved on heritage sites were identified during this IEA.
Visual Amenity	Across all landscape character areas, construction activities would involve the temporary mobilisation of plant throughout the proposal landscape to construct the proposal and to provide ancillary infrastructure (e.g. construction compounds and access tracks). Construction activity would be most prominent around transmission line structure footings. Vegetation removal would be required, which would mostly comprise of shrubs and groundcovers. Landform modification would be small and localised.	No impacts relating to visual amenity were identified during this IEA.

Category	Predicted Impact	Actual Impacts to Date
Aboriginal Heritage	<p>The proposal has the potential to directly and/or indirectly impact Aboriginal sites including:</p> <ul style="list-style-type: none"> • four artefact-only sites of low significance and seven with moderate significance • four artefact and hearth sites with moderate significance • one artefact scatter, hearth and modified tree site with moderate to high significance • three earth mound and hearth sites with moderate significance • five hearth-only sites with moderate significance • 15 isolated finds with low significance and five with moderate significance • five isolated finds and hearth sites with moderate significance • one midden site with moderate significance • seven modified/scar tree sites with moderate significance. <p>The proposal also has the potential to directly and/or indirectly Potential</p> <p>Archaeological Deposits (PADs) including:</p> <ul style="list-style-type: none"> • 23 PADs through direct impact • 16 PADs through potential direct impact. 	<p>Two compliance incidents occurred during this audit period. The investigation of those incidents determined that no unapproved impacts on heritage values occurred.</p>
Soils	<p>Construction of the proposal has the potential to result in soil erosion and impacts to land capability in the absence of adequate management measures. Key construction activities that present a risk to soils include excavation and other earth moving activities, vegetation removal and the movement of vehicles, plant and equipment within unsealed areas. The potential impact of these activities may include:</p> <ul style="list-style-type: none"> • erosion of exposed soils and stockpiled materials • dust generation from • increased sediment loads entering the surrounding waterways • compaction of soils leading to impacts on drainage 	<p>No soil erosion issues were identified during the audit period.</p>
Contamination	<p>Whilst areas known to be contaminated have not been identified, the assessment has identified areas of potential contamination. Construction activities potentially impacting these sites includes vegetation removal, excavation of soils, piling and dewatering activities.</p>	<p>To date no contamination has been encountered.</p>
Acid Sulphate Soils	<p>The majority of the proposal study area is identified as having a low risk of acid sulphate soils. Areas surrounding lakes and river beds are identified as potentially containing acid sulphate soils.</p>	<p>No acid sulphate soils were encountered during this audit period.</p>

Category	Predicted Impact	Actual Impacts to Date
Salinity	<p>Potential impacts from salinity can occur due to disruption of the water table (i.e. when saline groundwater rises and deposits salts in upper soil layers). Disruption can result from vegetation removal, physical barriers,</p> <p>or the reuse of saline soils generated by the proposal.</p>	No salinity related impacts were encountered during this audit period.
Construction Noise and Vibration	<p>There is the potential for concurrent construction activities occurring in proximity to sensitive receivers because of the construction of the transmission line, substation and the two main construction compounds.</p> <p>Based on the results of the above assessment and considering the proximity of the nearest receivers to Buronga substation and main construction compound and accommodation camp sites, the risk of notable construction impacts at the nearest receivers would be low, with concurrent noise levels anticipated to be below relevant construction NMLs.</p>	One noise related complaint was received during the audit period. In general, however, the noise impacts of the project are consistent with those predicted in the EIA.
Construction Air Quality	The assessment of air quality impacts at these identified sensitive receivers found that the impacts to sensitive receivers would be negligible.	No air quality related complaints have been received during the audit period. No air quality impacts from construction have been identified.
Traffic and access	The increase of light vehicles and heavy vehicle movements from current traffic volume would not be expected to adversely impact the capacity and serviceability of the road network and at intersections. Heavy vehicle traffic movements would also be distributed throughout the day to minimise their impact on town centres' peak traffic activities.	No traffic impacts exceeding the predictions in the EIS have been identified.

7.8.1 Extent of Project Operations

The original Environmental Assessment and modifications defined the proposed project boundaries. A review of current aerial imagery (Google Maps) and the Auditor's observations during the site inspection found that the construction works are confined to the approved site boundaries.

7.9 Other Matters

7.9.1 Water Take Records

Schedule 2, Condition C13 requires that the Proponent must report on water-take during construction. The water-take records provided by SecureEnergy are provided in Table 14 and Table 15 below.

Note that the water sources are presented as described in SecureEnergy's records.

Table 14 - Non-Potable Water Take

Water Source	Non-potable Water take (litres)					
	October 2024	November 2024	December 2024	January 2025	February 2025	March 2025
Alcheringa Hyrant (sic)	-	9,516,000	364,000	6,060,500	4,255,000	6,921,000
Alcheringa Hyrant/Maynards Tanks	993,000	-	-	-	-	-
Basin 1	-	-	-	-	84,000	-
Basin 2	-	-	-	-	2,089,000	-
Balranald	76,000	-	-	127,000	-	-
Church St Balranald	-	1,350,000	1,614,000	3,856,000	3,321,500	3,249,000
River Street Balranald	-	-	-	440,000	-	-
Bore Tanks	-	-	-	-	86,000	-
Camp 2	-	867,330	316,000	-	-	-
Camp 3 Turkey Nest	-	-	-	-	-	1,077,000
Camp 4 Turkey's Nest	-	-	-	-	799,000	384,000
Camp 4 Waste water	-	-	-	657,000	-	-
Camp 6	-	88,000	-	-	10,000	-
Camp 6 Sediment Dam	-	180,000	1,617,000	-	-	-
Camp 6 Turkey Nest	272,000	200,000	823,000	1,026,000	891,000	912,000
Camp 6 Waste water	-	-	240,000	-	-	-
Carne Street	-	-	-	-	-	66,000
Carne Street Molemain test	-	-	-	-	-	44,000
Caruso Bros	-	-	-	10,000	-	-
Coleambally	574,000	1,518,000	418,000	1,364,000	1,716,000	1,931,000
Darlington Point Stand Pipe	-	-	-	154,000	990,000	66,000
Deniliquin	-	-	274,000	8,510,000	689,000	-
Euston	127,000	511,000	-	-	-	248,000
Euston Hydrant	-	-	-	840,000	198,000	-

Water Source	Non-potable Water take (litres)					
	October 2024	November 2024	December 2024	January 2025	February 2025	March 2025
Falls Tanks	-	-	-	-	-	10,000
Fletches Lake	-	-	399,000	-	-	-
Kerri kerri tanks	-	-	-	806,000	-	44,000
Hay	-	-	42,000	1,606,000	795,000	-
Hay Standpipe	-	-	-	-	213,000	-
Hook Tanks	-	-	-	-	783,000	2,335,000
McCauley St Hay	-	21,000	-	-	-	-
Mallee Fire Tanks	140,000	-	-	-	-	-
Maynard Tanks	75,000	269,000	-	1,068,000	98,000	-
MFT Tanks	-	415,000	-	-	-	-
Milburlong	-	-	-	-	-	323,720
Modica Crescent	168,000	1,917,000	1,415,000	378,000	1,761,000	-
Sediment Dam	-	355,000	-	-	524,000	60,000
Substation	-	-	-	-	66,000	-
Tank 150	-	-	-	-	20,000	-
Turkey's nest	-	-	-	-	10,000	60,000
Water Treatment Plant	12,731,755	620,000	245,000	818,000	800,000	2,812,000
WWTP	-	-	-	-	56,000	-
Wentworth Tanks	13,000	-	-	-	-	-
Wentworth Yards	-	-	406,000	-	-	-
Wonga Tanks	-	-	-	-	25000	-
Z Basin	-	20,000	-	-	-	-

Table 15 - Potable Water Take

Water Source	Potable Water take (litres)					
	October 2024	November 2024	December 2024	January 2025	February 2025	March 2025
Alcharinga Drive	-	-	-	63,000	-	-
Balranald, Church Street	-	13,000	-	-	-	-
Caruso Bros	-	-	-	10,000	-	-
Coleambally	390,000	2,530,000	1,320,000	2,112,000	1,958,000	2,328,000
Darlington Pt Stand pipe	-	-	-	22,000	484,000	43,000
Deniliquin	-	-	114,000	851,000	689,000	656,000
Deni (Caruso)	-	-	-	30,000	-	-
Hay	-	-	-	42,000	-	-
Modica Crescent	259,000	1,917,000	1,415,000	1,315,000	1,761,000	1,416,000
Wastewater Treatment Plant	3,304,000	-	-	-	-	-

Appendix A

PEC East Project

April 2025 Independent Environmental Audit

Audit Table

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A1	Minimise harm to the Environment	In meeting the specific performance measures and criteria of this approval, 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, operation, rehabilitation, upgrading or decommissioning of the development.		Environment Manager - No incidents with the potential to cause material harm to the environment have occurred during the audit period.	No evidence of actual or potential material environmental harm was sighted during the site inspection.	No evidence of actual or potential material environmental harm was sighted during the site inspection. The Auditor notes that two non-compliances related to Aboriginal Heritage occurred during this audit period, one of those incidents resulted in the destruction or loss of an artifact. While this incident is not trivial, it does not, in the Auditor's opinion meet the threshold of "material harm".	Complies	
S2 A2	Terms of Approval	The Development may only be carried out: a. in compliance with this approval		Environment Manager – Two potential non-compliances were reported to DPHI during the audit period. 1 – potential non-compliance with Condition A13 2 – potential non-compliance with Conditions B1 and C28		Refer to the specific conditions below.	Noted	
		b. In accordance with all written directions of the Planning Secretary;		Environment Manager - No directions from DPE were received during the audit period.			Not Triggered	
		c. Generally, in accordance with the EIS; and		Environment Manager - While changes to the project compared to what was initially approved have been made, these changes have been subjected to Consistency Assessments and do not represent a fundamental or significant change to what has previously been approved.		No evidence was found that the works undertaken to date associated with SSD 9172452 (Modification 1) has not been undertaken in general accordance with the EIS or the approved plans.	Complies	
		d. generally, in accordance with the Development Layout in Appendix 1.				No evidence was found that the works undertaken to date associated with SSD 9172452 (Modification 1) has not been undertaken in general accordance with the EIS or the approved plans.	Complies	
S2 A3	Terms of Approval	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this approval;	Email from DPHI (W Jones) to Transgrid (L Fania) titled "Project EnergyConnect (NSW - Eastern Section) - Construction Environmental Management Plan SSI-9172452-PA-67 - Request for Additional Information", dated 4 December 2024.	Environment Manager - The Construction Environmental Management Plan was revised and submitted to the Department in August 2024 (prior to this audit), however was not approved. It is currently undergoing updates in response to DPHI comments and will be reissued for approval upon completion.		The Construction Environmental Management Plan was during the last audit period. The plan is being updated in response to DPHI directions.	Complies	
S2 A3	Terms of Approval	b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and		Environment Manager - There were no reports or reviews commissioned by the Department regarding compliance with this approval.		There were no reports or reviews commissioned by the Department regarding compliance with this approval.	Not Triggered	
S2 A3	Terms of Approval	c) the implementation of any actions or measures contained in these documents.				There were no reports or reviews commissioned by the Department regarding compliance with this approval.	Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A4	Terms of Approval	The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.					Noted	
S2 A5	Terms of Approval	Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This condition does not apply to the immediate written notification required in respect of an incident under condition E6.					Noted	
S2 A6	Lapse of Approval	This approval will lapse five years after the date on which it is granted unless construction has physically commenced on or before that time.					Not Triggered	
S2 A7	Evidence of Consultation	Where conditions of this approval require consultation with an identified party, the Proponent must: a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved.				Refer to specific conditions below	Noted	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A8	Staging, combining or revision of Strategies, Plans and Programs.	With the approval of the Planning Secretary, the Proponent may: a) prepare and submit any strategy, plan or program required by this approval 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);	EnergyConnect PEC East Project SSI 9172452 March 2024 Construction Phase Independent Environmental Audit, dated 13 June 2024, prepared by Barnett and May. Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Project EnergyConnect (NSW – Eastern Section) Traffic and Transport EMP Sub-plan for Stage 1 & 2” dated 26 April 2024. Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Project EnergyConnect (NSW – Eastern Section) Soil and Water EMP Sub-plan for Stage 1 & 2” dated 3 June 2024. Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Project EnergyConnect (NSW - Eastern Section) - Noise and Vibration EMP Sub-plan Stage 1 & 2 and Out of Hours Work Protocol” dated 26 July 2024.	Environment Manager – no changes to the staging of plans or strategies have occurred during this audit period.		No changes were made to the staging of plans during this audit period. Three plans were revised and submitted for approval to DPHI during this audit period: <ul style="list-style-type: none">Traffic and Transport EMP Subplan for Stage 1 & 2”, dated 21 March 2024Soil and Water EMP Subplan for Stage 1 & 2”, dated 21 March 2024Noise and Vibration EMP Subplan for Stage 1 & 2 and Out of Hours Work Protocol, dated 17 April 2024 The CEMP was revised during this audit period. The revised version was endorsed by the ER and submitted to DPHI for approval. DPHI had not approved the revised plan at the time of this IEA. It is noted that the previous (approved) version is on the website.	Noted	
		b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager – No approval has been sought for the combining of any plans, programs, or similar documents during this audit period.		No approval has been sought for the combining of any plans, programs, or similar documents during this audit period.	Not Triggered	
		c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). 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 approval. 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. If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this approval if those requirements are not applicable to the particular stage.		Environment Manager - The Construction Environmental Management Plan was revised and submitted to the Department in August 2024 (prior to this audit), however was not approved. It is currently undergoing updates in response to DPHI comments and will be reissued for approval upon completion.		The Construction Environmental Management Plan was during the last audit period. The plan is being updated in response to DPHI directions.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A9	Environmental Representative	Prior to commencing the development, an environmental representative (ER) must be approved by the Secretary and engaged by the Proponent.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller was appointed as the Independent ER. DPE approval was provided on 20/9/2022.	Complies	
S2 A10	Environmental Representative	The Secretary's approval of an ER must be sought no later than one (1) week before commencing the development.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller was appointed as the Independent ER. DPE approval was provided on 20/9/2022.	Complies	
S2 A11	Environmental Representative	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in condition A2 and is independent from the design and construction of the development. The ER must meet only the requirements set out in sections 2.2, 2.3, 2.4 and 3 in the <i>Environmental Representative Protocol</i> (Department of Planning and Environment, October 2018).	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller was appointed as the Independent ER. DPE approval was provided on 20/9/2022.	Complies	
S2 A12	Environmental Representative	From commencing the development, until commencing operation, or as agreed with the Secretary, the approved ER must: a) review the documents identified in conditions A22, B1, B2, C10, C45, C50 and C51, and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) make a written statement to this effect before submission of such documents to the Secretary (if those documents are required to be approved by the Secretary); or (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Department for information or are not required to be submitted to the Department);	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			All plans covered by Condition S2 A10 were reviewed and endorsed by the ER prior to the commencement of construction (prior to this audit period).	Not Triggered	
		b) as may be requested by the Secretary, assist the Department in the resolution of community complaints; and		Environmental Representative (telephone interview 25/3/2024) – The ER was not required to assist in the resolution of community complaints during this audit period.		The ER was not required to assist in the resolution of community complaints during this audit period.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A12	Environmental Representative	c) consider any minor amendments to be made to the plans / strategies in conditions A22, C50, C51, D3, D4, D5, D6 and D7 that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval.		Environmental Manager - The ACMP for Dinawan has undergone revision (updated to Revision 4) during the reporting period and is currently with the ER (therefore not yet approved).		The ACMP for Dinawan has undergone revision (updated to Revision 4) during the reporting period and is currently with the ER (therefore not yet approved).	Complies	
S2 A13	Environmental Representative	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A19, as well as the complaints register for any complaints received (on the day they are received).	Letter from Transgrid (L Fania) to DPHI Fishburn) titled “EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of potential non-compliance with condition A13”, dated 13 February 2025. Correspondence from Elecnor (J Hatchett) to the ER titled “L/H 069 complaint about position of gate on easement”, dated 13 December 2024. Correspondence from Elecnor (J Hatchett) to the ER titled “L/H50 complaint regarding Elecnor and construction experience”, dated 27 March 2025 Correspondence from Elecnor (J Hatchett) to the ER titled “L/H 62 issued a complaint regarding a gate left unlocked”, dated 3 April 2025.			Transgrid advised DPHI of the failure to advise the ER of a complaint relating to a traffic incident on 4 December 2024. Correspondence from Elecnor to the ER advising the ER of the receipt of other complaints was reviewed. The correspondence reviewed indicated that the ER was advised on the day the complaint was received.	Non-Compliance	Ensure that the ER is advised on all complaints received.
S2 A14	Reasonable Costs	The Proponent must pay all reasonable costs incurred by the Department to engage a suitably qualified, experienced and independent expert(s) to review the adequacy of any strategy, plan, program or report required under this approval.		Environment Manager - DPHI has not requested compensation for the review of any plans or other documents during this audit period.		DPHI has not requested compensation for the review of any plans or strategies since September 2023 (prior to this audit period).	Not Triggered	
S2 A15	Protection of Public Infrastructure	Unless the Proponent and the applicable authority agree otherwise, the Proponent must: a) undertake any works on or in the vicinity of public infrastructure in consultation with the applicable authority or service provider; b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to any damage to roads caused as a result of general road usage which is expressly provided for in the conditions of this approval.	Incident Register Stakeholder Consultation (refer to Section 5 of this report) Email from Elecnor (R Vusango) to Murray River Council (J Bond) titled “Project EnergyConnect TTMP Revision 11 – Murray River Council (Addition of Cairns and Young Streets)”, dated 13 December 2024 Meeting Minutes between Elecnor and Essential Energy (February, March and May 2025.	Environment Manager - Consultation occurred with Councils during the audit period in relation to the approval of roads for project use. The project undertakes consultation with Essential Energy regarding instances where the project must string/cross over essential energy assets.		Two councils covered by PEC East were consulted during this audit period to seek approval for use of additional roads, Elecnor has undertaken regular meetings with Essential Energy regarding impacts and actions to be taken in relation to impacts on their infrastructure. No incidents related to damage to public infrastructure were identified during this audit.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A16	Demolition	The Proponent must ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.		Environment Manager – no demolition works have been undertaken during this audit period.	No evidence of demolition was sighted during the site inspection.	No demolition work has been undertaken during this audit period.	Not Triggered	
S2 A17	Structure Adequacy	The Proponent 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 BCA; and where the BCA is not applicable, to the relevant Australian Standard.	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Environment Manager – No permanent buildings were constructed during the audit period. Earthworks only occurred at the Wagga Wagga substation.	No evidence of building works for permanent structures was sighted during the site inspection.	No permanent buildings were constructed during the audit period. Earthworks only occurred at the Wagga Wagga substation.	Not Triggered	
S2 A18	Compliance	The Proponent 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 approval relevant to activities they carry out in respect of the development.	EnergyConnect Stringing Constraints (PowerPoint presentation) Revision 1. EnergyConnect Environmental Awareness (PowerPoint presentation). Revision 2 EnergyConnect Environmental Training (PowerPoint presentation): <ul style="list-style-type: none"> Biodiversity Revision 2 Environmental Approvals Revision 2 Heritage, Revision 2 Land Access and Biosecurity, Revision 1. Training Noise and Vibration, Revision 1. Soil & water, Revision 1. Fauna Interaction (Toolbox) Heritage (Toolbox) Spiny Burrgrass (Plains Wanderer) Toolbox Attendance Records: <ul style="list-style-type: none"> Plains Wanderer and no-go zones, (date obscured) delivered to survey team members – 23 March 2025 Toolbox Meeting Attendance Record – Environmental Induction 29 March 2025. Toolbox Meeting Attendance Record – Camp 3 Environmental Induction 23 April 2025. Toolbox Meeting Attendance Record – Drone Stringing Induction 27 April 2025. 		The auditor attended the morning Pre-start meeting during the site inspection. During those meetings, critical issues covering safety and environment were presented. A central feature of the meeting areas (where the pre-starts are presented) at each Camp is the Daily work plan board (Photograph 3). Copies of work permits and key management plans (for example the CEMP and Safety Plans are kept at each of those locations.	Training materials covering all elements of the approval were sighted. Records of training from the audit period were sighted. Information is provided to the workforce every morning at the pre-start meetings, including important compliance-related notifications.	Complies	
S2 A19	Operation of Plant and Equipment	The Proponent must ensure that all plant and equipment used on the site is: a) maintained in a proper and efficient condition.	Extracts from the project maintenance management system were sighted, including: <ul style="list-style-type: none"> Daily (pre-start) check lists Maintenance requests Maintenance records Prestart workorders Maintenance work orders. 		Camps (accommodation, storage and maintenance areas) are well maintained and organised. All plant and equipment operating (on construction areas) appeared to be operational and well maintained.	Maintenance facilities (generally for light vehicles) are located at each camp. Records of inspections and maintenance were sighted.	Complies	
		b) operated in a proper and efficient manner.				All facilities, plant and equipment sighted during the audit were operational and appeared to be well maintained.	Complies	
S2 A20	Applicability oof Guidelines	References in the conditions of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.					Noted	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A21	Applicability oof Guidelines	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.					Noted	
S2 A22	Community Communications Strategy	Prior to the commencement of construction, the Proponent must prepare a Community Communication Strategy to provide mechanisms to facilitate communication between the Proponent and the community (including adjoining affected landowners) during construction. The Community Communication Strategy must: a) identify landowners for potentially impacted receivers;	Community Communication Strategy EnergyConnect (NSW – Eastern Section), Rev 1, dated 8 October 2024.	Environment Manager - The Community Communication Strategy has been uploaded. The plan was revised during this audit period.		The initial version of the Communication Strategy was prepared prior to the commencement of construction. This was verified during the previous IEA. Section 6.2 identifies potentially impacted landowners.	Complies	
		b) ensure that the landowners identified in (a) are consulted during construction;	EnergyConnect Construction Notification, dated February 2025. EnergyConnect Construction Notification, dated Quarter 1, 2025. EnergyConnect Construction Notification, dated Quarter 4 2024. EnergyConnect Construction Notification, dated September 2024.			The Strategy identifies the mechanisms for stakeholder and landowner consultation. The Auditor sighted the materials that are provided to landowners each month details the construction works planned for that month.	Complies	
		c) set out procedures and mechanisms for the regular distribution of information to the wider community;	Community Communication Strategy EnergyConnect (NSW – Eastern Section), Rev 1, dated 22 March 2023.			The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
		d) establish a public liaison officer(s) to engage with the local community; and				Section 4.4 of the Strategy identifies the public liaison officers.	Complies	
		e) set out procedures and mechanisms: <ul style="list-style-type: none">• through which the community can discuss or provide feedback to the Proponent;• through which the Proponent will respond to enquiries or feedback from the community; and• to resolve any issues and mediate any disputes that may arise in relation to construction of the development.				The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
		The Proponent must implement the Community Communication Strategy for the duration of construction.	Community Communication Strategy EnergyConnect (NSW – Eastern Section), Rev 1, dated 22 March 2023.			The Auditor, based on the review of complaints received and communications with the community, considers that that Community Consultation Strategy is being implemented.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 B1	Construction Environmental Management Plan	Prior to commencing construction, a Construction Environmental Management Plan (CEMP) must be prepared to detail how the performance outcomes, commitments and measures specified in the EIS will be implemented and achieved during construction to the satisfaction of the Planning Secretary.	Construction Environmental Management Plan EnergyConnect (NSW-Eastern Section) Stage 1 and Stage 2, Revision 2, dated 20 June 2023. Letter from DPE to Transgrid (L Fania) titled “Project EnergyConnect (NSW Eastern Section) - Construction environmental Management Plan”, dated 4 December 2024.	Environment Manager - The Construction Environmental Management Plan was revised and submitted to the Department in August 2024 (prior to this audit), however was not approved. It is currently undergoing updates in response to DPHI comments and will be reissued for approval upon completion.		The current version of the CEMP is revision 2, covering the Stage 1 and Stage 2 works. The plan was approved by the Planning Secretary on 6 July 2023. The CEMP was updated during the previous audit period and is currently being revised in response to a request for further information from DPHI. Biodiversity Management Plan Non-compliance: Overall, sufficient evidence was sighted that requirements relating to pre-clearing or clearing activities in areas of Plains-wanderer habitat are undertaken in accordance with the Plains-wanderer Protocol in Appendix F of the BMP. However, the green flagging was observed to be down at Line 2, Tower 154, Plains Wanderer habitat.	Non-Compliance	Flagging to be inspected regularly and maintained to appropriately to protect Plains Wanderer Habitat until construction is complete.
		The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan in Table 1.						
	Table 1	Required Plan	Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan	Documents Reviewed	Compliance Assessment		Complies	
		Noise and Vibration	Council	Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Project EnergyConnect (NSW - Eastern Section) - Noise and Vibration EMP Sub-plan Stage 1 & 2 and Out of Hours Work Protocol”, dated 26 July 2024. Post Approval Form 202440604005947, dated 4 June 2024.	The NVMP was revised during the previous audit period. The Post Approval Document Receipt Form noted that consultation was not required during the preparation of that revision.			
		Soil and Water	DPIE Water	Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Project EnergyConnect (NSW - Eastern Section) – Soil and Water EMP Sub-plan Stage 1 & 2”, dated 3 March 2024. Post Approval Form 20230423065200, dated 23 April 2024.	The SWMP was revised during the previous audit period. The Post Approval Document Receipt Form noted that consultation was not required during the preparation of that revision.			
		Biodiversity	BCS Council	Biodiversity Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2), Revision 5, dated 26 May 2025.	The BMP has undergone revision during the audit period following receipt of the biodiversity audit report on 18 February 2025. All appendices were revised as part of this process. The revised version was sent to the ER (after the reporting period) and has been endorsed. As the changes to the plan were minor DPHI has approved the plan without consultation with BCS or Council.			
		Heritage	Heritage NSW Aboriginal Stakeholders		The HMP was revised and approved during a previous audit period. The Auditor understands that the HMP was under review at the time of this IEA.			
		Traffic and Transport	TfNSW Council	Condition C32 - Request for use of additional roads in TTMP Revision 11 EnergyConnect (NSW – Eastern Section), Rev Bm dated 4 February 2025. Email from Elecnor (R Vusango) to Murray River Council (J Bond) titled “Project EnergyConnect TTMP Revision 11 – Murray River Council (Addition of Cairns and Young Streets)”, dated 13 December 2024. Email from Elecnor (R Vusango) to Balranald Council (V Scoleri) titled “Project EnergyConnect TTMP Revision 11 – Balranald Council (Addition of Myall, Ivanhoe and McCabie Streets)”, dated 12 May 2024.	The Traffic and Transport Management Plan was revised during the current audit period to include the use of additional roads in Balranald and Murray River Council areas. The revised plan has been approved (Rev 11). A copy of the TTMP and consultation undertaken was sighted. The council was consulted during the revision of the plan, however as the additional road are council roads TfNSW was not consulted.			

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 B2	CEMP and Subplan requirements	The EMP Sub-plans must be prepared in accordance with relevant guidelines and in consultation with the relevant government agencies identified for each Sub-plan in Table 1, and include: a) a summary of relevant background or baseline data;	Traffic and Transport Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 10, dated 19 April. Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024. Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March.		A hard copy of the CEMP is available at each Camp.	The Traffic and Transport Management Plan and Biodiversity Management Plan were prepared and approved during the previous audit period. Section 3 of the BMP details the a description of the pre-project baseline conditions. This requirement is not relevant to the TTMP plan.	Complies	
		b) details of: (i) the relevant statutory requirements; (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;				Legislative requirements are summarised in Section 2.1 and 2.2 of the revised plans. Section 4 of the BMP details the relevant performance limits and indicators. This requirement is not relevant to the TTMP plan.	Complies	
		c) any relevant commitments or recommendations identified in the EIS;				Relevant commitments from the EIS are covered in Section 2.3 of the revised plans.	Complies	
		d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;				Management and mitigation measures are described in Section 5 of the revised plans.	Complies	
		e) a program to monitor and report on the: (i) impacts and environmental performance of the development (including a table summarising all the monitoring and reporting obligations under the conditions of this approval); and (ii) effectiveness of the management measures set out pursuant to paragraph d);				Monitoring and reporting measures are described in Sections 6.3 and 6.6 of the revised plans.	Complies	
		f) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;				Contingency measures are described in Section 6.8 of the revised plans.	Complies	
		g) a program to investigate and implement ways to improve the environmental performance of the development over time;				Section 6 of the revised plans describe compliance management, that includes monitoring and reporting.	Complies	
		h) a protocol for managing and reporting any: (i) incident, non-compliance or exceedance of any impact assessment criterion and performance criterion; (ii) complaint; or (iii) failure to comply with other statutory requirements;				Section 6 of the SWMP, Section 7 of the TTMP and Section 8 of the NVMP describe compliance management, that includes monitoring, inspections, audits and reporting.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 B2	CEMP and Subplan requirements	i) set out the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the construction 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	Traffic and Transport Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 10, dated 19 April. Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024. Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024			Section 6 of the SWMP, Section 7 of the TTMP and Section 8 of the NVMP describe compliance management, that includes monitoring, inspections, audits and reporting.	Complies	
		j) a description of the roles and environmental responsibilities, authority and accountability for all relevant employees, as well as training and awareness; and				Roles and responsibilities are described in Section 6.2 of the SWMP, Section 7.2 of the TTMP and Section 8.2 of the NVMP.	Complies	
		k) a protocol for periodic review of the CEMP and associated Sub-plans and programs.				Section 1.9 of the revised plans cover periodic review of the CEMP and plans.	Complies	
S2 C1	Construction Hours	Road upgrades, construction, upgrading and decommissioning activities may only be undertaken between: a) 7 am to 6 pm Monday to Friday; b) 8 am to 1 pm Saturdays; and c) at no time on Sundays and NSW public holidays; unless the Planning Secretary agrees otherwise.	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024. Out-of-Hours Work Protocol (Appendix A to the NVMP).			The approved hours of construction are documented in the Noise and Vibration Management Plan and in the training provided to supervisors and workers on the project. Four complaints relating to OOHW were received during the audit period. A review of the complaints registers and the investigations undertaken by Elecnor indicated that all of the complaints were authorised under the OOWH approval process.	Complies	
S2 C2	Construction Hours	The following construction, upgrading and decommissioning activities may be carried out outside the hours specified in condition C1 above: a) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons;		Environment Manager – There are construction activities which occur on PEC East which are either inaudible or occur in accordance with a negotiated agreement. For works which are inaudible, the OOHW Protocol and permit system does not apply, however we do prepare permits anyway to ensure the noise levels are assessed.		No deliveries or dispatches from the project were required by the NSW Police or other public authorities during this audit period.	Not Triggered	
		b) emergency work to avoid the loss of life, property or to prevent material harm to the environment; or		Environment Manager – No emergency works were required during this audit period.		No emergency OOHW were required during this audit period.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C2	Construction Hours	c) works carried out in accordance with the hours and noise limits specified in any negotiated agreements with sensitive receivers (owners and occupiers), provided the negotiated agreements are in writing and finalised before the commencement of works.	Record of Contact Form with Landowner relating to works near Ashfords Road, Wagga Wagga, dated 19 September 2024. Record of Contact Form with Landowner relating to works near Euston Prungle Road, Euston, dated 3 June 2024.	Environment Manager - There are two negotiated agreements for this audit period.		There are two negotiated agreements in place for PEC East for out-of-hours works.	Noted	
		d) activities that are inaudible at non-associated residences;					Noted	
		e) road upgrades required by the relevant roads authority to be undertaken outside the standard construction hours; or		Environment Manager – No works were required by RMS or Council(s) during this audit period.		No out-of-hour work was required by RMS or Council(s) during this audit period.	Noted	
		f) works carried out in accordance with an Out-of-Hours Work Protocol approved in accordance with condition C10.				OOHW training is provided to supervisors and workers on the project. Four complaints relating to OOHW were received during the audit period.	Noted	
S2 C3	Construction and Demolition Noise	The Proponent must take all reasonable and feasible steps to minimise the construction, upgrading or decommissioning noise of the development in the locations where the noise is audible to sensitive receivers, including any associated traffic noise.	Complaints Register Environmental Training Noise and Vibration (PowerPoint training presentation)	Environment Manager - One complaint received from a resident on Cobb Hwy, Boorboorban during this audit period. This was received on Friday 27th September via email and notified to the ER on the same day. The complaint related to noise from Cobb Hwy Camp. Noise monitoring was conducted on 11 October at 12:40pm at the residence. Results were affected by wind, and were generally sitting between 50db and 60db when wind died down. It was noted during monitoring that construction noise was inaudible from as close as 1km to the camp. The resident's location is 4km from camp.	During the inspection of works compounds and construction on the easement, no rock breaking, blasting or impulsive noise generating activities were observed.	One noise complaint was recorded during the audit period relating to work at the Cobb Highway Camp. This complaint was investigated and monitoring undertaken. No exceedances to noise criteria were identified. No complaints were received regarding construction related noise or vibration. The majority of the works associated with PEC East are remote from sensitive receivers.	Complies	
S2 C4	Construction and Demolition Noise	The Proponent must implement mitigation measures: a) to ensure that the noise generated by any construction, upgrading or decommissioning activities is managed in accordance with the requirements for construction 'noise affected' management levels established in accordance with Interim Construction Noise Guideline (DECC, 2009); and b) with the aim of achieving the road traffic noise assessment criteria for residential land uses from NSW Road Noise Policy (DECCW, 2011).	Complaints Register Noise Monitoring 19 July 2024 (spreadsheet) Environmental Training Noise and Vibration (PowerPoint training presentation)	Environment Manager - One noise monitoring event occurred during the audit period.		Current construction activities are generally in sparsely populated areas with a considerable buffer distance between construction activities and most residential receivers. No high noise generating activities were observed during the audit inspection, although it is noted that wood chipping and stump grinding would be undertaken during vegetation clearing. One noise complaint was recorded during the audit period relating to the Cobb Highway Accommodation Camp. However, monitoring undertaken indicated that noise from the camp was inaudible at the complainant location four kilometres from the camp.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C5	Construction and Demolition Noise	The Proponent must comply with the following vibration limits: a) vibration criteria established using the Assessing vibration: a technical guideline (DEC 2006) (for human exposure); b) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and c) vibration limits set out in the German Standard DIN 4150-3: Structural Vibration - effects of vibration on structures (for structural damage).	Complaints Register	Environment Manager - No vibration monitoring has occurred during the audit period.	No vibration generating activities were observed during the audit inspection.	Current construction activities are in sparsely populated areas with a considerable buffer distance between construction activities and residential receivers. No vibration-related complaint were received during the audit period.	Complies	
S2 C6	Construction and Demolition Noise	Blasting may only be carried out on the site between 9 am and 5 pm Monday to Friday and between 9 am to 1 pm on Saturday. No blasting is allowed on Sundays or public holidays.		Environment Manager - No blasting occurred during the audit period.		No blasting occurred during the audit period.	Not Triggered	
S2 C7	Blasting Limit Conditions	The Proponent must ensure that any blasting carried out on the site does not exceed the criteria in Table 2.	All blast monitoring records covering this audit period.	Environment Manager - No blasting occurred during the audit period.		No blasting occurred during the audit period.	Not Triggered	
	Table 5	Location	Airblast overpressure	Ground Vibration				
			dB (Lin Peak)		Allowance			
		Any non-associated residence	120	10	0%			
			115	5	5% of the total number of blasts or events over a rolling period of 12 months			
S2 C8	Operational Noise	Except for corona discharge noise, the Proponent must ensure that the noise generated by the operation of the development does not exceed 35 dB(A) LAeq,15min, at the reasonably most affected point of the residence, in accordance with the NPfl, at any non-associated residence.				Operational requirement only	Not Triggered	
S2 C9	Operational Noise	The Proponent must: a) take all reasonable and feasible steps to minimise corona discharge noise during operation of the project; b) identify residences predicted to experience corona discharge noise levels above 35 dB(A) LAeq,15min at the reasonably most affected point of the residence, determined in accordance with the NPfl, and how often corona noise is expected to be above this this level per year; c) implement all reasonable and feasible noise mitigation measures, determined in accordance with the NPfl, at receivers predicted to experience corona discharge noise levels that exceed the noise level identified in condition C8; and d) prepare and implement a Research Program and allocate \$150,000 to this program, prepared in consultation with EPA, and be submitted to the Planning Secretary for approval.				Operational requirement only	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C10	Noise and Vibration CEMP Sub-Plan	The Noise and Vibration CEMP Sub-Plan required under condition B2 must: a) ensure the requirements in conditions C1 to C12 are complied with;	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			The current version of the NVMP was prepared and approved during the previous audit period. The NVMP provides a framework designed to ensure compliance with Conditions C1 to C12.	Complies	
		b) include a description of the reasonable and feasible measures that would be implemented to minimise noise and vibration impacts of the development;	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			Section 7.3 of the NVMP describes the noise and vibration mitigation measures to be implemented.	Complies	
		c) include a detailed description of the noise and vibration management system for the development;	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			Section 1.4 of the plan describes the environmental management system as it applies to noise and vibration management.	Complies	
		d) include a protocol for the identification, notification and management of works that exceed the noise management levels; and	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			Section 7,2 and Section 8 of the plan describes compliance management, including the notification requirements and management of works that may exceed noise criteria.	Complies	
		e) include a monitoring program that evaluates and reports on the effectiveness of the noise and vibration management system.	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			Section 8.3 describes the noise and vibration monitoring program.	Complies	
		f) include an Out-of-Hours Work Protocol to identify a process for the consideration, management and approval of works that are outside the hours defined in conditions C1 and C6, which must: (i) be prepared in consultation with the relevant Council; (ii) identify low risk activities that can be undertaken without the approval of the Planning Secretary and with the approval of the ER; (iii) identify high risk activities that must be approved by the Planning Secretary; and (iv) identify Department, Council and community notification arrangements for approved out of hours work.	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			Appendix A of the Noise and Vibration Management Plan describes the Out of Hours Works Protocol.	Complies	
S2 C11	Air Quality	In addition to the performance outcomes, commitments and mitigation measures specified in the EIS, the Proponent must take all reasonable steps to: a) minimise the off-site dust, fume, blast emissions and other air pollutants of the development; and	Complaints Register		During the site inspection water carts were observed operating at construction Camps, on access roads to active works areas and the substation construction site. Some dust was observed from vehicle movements on-site, however no evidence of significant migration of dust off-site was observed.	Water carts are available and were observed in all areas inspected (construction compounds and construction areas) to be in operation to reduce dust emissions during the site inspection. One dust-related complaint was received during this audit period.	Complies	
		b) minimise the surface disturbance of the site.			The clearing limits associated with the construction of the accommodation camps, laydown areas and the transmission line alignment are generally appropriately delineated (Photograph 5,6,7,13 and 15). In the areas inspected no evidence of clearing outside of designated clearing limits was sighted.	All vegetation clearing observed appeared to be limited to the approved construction limits.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C12	Water Supply	The Proponent 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.					Noted	
S2 C13	Water Supply	The Proponent must report on water take at the site during construction (whether direct or indirect and whether licensable or exempt) in the Independent Audit, including water taken under each water licence for the development.	Water Delivery Tracker (the data provided in the table below has been extracted directly from the Water Delivery Tracker without editing by the Auditor).	<p>Environment Manager – sufficient water has been available for the project during the audit period. The following water licenses were in place for privately owned water sources:</p> <ul style="list-style-type: none"> WAL 21411 – 145ML limit Groundwater (Hookes Farm) WAL 1909 – 370 ML limit Groundwater (Wonga Station) WAL 7725 –345 ML limit Groundwater (Coleambally Station) WAL 7731 – 65181.2 ML limit from Murrumbidgee River (Western Murray Irrigation) WAL 41857 – 101 ML limit from Murrumbidgee River (Iluka) 		Water-take from each location as reported by SecureEnergy and has been summarised in Section 7.9 above.	Complies	
S2 C14	Erosion and Sediment Control	The Proponent must: a) minimise erosion and control sediment generation; and b) ensure all land disturbances have appropriate drainage and erosion, and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008);	<p>Erosion and Sediment Control Strategy EnergyConnect (NSW – Eastern Section), Revision C, dated 15/8/2022.</p> <p>Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21/3/2024.</p> <p>Progressive Erosion and Sediment Control Plan, Camp 3 and Dinawan Substation, dated 21 July 2024.</p> <p>Generic ESCP doe Type 2 Access Points General ESCP, Document Number 45860-HSE-PL-G-1030, dated 14 June 2022.</p> <p>Wagga Wagga Substation 3 Rehabilitation Plan, Revision 4 dated 22 April 2025.</p> <p>Monthly Erosion and Sediment Control Inspection Report, Wagga Wagga Substation 3, Line 5 (Eastern Locations), prepared by Ron Billyard CPESC NO 9496, dated 12 October 2024.</p> <p>Monthly Erosion and Sediment Control Inspection Report Camp 4, Limondale Laydown (Western Sites), prepared by Ron Billyard CPESC NO 9496, dated 6 December 2024.</p> <p>Monthly Erosion and Sediment Control Inspection Report Camp 4, prepared by Ron Billyard CPESC NO 9496, dated 22 March 2025.</p> <p>Elecnor Weekly environmental checklists (covering the audit period)</p>	<p>Environment Manager - The CPESCs involved in project work during the audit period was:</p> <p>Regional Project Consulting Ron Billyard CPESC 9496</p> <p>Weekly and Monthly environmental inspections are undertaken by Environmental Advisors.</p> <p>The contract CPES undertook (and reported on ERSed inspections reports during the audit period.</p>	<p>Generally, ERSed controls at all areas inspected were installed in accordance with the relevant ERSed plans and were well maintained.</p> <p>During the site inspection the following observations were made:</p> <ul style="list-style-type: none"> Surface water management (surface drains, sedimentation / retention ponds) are provided at each of the accommodation camps / laydown areas and key construction areas. Topsoil that has been stripped is stockpiled for future use. Topsoil at the Wagga Wagga Substation that had been stockpiled was being used for rehabilitation works. (Photograph 1 and 2). Generally, the management of sediment tracking onto public roads had improved significantly since the last IEA. Light and heavy vehicle wash pads are located at the other sites. While each camp has a cattle grid at the site entrance. 	<p>Appropriate erosion and sediment (surface water management) controls were in place at all sites inspected during this IEA.</p> <p>Routine environmental inspections are undertaken (monthly, weekly and pre-rain) and these are recorded on standard checklists.</p> <p>The weekly environmental checklist includes confirmation of the operation and maintenance of vehicle wash facilities and other devices including shaker / rumble grids.</p> <p>An external ERSed specialist undertakes additional inspections and provides advice to the project.</p> <p>The management of erosion and sediment control is being undertaken in general accordance with the approved management plan.</p> <p>Generally, sediment tracking onto public roads from the Camps was acceptable (at the time of this IEA site inspection).</p>	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C15	Pollution of Waters	Unless otherwise authorised by an EPL, the Proponent must ensure the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	Incident Register	Environment Manager – No water related incidents occurred during this audit period.		No water-related incidents were recorded during this audit period.	Complies	
S2 C16	Pollution of Waters	The Proponent must: a) ensure that appropriate components of the concrete batching plants and substation are suitably bunded; and b) minimise any spills of hazardous materials or hydrocarbons and clean up any spills as soon as possible after they occur.			Fuel and chemical storage areas were inspected at all camps. All fuels are stored in double-skinned, bunded tanks that comply with AS1940 (Photograph 11). All chemical storage and potentially hazardous waste storage observed were generally appropriately contained. Spill kits were available at those locations.	All fuels and chemicals observed were stored appropriately and there was no evidence of spills or leakages in any storage locations inspected.	Complies	
S2 C17	Pollution of Waters	The Proponent must ensure that any groundwater dewatering activities do not discharge to watercourses.	Dewatering Procedure EnergyConnect (NSW – Eastern Section), Revision C, dated 11 November 2022.	Environment Manager - Following rain events, water can collect within the pile footings. These are dewatered in accordance with the Dewatering Procedure. There has been no groundwater dewatering undertaken during this audit period.	No groundwater dewatering observed during the site inspection.	Procedures for groundwater dewatering have been established.	Complies	
S2 C18	Riparian Areas	The Proponent must ensure: a) all activities on waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012), unless DPIE Water agrees otherwise; and b) the geomorphic condition of the major rivers and distributary channels crossed by the development is not impacted.	Incident Register Clearing and land disturbance permit (CDP) for Colombo Creek (viewed post impacted). – Pre-clear report for Colombo Creek crossing (viewed post inspection) – Nest box report for Colombo Creek crossing (viewed post inspection)	Environment Manager - No riparian zone incidents have occurred during the audit period. The Biodiversity Auditor conducted interviews with Ben Harper (Senior Environmental Advisor, Elecnor) and Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor)	Line 5, Tower 245-246, Colombo Creek crossing riparian zone	Ther Biodiversity Auditor verified that: • Clearing of the Colombo Creek riparian zone occurred during the last audit and was deemed compliant; and • No other riparian zones were clearing during the audit period.	Complies	
S2 C19	Flooding	The Proponent must ensure that the development: a) does not materially alter the flood storage capacity, flows or characteristics in the development area or off-site; and b) is designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site, unless otherwise agreed by Council.		Environment Manager - There were no flooding issues during the audit period. Consultation with council has not been required as the project has not been designed to increase impacts on surface water, localised flooding and groundwater.		A detailed assessment of flooding and water management issues was undertaken during the previous audits. No changes in design have occurred during this audit period. No flooding impacts have occurred during this audit period.	Complies	
S2 C20	Acid Sulphate Soils	The Proponent must ensure that any construction activities in identified areas of acid sulphate soil risk are undertaken in accordance with the <i>Acid Sulphate Soil Manual</i> (Acid Sulphate Soil Management Advisory Committee, 1998).	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.	Environment Manager - No ASS has been encountered during the audit period. If encountered PASS would be managed in accordance with the SWMP. Current activities are outside the areas of known acid sulphate soil risk areas.		Current activities are outside the areas of known acid sulphate soil risk areas.	Not Triggered	
S2 C21	Salinity	The Proponent must ensure that any construction activities in identified areas of moderate to high salinity are undertaken in accordance with the Salinity Training Manual (DPI, 2014) and Book 4 Dryland Salinity: Productive use of Saline Land and Water (NSW DECC, 2008).	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.	Environment Manager - No works have occurred within high salinity areas during the audit period. Consequently, no salinity management activities have been undertaken.		No works have occurred within high salinity areas during the audit period.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C22	Soil and Water CEMP Sub-Plan	The Soil and Water CEMP Sub-Plan required under condition B2 must include provisions for: a) ensuring the requirements in conditions C12 – C21 are complied with;	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.	Environment Manager - No reviews or revisions of Soil and Water Management Plan have taken place during the audit period.		The Soil and Water Management Plan provides an appropriate framework to manage compliance with the relevant conditions of the Approval. The plan was revised during this audit period.	Complies	
		b) managing flood risk during construction;	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Section 5.7 of the SWMP describes the proposed flood response procedures for the project.	Complies	
		c) investigating, assessing and managing contaminated land, soils and groundwater in the development area;	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Section 5.6 of the Plan describes the procedures for management of contaminated materials. Section 6.3 of the plan describes the monitoring program for soils and water.	Complies	
		d) investigating, assessing and managing the potential for asbestos and other hazardous materials in the development area; and	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Investigating, assessing and managing contaminated land is addressed in Section 5.5. Investigating, assessing and managing groundwater is addressed in Section 3.3.5 and Section 5.8.	Complies	
		e) managing any unexpected and / or suspected contaminated land, asbestos and unexploded ordinance excavated, disturbed or otherwise discovered during construction.	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Appendix B of the plan describes the management of unexpected finds (including hazardous materials).	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C23	Biodiversity Restrictions on and Habitat	Unless otherwise agreed with the Planning Secretary, the Proponent must: a) ensure that clearing does not exceed the limits identified in Appendix 2; and	Clearing and land disturbance permits (CDPs) for this audit period (viewed post inspection) Clearing and Land Disturbance Register (viewed during and post inspection): Permits register / tracking (for the period of 2/06/2025 – 4/06/2024) Native vegetation tracking TEC tracking Threatened flora tracking Threatened fauna tracking Predicted Clearing Register (viewed during and post inspection) GIS layers used for clearing calculations (Photograph D.31)(viewed during inspection). Verification report (viewed post inspection)	Specialist Biodiversity Auditor Interview with: <ul style="list-style-type: none">Ben Harper (Senior Environmental Advisor, Elecnor)Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)Luke Fania (Environment and Sustainability Manager, Transgrid)	Green flagging and survey pegging to delineate and calculate areas of clearance locations during the site inspection. Green flagging was noted as fallen in so cases, was beyond the cleared (and pegged) area, so would not impact up to more impact on ensuring protection of special biodiversity areas (see BD14 the calculation of cleared areas at Line 5, Tower 279a where Plains Wanderer habitat occurs	<p>Sufficient evidence sighted that clearing has not exceeded the limits identified within the BMP. Evidence sighted that spatial data and threatened species locations are being provided to the detailed design team during detailed construction planning. It was confirmed that:</p> <ul style="list-style-type: none">Based on the clearing registers provided, and description of progressive tracking of clearance areas provided by Elecnor/Transgrid during interviews, the project has not exceeded the clearing limits identified in the BMP for PEC East for native vegetation, TECs, threatened flora, or threatened fauna.It is noted that an explanation of how actual (versus predicted) clearance is calculated was provided by Elecnor and Transgrid, with spreadsheets shown during the site inspection. Only excerpts (PDFs) from the clearing register provided post inspection (not the entire dataset). Calculations were not undertaken by the biodiversity auditor due to the size of the dataset and limited time for the audit, which would have prevented such calculations to be prepared. Transgrid confirmed that a third-party check (WSP consultants) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery and converted into GIS shapefile formatSpatial data and threatened species locations are being provided to the detailed design team during detailed construction planning. Evidence sighted that threatened species spatial data (Plains Wanderer habitat) has been provided to the detailed design team and has informed the design of construction planning. Direct impacts to Plains Wanderer habitat have been avoided by micro siting project infrastructure (tower construction pads) outside of Plains Wanderer mapped habitat at Line 5, Tower 279a	Complies	Improvement recommendation Calculations were not undertaken by biodiversity auditor due to the size of the dataset and limited time for the audit. Transgrid confirmed that a third-party check (WSP consultants) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery. A report by the third-party reviewer should be provided to the auditor during the next audit period, to satisfy that auditor that clearing has not exceeded the limits specified in the BMP.

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C23	Biodiversity Restrictions on and Habitat	<p>b) minimise:</p> <ul style="list-style-type: none"> the impacts of the development on hollow-bearing trees; the impacts of the development on threatened bird and bat populations; and the clearing of native vegetation and key habitat. 	<p>GIS data layers showing sensitive areas at various locations shown both in the field and within the site office (Photograph D.12 and Photograph D.35) (viewed during inspection)</p> <p>Sensitive Area Plans (SAPs) relevant to areas visited during inspection (viewed post inspection)</p> <p>Flagging register (viewed during audit) (Photograph D.28)</p> <p>Clearing and land disturbance permits (CDPs) for this audit period (viewed post inspection)</p> <p>Clearing and Land Disturbance Register (viewed during and post inspection):</p> <p>Permits register / tracking (for the period of 2/06/2025 – 4/06/2024)</p> <p>Native vegetation/TEC/threatened flora/threatened fauna tracking</p> <p>Predicted Clearing Register (viewed during and post inspection)</p> <p>GIS layers used for clearing calculations (Photograph D.31)(viewed during inspection)</p>	<p>Specialist Biodiversity Auditor Interview with:</p> <ul style="list-style-type: none"> Ben Harper (Senior Environmental Advisor, Elecnor) Bobby Simpson (Environmental Advisor, Elecnor) Frank Team (Environmental Coordinator, Elecnor) Julie Vaillancourt (Environmental Advisor, Elecnor) Keeley Hartzer (Environmental Advisor - Biodiversity, Elecnor) Ozlem Anar (Environmental Coordinator, Elecnor) Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor) Alozie Agomoh (Senior Environmental Business Partner, Transgrid) Kim Lemcke (Senior Biodiversity Business Partner, Transgrid) Luke Fania (Environment and Sustainability Manager, Transgrid) 	<p>Acacia melvillei Shrubland Threatened Ecological Community (TEC), in proximity to stringing activities (which occurred during the audit period) (Line 2, Tower 544-543)</p> <p>Eleocharis obicis records in proximity to Tower 383 (Line 2). GIS layer and flagging tape observed around habitat with flagging noted as second level of defence as bunds and pegs around the tower site are the first level.</p> <p>Partial clearing at Line 2, Tower 180, within Plant Community Type (PCT) 15 - Black Box open woodland wetland, where centreline (Disturbance Area A), B4 and B10 clearing observed (which occurred during the audit period)</p> <p>Partial clearing at location of 600 year old tree (cultural significance) which occurs within B4 clearing zone, with minimal trimmed branches to comply with 4 m clearance requirements, and ongoing maintenance required (a 'hot spot' tree) in order to retain tree</p> <p>Austral Pillwort special biodiversity protection zone construction pad, bunding and green flagging (Line 2,Tower 162)</p>	<p>The Specialist Biodiversity Auditor verified that:</p> <ul style="list-style-type: none"> Clearing of native vegetation and key habitat is being minimised where possible Opportunities to minimise clearing has been occurring through review of temporary design and construction methodologies for the Stage 2 disturbance area, as demonstrated by proposed versus actual clearing calculations that are addressed via BD6 requirements Sufficient evidence sited that clearing of native vegetation and key habitat is being minimised where possible. 	Complies	
S2 C24	Biodiversity Off-set Package	<p>Prior to carrying out any development that would impact on biodiversity values, the Proponent must prepare a Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT and to the satisfaction of the Secretary in writing. The Package must include, but not necessarily be limited to:</p> <p>(a) details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS;</p> <p>(b) the cost for each specific biodiversity offset measure, which would be required to be paid into the Biodiversity Conservation Fund if the relevant measure is not implemented and delivered (as calculated in accordance with Division 6 of the Biodiversity Conservation Act 2016 (NSW) and the offsets payment calculator that was established as at 29 July 2021);</p> <p>(c) the timing and responsibilities for the implementation and delivery of the measures required in the Package; and</p> <p>(d) confirmation that the biodiversity offset measures will have been implemented and delivered no later than 1 September 2025.</p> <p>Following approval, the Proponent must implement and deliver the Biodiversity Offset Package.</p>	<p>Project EnergyConnect (NSW – Eastern Section) - Biodiversity Offset Package (BOP), Revision 2 (Scout Ecology, 2025)</p>	<p>Specialist Biodiversity Auditor Interview with Luke Fania (Environment and Sustainability Manager, Transgrid)</p>		<p>The Specialist Biodiversity Auditor verified that:</p> <ul style="list-style-type: none"> Specific offset measures are documented in Section 4 of the BOP Costs of each specific offset measure us documented in Section 4 of the BOP Timing is documented in Section 6 of the BOP Implementation of the BOP is progressing as per Table 32 of the BOP, with delivery extended to 1 September 2025 	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C25	Biodiversity Off-set Package	Prior to carrying out any development that could impact the biodiversity values requiring offset, the Proponent must lodge bank guarantee(s) with a total value of \$313,417,479.03, in accordance with the Deed of Agreement with the Planning Secretary (or delegate) executed on 1 September 2022. The Proponent must comply with the terms of the Deed.	Project EnergyConnect (NSW – Eastern Section) - Biodiversity Offset Package (BOP), Revision 2 (Scout Ecology, 2025) Bank Guarantee Deed and Qualifying Offset Statement (DG1023603418) (Transgrid, 2025)	Specialist Biodiversity Auditor Interview with Luke Fania (Environment and Sustainability Manager, Transgrid)		The Biodiversity Auditor verified that: BOP Rev B and confirmation of payment addressed in previous audit 2 and compliance confirmed Transgrid has implemented the majority of the actions required under the BOP and has prepared an Offset Statement, as required under the Bank Guarantee Deed, to outline the status of implementation of the BOP	Complies	
S2 C26	Biodiversity CEMP Subplan	The Biodiversity EMP Sub-Plan required under condition B2 must be prepared in accordance with the Revised Biodiversity Development Assessment Report (dated 19 August 2022) and include: a) a description of the measures that would be implemented for: (i) meeting the biodiversity mitigation requirements in condition C23; (ii) minimising the amount of native vegetation clearing within the development area; (iii) minimising the loss of key fauna habitat, including tree hollows; (iv) minimising the impacts on fauna on site, including undertaking pre-clearance surveys; (v) minimising the potential indirect impacts on threatened species, migratory species and ‘at risk’ species; (vi) rehabilitating and restoring disturbance areas to its pre-existing condition; (vii) avoiding and minimising impacts on Serious and Irreversible Impact (SAII); (viii) construction clearing and operation vegetation management protocols; (ix) monitoring of the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols; (x) protecting native vegetation and key fauna habitat outside the approved disturbance area; (xi) maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and restoration of the site; (xii) a Connectivity Strategy and a Supplementary Hollow and Nest Strategy; (xiii) controlling weeds; (xiv) controlling erosion; and (xv) bushfire management; and	Biodiversity Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2), Revision 5, dated 26 May 2025.	Environment Manager – this plan was t revised during this audit period.		Biodiversity management measures are described in Section 5 and compliance management is presented in Section 6 of the Biodiversity Management Plan.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
		b) a detailed program to monitor and report on the effectiveness of these measures.	Biodiversity Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2), Revision 5, dated 26 May 2025.			Biodiversity management measures are described in Section 5 and compliance management is presented in Section 6 of the Biodiversity Management Plan.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C27	Heritage Un-Surveyed Areas	<p>Prior to carrying out any construction within the unsurveyed areas of the development area identified in the EIS, or any potential archaeological deposits (PADs) identified for impact during detailed design, the Proponent must provide an Addendum Aboriginal Cultural Heritage Assessment Report (Addendum ACHAR), prepared in consultation with the Aboriginal stakeholders and Heritage NSW, to the satisfaction of the Planning Secretary.</p> <p>The report must:</p> <p>a) include details of consultation with the Aboriginal stakeholders;</p>	<p>Notifications, investigation results and related correspondence was sighted for:</p> <ol style="list-style-type: none"> 1. UFX0026 Unexpected find human remains 2. UFX029 Survey Area 1 multiple finds 3. UFX031 Potential fireplace T435-436 Access Track 4. UFX0031 Potential fireplace T430 tower ad corner 5. UFX0033 Unknown bones T435-436 UFX 31 & 34 6. UFX0034 Potential fireplace T436 7. UFX0036 Stone Artifact 8. UFX0037 T493 potential hearth 9. UFX0038 T430 – 429 Earthen Mound 10. UFX0040 T444 – 443A Grinding Stone 11. UFX0041 T327 potential artifact 12. UFX 0042 T318 – 319 potential artifact 13. UFX0043 T447 2 hearths 14. UFX0044 T400 quartz artifact 15. UFX0045 T398 – 399 Sandstone flake 16. UFX0046 T252 Clay deposit and hearth 17. UFX0047 T246 potential artifacts x 20 18. UFX0048 T252 – 253 hearth 19. UFX0050 2 scar trees 20. UFX0051 T246-247 hearth 21. UFX0052 T246-245 potential artefacts and bones 22. UFX0053 T173-174 PAD23 scar trees and heat retainers 23. UFX0054 Tt178 – 180 burial tree 24. UFX0055 Impirni Road 25. UFX0056 T279 glass and ceramic artefacts 26. UFX 0057 PAD 22 & 23 scattered bones. 	<p>Environment Manager - Heritage finds identified were:</p> <ol style="list-style-type: none"> 1. Line 2, human remains at T367 – Unexpected find 2. Line 2, multiple sites between T439-442 and T448-458 – expected finds identified as part of additional heritage clearance works with Balranald RAPs 3. Line 2, potential fireplace at T435 – 436 – avoided 4. Line 2, potential fireplace at T430 – potential UFX 5. Line 2, unknown bones at T435 - 436 Between UFX 31 & 34 - not a heritage site 6. Line 2, potential fireplace at T436 PAD Bellmouth on Track - impacts avoided 7. Line 2, stone artefact at T536 – Expected find 8. Line 2, potential hearth at T493 – Expected find 9. Line 2, earthen mound at T430 - T429 –avoided 10. Line 2, grinding stone at T444 - T443A – expected find 11. Line 2, potential artefact at T327 – impacts avoided 12. Line 2, potential artefact at T318-T319 – not a heritage site 13. Line 2, two hearths at T447 – expected find 14. Line 2, quartz artefact at T400 – expected find 15. Line 2, sandstone flake at T398 – expected find 16. Line 2, clay deposit/potential hearth at T252 – not a heritage site 17. Line 2, potential artefacts (x 20) (PEC-E-102)) at T246 - 245 Centreline – expected find 18. Line 2, hearths x 2 (PEC-E-105) at T252-T253 Centreline – expected find 19. Line 2, Scarred trees (two) at T252 – expected find 20. Line 2, hearth (PEC-E-103) at T246 - 247 centreline – expected find 21. Line 2, potential artefacts and bones at T246 - 245 Dist Area B – not a heritage site 22. Line 2, potential scarred trees at PAD23 – expected find 23. Line 2, Burial Tree West of T178 – project is avoiding 24. Line 2, hearth and artefact scatter at Impimi Road - not a heritage site 25. Line 5, potential items at T279 - not a heritage site 26. Line 2, unknown bones between PAD 22 and PAD 23 (T175 -T176) – not a heritage site, Items 5, 16, 24-26 were determined to not have heritage significance. <p>Items 12, 14, 15, 18-21 were expected finds. All items with heritage significance have had exclusion fencing installed and have been avoided and/or salvaged.</p>	<p>During the site inspection the PAD sites observed were fenced and signposted as no go areas.</p>	<p>Compliance with Condition S2 C27 was initially verified in the first IEA.</p> <p>Detailed records relating to each find was provided to the Auditor.</p> <p>Where heritage value was confirmed, the finds were managed in accordance with the management plan and heritage protocols.</p> <p>The Addendum ACHAR details the consultation undertaken with the relevant aboriginal stakeholders.</p>	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C27	Heritage Un-Surveyed Areas	b) describe the additional Aboriginal heritage surveys that were undertaken, including test excavations of PADs;	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Section 5 of the Addendum to the ACHAR describes the additional heritage assessment carried out in previously unsurveyed areas.	Complies	
		c) describe any potential additional impacts to heritage items;	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Section 6 and 7 assesses the potential impacts to the new sites identified during the additional surveys.	Complies	
		d) identify further mitigation measures, including avoidance or salvage;	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Table 8.1 provides recommended impact mitigation strategies for each identified heritage site.	Complies	
		e) include detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Section 7.1 provides justifications for unavoidable impacts to heritage items.	Complies	
		f) provide an updated and consolidated list of sites that would be protected and remain in-situ throughout construction and sites that would be salvaged and relocated to suitable alternative locations.	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Table 8.1 provides a consolidated list of sites that will be protected, salvaged or relocated.	Complies	
S2 C28	Protection of Heritage Items	The Proponent must: a) ensure the development does not cause any direct or indirect harm to Aboriginal heritage items located outside the development area;	Incident Register			No work has been undertaken outside the approved project boundary/development area to date. No harm to aboriginal items located outside of the approved project boundaries has been reported during this audit period.	Complies	
		b) implement all reasonable and feasible measures to avoid and minimise harm to Aboriginal heritage items and PADs within the development area; and	Incident Register Letter from Transgrid (L Fania) to DPHI (Fishburn) “EnergyConnect (NSW – East Section) (SSI-9172452) – Notification of potential non-compliance”, dated 28 November 2024. Post Approval Document Receipt 10 January 2025 (submission of heritage incident report) Letter from Transgrid (L Fania) to DPHI (Fishburn) “EnergyConnect (NSW – East Section) (SSI-9172452) – Investigation Report”, dated 10 January 2025.	Environmental Manager – Two heritage-related potential non-compliances occurred during the audit period involving works undertaken at Tower 430 and T485.	During the site inspection the PAD sites observed were fenced and signposted as no go areas.	Two compliance incidents relating to protection of Aboriginal Heritage were recorded during this audit period. The incidents relate to the unexpected heritage finds on Line 2 at Tower 430 (21/11/24) and Tower 485 (23/11/24). Works undertaken prior to the release of the hold point associated with the unexpected finds. Subsequent investigations found that the artefact(s) at Tower 430 were not of heritage significance. The works at Tower 485 did not impact the heritage artefact found.	Non-Compliance	Investigations were undertaken and actions taken, including training and procedure updates. No further actions have been identified by the Auditor.
S2 C28	Protection of Heritage Items	c) salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version.	RAP Consultation	Environment Manager – No incidents were identified in relation to the salvage and relocation of artefacts during this audit period.		No issues were identified in relation to the salvage and relocation of artefacts during this audit period.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C29	Protection of Heritage Items	The Proponent must; a) Ensure the development does not cause any direct or indirect harm to any heritage items located outside the development area; and	Incident Register			No work has been undertaken outside the approved project boundary/development area to date. No harm to aboriginal items located outside of the approved project boundaries has been reported during this audit period.	Complies	
		b) Implement all reasonable and feasible measures to avoid and minimise harm to PEC-E-H1 (Survey Marker Tree), the Yanga Pastoral Station Complex sheep yards at PEC-E-H3 (Bundure railway station dwelling artefact scatter), prior to carrying out any development that could harm the items or deposits.	Incident Reports	Environment Manager - No impact to PEC-E-H1 (Survey Marker Tree), the Yanga Pastoral Station Complex sheep yards at PEC-E-H3 (Bundure railway station dwelling artefact scatter) have occurred.		No impacts to PEC-E-H1 (Survey Marker Tree), the Yanga Pastoral Station Complex sheep yards at PEC-E-H3 (Bundure railway station dwelling artefact scatter) were reported during this audit period.	Complies	
S2 C30	Heritage EMP Subplan	The Heritage EMP Sub-Plan must: a) include a description of the measures that would be implemented for: (i) protecting Aboriginal heritage items and PADs in accordance with conditions C28(a) and C28(b); (ii) minimising and managing the impacts of the development on heritage items within the development area, including: – salvaging and relocating the Aboriginal heritage items identified in accordance with condition C28(c); – archival recording and/or salvage of the heritage items and sites identified in condition C29, where impacts cannot be avoided, including consultation with NPWS for the Yanga Pastoral Station Complex sheep yards and Heritage Council for PEC-E-H3 (Bundure railway station dwelling artefact scatter); – a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works; (iii) a contingency plan and reporting procedure if: – heritage items outside the approved disturbance area are damaged; – previously unidentified heritage items are found; or – skeletal material is discovered; (iv) 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 (v) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental. Aboriginal Cultural Heritage Management Strategy EnergyConnect (NSW – Western Section) Stage 1 and 2, Revision 5, dated 7 February 2024. Agency Consultation Report EnergyConnect (NSW – Eastern Section) Heritage Management Plan (Stage 2), Revision D, dated 17 January 2024.			The Aboriginal Cultural Heritage Management Strategy was prepared prior to the commencement of construction. The current version of the strategy was revised during the last audit period. The required consultation was undertaken during the preparation of this revision of the plan. The Strategy meets the contents requirements of this Condition, specifically: <ul style="list-style-type: none"> protecting Aboriginal heritage items and PADs – Section 5.7 salvaging and relocating the Aboriginal heritage items – Section 5.6 archival recording – Section 5.6 consultation with NPWS for the Yanga Pastoral Station Complex sheep yards and Heritage Council for PEC-E-H3 – Section 5.6.6 and 5.6.7 long-term management of any heritage items or material collected – Section 5.8 a contingency plan and reporting – Section 6.6 and 6.8 heritage inductions – Section 6.1 ongoing consultation with Aboriginal stakeholders – Section 1.7 	Complies	
S2 C30	Heritage EMP Subplan	b) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the development.	Aboriginal Cultural Heritage Management Strategy EnergyConnect (NSW – Western Section) Stage 1 and 2, Revision 5, dated 7 February 2024.			Inspections, audits, and reporting is described in Section 6 of the Aboriginal Cultural Heritage Management Strategy.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C31	Traffic and Transport	All over-dimensional vehicles associated with the development must only travel to and from the site via the Primary Access Routes described in the EIS, as identified in the figure in Appendix 3, unless the Planning Secretary agrees otherwise.	Condition C32 - Request for use of additional roads in TTMP Revision 11 EnergyConnect (NSW – Eastern Section), dated 4 February 2025 Email from Elecnor (R Vusango) to Murray River Council (J Bond) titled “Project EnergyConnect TTMP Revision 11 – Murray River Council (Addition of Cairns and Young Streets)”, dated 13 December 2024 Meeting Minutes between Elecnor and Essential Energy (February, March and May 2025. Complaints Register	Environment Manager - There have been changes to the transport routes during the audit period. These changes were only made following approval of the revised TTMP and consultation with the relevant Councils.		Additional roads have been added to the approved transport routes. These additions have been approved by the relevant Councils and DPHI. The TTMP contains details of all approved heavy vehicle routes. No complaints were received during the audit period relating to heavy vehicle routing.	Complies	
S2 C32	Traffic and Transport	All heavy and light vehicles associated with construction, upgrading and decommissioning of the development must travel to and from the site via the Primary Access Routes, Secondary Access Routes and Water Supply Routes as described in the EIS and identified in the figure in Appendix 3, unless the Planning Secretary agrees otherwise.	Driver’s Code of Conduct EnergyConnect, Revision D, dated 9 October 2023. Complaints Register Condition C32 - Request for use of additional roads in TTMP Revision 11 EnergyConnect (NSW – Eastern Section), dated 4 February 2025			Additional roads have been added to the approved transport routes. These additions have been approved by the relevant Councils and DPHI. The TTMP and Drivers Code of Conduct contains details of all approved heavy vehicle routes. No complaints were received during the audit period relating to vehicle routing.	Complies	
S2 C33	Road Upgrades	Unless the Planning Secretary agrees otherwise, the Proponent must implement the road upgrades identified in Appendix 3 in accordance with the relevant standard and timing requirements, to the satisfaction of the relevant roads authority.	Email from Hay Council (G Stewart) to SecureEnergy (D Maxwell) titled “A.P 2069”, dated 20 March 2025.	Environment Manager - access points have been installed during the reporting period.		The upgrading of the roads required by Appendix 3 was verified during a previous IEA. Hay Council inspected and approved a new access point and speed humps during this audit period.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C34	Road Maintenance	<p>The Proponent must:</p> <p>a) undertake independent dilapidation surveys to assess the:</p> <p>(i) existing condition of all local roads on the transport routes (including local road crossings) prior to use for construction, upgrading or decommissioning works; and</p> <p>(ii) condition of all local roads on the transport routes (including local road crossings):</p> <p>– within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed to by the relevant roads authority;</p> <p>– on an annual basis during construction, or within a timeframe agreed to by the relevant roads authority;</p> <p>b) repair (or pay the full costs associated with repairing) any damage to local roads on the transport route (including local road crossings), if dilapidation surveys identify that the road has been damaged by the development during construction, upgrading or decommissioning works; and</p> <p>c) prepare a report in consultation with the relevant roads authority.</p> <p>If there is a dispute about the road maintenance works, or the implementation of these works, then either party may refer the matter to the Planning Secretary for resolution.</p>	<p>Dilapidation Surveys and correspondence with the following Councils:</p> <ul style="list-style-type: none">• Balranald• Berrigan• Federation• Hay Shire• Lockhart• Mildura• Murray River• Murrumbidgee• Wagga Wagga• Wentworth <p>The surveys were undertaken by Pavement Management Services</p>	<p>Environment Manager - Dilapidation surveys for the PEC East project were undertaken during this audit period.</p> <p>We have a crew working full-time on Line 2 maintaining council roads. They were actively maintaining one of the roads during the audit inspection.</p> <p>One of our crews was provided to Lockhart council to rebuild Tennyson Lane.</p> <p>Federation were contacted recently by our Superintendent to ask if anything needed doing as INCO were running out of work. They said no.</p>		<p>Dilapidation surveys covering all Council areas across the PEC East project were undertaken during this audit period.</p> <p>The dilapidation surveys were undertaken by PMS</p> <p>Evidence of submission of the reports to each Council was sighted.</p>	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C35	Traffic and Transport CEMP Sub-Plan	The Traffic and Transport CEMP Sub-Plan required under condition B2 must include: a) details of the transport route to be used for all development-related traffic;	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 11, dated 25 November 2024.			Section 5 of the Traffic and Transport Management Plan describes the approved traffic routes.	Complies	
		b) details of the road upgrade works required by condition D33 of this approval, including; (i) Final number, location and type of Minor Access Points intersections to be implemented; and (ii) Verification that the proposed types of intersection treatments have sufficient capacity for the proposed vehicle numbers;	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 11, dated 25 November 2024.			Section 6.2 describes the Condition D33 upgrade works.	Complies	
S2 C35	Traffic and Transport CEMP Sub-Plan	c) details of the measures that would be implemented to: <ul style="list-style-type: none">• minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including:<ul style="list-style-type: none">- a description of the proposed dilapidation surveys required by condition D39 of this approval;- a description of the proposed measures for managing traffic flow around the work sites, construction compounds and accommodation camps;- temporary traffic controls, including detours and signage;- procedures for stringing cables and transmission lines across roads;- notifying the local community about development-related traffic impacts;- procedures for receiving and addressing complaints from the community about development- related traffic;- minimising potential cumulative traffic impacts with other projects in the area;- minimising potential conflict between development-related traffic and rail services, stock movements and school buses, in consultation with local schools, including preventing queuing on the public road network;- implementing measures to minimise development-related traffic on the public road network outside of standard construction hours;- minimising dirt tracked onto the public road network from development-related traffic; employee use of this service;	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 10, dated 19 April 2024.			Section 6 of the plan describes the traffic and transport management measures to be implemented.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C35	Traffic and Transport CEMP Sub-Plan	<p>The Traffic and Transport CEMP Sub-Plan required under condition B2 must include:</p> <p>c) details of the measures that would be implemented to:</p> <ul style="list-style-type: none">- details of the employee shuttle bus service (if proposed), including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage- encouraging car-pooling or ride sharing by employees;- scheduling of haulage vehicle movements to minimise convoy length or platoons;- responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding;- ensuring loaded vehicles entering or leaving the site have their loads covered or contained;- responding to any emergency repair or maintenance requirements;- provisions for maintaining emergency vehicle access at all times;- a traffic management system for managing over-dimensional vehicles; and- fatigue management. <ul style="list-style-type: none">• comply with the traffic conditions in this approval;	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 10, dated 19 April 2024.			Section 6 of the plan describes the traffic and transport management measures to be implemented.	Complies	
S2 C35	Traffic and Transport CEMP Sub-Plan	<p>d) include a drivers code of conduct that addresses:</p> <ul style="list-style-type: none">• travelling speeds;• procedures to ensure that drivers to and from the development adhere to the designated over-dimensional and heavy vehicle routes;• procedures to ensure that drivers to and from the development implement safe driving practices; and• include a detailed program to monitor and report on the effectiveness of these measures and the code of conduct; and	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 11, dated 25 November 2024.			The Drivers Code of Conduct is provided in Appendix A.	Complies	
		<p>e) a flood response plan detailing procedures and options for safe access to and from the site in the event of flooding.</p>	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 11, dated 25 November 2024.			The Flood Response Plan is provided in Appendix B.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C36	Visual Impact Mitigation	<p>Unless the Planning Secretary agrees otherwise, for a period of 2 years from the commencement of operations, the owners of R186, R233, R385, R422, R432, R450, R461, R501, R502 and R26749 may ask the Proponent to implement visual impact mitigation measures on their land to minimise the visual impacts of the development on their residence (including its curtilage).</p> <p>Upon receiving such a written request from the owner of these residences, the Proponent must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner.</p> <p>These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the transmission line and towers from the residence and its curtilage, and commensurate with the level of visual impact on the residence.</p> <p>All agreed mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise.</p> <p>If the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.</p> <p>To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of transmission lines and towers from any other locations on the property other than the residence and its curtilage.</p>				Operations Phase Condition.	Not Triggered	
S2 C37	Visual Impact Mitigation	<p>Prior to submitting the Final Layout Plans for towers 16 and 17 as identified in the EIS, the Proponent must provide reasonable and feasible measures to minimise the visual impacts on residence R26749, including increasing setbacks, in consultation with the owner of the residence, to the satisfaction of the Planning Secretary.</p> <p>Following approval, the Proponent must implement these measures.</p>	<p>Letter from DPE (N Brewer) to Transgrid (J Fisher) titled "Project Energy Connect (NSW – Eastern Section) – Review of visual impact minimisation for residence R26749 under Schedule 2, Condition C37", dated 10 September 2023</p> <p>Letter from Transgrid (C Hansell) to resident on Holbrook Road titled "Project EnergyConnect – NSW Electricity Networks Operations Pty Ltd (Transgrid) – consent to enter [REDACTED] (You) (H200) Property: Lot [REDACTED] in Deposited Plan [REDACTED]", dated 29 July 2024. The letter was signed by the resident approving access to conduct visual mitigation works.</p>	<p>Environmental Manager - The Department approved the proposed visual mitigation measures 10th September 2023.</p> <p>Visual mitigation progress provided with LH agreement, email and quotes to complete works.</p>		<p>Visual impact measures have been approved by DPHI. DPE noted they are satisfied with the measures proposed and approved the visual mitigation measures outlined in the Transgrid letter dated 15 August 2023.</p> <p>The impacted landowner has approved the visual impact mitigation works.</p>	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C38	Visual Appearance	The Proponent must: a) Take reasonable steps to minimise the offsite visual impacts of the development; and	Complaints Register. The Department approved the proposed visual mitigation measures 10th September 2023. Visual mitigation progress provided with landholder agreement, email and quotes to complete works.		Camps were inspected. No lighting issues (for example intrusive lights on residential properties or road users) were identified.	Site compound locations are not visible from the residential areas and are unlikely to cause any visual impacts. The lighting provided is appropriate for the development and is unlikely to cause glare issues for road users. No lighting complaints were received during the audit period.	Complies	
		b) Not mount any advertising signs or logos on site, except where it is required for identification or safety purposes.			Signage at site access points across the construction corridor were observed. No signage considered to breach this condition was observed.	No advertising signs or logos were observed at either site, other than for the purposes of site identification and safety.	Complies	
S2 C39	Lighting	The Proponent must: a) take all reasonable steps to minimise the off-site lighting impacts of the development; and b) ensure that any external lighting associated with the development: • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; and • complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting.	Complaints Register.		Camps were inspected. No lighting issues (for example intrusive lights on residential properties or road users) were identified.	Site compounds constructed for the project locations are not visible from the residential areas and are unlikely to cause any visual impacts. The lighting provided is appropriate for the development and is unlikely to cause glare issues for road users. One lighting complaint was received during the audit period about visible light from the Cob Highway Accommodation Camp. The complainant's residence is four kilometres from the camp. The Auditor is satisfied that the camp lighting meets the requirements of the Approval.	Complies	
C40	Radio Communications	If the development results in the disruption to any radio communications services (including point-to-point microwave links) in the area, then the Applicant must make good any disruption to these services as soon as possible following the disruption, but no later than 1 month following the disruption of the service unless the relevant service provider or user or Planning Secretary agrees otherwise.	L5 Assessment of Potential Impact of the EnergyConnect Project on Radiocommunication Services (Microwave Radio Links), Revision 2, dated 22 August 2024.	Environmental Manager – The project has conducted an analysis of the project's tower locations and their subsequent impact on point-point microwave links. Consultation with potentially impacted communication service providers has been conducted and documented.		The project has conducted an analysis of the project's tower locations and their subsequent impact on point-point microwave links. No impact has occurred to date.	Not Triggered	
S2 C41	Dangerous Goods	The Proponent must ensure that the storage, handling, and transport of dangerous goods is undertaken in accordance with the relevant Australian Standards and guidelines, particularly AS1940 The storage and handling of flammable and combustible liquids and AS/NZS 1596:2014 The storage and handling of LP Gas, the Dangerous Goods Code, and the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.	Incident Register		During the site inspection, the Auditor inspected fuel and other hazardous materials storage facilities. All flammable and combustible materials sighted were stored in appropriately bunded containers / areas compliant with AS1940. Refer to Photographs 11 and 12. Spill cleanup kits were located adjacent to storage areas. The storage and management of hazardous materials is of a high standard.	All fuels and chemicals observed were stored appropriately and there was no evidence of spills or leakages in any storage locations inspected. However, it was noted that, as is common practice on construction and industrial sites, that drummed liquids (20l to 1000l) are often stored on bunded pallets (See photograph 12). It is noted that bunded pallets do not meet the requirements of AS1940 for the storage of flammable and combustible materials as those pallets are not designed to prevent the escape of containerised liquids when the side of the container is accidentally penetrated. See recommendations for improvement in Section 6.2	Complies	Transition from the storage of containerised liquids (drums or IBCs) on bunded pallets to storage in (temporary (temporary bunding is commercially available) to permanently bunded areas.

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C42	Electrical and Magnetic Fields	The Proponent must ensure that the design, construction and operation of the development is managed to comply with the applicable electric and magnetic fields (EMF) limits in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz – 100kHz) (ICNIRP, 2010).	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			Three design studies have been undertaken for the transmission lines and incorporate the requirements of the (ICNIRP) Guidelines. Each study concludes that the power frequency electric and magnetic field levels near ground level are confirmed to be acceptable to humans, livestock and plants.	Complies	
S2 C43	Induced Current Risk	Prior to any works traversing the high-pressure gas main (Bowmen – Culcairn Pipeline) easement, including above ground electricity transmission lines, the proponent must undertake an induced electrical current risk assessment identifying potential risks to the pipeline, including any physical mitigation measures and ongoing management requirements.	PC L5 – 500kV Transmission Line Induction Study, Revision D, dated 4 July 2023.			Consultation with APA, the owner of the gas pipeline is underway with an earthing report prepared by Aurecon.	Complies	
S2 C44	Bushfire Safety	The Proponent must: a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022. Training PowerPoint Presentation titled “Fire Safety During Construction”.	Environment Manager - No bushfire incidents have occurred during the audit period.		No bushfire incidents have occurred during the audit period. Fire safety training is provided to the workforce.	Complies	
		b) ensure that the development: • complies with the relevant asset protection requirements in the RFS’s Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; • is suitably equipped to respond to any fires on site, including provision of a 20,000-litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds and accommodation camps; • incorporates the recommendations of a fire risk assessment as per TransGrid’s design standards;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) - Rev 0 dated 2/3/22 Accommodation Camp Management Plan Lockhart - Rev 2 dated 9/3/23 Accommodation Camp Management Plan Dinawan – Rev 2 dated 10/3/23	Environment Manager – fire related incidents have occurred during the audit period.		The Accommodation Camp Management Plan describes the fire control strategies and resources available.	Complies	
		c) ensure that buildings within the compounds and accommodation camps comply with Australian Standard AS2959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS’s Planning for Bushfire Protection 2019;				Plans for the camp building include specifications for compliance with the relevant fire standards and BAL specifications.	Complies	
		d) develop procedures to manage potential fires on site, in consultation with the RFS and FRNSW;		Environment Manager – A meeting was held with FRNSW at which we presented our fire management strategy.		SecureEnergy sought RFS input during the preparation of the Emergency Plan. A presentation was provided to FRNSW on the fire management strategy.	Complies	
		e) assist the RFS, FRNSW and emergency services as much as practicable if there is a fire in the vicinity of the site; and		Environment Manager - No bushfire incidents have occurred during the audit period.		No bushfire incidents have occurred during the audit period.	Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C44	Bushfire Safety	f) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.					Not Triggered	
S2 C45	Emergency Plan	Prior to commencing construction, the Proponent must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, in consultation with the RFS, and provide a copy of the plan to the local Fire Control Centre. The Proponent must keep two copies of the plan on site in a prominent position adjacent to the site entry point(s) to the Buronga Substation, Dinawan Substation and Wagga Wagga Substation at all times.	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.	Environmental Manager – the current version of the Emergency Plan is with the RFS for consultation.	Hard Copies of the plan were located at each camp.	The Emergency Plan was updated during this audit period to take into account the requirements of the Elecnor management system and the recommendations from the last IEA. Neither the current or previous versions of the Emergency plan were available on the project website at the time of the site inspection. Hard Copies of the plan were located at each camp (at the security room near the site entrance and at the main meeting area. SecureEnergy provided the RFS with a copy of the plan and requested input from the RFS.	Complies	
		The plan must; a) be consistent with: <ul style="list-style-type: none">• RFS's Planning for Bushfire Protection 2019 (or equivalent);• RFS's Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan;• the Fire and Rescue NSW Act 1989;• the Work Health and Safety (WHS) Act 2011;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			The plan is generally consistent with the requirements of the relevant guidelines.	Complies	
		b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 4 of the plan identifies fire hazards and risks.	Complies	
		c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 8 (Emergency Response) describes the procedures to be implemented to address a fire on or near the site(s).	Complies	
		d) list works that should not be carried out during a total fire ban;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 6.3.1 describes the activities that must not be carried out during a total fire ban.	Complies	
		e) include availability of fire suppression equipment, access and water;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 7.4 describes the location and availability of firefighting water supplies.	Complies	
		f) include procedures for the storage and maintenance of any flammable materials	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 6.4 describes the management of flammable materials.	Complies	
		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;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 7.5 describes site access for emergency vehicles and Section 9.1 provides emergency contact information.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D47	Emergency Plan	h) include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank(s);	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Appendix B, titled “Asset protection zone”, of the Emergency Plan provides aerial photographs of each Camp and includes the location of the fire water tanks at each camp.	Complies	
		i) include location of hazards (physical, chemical and electrical) that may impact on fire fighting activities and procedures to manage identified hazards during fire fighting activities;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Appendix A provides details of the location of fire hazards.	Complies	
		j) include details of the location, management and maintenance of any Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Appendix B and Section 6.1 address the asset protection zones.	Complies	
		k) include bushfire emergency management planning;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 7 describes bushfire preparedness.	Complies	
		l) include details of the how RFS would be notified, and procedures that would be implemented, in the event that: <ul style="list-style-type: none">• 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 that have the potential to ignite surrounding vegetation; and	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 9 describes emergency communications procedures.	Complies	
		m) include details on how live transmission infrastructure can be safely isolated in an emergency.	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Table 2.1 in Section 2.2 states “Site personnel should not attempt fire control activities near energized lines. In the event there is a fire near powerlines, early notification will be communicated to TransGrid or the respective electricity company / transmission line asset owner to allow an assessment of risks associated with deenergising the powerline”.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C46	Waste	<p>Waste generated during construction, operation, upgrading and decommissioning must be dealt with in accordance with the following priorities:</p> <p>a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced;</p> <p>b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and</p> <p>c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.</p>	<p>Waste Management Plan EnergyConnect (NSW – Eastern Section) Revision B, dated 21 September 2022.</p> <p>All Logistics Waste Tracking Register and Predictions (excel spreadsheet maintained by Elecnor)</p>		Recycling facilities (skip bins) are available on site for both general waste and recyclable waste.	<p>A waste management plan has been prepared and implemented for the project.</p> <p>Facilities for collections, segregation and storage of wastes are provided at each camp.</p> <p>Waste tracking register includes general waste, sanitary bin waste, concrete, contaminated soil, hydrocarbon waste and timber.</p>	Complies	
S2 C47	Waste	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the Protection of the Environment Operations Act 1997, the Protection of the Environment Operations (Waste) Regulation 2014, and orders or exemptions under the regulation.		Environment Manager - No waste importing has been undertaken by the Project during the audit period.	No evidence of the importation of wastes was sighted during the site inspections.	No importation of waste onto the project site was reported for this audit period.	Not Triggered	
S2 C48	Waste	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	<p>All Logistics Waste Tracking Register and Predictions (excel spreadsheet maintained by Elecnor)</p> <p>Cleanaway waste collection invoices covering the audit period.</p>	Environment Manager – Cleanaway is contracted to provide waste and recycling bins, and to collect wastes for processing (recycling) or disposal.		<p>A waste register is maintained that details the collection, recycling and disposal of all wastes generated by the project.</p> <p>Waste records from Cleanaway covering the audit period were sighted. The records indicate that all wastes collected by Cleanaway were managed in accordance with this Condition.</p>	Complies	
S2 C49	Waste	All waste that is removed from site must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	All Logistics Waste Tracking Register and Predictions (excel spreadsheet maintained by Elecnor)			Records indicate that nine loads (90 cu.m) of contaminated soil were removed from PEC East during this audit period.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C50	Accommodation Camp	Prior to establishing the accommodation camps, the Proponent must prepare an Accommodation Camp Management Plan in consultation with the relevant Council. The plan must: a) ensure utilities at the accommodation camps, including water, wastewater, waste and electricity, are designed and located in accordance with Council specifications and relevant standards;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2- Rev 6 dated 4 June 2024. Accommodation Camp Management Plan Lockhart (Camp 2) EnergyConnect (NSW Eastern Section), Rev 3 dated 4 June 2024. Accommodation Camp Management Plan Dinawan – Rev 3 dated 4 June 2024. Accommodation Camp Management Plan Cobb Highway (Camp 4) – Rev 3 dated 4 June 2024.	Environment Manager – a minor amendment to the Accommodation Plan was made in October last year to remove reference to Clough and to reflect the approved number of camps.		The Accommodation Management Plans have been prepared and implemented. There plans were not revised during this audit period. Section 2.4 of the plans reference the standards and guidelines used to develop the plan.	Complies	
		b) ensure the accommodation camp complies with conditions C19 and C44;				The Accommodation Management Plans provide an appropriate framework for compliance against the condition of approval.	Complies	
		c) ensure any treated wastewater from the accommodation camps used for dust suppression during construction: <ul style="list-style-type: none">• complies with the Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) guidelines for irrigation water quality;• meets the requirements of the Public Health Act 2010;			Treated effluent from site water treatment systems is stored and used for dust suppression.	The reuse of treated wastewater is described in Section 7.4 and 7.5 of the Accommodation Management Plans.	Complies	
		d) include measure for dust suppression within the accommodation camps;				Dust management is described in Section 7.5 of the Plans.	Complies	
		e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and				Site layout plans are provided in Section 4.1 (Figures 4.1 and 4.2).	Complies	
		f) include measures to support local suppliers in servicing the camp where possible.				Engagement of local suppliers is covered in Section 8.3.	Complies	
		Following approval, the Proponent must implement the Accommodation Camp Management Plan.			The camps were inspected and appeared to be set out and operated in general accordance with the Accommodation Management Plans.	The camps were being operated in general accordance with the Accommodation Management Plans at the time of this audit.	Complies	
S2 C51	Local Business and Employment Strategy	Prior to commencing construction, the Proponent must prepare a Local Business and Employment Strategy for the development in consultation with Council. This strategy must investigate options for prioritising the employment of local and Aboriginal workforce and suppliers for the construction of the development, where feasible. The Proponent must implement the Accommodation and Employment Strategy.	Local Business and Employment Strategy EnergyConnect (NSW - Eastern Section), Revision 2, dated 7 November 2022.	Environmental Manager – the Local Business and Employment Strategy was not revised during this audit period.		Compliance with this condition was verified during the last IEA. The Local Business and Employment Strategy has been prepared and implemented. A Local Industry Participation Manager (LIPM) has been appointed to identify opportunities for local goods and services and facilitate their procurement. The Local industry and indigenous participation is monitored and reported internally on a monthly basis. In addition, an Indigenous Participation Manager has been appointed whose role is to promote indigenous participation on the project.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C52	Rehabilitation	Within 6 months of the completion of construction, upgrading or decommissioning, unless the Planning Secretary agrees otherwise, the Proponent must rehabilitate the areas where ancillary facilities, accommodation camps and earthwork material sites are located, to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3.			Wagga Wagga Substation was being rehabilitated at the time of this IEA. Photographs 1 and 2.	Progressive Rehabilitation is being undertaken.	Not Triggered	
S2 D1	Environmental Management Strategy	The Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental. Construction Environmental Management Plan EnergyConnect (NSW-Eastern Section) Stage 1 and 2, Revision 2, dated 20 June 2023.	Environment Manager - the EMS has been integrated with the CEMP. The CEMP was not revised during this audit period.		The Environmental Management Strategy has been integrated with the CEMP. The CEMP was not revised during this audit period. The CEMP / EMS provides an appropriate framework for environmental management of the construction phase of the project.	Complies	
		a) provide the strategic framework for environmental management of the development;				Section 3.1 describes the statutory approvals required for this project.	Complies	
		b) identify the statutory approvals that apply to the development;				Section 4.9 describes the key roles and responsibilities assigned under the EMS.	Complies	
		c) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;						
		d) set out the procedures to be implemented to:	Letter for Transgrid (J Fisher) to DPE (D Cassel) titled “EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of commencement of construction (condition D3)”, dated 10 July 2023.					
		(i) keep the local community and relevant agencies informed about the construction, operation and environmental performance of the development;						
		(ii) receive record, handle and respond to complaints;						
		(iii) resolve any disputes that may arise during the course of the development;						
		(iv) respond to any non-compliance and any incident;						
		(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 under the conditions of this consent.						
		The Proponent must not commence construction until the Environmental Management Strategy is approved by the Planning Secretary.				Stage 2 construction works commenced on 17 July 2023. The CEMP was finalised on 20 June 2023.	Complies	
		The Proponent must implement the Environmental Management Strategy as approved by the Planning Secretary				The project is being undertaken in general accordance with the requirements of the EMS.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D2	Revision of Strategies, Plans and Programs.	The Proponent must review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 months of the: <ul style="list-style-type: none"> • submission of an incident report under condition D6; 		Environment Manager – no reportable incident occurred during this audit period.		No reportable incidents were recorded during this audit period. It is noted that two reportable (Heritage) non-compliances occurred and were reported to DPHI. The Auditor understands that the Heritage Management Plan was under review at the time of this IEA.	Complies	
		<ul style="list-style-type: none"> • submission of an audit report under condition D11; or 	Post Approval Form – Independent Environmental Audit – Sept 2024 (issued by DPHI acknowledging receipt of the report). Letter from Transgrid (L Fania) to DPHI (Fishburn) titled “EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Biodiversity component of the Independent Environment Audit (Condition D11)”, dated 6 March 2025.	Environmental Manager - The previous audit report was submitted to DPHI on 30 December 2024 following the grant of an extension. A further extension for the Biodiversity aspects was granted until 14 February 2025. The outstanding biodiversity component of the audit was submitted to DPHI on 6 March 2025. The Biodiversity Management Plan is currently undergoing revision, along with all of the appendices.		September 2024 IEA (Biodiversity elements) made a range of recommendations that have been adopted by the PEC East project and have resulted in the revision of the Biodiversity Management Plan.	Complies	
		<ul style="list-style-type: none"> • any modification to the conditions of this approval. 	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 11, dated 25 November 2024.	Environment Manager - There have not been any Modifications of the Infrastructure Approval during this audit period.		There have been no modifications to this Approval during this audit period. However, the Traffic and Transport Management Plan has been revised in response to the last Modification to the approval related to the addition of approved roads for project transportation.	Complies	
S2 D3	Notification	Prior to commencing construction, operations, upgrading or decommissioning of the development or, the Proponent must notify the Department in writing via the Major Projects website portal of the date of commencing the relevant phase. If any of these phases of the development are to be staged, then the Proponent 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.	Letter for Transgrid (J Fisher) to DPE (D Cassel) titled “EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of commencement of construction (condition D3)”, dated 10 July 2023.			Notifications of the commencement of works (both Stages 1 and 2) were issued to the Planning Secretary prior to the commencement of those works.	Complies	
S2 D4	Final Layout Plans	Prior to commencing construction, the Proponent must submit detailed plans of the final layout of the development to the Department’s website, including; <ul style="list-style-type: none"> a) Details on siting of transmission towers, ancillary infrastructure and/ or ancillary facilities; and b) Showing comparison to the approved layout and approved vegetation clearing. The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			Final layout Plans for Stage 1 were submitted to DPE on 12/12/22 with updated plans submitted to DPE on 3/3/22. Final Layout plans for Stage 2 were submitted to DPE on the 12th of July 2023 and are available on the DPE website	Complies	
S2 D5	Work as Executed Plans	Prior to commencing operations, the Proponent must submit plans that confirm the constructed layout of the development and showing comparison to the final layout plans to the Planning Secretary, via the Major Projects website.				Not yet required	Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D6	Incident Notification, Reporting and Response	The Department must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.		Environmental Manager – No reportable incidents occurred during this audit period.		No reportable incidents were recorded during this audit period. It is noted that two reportable (Heritage) non-compliances occurred and were reported to DPHI.	Not Triggered	
S2 D7	Non-compliance Notification	The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.	<p>Letter from Transgrid (L Fania) to DPHI (Fishburn) “EnergyConnect (NSW – East Section) (SSI-9172452) – Notification of potential non-compliance”, dated 28 November 2024.</p> <p>Post Approval Document Receipt 10 January 2025 (submission of heritage incident report)</p> <p>Letter from Transgrid (L Fania) to DPHI (Fishburn) “EnergyConnect (NSW – East Section) (SSI-9172452) – Investigation Report”, dated 10 January 2025.</p>	Environmental Manager – Two heritage-related potential non-compliances occurred during the audit period involving works undertaken at Tower 430 and T485.		Four compliance incidents relating to protection of Aboriginal Heritage were recorded during this audit period. The incidents relate to the unexpected heritage finds and:	Complies	
S2 D8	Non-compliance Notification	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.				<ul style="list-style-type: none"> Work outside of the assessed area at a break and winch site (13/11/2024). No documentation was available to the auditor regarding this incident. Tower 430 works undertaken prior to clearance of an unexpected finds investigation (18/11/24). No documentation was available to the auditor regarding this incident. Line 2 at Tower 430 (21/11/24) and Tower 485 (23/11/24) prior to the release of the hold point associated with the unexpected finds. Subsequent investigations found that the artefact(s) at Tower 430 were not of heritage significance. The works at Tower 485 did not impact the heritage artefact found. 	Complies	
S2 D9	Non-compliance Notification	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.					Noted	
S2 D10	Notification to Landholders	Prior to the commencement of construction, the Proponent must notify the owners of the owners of R1489, R2022 and R2023 of their rights under condition D41.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			The notifications were issued to relevant landowners on 13 March 2023.	Complies	
S2 D11	Independent Environmental Audit	Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.	EnergyConnect PEC East Project SSI – 9172452 Independent September 2024 Construction Phase Independent Environmental Audit dated 24 December 2024, prepared by Barnett & May.			Initial audit was undertaken on 17 and 18 August 2022, within 3 months of construction commencement. Subsequent three audits were undertaken 6 monthly and in compliance with this condition. DPE / DPHI approved extensions of time for reporting of the last audit due to availability conflicts with the Biodiversity auditor.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D12	Access to Information	<p>Before the commencement of construction until the completion of all rehabilitation required under this approval, the Proponent must:</p> <p>a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this approval) publicly available on its website:</p> <p>(i) the EIS;</p> <p>(ii) current statutory approvals for the development;</p> <p>(iii) approved strategies, plans or programs required under the conditions of this approval;</p> <p>(iv) the proposed staging plans for the development if the construction, decommissioning and/or operation of the development is to be staged;</p> <p>(v) a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the https://www.transgrid.com.au/project s-innovation/energyconnect/determinations-and-post-approval-documents various plans and programs approved under the conditions of this approval.</p> <p>(vi) a record of complaints, which is to be updated on a monthly basis;</p> <p>(vii) any independent environmental audit, and the Proponent's response to the recommendations in any audit; and</p> <p>(viii) any other matter required by the Planning Secretary; and</p>	https://www.transgrid.com.au/project s-innovation/energyconnect/determinations-and-post-approval-documents			All documents required by this Condition were available on the Transgrid website.	Complies	
S2 D12	Access to Information	<p>b) keep such information up to date, to the satisfaction of the Secretary.</p>	https://www.transgrid.com.au/project s-innovation/energyconnect/determinations-and-post-approval-documents			All documents required by this Condition were available on the Transgrid website.	Complies	

Appendix B

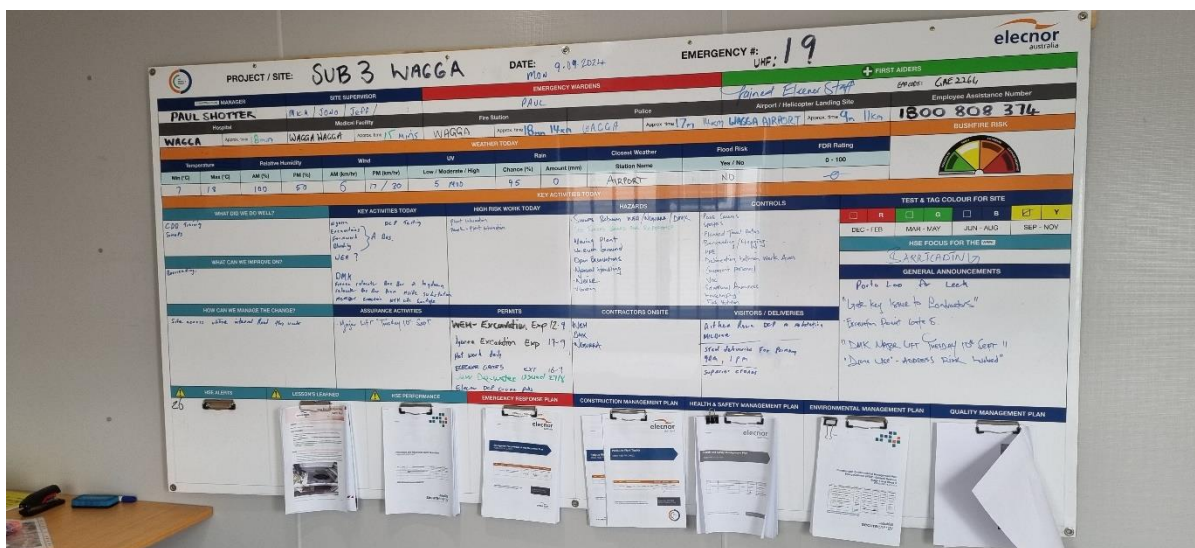
Audit Photographs



Photograph 1 – Regrading former Wagga Wagga substation works office site.



Photograph 2 – Drain stabilisation at Wagga Wagga substation.



Photograph 3 – Daily work plan, permits and key management plans



Photograph 4 – Bird nesting box (typical installation)



Photograph 5 – Braking winch site (T197 – T199)



Photograph 6 – Biodiversity (Plains Wanderer habitat) exclusion zone adjacent to active work site.



Photograph 7 – Construction site access track to T172



Photograph 8 – Indigenous Heritage (scar trees) protection zones



Photograph 9 – Indigenous Heritage (culturally significant tree) protection zone



Photograph 10 – ERSSED Works (Camp 4)



Photograph 11 – Bulk fuel storage (typical installation)



Photograph 12 – Bunded Pallets (typical liquid storage)



Photograph 13 – Targeted tree spraying (near structure 655)



Photograph 14 – Targeted tree spraying (near structure 655)



Photograph 15 – Cleared corridor (western end of PEC East)

Appendix C

Auditor Approval

NSW Planning ref: SSI-9172452-PA-81

Mr Luke Fania
Environment and Sustainability Manager
NSW Electricity Networks Operations Pty Limited
180 Thomas Street
HAYMARKET, NSW 2000
21/02/2025

Sent via the Major Projects Portal only

Subject: Project EnergyConnect (NSW - Eastern Section) - IEA Auditor Approval

Dear Mr Fania

I refer to your letter dated 20 February 2025, seeking the agreement of the Planning Secretary of the Department of Planning, Housing and Infrastructure ("NSW Planning") of the suitability of the auditor's qualifications, experience and independence to undertake an independent audit of the Project EnergyConnect (NSW – Eastern Section) ("the project"), in accordance with Condition D11 of State significant infrastructure approval SSI 9172452, as modified ("the approval").

Having considered the qualifications and experience of Mr Ken Holmes of Barnet & May Pty Ltd, as nominee of the Planning Secretary, I endorse the appointment of Mr Holmes, in accordance with Condition D11 of the approval. This approval is conditional on Mr Holmes being independent of the project and maintaining Exemplar Global certification. NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Please ensure this correspondence is appended to the Audit Report.

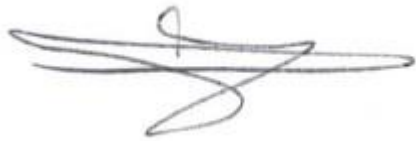
The audit is to be conducted in accordance with the conditions of approval and the Independent Audit Post Approval Requirements (May 2020). A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>. Auditor may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

Audit Report, including the response to any recommendations contained in the audit report and a timetable to implement the recommendations is to be submitted to the Planning Secretary, with the Audit Report.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Should you have any enquiries in relation to this matter, please contact me on (02) 42471852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to be "Georgia Dragicevic".

Georgia Dragicevic
A/Team Leader Compliance
Compliance

As nominee of the Planning Secretary

NSW Planning ref: SSI-9172452-PA-83 Mr
Luke Fania
Environment and Sustainability Manager
NSW Electricity Networks Operations Pty Limited 180
THOMAS STREET
HAYMARKET New South Wales 2000
05/05/2025

Sent via the Major Projects Portal only

Subject: Project EnergyConnect (NSW - Eastern Section) - Independent Environmental Audit audit team - Biodiversity expert endorsement May 2025

Dear Mr Fania

Reference is made to your post approval matter, SSI-9172452-PA-83, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person to participate in the Independent Environmental Audit (IEA) of the Project EnergyConnect (NSW - Eastern Section) submitted as required by Condition D11 of SSI-9172452 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 5 May 2025.

NSW Planning has reviewed the independent biodiversity expert auditor nomination and based on the information you have provided is satisfied that the proposed person is suitably qualified, experienced, and independent.

In accordance with Condition D11 of the approval and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse Erin Lowe of EMM Consulting Pty Limited as the Biodiversity expert for the independent audit team.

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

Please note, the expert must attend site (unless otherwise agreed by the Secretary) and the IEA report must include specific sections (and/or an appended report) prepared by the experts which addresses their assessment of compliance (and recommendations for improvements) in respect to the conditions, management plans and any other matters considered relevant for their areas of expertise.

Should you wish to discuss the matter further, please contact me on 0429400261 or email compliance@planning.nsw.gov.au

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Stakeholder Consultation

Appendix D

From: [Katrina O'Reilly](#)
To: [Ken Holmes](#)
Subject: Re: Project Energy Connect PEC East / PEC West - Independent Environmental Audit - Consultation Request DPHI
Date: Friday, 4 April 2025 1:28:26 PM

Thank you for your email requesting input into the upcoming audits of Project Energy Connect eastern and western sections. It is noted that you intend to undertake site inspections in the coming week. NSW Planning requests in future that you provide ample time for agency's consultation and their feedback prior to going on site to conduct the audit site component. It is further noted you were approved as the auditor in early August 2024.

NSW Planning would like the below stakeholders to be consulted:

EPA, BCS, Commonwealth DCCEEW, TfNSW, Local Councils, DPI, Forestry, RFS, Fire and Rescue, Local Aboriginal Councils (RAPS), NPWS, Heritage NSW, heritage council, DPI and DPE Water, local lands service.

I'm also assuming there will also be the BAM accredited ecologist as part of the audit team.

Areas to be focused to include:

Evidence of compliance with commitments, reporting and monitoring in all management plans.

Evidence of any adaptive management identified/ implemented.

Evidence of compliance with approved footprint and current activities.

Erosion and sediment controls, management, monitoring and maintenance.

Comparison between EA predictions and actual impacts.

Evidence (tracking documentation/measures implemented) to ensure compliance with clearing and disturbance limits c 23.

Road maintenance/ monitoring and management and the interface /access onto road networks.

Evidence of Progressive Rehabilitation.

Detailed assessment (evidence) of compliance with the Biodiversity Management Plan including but not limited to the reporting/checks/monitoring committed to in the Biodiversity Management Plan (BMP) Condition c 26 (a) (ix) which states

monitor the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols;

Evidence of compliance with partial clearing, clearing commitments (how is this tracked, managed and monitored). Is the current clearing (in particular partial clearing) activity being undertaken in accordance with the commitments within BMP, EA, BDAR and description of partial clearing.

Implementation of ACHMP and compliance with conditions and evidence of consultation with Local RAPS.

Complaints management, monitoring and response.

Regards
Katrina

From: Ken Holmes <Ken@baeckea.com.au>

Sent: Sunday, March 16, 2025 12:34:05 PM

To: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>

Subject: Project Energy Connect PEC East / PEC West - Independent Environmental Audit - Consultation Request DPHI

Katrina,

The NSW planning approvals SSI 9172452 and SSI 10040 for the Project Energy Connect Eastern Section and Western Sections respectively and requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under these approvals. The audit is scheduled for to commence in late April and will be undertaken concurrently, although separate reports will be prepared for each section. The Audits will be undertaken accordance with the Project Approval Conditions that require:

D11 / E11 Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.

The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the Auditor consults with relevant stakeholders.

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that DPHI may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

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

Our ref: OUT25/3107

Ken Holmes

Barnett & May

Email: Ken@baeckea.com.au

17/03/2025

Subject: Project Energy Connect Eastern section and Western Sections - Independent Environmental Audit - (SSI-9172452 and SSI-10040)

Dear Ken,

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

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

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

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

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

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

- Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

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

Yours sincerely,



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

Our ref: HMS ID 9722

Ken Holmes
Director
Barnett & May
ken@baeckea.com.au
Letter provided via email

Independent Environmental Audit - State Significant Infrastructure

Proposal: Project Energy Connect NSW Western Section and Eastern Section

Major Project reference: SSI 9172452 and SSI 10040

Received: 19 March 2025

Dear Ken,

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for the above Infrastructure projects. Thank you for the continued opportunity to comment on the project.

With respect to the scope of the audit for Project Energy Connect East, Heritage NSW notes the requirements under the Heritage Management Plan Energy Connect NSW (Eastern Section) Stage 1 and Stage 2, prepared by Elecnor, dated 7 February 2024. Including the requirements for management of newly identified Aboriginal sites during construction works.

With respect to the scope of audit for Project Energy Connect West, Heritage NSW notes the requirements under the Heritage Management Plan Energy Connect (NSW - Western Section) prepared by Secure Energy dated 17 December 2021.

It is recommended that the Department of Climate Change, Energy, the Environment and Water Compliance Team be contacted via info@environment.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact Alison Lamond at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Corey O'Driscoll

Corey O'Driscoll
Practice Lead, Major Projects
Heritage NSW, Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
27 March 2025

From: [Mon Carmichael](#)
To: [Ken Holmes](#)
Subject: Automatic reply: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request NPWS
Date: Sunday, 16 March 2025 12:53:01 PM

Thanks for your email. I am away and will be back in the office on Tuesday 18 March.

You can direct enquiries to npws.lowerdarling@environment.nsw.gov.au or call the Lower Darling Area office on 03 5021 8900. Otherwise I will attend to your message when I return.

-
Thanks

Mon Carmichael

Manager
Lower Darling National Park,
/ National Parks & Wildlife Service
Barrington 2715

T 0350 218 988
M 0488 499 931
W nationalparks.nsw.gov.au

From: [South West Planning Mailbox](#)
To: [Ken Holmes](#)
Cc: [Adam Vey](#); [Simon Maffei](#); [Leigh Maloney](#); [Miranda Kerr](#); [Mel Cotterill](#)
Subject: RD Response RE: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request
Date: Monday, 7 April 2025 12:39:23 PM
Attachments: [image001.png](#)

Hi Ken,

Thank you for the opportunity to provide input into the upcoming Independent Environmental Audits for PEC East CSSI.

Noting the audit scope as outlined in section 3.3 of the *Independent Audit Post Approvals Requirements (2020)*, South West Regional Delivery (RD) provide the following comments for consideration in your audit.

RD has reviewed the *PROJECT ENERGYCONNECT – EAST Biodiversity Technical Specialist Audit Report, FINAL February 2025* and make the following comments/recommendations.

We note non compliance 3 that states ‘*The Post Clearance Ecology Survey Reports sighted do not contain sufficient information on completed partial clearing to inform verification reporting (to confirm if any changes are required to the construction vegetation clearing protocols). A Verification Report has not been prepared as required*’. We also note the *Improvement Recommendations* listed in Table 3.3, particularly *Improvement Recommendation Biodiversity 4*. RD supports the adoption of improvement recommendation Biodiversity 4 as listed below, with suggested additions in red. We would be interested to know the status of implementing this recommendation.

The BMP should be updated to specify the requirements for partial clearing verification monitoring and reporting including:

- *data collection requirements;*
- *fixed point monitoring at representative locations matching BDAR plot locations and at locations where high densities of trees have been removed (as documented by the project arborist data);*
- *recording of clearing machinery types used;*
- *Documentation of mulch cover and depth post clearing;*
- *Fixed BAM plot monitoring of floristics and associated vegetation integrity scores.*
- *calculation and reporting of actual tracking of VI scores against predicted targets for PCTs vegetation zones in the Revised BDAR.*
- *for each vegetation zone, tracking of time between clearing and partial clearing verification monitoring.*
- *comparison of post clearing floristic species richness and cover by growth form type for native species with pre-clearing plot data from the BDAR to identify any losses or gains in native species composition.*
- *comparison of post-clearing cover and species richness for exotic flora species compared with pre-clearing plot data from the BDAR to identify any weed introductions or increases to exotic flora species cover.*
- *recommendations for changes to clearing methods where appropriate, to ensure VI targets identified in the BDAR are likely to be achieved during Stage 3 (Operation).*

- confirmation of compliance with partial impact clearing requirements and reporting on any excessive clearing of partial impact zones.
- Identify any locations where the VI predictions for partial clearing footprints are not likely to be met due to loss of understorey species and/or increase in exotic flora species cover related to excessive clearing.
- verification reporting and monitoring to be undertaken by an appropriately experienced ecologist accredited under the BAM.
- include BCS (now Conservation Programs, Heritage and Regulation) as a reviewer of Verification Reports.
- *verification reports to be provided to DPHI and CPHR within 3 months of monitoring.*

If locations are identified where partial impact zones are not likely to meet VI predictions due to excessive clearing or disturbance, the VI difference and area of additional impact may need to be taken into account in the determination of final biodiversity offset requirements, as per Section 7 of Appendix A of the BMP which states that "Clearing of native vegetation will be monitored and recorded to inform any final biodiversity offset requirements within the biodiversity offset package".

RD advises that partial clearing monitoring should exclude regenerating vegetation in the vegetation integrity scores. This is because regeneration is not reflective of the clearing impacts at the time of clearing, as required for the Biodiversity Offsets Scheme.

RD notes that the audit findings indicate a lack of clarity in the project approval and subsequent BMP about monitoring and reporting and auditability of partial vegetation impacts. As the predicted retention of vegetation components from partial impact has a significant influence on a project's credit liability and the consequence of over-clearing is harm that has not been offset, RD supports including further audit recommendations to ensure transparent reporting (including to RD), monitoring, tracking, auditing, and consequence of partial impact thresholds and outcomes.

If you have any questions please contact Simon Maffei, Senior Project Officer via planning.southwest@environment.nsw.gov.au or 02 6022 0646.

Regards

Andrew Fisher

Senior Team Leader, Planning - South West
Regional Delivery

Conservation Programs, Heritage and Regulation Group

Department of Climate Change, Energy, the Environment and Water

T 02 6022 0623 M 0427 562 844 E andrew.fisher@environment.nsw.gov.au

620 Macauley St, Albury NSW 2640

www.environment.nsw.gov.au



Contact the South West Planning Team about biodiversity and flood management planning in south-western NSW by emailing planning.southwest@environment.nsw.gov.au

From: Ken Holmes <Ken@baeckea.com.au>

Sent: Sunday, 16 March 2025 12:36 PM

To: Andrew Fisher <Andrew.Fisher@environment.nsw.gov.au>

Subject: Project Energy Connect PEC East / PEC West- Independent Environmental Audit - Consultation Request DPHI -BCD

Andrew,

The NSW planning approvals SSI 9172452 and SSI 10040 for the Project Energy Connect Eastern Section and Western Sections respectively and requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. DPHI has recently approved the change in audit timing to allow both audits to be run concurrently.

I have been commissioned by the to undertake the next six-monthly audit as required under these approvals. The audit is scheduled for to commence in **late April**. The Audits will be undertaken accordance with the Project Approval Conditions that require:

D11 / E11 Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.

The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the Auditor consults with relevant stakeholders.

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that BCD may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

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Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment, Energy and Science.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

From: [Emily Lu](#)
To: [Ken Holmes](#)
Cc: [Alexandra Power](#)
Subject: RE: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request TfNSW
Date: Monday, 7 April 2025 2:15:36 PM
Attachments: [image001.png](#)

Hi Ken,

Thanks for reaching out to TfNSW regarding Project Energy Connect.

I have not come across any new concerns over the last six months, but looking at the conditions of consent and TMP, here are some items I would recommend you consider:

- Road upgrade/intersection treatment works are conducted as outlined within the Consent
- Vehicle movements are aligned to numbers indicated in TIA
- Heavy vehicles use only the access routes as described in the Consent (Appendix 2 for West, Appendix 3 for East)
- Traffic control plan
- Adherence to Drivers' Code of Conduct is appropriately monitored

Feel free to reach out if you require any further information.

Kind regards,

Emily Lu (*she/her*)

Development Services Case Officer - Renewables

Transport Planning

Planning, Integration and Passenger

Transport for NSW

P 1300 019 680 E development.renewables@transport.nsw.gov.au



**Transport
for NSW**

OFFICIAL

From: Maurice Morgan <Maurice.MORGAN@transport.nsw.gov.au>
Sent: Monday, 17 March 2025 7:49 AM
To: Development Renewables <development.renewables@transport.nsw.gov.au>
Cc: Alexandra Power <Alexandra.Power@transport.nsw.gov.au>
Subject: FW: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request TfNSW

Good Morning

Please refer to email below

OFFICIAL

From: Ken Holmes

Sent: Sunday, 16 March 2025 12:38 PM

To: Maurice Morgan

Subject: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request TfNSW

You don't often get email from ken@baeckea.com.au. [Learn why this is important](#)

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Maurice,

The NSW planning approvals SSI 9172452 and SSI 10040 for the Project Energy Connect Eastern Section and Western Sections respectively and requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. DPHI has recently approved the change in audit timing to allow both audits to be run concurrently.

I have been commissioned by the to undertake the next six-monthly audit as required under these approvals. The audit is scheduled for to commence in late April. The Audits will be undertaken accordance with the Project Approval Conditions that require:

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The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the Auditor consults with relevant stakeholders.

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that TfNSW may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes

**Principal Environmental Auditor
Director**

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

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From: [Brionny Seaman](#)
To: [Ken Holmes](#)
Subject: RE: Project Energy Connect PEC East / PEC West - Independent Environmental Audit - Consultation Request
EPA
Date: Monday, 17 March 2025 4:16:55 PM
Attachments: [image001.png](#)

Good Afternoon Ken,

The EPA understand that you are carrying out an independent audit of the NSW Eastern Section of the Project Energy Connect (Eastern and Western Sections).

The EPA's interest in the project relates to the requirement for an Environment Protection Licence under section 43 and 48 of the *Protection of the Environment Operations Act 1997* (POEO Act) for crushing, grinding or separating, clause 16 of Schedule 1 - for the upgrade of the Dinawan Substation (SSI-9172452) and the upgrade of the Buronga Substation (SS1-10040).

The proponent should be aware that under section 120 of the POEO Act, it is an offence in NSW to pollute waters. During construction the proponent must take all necessary precautions and implement all practical measures that could be taken to prevent, control, abate or mitigate water pollution and protect human health and the environment from harm during the construction phase.

The proponent should also be aware of the management of noise and vibration from the construction sites, ensuring that all practical measures that could be taken to prevent noise and vibration impacts on sensitive receptors are undertaken, including the scheduling of noisy activities.

In addition, note should be taken on the management of dust from the work sites, in particular ensuring that all practical measures that could be taken to prevent dust moving from the work sites are being implemented.

Please ensure that all future emails are directed to info@epa.nsw.gov.au to ensure that it is allocated to the appropriate officer.

If you have any further questions, please don't hesitate to get in touch.

Regards

Brionny

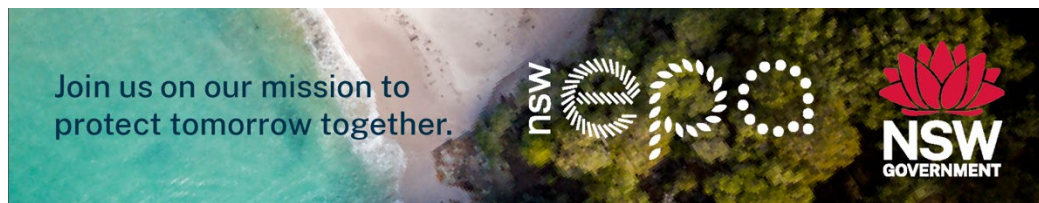
Brionny Seaman

Unit Head

Operations

NSW Environment Protection Authority

T 02 6983 4918 | M 0417 203 094 | www.epa.nsw.gov.au



The EPA acknowledges the Traditional Custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal Elders past and present.

I work on Wiradjuri Country.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Sunday, 16 March 2025 12:37 PM
To: Briohny Seaman <Briohny.Seaman@epa.nsw.gov.au>
Subject: Project Energy Connect PEC East / PEC West - Independent Environmental Audit - Consultation Request EPA

Briohny,

The NSW planning approvals SSI 9172452 and SSI 10040 for the Project Energy Connect Eastern Section and Western Sections respectively and requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. DPHI has recently approved the change in audit timing to allow both audits to be run concurrently.

I have been commissioned by the to undertake the next six-monthly audit as required under these approvals. The audit is scheduled for to commence in late April. The Audits will be undertaken accordance with the Project Approval Conditions that require:

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The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the Auditor consults with relevant stakeholders.

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that EPA may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

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From: [Sarah Griffiths](#)
To: [Ken Holmes](#)
Subject: FW: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Berrigan Shire Council
Date: Thursday, 27 March 2025 1:18:11 PM
Attachments: [image002.png](#)

Afternoon Ken

I have spoken internally about the <https://www.projectenergyconnect.com.au/>. While the haulage route is not near Berrigan Shire, we note that heavy haulage vehicles will be travelling from VIC and Sydney to the site. Can you please ensure that your audits look at the impacts on infrastructure; environmental impacts resulting from heavy haulage; and impacts on local areas (EG as a result of camp sites used by traffic haulers, stopping mid journey) in terms of noise, fumes etc.

Happy to discuss.

Regards,



Sarah Griffiths
Manager Planning and Development

Berrigan Shire Council | 56 Chanter Street, Berrigan NSW 2712

P: 03 5888 5100 **M:** 0438 479 899

E: sarah.griffiths@berriganshire.nsw.gov.au

W: www.berriganshire.nsw.gov.au



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From: Sarah Griffiths
Sent: Tuesday, 18 March 2025 11:05 AM
To: Ken@baeckea.com.au
Subject: RE: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Berrigan Shire Council

Morning Ken

I acknowledge receipt of your email relating to the 2 State Significant Infrastructure projects. I respond on behalf of Council's CEO and I am happy to be your contact at Council moving forward.

I have reached out to Council's infrastructure team about the information that you are looking for. I just wanted to check your timeframe and expectation - To commence your audits concurrently in late April, when do you need the information from us by?

Regards,



Sarah Griffiths
Manager Planning and Development

Berrigan Shire Council | 56 Chanter Street, Berrigan NSW 2712

P: 03 5888 5100 **M:** 0438 479 899

E: sarah.griffiths@berriganshire.nsw.gov.au

W: www.berriganshire.nsw.gov.au



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From: Ken Holmes <Ken@baeckea.com.au>

Sent: Sunday, 16 March 2025 12:48 PM

To: Karina Ewer - MBA, MCDR, MAHRI, GAICD <KarinaE@berriganshire.nsw.gov.au>

Subject: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request
Berrigan Shire Council

Attention: The Chief Executive.

Karina

The NSW planning approvals SSI 9172452 and SSI 10040 for the Project Energy Connect Eastern Section and Western Sections respectively and requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. DPHI has recently approved the change in audit timing to allow both audits to be run concurrently.

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Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

From: [Darryl Woods](#)
To: [Ken Holmes](#)
Subject: RE: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Wagga Wagga Council
Date: Wednesday, 19 March 2025 11:21:08 AM
Attachments: [image001.png](#)

Re: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Wagga Wagga Council

One comment in relation to the works. We would like the auditor to review the tree removal at Gregadoo Waste Management Centre. The trees were to be removed and roots grubbed, however many of the trees were felled and there is evidence of regrowth. This has an impact on our grazing licence for the site.

Darryl Woods

Executive Manager - Major Projects

1300 292 442

d: +61 2 6926 9430 | **e:** Woods.Darryl@wagga.nsw.gov.au

[Wagga Wagga City Council](#) · 243 Baylis Street (PO Box 20) · Wagga Wagga NSW 2650

Committed to a thriving, innovative, connected and inclusive city

Wagga Wagga City Council acknowledges the traditional custodians of the land, the Wiradjuri people, and pays respect to Elders past, present and future and extends our respect to all First Nations Peoples in Wagga Wagga.

We recognise and respect their cultural heritage, beliefs and continuing connection with the land and rivers.

We also recognise the resilience, strength and pride of the Wiradjuri and First Nations communities.

From: Paige Andrews <Andrews.Paige@wagga.nsw.gov.au>

Sent: Wednesday, 19 March 2025 11:12 AM

To: Darryl Woods <Woods.Darryl@wagga.nsw.gov.au>

Subject: FW: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Wagga Wagga Council

For action.

Paige Andrews

Casual Business Support Officer

1300 292 442

d: | **e:** Andrews.Paige@wagga.nsw.gov.au

[Wagga Wagga City Council](#) · 243 Baylis Street (PO Box 20) · Wagga Wagga NSW 2650

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We recognise and respect their cultural heritage, beliefs and continuing connection with the land and rivers.

We also recognise the resilience, strength and pride of the Wiradjuri and First Nations communities.

From: Ken Holmes <Ken@baeckea.com.au>

Sent: Sunday, 16 March 2025 12:41 PM

To: City of Wagga Wagga <Council@wagga.nsw.gov.au>

Subject: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Wagga Wagga Council

Attention: David Woods

David,

The NSW planning approvals SSI 9172452 and SSI 10040 for the Project Energy Connect Eastern Section and Western Sections respectively and requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. DPHI has recently approved the change in audit timing to allow both audits to be run concurrently.

I have been commissioned by the to undertake the next six-monthly audit as required under these approvals. The audit is scheduled for to commence in late April. The Audits will be undertaken accordance with the Project Approval Conditions that require:

D11 / E11 Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.

The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the Auditor consults with relevant stakeholders.

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that Council may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

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From: [Peter Bascomb](#)
To: [Ken Holmes](#)
Subject: RE: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request
Balranald Council
Date: Wednesday, 2 April 2025 4:14:21 PM
Attachments: [image001.png](#)

Good afternoon Ken

Thank you for your email.

Balranald Shire Council has not identified any issues.

regards



Peter Bascomb

Interim General Manager

pbascomb@balranald.nsw.gov.au
03 5020 1300
70 Market Street Balranald NSW 2715

www.balranald.nsw.gov.au | www.visitbalranald.com.au



We acknowledge the traditional owners of the land on which we live and work, and pay our respects to their elders past, present, and emerging.

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From: Ken Holmes <Ken@baeckea.com.au>
Sent: Sunday, March 16, 2025 12:42 PM
To: Council <council@balranald.nsw.gov.au>
Subject: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Balranald Council

You don't often get email from ken@baeckea.com.au. [Learn why this is important](#)

Attention: The General Manager

The NSW planning approvals SSI 9172452 and SSI 10040 for the Project Energy Connect Eastern Section and Western Sections respectively and requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. DPHI has recently approved the change in audit timing to allow both audits to be run concurrently.

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Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

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A PO Box 365 Belrose NSW 2085

Lead Auditor CV

Appendix E

KEN HOLMES

Senior Principal Environmental Consultant



Contact

Email ken@baeckea.com.au

Mobile +61 0438 046 261

Qualifications & professional affiliations

- Bachelor of Science (Industrial Chemistry)
- Master of Applied Science (Waste Management)
- Master of Business Administration (MBA)
- Accredited Lead Environmental Auditor (Exemplar Global #: 14065)

Ken Holmes is an acknowledged industry leader in environmental auditing, environmental management and project approvals. His career spans over 30 years and includes experience across Australia, Africa, Europe and South-east Asia.

Ken's extensive Environmental Audit, Infrastructure Planning and Approvals experience includes that preparation of environmental impact statements for major projects, pre-construction approvals, and operations environmental management experience.

He has led large scale projects on major road, rail, renewable energy, mining and water infrastructure projects across Australia. The projects presented below are a sample of the range and complexity of projects that Ken has delivered.

Project experience

Environmental Auditing (Audits completed in the recent years)

Project Energy Connect (2024 – on-going). Ken is currently undertaking the independent environmental audits of construction phase of this major (900km) electricity infrastructure project that consists of high voltage power line and associated infrastructure construction between Wagga Wagga and South Australia.

Victoria Cross Over Station Development IEA (2023 – on-going) Construction phase bi-annual independent audits - Ken has commenced a program of (six) environmental compliance audits of this landmark construction project in the North Sydney CBD. The audit program covered two separate Planning Approvals (for adjacent office tower construction sites). The audits cover the conditions of the project's Planning Approval requiring bi-annual independent environmental audit of compliance against the DP&E (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

Hunter Power Project (Construction Phase IEA 2022 – on-going) - Ken has been commissioned to undertake the construction phase independent environmental audits on the Hunter Power Project. The Hunter Power Project is the construction of a new gas fired power station located in the Hunter Valley in NSW. The conditions of approval for the project requires bi-annual independent environmental audit of compliance against:

- o DP&E Conditions of Approval / Development Approvals;
- o Commonwealth Approvals;;

The independent environmental audit are being undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

As auditor, Ken's role covers all technical areas including construction management, waste, greenhouse gas, surface water management, air quality and noise management.

Kurri Kurri Lateral Pipeline (Construction Phase IEA 2023 - 2025)- Ken has been commissioned to undertake the construction phase independent environmental audits on the Kurri Kurri gas pipeline project located in the Hunter Valley in NSW. The conditions of approval for the project requires bi-annual independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;

The independent environmental audit are being undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

As auditor, Ken's role covers all technical areas including construction management, waste, greenhouse gas, surface water management, air quality and noise management.

Dargues Gold Mine IEA (2023)- Ken led the independent environmental audit of environmental compliance audit of the this gold mining project located near Braidwood in southern NSW. The conditions of approval for the mine requires a two-yearly independent environmental audit of compliance against:

- o DP&E Conditions of Approval / Development Approvals;
- o Water Licences;
- o Environment Protection Licences;
- o Mining Leases;

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

Martin Place Over Station Development (2020 – 2023) Construction phase annual independent audits) - Ken undertook the (six) environmental compliance audits of this landmark construction project in the Sydney CBD. The audit program covered two separate Planning Approvals (for adjacent office tower construction sites). The audits covered the conditions of each project's Planning Approval requiring annual independent environmental audit of compliance against the DP&E (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

Mt Thorley / Warkworth Mine IEA (2023)- Ken led the multi-disciplinary team that completed the 2023 independent environmental audit of environmental compliance audit of this large mining complex located in the Hunter Valley, NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases;

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

Hera Gold Mine (2019 and 2023)- Ken led the independent

environmental audits for the environmental compliance audit of the Hera Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management, air quality and noise management.

Bingo Industries Eastern Creek Resource Recovery Facility and Landfill (2022) - Ken led the environmental compliance audit of Bingo's Resource Recovery Facility and Landfill located in western Sydney. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- DP&E (NSW) Conditions of Approval / Development Approvals;

Environment Protection Licence.

The Audit also included an odour audit and surface water audits undertaken by specialists within the audit team.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

McArthur River Mine (Northern Territory) (2022) - Ken is currently leading the environmental compliance audit of McArthur River Mine in the Cape of Carpentaria, NT. EPBC Approval requires an annual independent environmental audit of compliance against that Approval.

The independent environmental audit is being undertaken in accordance with AS/NZS ISO 19011:2014 and the DAWE Audit Guidelines.

Moolarben Coal Mine (2019 and 2022) - Ken led the environmental compliance audits of Moolarben Coal Mine located near Mudgee in Western NSW. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- EPBC Approval
- DP&E (NSW) Conditions of Approval / Development Approvals;
- Water Licences;

Environment Protection Licence; and all Mining Leases.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management, air quality and noise management.

Tomingley Gold Mine (2021 and 2024) - Ken was the lead auditor for the environmental compliance audit of the Tomingley Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Tritton Copper Mine (2018 and 2024) - Ken was the lead auditor for the environmental compliance audit of the Tritton Copper Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Bingo Industries Mortdale Resource Recovery Facility (2022) - Ken undertook the environmental compliance audit of waste recycling plant and transfer station located in Mortdale, NSW. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- DP&E (NSW) Conditions of Approval / Development Approvals;
- Environment Protection Licence.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

Client: Port Waratah Coal Loader (2018, 2021 and 2024)- Ken was the lead auditor for the last two independent environmental compliance audits of the Port Waratah Coal Loader located on Kooragang Island near Newcastle. The conditions of approval for the facility Barnett & May

requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

These independent environmental audit were undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water, air quality and noise management.

North Parkes Mine (2021 and 2024)- Ken was the lead auditor for the environmental compliance audit of the Tritton Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Metropolitan Coal Mine (2018, 2021 and 2024)

Ken was the independent environmental auditor for the last two independent environmental compliance audits of the Metropolitan Coal Mine south of Sydney, NSW. These conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management (covering the mine infrastructure areas), air quality and noise management.

Stratford and Duralie Coal Mines – (2020) Ken was the lead auditor for the environmental compliance audit of Ashton Coal Mine in the Hunter Valley. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in

accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Ashton Coal Mine (2020) - Ken was the lead auditor for the environmental compliance audit of Ashton Coal Mine in the Hunter Valley. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- EPBC Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Newcastle Coal Infrastructure Group (2019 and 2022) - Ken was the lead auditor for the environmental compliance audits of the NCIG Coal Loader located on Kooragang Island near Newcastle. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- EPBC Approvals;
- Water Licences;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Kables Sand Quarry EPBC Audit (2019) – Ken was the auditor for the EPBC audit of Hansons Kables Sand Quarry located in the Blue Mountains in NSW. The audit was a requirement of the project EPBC approval and was undertaken in accordance with the DAWE Audit Guidelines.

Bendicks Recycling Mayfield (2019)- Ken was the lead auditor for the environmental compliance audit of the Benedicks waste facility in Newcastle. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Oberon Quarries (2019) - Ken was the lead auditor for the environmental compliance audit of this Gravel Quarry located in near Oberon in western NSW. The conditions of approval for the quarry requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the

Department of Planning and NSW EPA audit guidelines.

Sibelco Dunes Sand Mine (2018 / 2019) – Ken was the auditor for the environmental compliance audit of the Sibelco Sand located near Nelson Bay in NSW. The conditions of approval for the mine required an independent environmental audit of against:

- DP&E Conditions of Approval / Development Approvals;
- EIS predication against actual impacts.

The Approval required that the audit be conducted within 12 months of completion of mining and focussed on mine site rehabilitation.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines

Ardglen Quarry (Daracon) (2018) - Ken was the lead auditor for the environmental compliance audit of the Ardglen Gravel Quarry located in the upper Hunter Valley. The conditions of approval for the quarry requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Holcim Hume Quarry (2017/8) - Ken was auditor for the environmental compliance audit of Holcim' hard rock quarry located near Queanbeyan in NSW. Ken undertook the compliance audits of the quarry's Conditions of Approval. The conditions of approval required a detailed assessment of compliance against:

- DP&E Conditions of Approval / Development Approvals
- Water Licences
- Environment Protection Licences.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

PGH Bricks (2017/8) - Ken was the lead auditor for the environmental compliance audits of PGH's NSW, QLD, Vic and SA quarries. Ken undertook the compliance audits of the quarries as required by the Conditions of Approval for each site. The conditions of approval required a detailed assessment of compliance against:

- DP&E Conditions of Approval / Development Approvals (for non-NSW sites)
- Mining (and Exploration) Leases
- Environment Protection Licences (or equivalent)

Enviroking (2017/8) - Ken was the lead auditor for an independent environmental audit undertaken in accordance with AS/NZS ISO 19011:2014 "Guidelines for auditing management systems" for the liquid waste facility. The audit reviewed Enviroking's compliance with conditions of approval, made recommendations to address non-compliances and identified opportunities for improvement in the project's environmental management and performance.

Ken has also undertaken environmental management system and statutory compliance audits for a wide range of industries and projects including:

- Cowal Gold Mine
- Manildra Limited / Castlereagh Coal
- Bougainville Copper Limited (Bougainville, PNG)
- News Limited
- Fairfax News Papers
- Norske Skog
- Alcoa
- Ok Tedi Mining (PNG)
- Albright & Wilson
- Seafood Specialities
- Rio Tinto
- Hunter Water
- Department of Foreign Affairs and Trade
- Sydney Water
- Transport for NSW
- Mount Isa Mines
- Scott Transport
- Roads and Traffic Authority (now Roads and Maritime Services)
- AbiGroup (now LendLease)
- Leighton Contractors (now CPB Contractors)
- John Holland Group
- Queensland Transport
- PMP (Printing)
- Straits Resources
- Mount Isa Mines
- Philips (electronics)
- Bonlac Foods
- BHP

Ken has also led a wide range of Acquisition / Due Diligence audits for private sector clients in Australia, PNG, Africa, South Pacific, New Zealand, China, Singapore, Indonesia, Thailand.

Project Approvals

Central Station Re-development – Transport for NSW - Ken led the team responsible for gaining the environmental approvals (preparation of EMPs /construction licences etc.) for the Sydney Central Station project. In this role, Ken was responsible for the interpretation of the Approval requirements (Minister's Conditions of Approval) and the provision of strategic advice on the approvals, licencing, construction environmental management and stakeholder management.

Sydney Metro – Transport for NSW - Transport for NSW (TfNSW) commissioned two demolition contractors to demolish a number of multistorey buildings within the Sydney CBD in preparation for the construction of the Sydney Metro project. Ken led the team responsible for the preparation of environmental management plans for these works (TfNSW was not comfortable that the demolition contractors had the appropriate skills to prepare the required plans and gain the required approvals for the works). Ken worked with the demolition contractors to streamline their internal management processes and to add the requisite environmental management functions within both their corporate and project management systems.

M2 Widening Project Approvals (Roads and Maritime Services) – Ken (Project Manager) led the environmental

approvals team for the preparation of the Environmental Impact Assessment and construction approvals (preparation of EMPs /construction licence etc.) for the M2 widening project.

The management and minimisation of vegetation clearing on this project (along with the minimisation of impacts on residents a high priority. Ken oversaw all the specialist studies that supported the preparation of the Environmental Impact Assessment and subsequent Environmental Management Plans, including:

- Ecological survey;
- Tree reports;
- Noise and vibration impact assessments;
- Contamination assessments;
- Traffic impact assessments; and
- Ground and surface water impact assessments.

Sydney Light Rail – Acciona / Transport for NSW - Ken led the team responsible for leading the construction approvals program and setting up the environmental management system for this significant brown fields infrastructure construction project. His responsibilities included:

- Establishing the project Environmental Management System;
- Interpreting the Conditions of Approval and the Project Deed and advising the Acciona management team on all aspects of compliance with those key approval and contractual documents;
- Gaining the construction environmental approvals (preparation of EMPs /construction licences etc.) for the Sydney Light Rail project. In this role, Ken provided strategic advice on the approvals, licencing, construction environmental management and stakeholder management. He was also responsible for all internal (Acciona / KMH) document quality control.
- Selecting, commissioning and supervising the wide range of specialist environment service providers including ecological survey, tree reports, and pre-construction vegetation clearance reports.
- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Ken also led the consultation with the NSW Government regulators and supported and mentored the Acciona Construction Environmental Manager. In addition, Ken personally led the community and business reference group consultation process on behalf of the design and construction joint venture, successfully gaining signoff from these consultation bodies on the environmental plans and strategies.

Environmental Management Representative (ER) - The role of Independent Environmental Representative on major infrastructure projects in NSW was established in 1998 and continues to be a requirement of the Conditions of Approval for all major infrastructure projects in NSW. The appointees are nominated by the project proponent or construction consortium but are approved by and report to the Director General of the Department of Planning and Environment (DPE).

- The scope of the ER's role is broad range and includes:
 - Interpreting and advising on requirements of the Project Approval.
 - Reviewing and assessing the performance of the project against the Conditions of Approval, Project Deed and other relevant project related approvals. In that role, the ER reviews and approves all environmental related plans (EMPs), audits the implementation of environmental management plans and strategies, verifies (through audit and surveillance) compliance with the relevant project approval and project deed requirements, monitors and reports on regulatory compliance and provides reports to the Department and the project proponent on these matters.
 - Reports on compliance related issues to the public and investigates environmental and compliance issues, complaints and incidents.
 - Review and approval of vegetation clearing and other high (environmentally) impact activities.

Ken has fulfilled the role of Independent Representative on seven major infrastructure projects:

- Hunter Expressway (Motorway construction, Hunter Valley) - (2011 – 2013)
- Integral Energy 9JA Project (Transmission Line Construction Western Sydney) - (2006-2007)
- Westlink M7 (40km Motorway project, Western Sydney) - (2003-2005)
- Towra Beach Nourishment Project (Wet land protection, dredging project, Botany Bay) - (2004)
- Warragamba Dam Auxiliary Spillway Project– (1998 – 2013)
- Cronulla Sewage Treatment Plant Upgrade – (1998 – 2000)
- Liverpool Sewage Treatment Plant Upgrade – (2000)

Upper Hunter Valley Alliance (UHVA) – Leighton Contractors /ARTC - Ken led the team responsible for the provision of the environmental approvals (preparation of EMPs /construction licences etc.) on this major ARTC rail infrastructure program in the Hunter Valley of New South Wales. Ken's team on this project provided the entire environment and community and stakeholder team as a Sub-Alliance partner. In this role, Ken provides strategic advice on the approvals, licencing, construction environmental management and stakeholder management. His responsibilities included:

- Establishing the project Environmental Management System;
- Interpreting the Conditions of Approval and the Project Deed and advising the Leighton management team on all aspects of compliance with those key approval and contractual documents;
- Gaining the construction environmental approvals (preparation of EMPs /construction licences etc.) for range of projects delivered by the Alliance. In this role, Ken provided strategic advice on the approvals, licencing, construction environmental management and stakeholder management. He was also responsible for all internal document quality control.
- Selecting, commissioning and supervising the wide range of specialist environment service providers

- including ecological survey, tree reports, and pre-construction vegetation clearance reports.
- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Other relevant Infrastructure Projects led by Ken include:

- Joint Defence Headquarter Construction Project (ACT) – Environment Approvals Manager
- Melbourne Desalination Plant Project – EMP preparation
- Ballina Bypass (Pacific Highway construction project) - Environment Approvals Manager
- Northern Hume Alliance (Hume Highway Duplication) - Environment Approvals and Community Manager
- Anvil Hill Coal Mine (Hunter Valley) - Environment Approvals Manager
- Shannon Creek Dam Construction Project - Environment Approvals and Community Manager
- Liverpool to Ashfield Pipeline Project (Sydney Water) - Environmental Approvals Manager
- Networks Alliance (Sydney Water –water and sewage mains renewals project) – KMH Management Representative
- Technical Reviewer and Economic Impact Analyst – DEC Construction Noise Management Guidelines (2006)
- Northwest Transit Way - Environment Approvals Manager
- Lane Cove Tunnel - Environment Advisor to Approvals and Construction Team
- North Connex – Environmental Management Plan preparation, consistency assessments and preparation of Environmental Impact Assessments to support variations to the project approvals
- Sydney Desal Plant -Internal QA Reviewer
- Keepit Dam Safety Upgrade – Project Director
- Cordeaux Water Treatment Plant – Lead Consultant and Project Manager

Investigative / Expert Roles

Minter Ellison – Expert Opinion / Report (2018/9) - Ken was commissioned by Minter Ellison on behalf of their client (a consortium of major construction contractors) to provide an expert opinion regarding the interpretation of impact of changes to the Conditions of Approval for a major Sydney linear infrastructure project on environmental investigation and reporting obligations and project cost impacts. This expert opinion was commissioned to support the resolution of a contractual dispute between the consortium and their client.

Environment Protection Authority — Investigation of Illegal Land Clearing and Waste Disposal Activities (April 2015 – July 2017) - Ken was the lead auditor for the investigations undertaken by the KMH team commissioned by the NSW Environment Protection Authority (EPA) to investigate an alleged illegal vegetation clearing and waste disposal operations located in the Hunter Valley, Hawkesbury River Basin and Arcadia (north western Sydney). Ken developed and supervised the implementation site investigation strategies that included a series of investigative processes designed to identify the location and extent of vegetation clearing, and to determine the depth and volumes

of buried construction and demolition wastes.

Environment Protection Authority — Expert Reports Illegal Land Clearing and Waste Disposal Activities (2018)

- Ken was commissioned by the NSW Environment Protection Authority (EPA) to provide expert opinion regarding the alleged illegal vegetation clearing and waste disposal at a site in the Hawkesbury River Basin and Arcadia (north western Sydney).

Ken was subsequently briefed to provide expert opinion in the legal actions taken by the EPA in these matters.

Qenos Mandatory Environmental Audit - Ken was commissioned as the Expert Independent Environmental Auditor (Lead Auditor) for the Qenos Mandatory Audit. As a result of a series of environmental incidents, Qenos were required by the NSW EPA to commission an independent auditor to determine if the plant is capable of being operated and maintained and if the plant is being competently operated and maintained, in order to minimise the risk of environmental incidents and better protect the environment.

In doing this, the audit Assessed the:

- adequacy of Risk Assessment procedures and practices
- adequacy of maintenance and operational Systems
- physical condition and reliability of the Plant
- adequacy and suitability of environmental risk management
- adequacy and suitability of performance monitoring equipment
- processes and procedures for identifying and rectifying plant and equipment issues.

Incidents and assessed of the adequacy the investigations and responses to those incidents.

Orica Port Botany Ground Water Remediation Project – Expert Auditor - Ken was the lead auditor for the independent compliance audit of the Orica groundwater remediation project. These annual audits were a condition of licence established by the (then) Department of Environment and Climate Change and the Department of Planning.

Other

Kelian Equatorial Mining (Kalimantan, Indonesia) - Ken led a specialist environmental and social impact audit team that was established by Rio Tinto (and approved by the Government) to investigate and report on the environmental and social impacts associated with alluvial mining operations

(downstream) from the Rio Tinto (major owner) operated gold mine located in the remote, mountainous region of Kalimantan. The audit team included Government representatives and was undertaken to address the concerns of local village communities that were being impacted socially and economically.

Bougainville Copper Limited (Bougainville, PNG) - Ken led two specialist projects for Bougainville Copper Limited. Including Investigation of the Loloho Port Facility on Bougainville Island. Ken lead the investigation team commissioned to identify and plan for the clean-up of hazardous chemicals left after BCL evacuated Bougainville at the commencement of the civil war in 1990. The investigation covered gases, PCBs, and minerals processing chemicals. The second project was clean up and destruction of chlorine and other compressed gases located at the Loloho Port facility on Bougainville Island.

Ken subsequently lead a team dispatched to Bougainville to chemically destroy 1 tonne of chlorine and other toxic gases. The team built a treatment plant on site and successfully removed the toxic gas threat.

Waste Management

Review of Energy to Waste Technologies – Client Confidential (Australian Based Waste Management Company)

Ken participated (as technical reviewer) in the preparation of a technical review of energy to waste technologies for a major waste management group operating in Australia. The purpose of the review has to provide the client with a detailed assessment of all available and emerging energy to waste technologies available including determining the barriers to implementation within the Australian market, political and social framework.

Shredder Waste Disposal Assessment – Sims Metal

Metal shredders produce a complex waste stream consisting of a mixture of plastic, rubber, metal and other materials that is costly to dispose of. Ken led the KMH team that researched the options for management of this waste stream and prepared recommendations for the development of waste treatment and disposal options (including energy extraction) for Sims Metal.

SPECIALIST BIODIVERSITY AUDIT REPORT

Appendix F

Project EnergyConnect East

Biodiversity Technical Specialist Audit

Prepared for Transgrid

July 2025

Project EnergyConnect East

Biodiversity Technical Specialist Audit

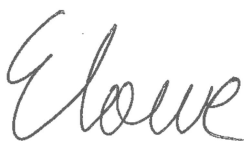
Transgrid

E250430 RP1

July 2025

Version	Date	Prepared by	Reviewed by	Comments
1.0	05/07/2025	Erin Lowe	Katie Diver	Draft for client review
2.0	09/07/202	Erin Lowe	Katie Diver	Final

Approved by



Erin Lowe

Associate Ecologist – Team Leader, Ecology

9 July 2025

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1 Introduction

1.1 Background

Project EnergyConnect (PEC) is an approved 629-kilometre (km) transmission line that is classified as Critical State significant Infrastructure (CSSI). PEC was assessed and approved under two separate approvals within NSW including:

- PEC East - covering the power line construction from Wagga Wagga to Mildura (SSI 9172452). This project is currently in the later stages of construction (70% complete)
- PEC West - covering the power line construction from Mildura (Buronga substation) west to the NSW border (SSI 10040). Construction of this project is now complete, and it is in the final stages of rehabilitation works.

Transgrid is the PEC proponent and Elecnor (formerly SecureEnergy) is the PEC construction contractor.

This report has been prepared for the PEC East infrastructure approval (herein referred to as 'the project'), a 537 km section of transmission line from Buronga substation to the existing Wagga Wagga substation.

This report has been prepared to document the biodiversity technical specialist's findings for Construction Audit number 5 for the project.

The project is currently in the construction phase and independent audits are required at intervals of no greater than 26 weeks from the date of the initial audit. EMM Consulting Pty Limited's (EMM's) role in the audit was to provide an independent and objective assessment of the environmental performance and compliance status of the project in relation to biodiversity aspects only.

1.2 Audit team

The lead auditor for the project is Barnett & May Principal Environmental Consultant, Ken Holmes.

The biodiversity technical specialist for the audit is Erin Lowe, Associate Ecologist at EMM, whose qualifications include:

- Bachelor of Science (Sustainable Resource Management)
- Bachelor of Natural History Illustration
- Biodiversity Assessment Method (BAM) Accredited Assessor (BAAS 18135) under the *Biodiversity Conservation Act 2016* (NSW).

Erin has over 15 years' experience as a consulting ecologist and, as required by the infrastructure approval, has been approved by the Department of Planning, Housing and Infrastructure (DPHI) as a biodiversity expert for the independent audit (see Appendix A).

An independence declaration form is provided in Appendix B.

1.3 Biodiversity audit scope

The biodiversity audit was generally conducted in accordance with the NSW Department of Planning and Environment (DPIE) document *Independent Audit – Post Approval Requirements* (DPIE, 2020).

This document sets out the following independent audit scope:

1. assessment of compliance with:
 - a) all conditions of consent applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation as per Section 3.2
 - b) all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of environmental management plans and sub-plans
2. review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - a) actual impacts compared to predicted impacts documented in the environmental impact assessment
 - b) the physical extent of the development in comparison with the approved boundary
 - c) incidents, non-compliances and complaints that occurred or were made during the audit period
 - d) the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - e) feedback received from the DPIE, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period
3. status of implementation of previous Independent Audit findings, recommendations and actions (if any)
4. high-level assessment of whether environmental management plans and sub-plans are adequate
5. any other matters considered relevant by the auditor or the DPIE, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

1.4 Temporal period covered by the audit

This report includes the biodiversity technical specialist's findings for Construction Audit number 5, for the period between 9 September 2024 and 28 April 2025.

2 Biodiversity audit method

2.1 Endorsement of biodiversity expert

The NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Biodiversity Conservation and Science (BCS) (now Conservation Programs, Heritage & Regulation Group – CPHR) south-west division requested that the proponent, Transgrid, engaged a BAM Accredited biodiversity specialist for the previous independent audit for PEC East (Construction Audit number 4). This was in response to concerns of a potential non-compliance with partial vegetation clearing requirements (Consent condition 26(a)(ix)) after a site inspection completed by BCS in the project area.

The current audit, Construction Audit number 5, follows on from the previous audit with the requirement to engage a BAM Accredited biodiversity specialist.

A curriculum vitae and declaration of independence for PEC (East and West) were submitted to DPHI by Erin Lowe (BAM Accredited Assessor BAAS 18153) who was appointed as a biodiversity expert for the independent audit (refer to Appendix A).

2.2 Biodiversity audit scope development

The independent audit scope for biodiversity has been developed in general accordance with *Independent Audit – Post Approval Requirements* (DPIE, 2020).

In addition, the scope was developed through the following methods:

- consultation with the lead auditor
- review of relevant conditions of approval as listed in Section 3.1
- review of supporting documents as listed in Section 3.1.

The lead auditor provided EMM the following scope for the biodiversity component of the audit:

- Evidence of compliance with commitments, reporting and monitoring in relevant management plans.
- Evidence of any adaptive management identified/ implemented.
- Comparison between Environment Assessment (EA) predictions and biodiversity impacts.
- Evidence (tracking documentation/measures implemented) to ensure compliance with clearing and disturbance limits (Condition c 23).
- Evidence of Progressive Rehabilitation.
- Detailed assessment (evidence) of compliance with the Biodiversity Management Plan (BMP) including but not limited to the reporting/checks/monitoring committed to in the BMP Condition c26(a)(ix) which states: *monitor the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols.*
- Evidence of compliance with partial clearing, clearing commitments (how is this tracked, managed and monitored). Is the current clearing (in particular, partial clearing) activity being undertaken in accordance with the commitments within the BMP, EA, Biodiversity Development Assessment Report (BDAR) and description of partial clearing.

2.3 Compliance evaluation

In accordance with DPIE (2020), compliance has been evaluated based on verifiable evidence. Evidence has been collected during the audit using the following methods:

- review of records, documents and reports
- interview of relevant site personnel
- photographs (including the date the photograph was taken)
- site inspection of relevant locations, activities and processes
- monitoring data and analysis including the period covered by the monitoring data
- delivery records, invoices and receipts including the record date and reference number.

The evidence used to verify the compliance status descriptor chosen with respect to each condition has been documented in the compliance tables (see Appendix C) along with relevant observations and notes, including any opportunities for improvement, as seen fit in relation to any compliance requirement or any other aspect of the project.

In relation to the evaluation of post-approval documentation, where relevant, the audit scope assesses whether:

- the documentation has been developed in accordance with the conditions of consent and approvals applicable to the development and its content is considered adequate
- the document has been implemented in accordance with the conditions of consent for the development
- there are any non-compliances resulting from the implementation of the document
- there are any opportunities for improvement.

2.4 Site inspections

Site inspections were undertaken between 2 to 4 June 2025, at the following locations:

- 2 June 2025 (Line 2, Towers 661, 557, 543-544, 383, 385-386)
- 3 June 2025 (Line 2, Towers 180, 178, 174, 162, 154, 98)
- 4 June 2025 (Line 2 and Line 5, Towers 279a, 245, 241-242, 198-199).

The site inspection relevant to biodiversity matters focussed on the parts of the project that had construction works undertaken during the temporal period of the audit (9 September 2024 to 28 April 2025).

No restricted access issues were encountered during the site section.

2.5 Site interviews

During the site inspection, interviews were conducted with key personnel involved in environmental management for the project, as listed in Table 2.1.

Table 2.1 On site interviews

Name	Company	Role
Ben Harper	Elecnor	Senior Environmental Advisor
Bobby Simpson	Elecnor	Environmental Advisor
Frank Team	Elecnor	Environmental Coordinator
Jule Vaillancourt	Elecnor	Environmental Advisor
Keeley Hartzer	Elecnor	Environmental Advisor – Biodiversity
Ozlem Anar	Elecnor	Environmental Coordinator
Rebecca Walker-Edwards	Elecnor	Environmental/Approvals Manager
Adam Elliot	NGH	Fauna Spotter Catcher
Latasha Painter	NGH	Ecologist
Alozie Agomoh	Transgrid	Senior Environmental Business Partner
Kim Lembke	Transgrid	Senior Biodiversity Business Partner
Luke Fania	Transgrid	Environment and Sustainability Manager

2.6 Opening and closing meeting attendance

The biodiversity technical specialist completed the site inspection after the lead auditor and therefore was not present during the opening and closing meetings. These were instead attended by the lead auditor.

2.7 Consultation

Consultation with BCS was undertaken by the lead auditor during the previous audit period, and in relation to BCS concerns of non-compliance with partial vegetation clearing requirements (Consent condition 26(a)(ix)) after a site inspection by BCS in part of the project area.

This consultation was reviewed and taken into consideration during the current audit.

No other consultation was deemed necessary to the scope by the biodiversity technical specialist.

2.8 Compliance status descriptors

The compliance status of each compliance requirement has been assessed using the descriptors in DPIE (2020), as listed in Table 2.2.

DPIE (2020) notes that no other compliance status terms can be used, however, as part of the audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the project.

Table 2.2 Compliance status descriptors

Status	Descriptor
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant

Source: *Independent Audit – Post Approval Requirements* (DPIE, 2020)

2.9 Limitations

The following limitations apply to the biodiversity specialist's audit:

- The team for this audit consisted of those people approved by the DPHI, as noted above (Erin Lowe).
- The audit did not include any technical input from others within EMM, with a review for readability and consistency undertaken by Katie Diver, Associate Director, Technical Lead - Ecology, of EMM.
- The auditors' professional opinions are based upon professional judgement, experience, and training. These opinions are also based upon data derived from the site inspection (those areas able to be inspected), site interviews, and review and interpretation of the documentation provided by Barnett & May, Transgrid, and Elecnor.
- The opinions presented within this report apply to the project area as it existed at the time of the audit and from the information provided by site personnel. Any changes to this information of which the auditor is not aware and has not had the opportunity to evaluate therefore cannot be considered in this report.
- The duration of the site inspection was not sufficient to cover all project areas or all relevant biodiversity aspects of the audit, due to the very large and linear nature of the project area (over 500 km in length).
- There was a timing constraint associated with the delayed engagement of a biodiversity technical specialist to participate in the audit and limited time for the site inspection and subsequent document review and reporting requirements. Due to the limited time, the biodiversity auditor has relied on the lead auditor for some tasks (for example, defining the scope and attending opening and closing meetings) and data collection and analysis obtained from work undertaken by other consultants (e.g. recent vegetation integrity (VI) plot data collected by BAM Accredited assessors at WSP).

3 Biodiversity audit findings

3.1 Documentation reviewed

The audit included review of the following biodiversity related approval conditions and related documentation, as listed within Table 3.1.

Table 3.1 Approval conditions and related documentation

Document	Author (date)
<i>Infrastructure Approval / Consolidated Consent – SSI 9172452 (30 August 2024) including MOD 1 – Extension of Offset Timing</i>	DPE (2024)
<i>EnergyConnect (NSW – Eastern Section) - Technical Paper 1 – Revised Biodiversity Development Assessment Report</i>	WSP (2022)
<i>Biodiversity Management Plan – EnergyConnect (NSW – Eastern Section) - Stage 1 and Stage 2 (45860-HSE-PL-D-0117</i>	SecureEnergy (2023)
<i>Project EnergyConnect (NSW – Eastern Section) - Biodiversity Offset Package, Revision 2</i>	Scout Ecology (2025)
<i>Project Energy Connect – East, Biodiversity Technical Specialist Audit Report</i>	Umwelt (2025)
<i>Verification Report - Project EnergyConnect (NSW – Eastern Section) (45860-HSE-REP-D-0050)</i>	Elecnor (2025a)
<i>Biodiversity Report – Voluntary Update - Project EnergyConnect (NSW – Eastern Section) (45860-HSE-REP-D-0049)</i>	Elecnor (2025b)
<i>Bank Guarantee Deed and Qualifying Offset Statement (DG1023603418)</i>	Transgrid (2025)
<i>Update on Partial Impacts under the NSW Biodiversity Assessment Method for Project EnergyConnect East</i>	WSP (2025)

In addition, numerous other documents related to biodiversity management during construction of the project were reviewed during the audit. All documentation that was assessed throughout the audit is detailed within the compliance tables in Appendix C.

3.2 Compliance assessment summary

Compliance in relation to biodiversity matters was assessed against 10 requirements related to the Infrastructure Approval and 29 requirements related to the BMP, excluding requirements that were not triggered for assessment during the current audit period. Of the matters assessed, one non-compliance was recorded.

The compliance assessment is documented in Table C.1 and Table C.2 of Appendix C with a summary of the key findings, identified non-compliance and recommendations and opportunities for improvement provided in the following sections.

3.2.1 Infrastructure approval

Project compliance for this audit period was assessed against the relevant conditions of the Infrastructure Approval, as documented in Appendix C, Table C.1.

No non-compliances were raised against the project Infrastructure Approval.

3.2.2 Environment Protection and Biodiversity Conservation Act 1999 approval

Annual compliance reporting and independent audits as requested in writing by the Minister are required under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval conditions for the project. Independent auditing of project compliance with the EPBC Act approval conditions is outside the scope of this audit.

3.2.3 Biodiversity development assessment report mitigation measures

A high-level review of the recommended mitigation measures from the BDAR was undertaken. It is considered that the measures have been incorporated into the BMP and specific auditing against each of the recommended mitigation measures in the BDAR is not considered necessary, given the focus on evaluating compliance with the requirements of the BMP.

3.2.4 Biodiversity management plan

Project compliance for this audit period was assessed against the measures identified within Table 5.3 of the BMP (SecureEnergy, 2023), as documented in Appendix C, Table C.2.

One non-compliance was raised against the BMP measures, with a summary of the non-compliance identified provided in Table 3.2.

Table 3.2 Biodiversity management plan (BMP) – summary of non-compliances

Non-compliance	Summary of non-compliance	Explanation
NC1	Related to BMP measure BD14 which requires pre-clearing or clearing activities in areas of Plains-wanderer habitat to be undertaken in accordance with the Plains-wanderer Protocol in Appendix F of the BMP.	<p>Overall, sufficient evidence was sighted that requirements relating to pre-clearing or clearing activities in areas of Plains-wanderer habitat are undertaken in accordance with the Plains-wanderer Protocol in Appendix F of the BMP.</p> <p>Non-compliance:</p> <p>Relates to green flagging that was observed to be down at Line 2, Tower 154, Plains Wanderer habitat.</p> <p>Improvement recommendation 2:</p> <p>Flagging to be inspected regularly and maintained to appropriately to protect Plains Wanderer Habitat until construction is complete.</p> <p>It is acknowledged that the project has encountered disturbance to flagging and pegs by landholders and/or livestock and ongoing maintenance of pegs and flagging can therefore be challenging, especially at the location (Tower 154) where the non-compliance was noted.</p> <p>Adaptive management (the use of both temporary fencing and green flagging) is being applied to address landholder livestock concerns at this location.</p> <p>The evidence provided to the auditor, relating to the flagging register and monitoring of flagged sites, is noted. The auditor is satisfied that there are suitable checks in place prior to construction activities commencing, meaning that Plains Wanderer Habitat would be protected prior to construction activities (which were not occurring at the time of the audit).</p>

3.3 Notices, orders, penalty notices, or prosecutions issued

No formal notices, orders, penalty notices, or prosecutions that have been issued in relation to the consent during the audit period were identified to the biodiversity technical specialist.

As mentioned within Section 2.1, BCS (now CPHR), south-west division, requested that the proponent, Transgrid, engage a BAM Accredited biodiversity specialist for the previous independent audit for PEC East in response to concerns of a potential non-compliance with partial vegetation clearing requirements as outlined in Infrastructure Approval condition 26(a)(ix).

3.4 Status of actions from previous audit

A biodiversity technical specialist was engaged for the previous independent audit (Construction Audit number 4) and several improvement recommendations were provided. A summary of corrective actions, and their status (as assessed by this current audit) to address the previous audit recommendations is provided in Table 3.3.

Table 3.3 **Status of actions from previous audit**

Improvement recommendation ID	Source	Improvement recommendation	Corrective action proposed by proponent	Proposed completion date	Status (current audit)
Biodiversity 1	Infrastructure Approval: C23(a)	It is recommended that clearing pegs and flagging be regularly maintained until the completion of construction, as required under the BMP. It is noted that the Project has encountered disturbance to flagging and pegs by landholders and/or livestock and ongoing maintenance of pegs and flagging can therefore be challenging.	The project will continue to focus inspections on identifying any maintenance required for the flagging and ensuring rectification.	Not specified	Sufficient evidence sighted that efforts are ongoing. See recommendation Biodiversity 2 (Section 3.8).
Biodiversity 2	Infrastructure Approval: C23(a)	Update BMP to require progressive reporting on all items identified in Appendix A, Section 7 of the BMP. It is recommended that this information be made available for review every 26 weeks at the commencement of future audits, to demonstrate progressive tracking and assist audit reporting within the mandatory timeframe requirements. It is recommended that shapefiles be provided to BCS to support the totals provided in the clearing register. It is also recommended that a BAM Accredited Biodiversity Specialist be required for future audits.	Works have commenced on the update of the BMP. Shapefiles have been provided to DPHI to support the totals provided in the clearing register. A BAM Accredited auditor will be engaged for the upcoming audit.	Not specified	Sufficient evidence sighted. See recommendation Biodiversity 1 (Section 3.8).
Biodiversity 3	Infrastructure Approval: C23(b)	It is noted that a Trigger Action Response Plan (TARP) and Improvement Report has been prepared to address non-compliance related to nest box installation requirements. The Project should continue to seek and identify any challenges that exist to installing nest boxes as required and address barriers to installation where possible. Installation of Squirrel Glider nest boxes should be prioritised prior to clearing in areas of mapped Squirrel Glider habitat.	A TARP has been prepared and is being implemented to accelerate the delivery and installation of the nest boxes.	As soon as possible	Sufficient evidence sighted that nest boxes are being provided to offset the loss of tree fauna habitat in accordance with a Supplementary Hollow and Nest Strategy.
Biodiversity 4	Infrastructure Approval: C23(b)	The BMP should be updated to specify the requirements for partial clearing verification monitoring and reporting including: <ul style="list-style-type: none"> • data collection requirements • fixed point monitoring at representative locations matching BDAR plot locations and at locations where high densities of trees have been removed (as documented by the project arborist data) • recording of clearing machinery types used • documentation of mulch cover and depth post clearing 	Works have commenced on the update of the BMP. The project will complete a verification report.	31 May 2025	Verification report completed, see Section 3.7 of this report for further detail. See recommendation Biodiversity 1 (Section 3.8).

Improvement recommendation ID	Source	Improvement recommendation	Corrective action proposed by proponent	Proposed completion date	Status (current audit)
		<ul style="list-style-type: none"> fixed BAM plot monitoring of floristics and associated vegetation integrity scores tracking of VI scores against predicted targets for plant community types (PCTs) in the revised BDAR comparison of post clearing floristic species richness and cover by growth form type for native species with pre-clearing plot data from the BDAR to identify any losses or gains in native species composition comparison of post-clearing cover and species richness for exotic flora species compared with pre-clearing plot data from the BDAR to identify any weed introductions or increases to exotic flora species cover recommendations for changes to clearing methods where appropriate, to ensure VI targets identified in the BDAR are likely to be achieved during Stage 3 (Operation) confirmation of compliance with partial impact clearing requirements and reporting on any excessive clearing of partial impact zones identify any locations where the VI predictions for partial clearing footprints are not likely to be met due to loss of understorey species and/or increase in exotic flora species cover related to excessive clearing verification reporting and monitoring to be undertaken by an appropriately experienced ecologist accredited under the BAM include BCS (now Conservation Programs, Heritage and Regulation) as a reviewer of Verification Reports. <p>If locations are identified where partial impact zones are not likely to meet VI predictions due to excessive clearing, this may need to be taken into account in the determination of final biodiversity offset requirements, as per Section 7 of Appendix A of the BMP which states that "Clearing of native vegetation will be monitored and recorded to inform any final biodiversity offset requirements within the biodiversity offset package".</p>			

Improvement recommendation ID	Source	Improvement recommendation	Corrective action proposed by proponent	Proposed completion date	Status (current audit)
Biodiversity 5	BMP: BD6	Update BMP to require progressive reporting on all items identified in Appendix A, Section 7 of the BMP. It is recommended that this information be made available for review every 26 weeks at the commencement of future audits, to demonstrate progressive tracking and assist audit reporting within the mandatory timeframe requirements.	Works have commenced on the update of the BMP. Shapefiles have been provided to DPHI to support the totals provided in the clearing register. A BAM Accredited auditor will be engaged for the upcoming audit.	31 May 2025	Verification report completed, see Section 3.7 of this report for further detail.
Biodiversity 6	BMP: BD23	Update BMP Appendix B Unexpected Threatened Species Finds Procedure to include appropriate and specific mandatory assessment and threshold requirements for both EPBC Act and <i>Biodiversity Conservation Act 2016</i> (BC Act) listed species for determining agency consultation triggers for unexpected threatened species finds.	Works have commenced on the update of the BMP. The BMP will be updated to state that the significance assessment will also occur for unexpected threatened species identified under the BC Act.	Not specified	Sufficient evidence sighted that a significance assessment (WSP, 2024) has been undertaken for the <i>Eleocharis obicis</i> that was unexpectedly found during the previous audit period.
Biodiversity 7	BD39	Update BMP to include annual reporting for annual nest box monitoring.	Works have commenced on the update of the BMP. Annual reporting will be included.	Not specified	Sufficient evidence sighted that nest boxes are being provided to offset the loss of tree fauna habitat in accordance with a Supplementary Hollow and Nest Strategy.
Biodiversity 8	BMP: BD40	The clearing register should be updated to provide details of completed partial clearing and total clearing footprints, with comparison to the partial and total clearing extents provided in the BDAR for PCTs and threatened species. Determination of areas of partial and total clearing should be informed by a verification report and post-clearing land survey and/or GIS mapping informed by post clearing orthorectified aerial imagery.	None	31 May 2025	Verification report completed, see Section 3.7 of this report for further detail.

Improvement recommendation ID	Source	Improvement recommendation	Corrective action proposed by proponent	Proposed completion date	Status (current audit)
Biodiversity 9	BMP: BD29 BD30	A review of weed management practices should be undertaken and improvements made as necessary to remove and manage existing outbreaks of weeds onsite and limit the spread of weeds through improvements to rehabilitation and site stabilisation practices.	None	Not specified	Sufficient evidence sighted that no new infestations of notifiable weeds were detected by Elecnor / TransGrid during the audit period.

3.5 Adequacy of environmental management plans

The BMP was reviewed for adequacy in accordance with the requirements of the Infrastructure Approval, it was found to contain the information required to achieve adequacy with approval required under Condition C26. Recommendations for updates to the BMP associated with opportunities for improvement are identified within Section 3.8.

3.6 Complaints and responses

Fourteen biosecurity related complaints from landholders have been received during the audit period, related to non-conformance with vehicle hygiene requirements. Elecnor has responded to complaints with communication and/or training to construction teams, additional mitigation and/or management measures, additional vehicle inspections, as relevant to each complaint. All complaints are reported to have been closed out by the Elecnor environment team.

3.7 Actual versus predicted impacts

3.7.1 Actual versus predicted impacts

Condition A2 of the Infrastructure Approval identifies that the development must be carried out generally in accordance with the Environmental Impact Statement (EIS), which includes the Revised BDAR, dated 19 August 2022 (WSP, 2022).

The clearing limits contained in Appendix 2 of the Infrastructure Approval incorporate both the areas of partial loss and full loss of biodiversity values assessed in Section 9.12 of the BDAR.

During the current audit, sufficient evidence (clearing registers) was sighted that clearing has not exceeded the limits identified within the BDAR, BMP and Infrastructure Approval.

Predicted versus actual clearing calculations were not undertaken by the biodiversity auditor due to the size of the dataset and limited time for the audit. Transgrid confirmed that a third-party check (WSP) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery. A report by the third-party reviewer should be provided to the auditor during the next audit period, to satisfy that auditor that clearing has not exceeded the limits specified in the BMP.

3.7.2 Partial loss

Partial loss is when direct impacts are proposed that will not result in full loss of biodiversity values and a predicted vegetation integrity (VI) score of greater than zero is utilised, which reduces the biodiversity credit liability compared to assessment of full biodiversity loss.

A description of works for the different disturbance areas assessed is provided in Table 9.1 of the BDAR and a detailed justification for determining future vegetation integrity scores for partial clearing zones is provided in Section 9.1.1 of the BDAR. For this project, full loss of biodiversity values was assessed for Disturbance Area A and partial loss of biodiversity values was assessed for Disturbance Area B4, Disturbance Area B10 and Disturbance Area Hazard / high risk trees.

Based on the site inspections undertaken during the previous audit (Umwelt, 2025), it was considered that some predictions related to partial loss of biodiversity values were not being supported by the clearing methods that were utilised. Umwelt (2025) indicated that verification reporting for partial clearing impacts had not been undertaken and therefore while the clearing register indicated compliance with the overall clearing limits in Appendix 2 of the Infrastructure Approval, it was not sufficient to demonstrate compliance in relation to actual impacts versus predicted impacts on the biodiversity values assessed in the BDAR component of the EIS.

Verification reporting (Elecnor, 2025a) for partial clearing impacts has now been undertaken to demonstrate compliance in relation to actual impacts versus predicted impacts on the biodiversity values assessed in the BDAR.

In addition, Elecnor has prepared a Biodiversity Voluntary Update Report (Elecnor, 2025b). This report documents the outcomes of vegetation clearing activities associated with the project and assesses the condition of vegetation 12 to 18 months post-construction, evaluating the effectiveness of the biodiversity management measures implemented. This report provides a summary of monitoring undertaken to assess post-construction partial impact areas against the BDAR predicted effects. The surveys found that the current vegetation integrity (VI) scores for the four dominant vegetation formations impacted by the project were generally higher than the predicted VI scores in the Revised BDAR (WSP, 2022).

The VI monitoring data that supports the Voluntary report, is contained within a comprehensive assessment of VI scores that has been undertaken by WSP (2025). Specifically, this assessment addresses (through collection of paired BAM plots) changes in VI and individual attribute scores across the dominant formations identified within partial impact zones. The assessment concludes that the BDAR (WSP, 2022) estimate of partial impacts was reasonably conservative for several vegetation formations, and that it was likely to have overestimated the extent to partial impact as it relates to VI loss and the BAM-C.

3.8 Recommendations and opportunities for improvement

Recommendations for improvement have been listed within the compliance assessment in Appendix C, and have been summarised in Table 3.4.

Table 3.4 Summary of recommended improvement measures

Improvement recommendation ID	Infrastructure Approval or BMP measure	Improvement recommendation detail
Biodiversity 1	C23a and BD6	Calculations in predicted versus actual clearing were not undertaken by the biodiversity auditor due to the size of the dataset and limited time for the audit. Transgrid confirmed that a third-party check (WSP) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery. It is recommended that a report by the third-party reviewer should be provided to the auditor during the next audit period, to satisfy that auditor that clearing has not exceeded the limits specified in the BMP.
Biodiversity 2	BD14	Flagging to be inspected regularly and maintained to appropriately to protect Plains Wanderer Habitat until construction is complete.

The following additional recommendations have been listed in the compliance tables within Appendix C, in relation to recommendations for subsequent biodiversity audits:

- Inspect clearing within riparian areas.
- Confirm that stringing activities (not yet strung during current audit) were undertaken in accordance with a bespoke stringing methodology at the location of Austral Pillwort records (Line 2, Tower 162) (BD18).
- Confirm that stringing activities (not yet strung during current audit) were undertaken in accordance with a bespoke stringing methodology at the location of Natural Grasslands of the Murray Valley Plains – Critically Endangered TEC (Line 5, Tower 241 and 242) (BD19)
- Confirm that stringing activities were undertaken in accordance with a bespoke stringing methodology at the Property Vegetation Plan (PVP) (Line 5, Tower 243 and 249) (BD20).
- Inspect further locations identified for connectivity corridor management measures (BD 27).

References

- DPE. (2024). *Infrastructure Approval / Consolidated Consent – SSI 9172452 (30 August 2024) including MOD 1 – Extension of Offset Timing*. NSW Department of Planning and Environment.
- DPIE. (2020). *Independent Audit – Post Approval Requirements*. NSW Department of Planning, Industry and Environment.
- Elecnor. (2025a). *Verification Report - Project EnergyConnect (NSW – Eastern Section) (45860-HSE-REP-D-0050)*. Elecnor Australia.
- Elecnor. (2025b). *Biodiversity Report – Voluntary Update - Project EnergyConnect (NSW – Eastern Section) (45860-HSE-REP-D-0049)*. Elecnor Australia.
- Scout Ecology. (2025). *Project EnergyConnect (NSW – Eastern Section) - Biodiversity Offset Package, Revision 2*. Transgrid.
- SecureEnergy. (2023). *Biodiversity Management Plan – EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2 (45860-HSE-PL-D-0117)*. SecureEnergy Joint Venture.
- Transgrid. (2025). *Bank Guarantee Deed and Qualifying Offset Statement (DG1023603418 #1, #2, #3, #4, #5, #6, #7, #8, #10)*. Transgrid.
- Umwelt. (2025). *Project Energy Connect – East, Biodiversity Technical Specialist Audit Report*. Umwelt Environmental & Social Consultants.
- WSP. (2022). *EnergyConnect (NSW – Eastern Section) - Technical Paper 1 – Revised Biodiversity Development Assessment Report*. WSP Australia Pty Limited.
- WSP. (2024). *Unexpected finds – Eleocharis obicis*. WSP Consultants.
- WSP. (2025). *Update on Partial Impacts under the NSW Biodiversity Assessment Method for Project EnergyConnect East*. WSP Consultants.

Appendix A

Endorsement of biodiversity expert

NSW Planning ref: SSI-9172452-PA-83
Mr Luke Fania
Environment and Sustainability Manager
NSW Electricity Networks Operations Pty Limited
180 THOMAS STREET
HAYMARKET New South Wales 2000
05/05/2025

Sent via the Major Projects Portal only

**Subject: Project EnergyConnect (NSW - Eastern Section) - Independent Environmental Audit
audit team - Biodiversity expert endorsement May 2025**

Dear Mr Fania

Reference is made to your post approval matter, SSI-9172452-PA-83, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person to participate in the Independent Environmental Audit (IEA) of the Project EnergyConnect (NSW - Eastern Section) submitted as required by Condition D11 of SSI-9172452 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 5 May 2025.

NSW Planning has reviewed the independent biodiversity expert auditor nomination and based on the information you have provided is satisfied that the proposed person is suitably qualified, experienced, and independent.

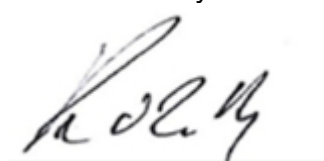
In accordance with Condition D11 of the approval and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse Erin Lowe of EMM Consulting Pty Limited as the Biodiversity expert for the independent audit team.

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

Please note, the expert must attend site (unless otherwise agreed by the Secretary) and the IEA report must include specific sections (and/or an appended report) prepared by the experts which addresses their assessment of compliance (and recommendations for improvements) in respect to the conditions, management plans and any other matters considered relevant for their areas of expertise.

Should you wish to discuss the matter further, please contact me on 0429400261 or email compliance@planning.nsw.gov.au

Yours sincerely



Katrina O'Reilly

Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Appendix B

Declaration of independence

Appendix A – Declaration of Independence Form Template

Declaration of Independence:

Project Name: Project Energy Connect

Consent Number: SSD 10040 and SSD 9172452

Description of Project: Electricity Transmission Infrastructure

Project Address: Wagga Wagga NSW

Proponent: Transgrid

Date: 2 May 2025

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor: Erin Lowe

Signature:



Qualifications:

Bachelor of Science (Sustainable Resource Management), University of Newcastle, 2009

Bachelor of Natural History Illustration, University of Newcastle, 2009

BioBanking Accredited Assessor

Biodiversity Assessment Method Accredited Assessor / Accreditation No: BAAS18135

Company: EMM Consulting Pty Ltd

Appendix C

Compliance tables

Table C.1 Infrastructure approval SS1 9172452 - MOD 1 – biodiversity compliance assessment

Infrastructure approval SS1 9172452 – Modification 1 (August 2024)				
Condition number	Requirements	Evidence collected	Compliance status	Recommendations
Riparian areas C18	<p>The Proponent must ensure:</p> <p>a) all activities on waterfront land are constructed in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i> (2012), <i>Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (NSW Fisheries 2003) and the <i>Policy and Guidelines for Fish Habitat and Conservation and Management</i> (NSW Fisheries, 2013), unless DPE Water agrees otherwise; and</p> <p>b) the geomorphic condition of the major rivers and distributary channels crossed by the development is not impacted.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor)• Site inspection:<ul style="list-style-type: none">– Line 5, Tower 245-246, Colombo Creek crossing riparian zone (Photograph D.40 and Photograph D.41)• Review of the following related documents:<ul style="list-style-type: none">– Clearing and land disturbance permit (CDP) for Colombo Creek (viewed post inspection)– Pre-clear report for Colombo Creek crossing (viewed post inspection)– Nest box report for Colombo Creek crossing (viewed post inspection)• It was confirmed that:<ul style="list-style-type: none">– Clearing of the Colombo Creek riparian zone occurred during the last audit period and was previously deemed as compliant, refer to Umwelt (2025)– No other riparian zones were clearing during the audit period	Not triggered	<p>None:</p> <p>Not applicable to the current audit (Colombo Creek crossing was cleared previously).</p> <p>Previous audit recommendation</p> <p>None.</p>

Infrastructure approval SS1 9172452 – Modification 1 (August 2024)				
Condition number	Requirements	Evidence collected	Compliance status	Recommendations
Restrictions on Clearing and Habitat C23(a)	<p>Unless otherwise agreed with the Planning Secretary, the Proponent must:</p> <p>a) ensure that clearing does not exceed the limits identified in Appendix 2; and</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none"> Interview with: <ul style="list-style-type: none"> Ben Harper (Senior Environmental Advisor, Elecnor) Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor) Luke Fania (Environment and Sustainability Manager, Transgrid) Site inspection: <ul style="list-style-type: none"> Green flagging and survey pegging to delineate and calculate areas of clearance were identified at various locations during the site inspection. Green flagging was noted as fallen in some areas, however this, in all cases, was beyond the cleared (and pegged) area, so would not impact upon clearing calculations and has more impact on ensuring protection of special biodiversity areas (see BD14 non-compliance) and not upon the calculation of cleared areas Line 5, Tower 279a where Plains Wanderer habitat occurs (Photograph D.36 and Photograph D.37) Review of the following related documents: <ul style="list-style-type: none"> Clearing and land disturbance permits (CDPs) for this audit period (viewed post inspection) Clearing and Land Disturbance Register (viewed during and post inspection): <ul style="list-style-type: none"> Permits register / tracking (for the period of 2/06/2025 – 4/06/2024) Native vegetation tracking TEC tracking Threatened flora tracking Threatened fauna tracking Predicted Clearing Register (viewed during and post inspection) GIS layers used for clearing calculations (Photograph D.31)(viewed during inspection). Verification report (viewed post inspection) It was confirmed that: <ul style="list-style-type: none"> Based on the clearing registers provided, and description of progressive tracking of clearance areas provided by Elecnor/Transgrid during interviews, the project has not exceeded the clearing limits identified in the BMP for PEC East for native vegetation, TECs, threatened flora, or threatened fauna It is noted that an explanation of how actual (versus predicted) clearance is calculated was provided by Elecnor and Transgrid, with spreadsheets shown during the site inspection. Only excerpts (PDFs) from the clearing register provided post inspection (not the entire dataset). Calculations were not undertaken by the biodiversity auditor due to the size of the dataset and limited time for the audit, which would have prevented such calculations to be prepared. Transgrid confirmed that a third-party check (WSP consultants) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery and converted into GIS shapefile format Spatial data and threatened species locations are being provided to the detailed design team during detailed construction planning. Evidence sighted that threatened species spatial data (Plains Wanderer habitat) has been provided to the detailed design team and has informed the design of construction planning. Direct impacts to Plains Wanderer habitat have been avoided by micro siting project infrastructure (tower construction pads) outside of Plains Wanderer mapped habitat at Line 5, Tower 279a 	Compliant	<p>None:</p> <p>Sufficient evidence sighted that clearing has not exceeded the limits identified within the BMP. Evidence sighted that spatial data and threatened species locations are being provided to the detailed design team during detailed construction planning. The auditor did not undertake calculations on predicted versus clearing as only PDFs of the clearing registers were provided (spreadsheets briefly viewed during the inspection) and the limited time to undertake the audit would not have allowed detailed calculations.</p> <p>Previous audit recommendations</p> <p>Improvement recommendation – Biodiversity 1: Clearing pegs and flagging to be properly maintained until the completion of clearing.</p> <p>Improvement recommendation – Biodiversity 2: Update BMP to require progressive reporting on all items identified in Appendix A, Section 7 of the BMP. It is recommended that this information be made available for review every 26 weeks at the commencement of future audits, to demonstrate progressive tracking and assist audit reporting within the mandatory timeframe requirements. It is recommended that shapefiles be provided to BCS to support the totals provided in the clearing register. It is also recommended that a BAM Accredited biodiversity specialist be required for future audits.</p> <p>The status of these improvement recommendations is addressed within Table 3.3 of this report.</p> <p>Improvement recommendation 1 (this audit)</p> <p>Calculations were not undertaken by the biodiversity auditor due to the size of the dataset and limited time for the audit. Transgrid confirmed that a third-party check (WSP consultants) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery. A report by the third-party reviewer should be provided to the auditor during the next audit period, to satisfy that auditor that clearing has not exceeded the limits specified in the BMP.</p>

Infrastructure approval SS1 9172452 – Modification 1 (August 2024)				
Condition number	Requirements	Evidence collected	Compliance status	Recommendations
Restrictions on Clearing and Habitat C23(b)	Unless otherwise agreed with the Planning Secretary, the Proponent must: b) minimise: i) the impacts of the development on hollow bearing trees; ii) the impacts of the development on threatened flora and fauna populations; and iii) the clearing of native vegetation and key habitat.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">Interview (at various locations) with:<ul style="list-style-type: none">Ben Harper (Senior Environmental Advisor, Elecnor)Bobby Simpson (Environmental Advisor, Elecnor)Frank Team (Environmental Coordinator, Elecnor)Julie Vaillancourt (Environmental Advisor, Elecnor)Keeley Hartzer (Environmental Advisor - Biodiversity, Elecnor)Ozlem Anar (Environmental Coordinator, Elecnor)Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)Alozie Agomoh (Senior Environmental Business Partner, Transgrid)Kim Lemcke (Senior Biodiversity Business Partner, Transgrid)Luke Fania (Environment and Sustainability Manager, Transgrid)Site inspection:<ul style="list-style-type: none"><i>Acacia melvillei</i> Shrubland Threatened Ecological Community (TEC), in proximity to stringing activities (which occurred during the audit period) (Line 2, Tower 544-543) (Photograph D.7)<i>Eleocharis obicis</i> records in proximity to Tower 383 (Line 2). GIS layer and flagging tape observed around habitat with flagging noted as second level of defence as bunds and pegs around the tower site are the first level (Photograph D.8 and Photograph D.9)Partial clearing at Line 2, Tower 180, within Plant Community Type (PCT) 15 - Black Box open woodland wetland, where centreline (Disturbance Area A), B4 and B10 clearing observed (which occurred during the audit period) (Photograph D.17, Photograph D.18, and Photograph D.19)Partial clearing at location of 600 year old tree (cultural significance) which occurs within B4 clearing zone, with minimal trimmed branches to comply with 4 m clearance requirements, and ongoing maintenance required (a ‘hot spot’ tree) in order to retain tree (Photograph D.20 and Photograph D.21)Austral Pillwort special biodiversity protection zone construction pad, bunding and green flagging (Line 2, Tower 162) (Photograph D.22)Review of the following related documents:<ul style="list-style-type: none">GIS data layers showing sensitive areas at various locations shown both in the field and within the site office (Photograph D.12 and Photograph D.35) (viewed during inspection)Sensitive Area Plans (SAPs) relevant to areas visited during inspection (viewed post inspection)Flagging register (viewed during audit) (Photograph D.28)Clearing and land disturbance permits (CDPs) for this audit period (viewed post inspection)Clearing and Land Disturbance Register (viewed during and post inspection):<ul style="list-style-type: none">Permits register / tracking (for the period of 2/06/2025 – 4/06/2024)Native vegetation/TEC/threatened flora/threatened fauna trackingPredicted Clearing Register (viewed during and post inspection)GIS layers used for clearing calculations (Photograph D.31)(viewed during inspection)It was confirmed that:<ul style="list-style-type: none">Clearing of native vegetation and key habitat is being minimised where possibleOpportunities to minimise clearing has been occurring through review of temporary design and construction methodologies for the Stage 2 disturbance area, as demonstrated by proposed versus actual clearing calculations that are addressed via BD6 requirements	Compliant	<p>None:</p> <p>Sufficient evidence sited that clearing of native vegetation and key habitat is being minimised where possible.</p> <p>Previous audit recommendations</p> <p>Improvement recommendation – Biodiversity 3: It is noted that a TARP and Improvement Report has been prepared to address non-compliance related to nest box installation requirements. The Project should continue to determine why nest boxes cannot be installed and address barriers to installation where possible. Installation of Squirrel Glider nest boxes should be prioritised prior to clearing in areas of mapped Squirrel Glider habitat.</p> <p>Improvement Recommendation - Biodiversity 4: The BMP should be updated to specify the requirements for partial clearing verification monitoring and reporting including:</p> <ul style="list-style-type: none">data collection requirementsfixed point monitoring at representative locations matching BDAR plot locations and at locations where high densities of trees have been removed (as documented by the collected project arborist data)recording of clearing machinery types usedDocumentation of mulch cover and depth post clearingFixed BAM plot monitoring of floristics and associated vegetation integrity scorestracking of VI scores against predicted targets for PCTs in the Revised BDARcomparison of post clearing floristic species richness and cover by growth form type for native species with preclearing plot data from the BDAR to identify any losses or gains in native species compositioncomparison of post-clearing cover and species richness for exotic flora species compared with preclearing plot data from the BDAR to identify any weed introductions or increases to exotic flora species coverrecommendations for changes to clearing methods where appropriate, to ensure VI targets identified in the BDAR are likely to be achieved during Stage 3 (Operation)confirmation of compliance with partial impact clearing requirements and reporting on any excessive clearing of partial impact zonesIdentify any locations where the VI predictions for partial clearing footprints are not likely to be met due to loss of understorey species and/or increase in exotic flora species cover related to excessive clearingverification reporting and monitoring to be undertaken by an appropriately experienced ecologist accredited under the BAM. <p>The status of this improvement recommendation is addressed within Table 3.3 of this report.</p>

Infrastructure approval SS1 9172452 – Modification 1 (August 2024)				
Condition number	Requirements	Evidence collected	Compliance status	Recommendations
Biodiversity Offset Package C24(a) to (d)	<p>Prior to carrying out any development that would impact on biodiversity values, the Proponent must prepare a Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT and to the satisfaction of the Secretary in writing. The Package must include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> a) details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS; b) the cost for each specific biodiversity offset measure, which would be required to be paid into the Biodiversity Conservation Fund if the relevant measure is not implemented and delivered (as calculated in accordance with Division 6 of the Biodiversity Conservation Act 2016 (NSW) and the offsets payment calculator that was established as at 18 August 2022); c) the timing and responsibilities for the implementation and delivery of the measures required in the Package; and d) confirmation that the biodiversity offset measures will have been implemented and delivered no later than 1 September 2025. <p>Following approval, the Proponent must implement and deliver the Biodiversity Offset Package.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none"> • Interview with: <ul style="list-style-type: none"> – Luke Fania (Environment and Sustainability Manager, Transgrid) • Review of the following related documents: <ul style="list-style-type: none"> – Project EnergyConnect (NSW – Eastern Section) - Biodiversity Offset Package (BOP), Revision 2 (Scout Ecology, 2025) • It was confirmed that: <ul style="list-style-type: none"> – Specific offset measures are documented in Section 4 of the BOP – Costs of each specific offset measure us documented in Section 4 of the BOP – Timing is documented in Section 6 of the BOP – Implementation of the BOP is progressing as per Table 32 of the BOP, with delivery extended to 1 September 2025 	Compliant	<p>None:</p> <p>Sufficient evidence sighted.</p> <p>Previous audit recommendation</p> <p>None.</p>
Biodiversity Offset Package C25	<p>Prior to carrying out any development that could impact the biodiversity values requiring offset, the Proponent must lodge bank guarantee(s) with a total value of \$313,417,479.03, in accordance with the Deed of Agreement with the Planning Secretary (or delegate) executed on 1 September 2022. The Proponent must comply with the terms of the Deed.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none"> • Interview with: <ul style="list-style-type: none"> – Luke Fania (Environment and Sustainability Manager, Transgrid) • Review of the following related documents: <ul style="list-style-type: none"> – Project EnergyConnect (NSW – Eastern Section) - Biodiversity Offset Package (BOP), Revision 2 (Scout Ecology, 2025) – Bank Guarantee Deed and Qualifying Offset Statement (DG1023603418) (Transgrid, 2025) • It was confirmed that: <ul style="list-style-type: none"> – BOP Rev B and confirmation of payment addressed in previous audit 2 and compliance confirmed – Transgrid has implemented the majority of the actions required under the BOP and has prepared a Qualifying Offset Statement, as required under the Bank Guarantee Deed, to outline the status of implementation of the BOP 	Compliant	<p>None:</p> <p>Sufficient evidence sighted.</p> <p>Previous audit recommendation</p> <p>None.</p>

Infrastructure approval SS1 9172452 – Modification 1 (August 2024)				
Condition number	Requirements	Evidence collected	Compliance status	Recommendations
Biodiversity EMP Sub-Plan C26(a)	<p>The Biodiversity EMP Sub-Plan required under condition B2 must be prepared in accordance with the Revised Biodiversity Development Assessment Report (dated 19 August 2022) and include:</p> <p>a) a description of the measures that would be implemented for:</p> <p>i) meeting the biodiversity mitigation requirements in condition C23;</p> <p>ii) minimising the amount of native vegetation clearing within the development area;</p> <p>iii) minimising the loss of key fauna habitat, including tree hollows;</p> <p>iv) minimising the impacts on fauna on site, including undertaking pre-clearance surveys;</p> <p>v) minimising the potential indirect impacts on threatened flora and fauna species, migratory species and ‘at risk’ species;</p> <p>vi) rehabilitating and restoring disturbance areas to its pre-existing condition;</p> <p>vii) avoiding and minimising impacts on Serious and Irreversible Impact (SAII);</p> <p>viii) construction clearing and operation vegetation management protocols;</p> <p>ix) monitoring of the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols;</p> <p>x) protecting native vegetation and key fauna habitat outside the approved disturbance area;</p> <p>xi) maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and restoration of the site;</p> <p>xii) a Connectivity Strategy and a Supplementary Hollow and Nest Strategy;</p> <p>xiii) controlling weeds;</p> <p>xiv) controlling erosion; and</p> <p>xv) bushfire management.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none">Interview (at various locations) with:<ul style="list-style-type: none">Ben Harper (Senior Environmental Advisor, Elecnor)Bobby Simpson (Environmental Advisor, Elecnor)Frank Team (Environmental Coordinator, Elecnor)Julie Vaillancourt (Environmental Advisor, Elecnor)Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor)Ozlem Anar (Environmental Coordinator, Elecnor)Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)Alozie Agomoh (Senior Environmental Business Partner, Transgrid)Kim Lemcke (Senior Biodiversity Business Partner, Transgrid)Luke Fania (Environment and Sustainability Manager, Transgrid)Adam Elliot (Fauna Spotter Catcher, NGH)Latasha Painter (Ecologist, NGH)Site inspection:<ul style="list-style-type: none">at various locations as described within Table C.2 (BMP compliance summary)Review of the following related documents:<ul style="list-style-type: none">Biodiversity Management Plan – EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2 (45860-HSE-PL-D-0117) (SecureEnergy, 2023)Various documentation as described within Table C.2 (BMP compliance summary)It was confirmed that:<ul style="list-style-type: none">The BMP has been prepared in accordance with the BDAR and includes descriptions of measures i) through to xv) with these measures being implemented during the site inspection (for those items relevant to the temporal period in which the audit applies)	Compliant	<p>None:</p> <p>Sufficient evidence sited that The BMP has been prepared in accordance with the BDAR and includes descriptions of measures i) through to xv) where compliance was observed to those measures that were relevant to the construction activities undertaken during temporal period of the audit.</p> <p>Previous audit recommendation</p> <p>See Improvement recommendation - Biodiversity 4 (refer to C23(b) above).</p> <p>The status of this improvement recommendations is addressed within Table 3.3 of this report.</p>

Infrastructure approval SS1 9172452 – Modification 1 (August 2024)				
Condition number	Requirements	Evidence collected	Compliance status	Recommendations
Biodiversity EMP Sub-Plan C26(b)	<p>The Biodiversity EMP Sub-Plan required under condition B2 must be prepared in accordance with the Revised Biodiversity Development Assessment Report (dated 19 August 2022) and include:</p> <p>b) a detailed program to monitor and report on the effectiveness of these measures.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none"> Interview (at various locations) with: <ul style="list-style-type: none"> Ben Harper (Senior Environmental Advisor, Elecnor) Bobby Simpson (Environmental Advisor, Elecnor) Frank Team (Environmental Coordinator, Elecnor) Julie Vaillancourt (Environmental Advisor, Elecnor) Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor) Ozlem Anar (Environmental Coordinator, Elecnor) Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor) Alozie Agomoh (Senior Environmental Business Partner, Transgrid) Kim Lemcke (Senior Biodiversity Business Partner, Transgrid) Luke Fania (Environment and Sustainability Manager, Transgrid) Adam Elliot (Fauna Spotter Catcher, NGH) Latasha Painter (Ecologist, NGH) Site inspection: <ul style="list-style-type: none"> at various locations as described within Table C.2 (BMP compliance summary) Review of the following related documents: <ul style="list-style-type: none"> Biodiversity Management Plan – EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2 (45860-HSE-PL-D-0117) (SecureEnergy, 2023) various documentation as described within Table C.2 (BMP compliance summary) It was confirmed that: <ul style="list-style-type: none"> The BMP has been prepared in accordance with the BDAR includes a detailed program to monitor and report on the effectiveness of these measures. 	Compliant	<p>None:</p> <p>Sufficient evidence sited that the BMP has been prepared in accordance with the BDAR and includes a detailed program to monitor and report on the effectiveness of these measures.</p> <p>Previous audit recommendation</p> <p>Improvement recommendation - Biodiversity 4 (refer to C23(b) above).</p> <p>The status of this improvement recommendation is addressed within Table 3.3 of this report.</p>

Table C.2 Biodiversity management plan (BMP) – biodiversity compliance assessment

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
General				
BD1	Training will be provided to all project personnel, including relevant sub-contractors on biodiversity management practices and the requirements from this plan through inductions, toolbox talks and activity specific training.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Attendance at morning pre-start meeting on 3 June and 4 June 2025 (Line 2) where biosecurity measures and environmental flagging were discussed• Environmental notice boards reviewed on Line 2 (Photograph D.11 and Photograph D.27), which contained information on:<ul style="list-style-type: none">– Environmental No-Go Zones– Works outside of approved disturbance areas– Biosecurity measures including car/plant cleaning guide– Controls and obligations to minimise impacts on Plains Wanderer Habitat– Plains Wanderer Protocol– Plains Wanderer habitat maps– Information on Southern Bell Frog– Bespoke Construction Methodology for Thyme Rice Flower and Austral Pillwort– Information on fauna strike during travel and on site– Fauna strike forms– Wash bay logs• Interview (at various locations) with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Bobby Simpson (Environmental Advisor, Elecnor)– Frank Team (Environmental Coordinator, Elecnor)– Julie Vaillancourt (Environmental Advisor, Elecnor)– Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor)– Ozlem Anar (Environmental Coordinator, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Alozie Agomoh (Senior Environmental Business Partner, Transgrid)– Kim Lemcke (Senior Biodiversity Business Partner, Transgrid)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection:<ul style="list-style-type: none">– Southern Bell Frog hygiene station and clean-down log with instructions (Photograph D.25 and Photograph D.26)– Line 5, Tower 241-242, Natural Grasslands of the Murray Valley Plains TEC special biodiversity protection zone/Property Vegetation Plan (PVP) induction on entrance gate (Photograph D.44)• Review of the following related documents:<ul style="list-style-type: none">– Thyme Rice Flower toolbox talk (PowerPoint) (viewed during inspection)– Biosecurity toolbox talk (PowerPoint) (viewed during inspection)– Bespoke stringing method document (Thyme Rice Flower) (viewed post inspection)– Plains Wanderer habitat Toolbox (viewed post inspection)– Southern Bell Frog Toolbox (viewed post inspection)– Austral Pillwort Toolbox (viewed post inspection)	Compliant	<p>None:</p> <p>Sufficient evidence sighted that training on biodiversity management practices, in accordance with the BMP, is being provided.</p> <p>Previous audit recommendation</p> <p>None.</p>
BD2	Any site offices or crib sheds which may be required will be located in an area of limited biodiversity value (e.g. cleared land or areas of native vegetation with vegetation integrity scores of less than 17 (in accordance with the NSW Government Biodiversity Assessment Method Operational Manual) will be prioritised).	<p>Not triggered:</p> <p>No new site offices or sheds were established in areas of native vegetation during the audit period</p>	Not triggered	<p>None:</p> <p>Not applicable to the current audit.</p> <p>Previous audit recommendation</p> <p>None.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD3	Where vegetation disturbance activities are required in areas that have not previously been subject to biodiversity survey, additional survey will be carried out prior to works occurring to inform detailed design and construction methodology. These surveys will be carried out by a suitably qualified ecologist.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Review of the following related documents:<ul style="list-style-type: none">– Infrastructure Approval / Consolidated Consent – SSI 9172452 (30 August 2024) including MOD 1 – Extension of Offset Timing– Project Energy Connect – East, Biodiversity Technical Specialist Audit (Umwelt, 2025)– Consistency assessment for Sturt Highway crossing (change in construction method)• Site inspection at Line 2, Tower 385-386:<ul style="list-style-type: none">– Optical Ground Wire (OPGW) sites• Site inspection at Sturt Highway crossing site• It was confirmed that:<ul style="list-style-type: none">– Only one modification for the project has occurred, being an administrative modification related to an extension on timing of the biodiversity offset package– Areas of minor design refinement are being surveyed by a suitably qualified ecologist, in accordance with the BAM and by an accredited assessor– Consistency assessments are prepared for each OPGW site– Consistency assessments are prepared for areas of proposed impacts that are not the same as the BDAR proposed impacts (e.g. OPGW sites and Sturt Highway crossing)	Compliant	<p>None:</p> <p>Sufficient evidence sighted that minor design refinements are being surveyed by a suitably qualified ecologist, in accordance with the BAM and by an accredited assessor. Consistency assessments are being prepared for areas of design refinement or changed impacts.</p> <p>Previous audit recommendation</p> <p>None.</p>
BD4	Should changes to the project’s design or construction methodology or additional field surveys result in changed impacts to biodiversity which have not been included in the Final BDAR, these would be assessed in accordance with the requirements of the BAM by an accredited assessor.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Review of the following related documents:<ul style="list-style-type: none">– Infrastructure Approval / Consolidated Consent – SSI 9172452 (30 August 2024) including MOD 1 – Extension of Offset Timing– Project Energy Connect – East, Biodiversity Technical Specialist Audit (Umwelt, 2025)– Consistency assessment for Sturt Highway crossing (change in construction method)• Site inspection at Line 2, Tower 385-386:<ul style="list-style-type: none">– Optical Ground Wire (OPGW) sites• Site inspection at Sturt Highway crossing site.• It was confirmed that:<ul style="list-style-type: none">– Only one modification for the project has occurred, being an administrative modification related to an extension on timing of the biodiversity offset package– Areas of minor design refinement were being surveyed by a suitably qualified ecologist, in accordance with the BAM and by an accredited assessor– Consistency assessments are prepared for each OPGW site– Consistency assessments are prepared for areas of proposed impacts that are not the same as the BDAR proposed impacts (e.g. OPGW sites and Sturt Highway crossing)	Compliant	<p>None:</p> <p>Sufficient evidence sighted that minor design refinement were being surveyed by a suitably qualified ecologist, in accordance with the BAM and by an accredited assessor. Consistency assessments are being prepared for areas of design refinement or changed impacts.</p> <p>Previous audit recommendation</p> <p>None.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD5	Clearing of native vegetation and key habitat will be minimised where possible. This will include minimising impacts on the clearing of hollow-bearing trees, threatened species as well as native vegetation and key habitat. Opportunities to minimise clearing will occur through review of temporary design and construction methodologies for the Stage 2 disturbance area.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview (at various locations) with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Bobby Simpson (Environmental Advisor, Elecnor)– Frank Team (Environmental Coordinator, Elecnor)– Julie Vaillancourt (Environmental Advisor, Elecnor)– Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor)– Ozlem Anar (Environmental Coordinator, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Alozie Agomoh (Senior Environmental Business Partner, Transgrid)– Kim Lemcke (Senior Biodiversity Business Partner, Transgrid)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection:<ul style="list-style-type: none">– <i>Acacia melvillei</i> Shrubland Threatened Ecological Community (TEC), in proximity to stringing activities (which occurred during the audit period) (Line 2, Tower 544-543) (Photograph D.7)– <i>Eleocharis obicis</i> records in proximity to Tower 383 (Line 2). GIS layer and flagging tape observed around habitat with flagging noted as second level of defence as bunds and pegs around the tower site are the first level (Photograph D.8 and Photograph D.9)– Partial clearing at Line 2, Tower 180, within Plant Community Type (PCT) 15 - Black Box open woodland wetland, where centreline (Disturbance Area A), B4 and B10 clearing observed (which occurred during the audit period) (Photograph D.17, Photograph D.18, and Photograph D.19).– Partial clearing at location of 600 year old tree (cultural significance) which occurs within B4 clearing zone, with minimal trimmed branches to comply with 4 m clearance requirements, and ongoing maintenance required (a ‘hot spot’ tree) in order to retain tree (Photograph D.20 and Photograph D.21)– Austral Pillwort special biodiversity protection zone construction pad, bunding and green flagging (Line 2, Tower 162) (Photograph D.22)• Review of the following related documents:<ul style="list-style-type: none">– GIS data layers showing sensitive areas at various locations shown both in the field and within the site office (Photograph D.12 and Photograph D.35) (viewed during inspection)– Sensitive Area Plans (SAPs) relevant to areas visited during inspection (viewed post inspection)– Flagging register (viewed during audit) (Photograph D.28)– Clearing and land disturbance permits (CDPs) for this audit period (viewed post inspection)– Clearing and Land Disturbance Register (viewed during and post inspection):<ul style="list-style-type: none">▪ Permits register / tracking (for the period of 2/06/2025 – 4/06/2024)▪ Native vegetation/TEC/threatened flora/threatened fauna tracking– Predicted Clearing Register (viewed during and post inspection)– GIS layers used for clearing calculations (Photograph D.31)(viewed during inspection)• It was confirmed that:<ul style="list-style-type: none">– Clearing of native vegetation and key habitat is being minimised where possible– Opportunities to minimise clearing has been occurring through review of temporary design and construction methodologies for the Stage 2 disturbance area, as demonstrated by proposed versus actual clearing calculations that are addressed via BD6 requirements	Compliant	<p>None:</p> <p>Sufficient evidence sited that clearing of native vegetation and key habitat is being minimised where possible.</p> <p>Previous audit recommendation</p> <p>None.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD6	<p>Unless otherwise agreed with the Planning Secretary, clearing is not to exceed the limits identified in Section 5.3, Table 5.1, Table 5.2 and Table 5.3 of this BMP.</p> <p>Spatial data and threatened species locations will be provided to the detailed design team in detailed construction planning.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection:<ul style="list-style-type: none">– Green flagging and survey pegging to delineate and calculate areas of clearance were identified at various locations during the site inspection. Green flagging was noted as fallen in some areas, however this, in all cases, was beyond the cleared (and pegged) area, so would not impact upon clearing calculations and has more impact on ensuring protection of special biodiversity areas (see BD14 non-compliance) and not upon the calculation of cleared areas– Line 5, Tower 279a where Plains Wanderer habitat occurs (Photograph D.36 and Photograph D.37)• Review of the following related documents:<ul style="list-style-type: none">– Clearing and land disturbance permits (CDPs) for this audit period (viewed post inspection)– Clearing and Land Disturbance Register (viewed during and post inspection):<ul style="list-style-type: none">▪ Permits register / tracking (for the period of 2/06/2025 – 4/06/2024)▪ Native vegetation tracking▪ TEC tracking▪ Threatened flora tracking▪ Threatened fauna tracking– Predicted Clearing Register (viewed during and post inspection)– GIS layers used for clearing calculations (Photograph D.31)(viewed during inspection).– Verification report (viewed post inspection)• It was confirmed that:<ul style="list-style-type: none">– Based on the clearing registers provided, and description of progressive tracking of clearance areas provided by Elecnor/Transgrid during interviews, the project has not exceeded the clearing limits identified in the BMP for PEC East for native vegetation, TECs, threatened flora, or threatened fauna. It has been identified that Squirrel Glider habitat is close to reaching clearing limits as identified within the BMP and is therefore being monitored closely– It is noted that an explanation of how actual (versus predicted) clearance is calculated was provided by Elecnor and Transgrid, with spreadsheets shown during the site inspection. Only excerpts (PDFs) from the clearing register provided post inspection (not the entire dataset). Calculations were not undertaken by the biodiversity auditor due to the size of the dataset and limited time for the audit, which would have prevented such calculations to be prepared. Transgrid confirmed that a third-party check (WSP consultants) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery and converted into GIS shapefile format– Spatial data and threatened species locations are being provided to the detailed design team during detailed construction planning. Evidence sighted that threatened species spatial data (Plains Wanderer habitat) has been provided to the detailed design team and has informed the design of construction planning. Direct impacts to Plains Wanderer habitat have been avoided by micro siting project infrastructure (tower construction pads) outside of Plains Wanderer mapped habitat at Line 5, Tower 279a	Compliant	<p>None:</p> <p>Sufficient evidence sighted that clearing has not exceeded the limits identified within the BMP. Evidence sighted that spatial data and threatened species locations are being provided to the detailed design team during detailed construction planning. The auditor did not undertake calculations on predicted versus clearing as only PDFs of the clearing registers were provided (spreadsheets briefly viewed during the inspection) and the limited time to undertake the audit would not have allowed detailed calculations.</p> <p>Previous audit recommendation</p> <p>Improvement recommendation – Biodiversity 1 (see C23(a) above)</p> <p>Improvement recommendation – Biodiversity 5: Update BMP to require progressive reporting on all items identified in Appendix A, Section 7 of the BMP. It is recommended that this information be made available for review every 26 weeks at the commencement of future audits, to demonstrate progressive tracking and assist audit reporting within the mandatory timeframe requirements.</p> <p>The status of this improvement recommendation is addressed within Table 3.3 of this report.</p> <p>Improvement recommendation 1</p> <p>Calculations were not undertaken by the biodiversity auditor due to the size of the dataset and limited time for the audit. Transgrid confirmed that a third-party check (WSP consultants) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery. A report by the third-party reviewer should be provided to the auditor during the next audit period, to satisfy that auditor that clearing has not exceeded the limits specified in the BMP.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD7	<p>Detailed design and construction methodologies will avoid impact to matters of biodiversity conservation significance to the greatest extent practicable.</p> <p>Micro-siting of the transmission line infrastructure and associated construction working areas and other areas of disturbance will occur to avoid impacts wherever practicable.</p> <p>Threatened species recorded and their habitat, will be given the highest priority in terms of impact minimisation.</p> <p>Threatened species and their habitats, as well as endangered threatened ecological communities, will be identified through the GIS or sensitive area plans (SAPs) (per Section 4.5 of the CEMP). The results of pre-clearing surveys will be used to update and confirm the accuracy of SAPs.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview (at various locations) with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Keeley Hartzer (Environmental Advisor - Biodiversity, Elecnor)– Ozlem Anar (Environmental Coordinator, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection:<ul style="list-style-type: none">– Most locations inspected during the audit contained sensitive areas (flora features, aboriginal heritage sites, riparian zones, fauna habitat, areas of vegetation to be retained, clearing limit boundaries, no-go zones)• Review of the following related documents:<ul style="list-style-type: none">– GIS data layers showing sensitive areas at various locations shown both in the field and within the site office (Photograph D.12 and Photograph D.35) (viewed during inspection)– Sensitive Area Plans (SAPs) relevant to areas visited during inspection (viewed post inspection)• It was confirmed that:<ul style="list-style-type: none">– threatened species and their habitat, and TECs, are being avoided to the greatest extent possible during detailed design and construction– GIS and SAPs are in use to identify areas of biodiversity conservation significance	Compliant	<p>None:</p> <p>Sufficient evidence sighted that threatened species and their habitat, and TECs, are being avoided to the greatest extent possible. GIS and SAPs are in use to identify areas of biodiversity conservation significance.</p> <p>Previous audit recommendation</p> <p>None.</p>
BD8	<p>To avoid the construction of new tracks, existing tracks and clearings will be utilised where possible during construction. Detailed design will ensure that where this is not possible, that impacts to native vegetation is minimised.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection:<ul style="list-style-type: none">– Various locations visited during the site inspection• Review of the following related documents:<ul style="list-style-type: none">– GIS layers used for clearing calculations (Photograph D.31)(viewed during inspection)• It was confirmed that:<ul style="list-style-type: none">– All new tracks are approved for 8 m width, but most have been less– Construction of new tracks has been avoided when existing tracks and clearings have been utilised where possible during construction	Compliant	<p>None:</p> <p>Sufficient evidence sited that existing tracks are being utilised where possible and where not possible, impacts are limited on new tracks.</p> <p>Previous audit recommendation</p> <p>None.</p>
BD9	<p>Transmission line towers have been located and will be constructed to minimise impacts to vegetated riparian corridors, as defined by “Guidelines for riparian corridors on waterfront land” (DPI – Office of Water, July 2012) of Murrumbidgee River.</p>	<p>Not triggered:</p> <p>The Murrumbidgee River crossing was not constructed during the audit period</p>	Not triggered	<p>None:</p> <p>Not applicable to the current audit.</p> <p>Previous audit recommendation</p> <p>None.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD10	Works within the Tree Protection Zones of retained trees within or immediately adjacent to the disturbance area would be planned with consideration of the tree protection measures outlined in managed in accordance with AS4970–2009 Protection of Trees on Development Sites where practicable and appropriate measures would be implemented to minimise the impact of the works on the long–term health of these trees.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview (at various locations) with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Keeley Hartzer (Environmental Advisor - Biodiversity, Elecnor)• Site inspection:<ul style="list-style-type: none">– Partial clearing at Line 2, Tower 180, within Plant Community Type (PCT) 15 - Black Box open woodland wetland, where centreline (Disturbance Area A), B4 and B10 clearing observed (which occurred during the audit period) (Photograph D.17, Photograph D.18, and Photograph D.19)– Partial clearing at location of 600 year old tree (cultural significance) which occurs within B4 clearing zone, with minimal trimmed branches to comply with 4 m clearance requirements, and ongoing maintenance required (a ‘hot spot’ tree) in order to retain tree (Photograph D.20 and Photograph D.21)– Partial clearing at Line 2, Tower 661 where Thyme Rice-flower individuals occur (previously mapped records and additional unexpected finds) (Photograph D.1, Photograph D.2, and Photograph D.3)• Review of the following related documents:<ul style="list-style-type: none">– GIS showing detail on trees marked by an arborist in the transmission corridor (Photograph D.32)– No other documents were requested by the auditor in relation to this requirement• It was confirmed that:<ul style="list-style-type: none">– Tree protection measures for trees to be retained are considered in collaboration with the project arborists to minimize impact of the works on the long-term health of trees	Compliant	<p>None:</p> <p>Sufficient evidence sited and findings based on site inspection areas only.</p> <p>Previous audit recommendation</p> <p>None.</p>
Pre-clearing and clearing				
BD11	Pre-clearing surveys will be completed prior to construction by a suitably qualified ecologist in accordance with the Pre-clearing and Clearing Procedure (Appendix A). This includes the requirement to undertake pre-clearance surveys as required by the Commonwealth Approval.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview (at various locations) with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection:<ul style="list-style-type: none">– No pre-clearance surveys were being undertaken during the site inspection• Review of the following related documents:<ul style="list-style-type: none">– Pre-clearing reports from the audit period (viewed post inspection)– Post-clear report from the audit period (viewed during inspection) (Photograph D.34)– Verification report (viewed post inspection)• It was confirmed that:<ul style="list-style-type: none">– Pre-clearing surveys are being completed prior to construction by a suitably qualified ecologist in accordance with the Pre-clearing and Clearing Procedure of the BMP	Compliant	<p>None:</p> <p>Sufficient evidence sited and findings based on site inspection areas only.</p> <p>Previous audit recommendation</p> <p>None.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD12	<p>Biodiversity exclusion zones for retained vegetation would be confirmed by a suitably qualified ecologist prior to the commencement of clearing or any site activity that could damage the vegetation within the exclusion zone.</p> <p>Biodiversity exclusion zones would consider:</p> <ul style="list-style-type: none">• identified Plains–wanderer habitat;• identified threatened flora populations; and• PCTs in disturbance area B that are not of a growth form height that would ever require management. <p>Biodiversity exclusion zones would be physically marked and demarcated, and included on sensitive area maps, prior to clearing.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview (at various locations) with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Ozlem Anar (Environmental Coordinator, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection:<ul style="list-style-type: none">– Line 2, Tower 661 where Thyme Rice-flower individuals occur (previously mapped records and additional unexpected finds) (Photograph D.1, Photograph D.2, and Photograph D.3)– Line 2, Tower 544-543 where <i>Acacia melvillei</i> Shrubland Threatened Ecological Community (TEC) occurs, in proximity to stringing activities (which occurred during the audit period) (Photograph D.7)• Review of the following related documents:<ul style="list-style-type: none">– GIS data layers showing sensitive areas at various locations shown both in the field and within the site office Photograph D.8, Photograph D.12, and Photograph D.35) (viewed during inspection)– Pre-clearing reports from the audit period (viewed post inspection)– Post-clear report from the audit period (viewed during inspection) (Photograph D.34)• It was confirmed that:<ul style="list-style-type: none">– Biodiversity exclusion zones for retained vegetation are being confirmed by a suitably qualified ecologist prior to clearing– Biodiversity exclusion zones are being physically marked and demarcated, and are included on sensitive area maps, prior to clearing	Compliant	<p>None:</p> <p>Sufficient evidence sited and findings based on site inspection areas only.</p> <p>Previous audit recommendation</p> <p>None.</p>
BD13	<p>In circumstances where a tree that would exceed the vegetation clearing requirements is identified within one of the biodiversity conservation zones relating to the Plains wanderer habitat areas then this tree would be subject to removal to ground level (i.e. tree height cut back but rootball to be retained in place) using methods that minimise potential impact to key habitat and to ensure avoidance of impact to bird individuals.</p> <p>This would occur under supervision of an ecologist.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview (at various locations) with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection:<ul style="list-style-type: none">– Line 2, Tower 154 where Plains Wanderer habitat occurs (Photograph D.23 and Photograph D.24)– Line 5, Tower 279a where Plains Wanderer habitat occurs (Photograph D.36 and Photograph D.37)• Review of the following related documents:<ul style="list-style-type: none">– No documents were requested by the auditor in relation to this requirement• It was confirmed that:<ul style="list-style-type: none">– The areas of Plains Wanderer habitat visited during the site inspection, and that have been subject to clearance (for tower construction pads) during the audit period, are naturally treeless vegetation communities, as confirmed during the site inspection	Compliant	<p>None:</p> <p>Sufficient evidence sited that no trees occur within the areas of Plains Wanderer habitat that have been cleared during the audit period.</p> <p>Previous audit recommendation</p> <p>None.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD14	Any additional requirements relating to pre-clearing or clearing activities in areas of Plains-wanderer habitat would be undertaken in accordance with the Plains-wanderer Protocol in Appendix F.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview (at various locations) with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Bobby Simpson (Environmental Advisor, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection:<ul style="list-style-type: none">– Line 2, Tower 154 where Plains Wanderer habitat occurs (Photograph D.23 and Photograph D.24).– Line 5, Tower 279a where Plains Wanderer habitat occurs (Photograph D.36 and Photograph D.37)• Review of the following related documents:<ul style="list-style-type: none">– Exclusion flagging register (viewed during audit) (Photograph D.28), inclusive of step through by Elecnor of the register, inclusive of steps undertaken to monitor and rectify when flagging is down– Plains Wanderer Protocol (Appendix F of BMP) (viewed post inspection)– Bespoke stringing method document (Plains Wanderer) (viewed post inspection)– Plains Wanderer habitat Toolbox (viewed post inspection)• It was confirmed that:<ul style="list-style-type: none">– Direct impacts to Plains Wanderer habitat in the areas inspected have been avoided by micro siting project infrastructure (tower construction pads) outside of Plains Wanderer mapped habitat– At Tower 279a, this was achieved by reducing the size of the tower construction pad– Green flagging and ‘no-go zone’ signs are erected at Line 2, Tower 154 to indicate the Plains Wanderer habitat (Photograph D.23 and Photograph D.24). Adaptive management has been applied due to landholder concerns about the green flagging and livestock. This includes the use of temporary fencing to elevate the flagging out of the reach of livestock. The construction pad and bunds provide a first line of defence with flagging and Plains Wanderer habitat beyond these areas, making a very clear delineation of habitat areas– Fallen green flagging (Photograph D.23 and Photograph D.24) at Line 2, Tower 154. It was explained that this area was checked two weeks ago, with this being a constant battle where livestock occur. The auditor witnessed Elecnor implementing measures to have the flagging re-installed. It is also noted that the tower construction pad and bunding provides a clear boundary that would be unlikely to be crossed by construction crews in the meantime– Elecnor confirmed that since Construction Audit Number 4, Elecnor has had labourers assigned specifically to the environmental team. Prior to this, they were doing all activities (including flagging) but now it’s more focused with environmental specific labourers.– The flagging register tracks monitoring of flagged sites with labourers sent out regularly including prior to construction activities commencing– Stringing is yet to occur at both Plains Wanderer habitat locations visited; however, it was explained that it will occur in accordance with the Bespoke stringing method document that has been used at previous Plains Wanderer habitat sites that have been strung (outside of the current audit period). This document was reviewed and is in accordance with Appendix F of the BMP	Non-compliant (NC1)	<p>Overall, sufficient evidence sited that requirements relating to pre-clearing or clearing activities in areas of Plains-wanderer habitat are undertaken in accordance with the Plains-wanderer Protocol in Appendix F of the BMP.</p> <p>Non-compliance</p> <p>Green flagging was observed to be down at Line 2, Tower 154, Plains Wanderer habitat. No construction was happening at the time of the observation.</p> <p>It is acknowledged that the project has encountered disturbance to flagging and pegs by landholders and/or livestock and ongoing maintenance of pegs and flagging can therefore be challenging, especially at the location (Tower 154) where the non-compliance was noted.</p> <p>Adaptive management (the use of both temporary fencing and green flagging) is being applied to address landholder livestock concerns at this location.</p> <p>Flagging to be inspected regularly and maintained to appropriately to protect Plains Wanderer Habitat until construction is complete.</p> <p>Elecnor explained that since Construction Audit Number 4, Elecnor has had labourers assigned specifically to the environmental team. The flagging register tracks monitoring of flagged sites with labourers sent out regularly including prior to construction activities commencing.</p> <p>Previous audit recommendation</p> <p>None.</p> <p>Improvement recommendation 2</p> <p>Flagging to be inspected regularly and maintained to appropriately to protect Plains Wanderer Habitat until construction is complete.</p> <p>The evidence provided to the auditor, relating to the flagging register and monitoring of flagged sites, is noted. The auditor is satisfied that there are suitable checks in place prior to construction activities commencing, meaning that Plains Wanderer Habitat would be protected prior to construction activities (which were not occurring at the time of the audit).</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD15	<p>Activities within vegetated riparian zones will be undertaken in a way so to minimise impacts to aquatic environments.</p> <p>Shrub or ground stratum native vegetation within vegetated riparian zones (within the definition of <i>Water Management Act 2000</i> and <i>Guidelines for riparian corridors on waterfront land</i> (DPI – Office of Water, 2012)) of defined riparian areas would be protected to the greatest extent practicable, with vegetation clearing ideally limited to the tree stratum only, with trunk bases being retained insitu.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor)• Site inspection:<ul style="list-style-type: none">– Line 5, Tower 245-246, Colombo Creek crossing riparian zone (Photograph D.40 and Photograph D.41)• Review of the following related documents:<ul style="list-style-type: none">– Clearing and land disturbance permit (CDP) for Colombo Creek (viewed post inspection)– Pre-clear report for Colombo Creek crossing (viewed post inspection)– Nest box report for Colombo Creek crossing (viewed post inspection)• It was confirmed that:<ul style="list-style-type: none">– Clearing of the Colombo Creek riparian zone occurred during the last audit period and was previously deemed as compliant, refer to Umwelt (2025)– Epicormic shoots were noted on the River Red Gum trunk bases that were left in situ in the B4 and B10 clearing zones. Trunk bases that are retained in situ will require ongoing vegetation management to limit their height in accordance with the height limits for transmission corridors– No other riparian zones were clearing during the audit period	Compliant	<p>None:</p> <p>Not applicable to the current audit (Colombo Creek crossing was cleared previously). Epicormic shoots on River Red Gum in B4 and B10 clearing zones demonstrate that trunk bases were left in situ.</p> <p>Previous audit recommendation</p> <p>Additional inspections of other riparian crossings recommended for subsequent audits. This was not undertaken during the current audit because clearing did not occur within any riparian crossing during the audit period (to the auditor’s knowledge).</p> <p>Recommendation</p> <p>Subsequent biodiversity audit to inspect clearing within riparian areas.</p>
BD16	<p>Clearing of any hollow bearing trees at the crossing point of the Murrumbidgee River within PCT 8 and PCT 11 will be undertaken outside of the period between September and December.</p>	<p>Not triggered:</p> <p>Clearing at the Murrumbidgee River crossing was not undertaken during the audit period</p>	Not triggered	<p>None:</p> <p>Not applicable to the current audit.</p> <p>Previous audit recommendation</p> <p>None</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD17	<p>Between towers 660-663* a bespoke construction methodology would be employed which would avoid impacts to known individuals of Thyme Rice-flower and minimise impact as far as practicable to the species' habitat. This would include at a minimum:</p> <ul style="list-style-type: none"> during detailed design and review of temporary design, opportunities to site items in locations where impacts to matters of biodiversity conservation significance are reduced, will occur, in accordance with RMM B1; pre-clearing surveys for areas which would be cleared or impacted to identify and clearly mark all Thyme Rice-flower individuals; the ecologists undertaking the pre-clearing survey are to install four (4) 1.5 metre high wooden/metal stakes on all sides of the Pimelea individuals (give 1 metre distance off main stem to lower risk of root damage); attach flagging tape at top of stake to notify clearing machinery where to avoid (where possible); areas within this special biodiversity protection zone which will not be cleared will be delineated with flagging or other highly visible markers; provide a map of all Pimelea individuals to all contractors to notify significance; pre-clearing induction of all contractors that work in this area to discuss this special biodiversity protection zone and the location of Pimelea individuals which are to be avoided; during clearing an ecologist shall be on site at all times to monitor activities within this special biodiversity protection zone; A-Frame Fence Hurdles will be utilised when stringing transmission lines within the special biodiversity protection zones and / or the transmission cable will be walked through on foot if traversing through habitat is required, with an ecologist walking ahead acting as a spotter; access being prioritised from existing tracks clearing restricted to the identified tower 660–663* worksite locations and short new perpendicular access track sections. These would provide access between the existing access track along the proposal alignment and the tower 660–663* worksite locations; and alternative line installation techniques which do not require clearing of Disturbance Area A - centreline; clearing will not occur within Disturbance Area B4 and B10 unless absolutely required to meet the transmission line clearance requirements. <p>Refer to Section 5.4 of the Pre-clearing and Clearing Procedure for detail of the measures which are to be implemented within this special biodiversity protection zone.</p>	<p>Transgrid and Elecnor confirmed that clearing at this location was undertaken during the audit period. Accordingly, the following evidence was collected:</p> <ul style="list-style-type: none"> Site inspection at Line 2, Tower 661 where Thyme Rice-flower individuals occur (previously mapped records and additional unexpected finds) (Photograph D.1, Photograph D.2, and Photograph D.3) Site inspection at Line 2, Tower 557, which was not cleared during the audit period, but is an example of Disturbance Area A – centreline full clearance within mallee representing habitat for Thyme Rice-flower, but where no Thyme Rice Flower occurs. This was useful in comparing the clearance activities at the Thyme Rice Flower special biodiversity protection zone versus clearance in an area where no Thyme Rice Flower occurs (Photograph D.4) Interview (on site at Line 2, Tower 661 and Tower 557) with: <ul style="list-style-type: none"> Ben Harper (Senior Environmental Advisor, Elecnor) Ozlem Anar (Environmental Coordinator, Elecnor) Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor) Luke Fania (Environment and Sustainability Manager, Transgrid) Review of the following related documents: <ul style="list-style-type: none"> Thyme Rice Flower toolbox talk (PowerPoint) (viewed during inspection) Flagging register (viewed during inspection) Clearing and land disturbance permit (CDP) (provided post inspection) Unexpected finds register (Thyme Rice Flower) (provided post inspection). Bespoke stringing method document (Thyme Rice Flower) (viewed post inspection) The site inspection, site interviews and documents viewed/provided confirm that: <ul style="list-style-type: none"> Pre-clearing surveys were undertaken Suitable flagging was installed to protect Thyme Rice Flower individuals Pre-clearing induction was provided for contractors An ecologist and environmental coordinator were present during clearing activities Access was prioritised from existing tracks An alternative stringing technique was used to prevent clearing of vegetation within the Disturbance Area A – centreline Clearing within Disturbance Area A – centreline was restricted to the trimming of one mallee tree to fit the height requirements of below 4 m for transmission line requirements (Photograph D.2) Clearing did not occur within Disturbance Area B4 and B10 	Compliant	<p>None:</p> <p>Sufficient evidence sighted that a bespoke construction methodology was employed that avoided impacts to known individuals of Thyme Rice-flower and limited impacts to habitat (one tree trimmed).</p> <p>Previous audit recommendation</p> <p>None</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD18	<p>Between towers 161–162* a bespoke construction methodology would be employed which would avoid impacts to known individuals of Austral Pillwort individuals and minimise impact as far as practicable to the species habitat. This methodology would include at a minimum:</p> <ul style="list-style-type: none">• during detailed design and review of temporary design, opportunities to site items in locations where impacts to matters of biodiversity conservation significance are reduced, will occur, in accordance with RMM B1;• pre-clearing threatened flora survey for areas which would be cleared or impacted to identify and clearly mark all Austral Pillwort individuals;• temporary fencing around suitable habitat/acknowledged species polygons within the Final BDAR (along with a 10m buffer – to decrease any potential impacts to geomorphology) prior to construction. Installation of clear signage saying “No Go Zone”;• areas within this special biodiversity protection zone which will not be cleared will be delineated with flagging or other highly visible markers;• pre-clearing induction of all contractors that work in this area to discuss this special biodiversity protection zone and the importance of Austral Pillwort. The importance of maintaining geomorphology where possible should also be raised;• during clearing an ecologist shall be on site at all times to monitor activities within this special biodiversity protection zone;• A-Frame Fence Hurdles will be utilised when stringing transmission lines within the special biodiversity protection zones and / or the transmission cable will be walked through on foot if traversing through habitat is required, with an ecologist walking ahead acting as a spotter;• access being prioritised from existing tracks;• clearing restricted to the identified tower 161 and 162* worksite locations and short new perpendicular access track sections. These would provide access between the existing access track along the proposal alignment and the tower 161 and 162* worksite locations; and• alternative line installation techniques which do not require clearing of Disturbance Area A - centreline;• clearing will not occur within Disturbance Area B4 and B10 unless absolutely required to meet the transmission line clearance requirements. <p>Refer to Section 5.4 of the Pre-clearing and Clearing Procedure for detail of the measures which are to be implemented within this special biodiversity protection zone.</p>	<p>Transgrid and Elecnor confirmed that clearing at this location was undertaken during the audit period. Accordingly, the following evidence was collected:</p> <ul style="list-style-type: none">• Site inspection at Line 2, Tower 162, where Austral Pillwort individuals occur (previously mapped records) (Photograph D.22)• Interview (on site at Line 2, Tower 162) with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Review of the following related documents:<ul style="list-style-type: none">– Clearing and land disturbance permit (CDP) (provided post inspection)– Induction toolbox for Austral Pillwort) (provided post inspection)• The site inspection, site interviews and documents viewed/provided confirm that:<ul style="list-style-type: none">– Pre-clearing surveys were undertaken– Suitable flagging was installed to protect Austral Pillwort individuals– Pre-clearing induction was provided for contractors– An ecologist and environmental coordinator were present during clearing activities– The tower construction pad was placed in an area outside of Austral Pillwort records– Access was prioritised as a short perpendicular access track (in an area of no Austral Pillwort records)– An alternative stringing technique will be used to prevent clearing of vegetation within the Disturbance Area A, centreline, which will include walking stringing only (no machines) and will limit ground disturbance (yet to be prepared as stringing activities have not occurred)– Disturbance will not occur within Disturbance Areas B4 and B10 as there are no trees	Compliant	<p>None:</p> <p>Sufficient evidence sighted with stringing activities yet to occur.</p> <p>Previous audit recommendation</p> <p>None</p> <p>Recommendation</p> <p>Subsequent biodiversity audit to confirm that stringing activities were undertaken in accordance with a bespoke stringing methodology.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD19	<p>Between towers 241–242* a bespoke construction methodology would be employed which would minimise impacts as far as practical to the mapped Natural Grasslands of the Murray Valley Plains – Critically Endangered TEC located between the tower 241 and 242 location worksites. This methodology would include at a minimum:</p> <ul style="list-style-type: none">• during detailed design and review of temporary design, opportunities to site items in locations where impacts to matters of biodiversity conservation significance are reduced, will occur, in accordance with RMM B1;• pre-clearing induction of all contractors that work in this area to discuss this special biodiversity protection zone;• areas within this special biodiversity protection zone which will not be cleared will be delineated with flagging or other highly visible markers;• during clearing an ecologist shall be on site at all times to monitor activities within this special biodiversity protection zone;• access being prioritised from existing tracks;• clearing being restricted to the identified tower 241 and 242* worksite locations and short new perpendicular access track sections. These would provide access between the existing access track along the proposal alignment and the tower 241 and 242* worksite locations; and• alternative line installation techniques which do not require clearing of Disturbance Area A - centreline;• clearing will not occur within Disturbance Area B4 and B10 unless absolutely required to meet the transmission line clearance requirements. <p>Refer to Section 5.4 of the Pre-clearing and Clearing Procedure for detail of the measures which are to be implemented within this special biodiversity protection zone.</p>	<p>Transgrid and Elecnor confirmed that clearing at this location was undertaken during the audit period. Accordingly, the following evidence was collected:</p> <ul style="list-style-type: none">• Site inspection at Line 5, Tower 241-242, where Natural Grasslands of the Murray Valley Plains – Critically Endangered TEC occurs (Photograph D.42 and Photograph D.43)• Interview with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Bobby Simpson (Environmental Advisor, Elecnor)– Frank Team (Environmental Coordinator, Elecnor)– Julie Vaillancourt (Environmental Advisor, Elecnor)– Keeley Hartzer (Environmental Advisor - Biodiversity, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Alozie Agomoh (Senior Environmental Business Partner, Transgrid)– Kim Lemcke (Senior Biodiversity Business Partner, Transgrid)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Review of the following related documents:<ul style="list-style-type: none">– Natural Grasslands of the Murray Valley Plains TEC special biodiversity protection zone/Property Vegetation Plan (PVP) induction on entrance gate (Photograph D.44)• The site inspection, site interviews and documents viewed/provided confirm that:<ul style="list-style-type: none">– Suitable flagging was installed to protect the TEC– Access was prioritised on existing access track– An alternative stringing technique will be used to prevent clearing of vegetation within the Disturbance Area A, centreline, which will include walking stringing only (no machines) and will limit ground disturbance (yet to be prepared as stringing activities have not occurred)– Disturbance will not occur within Disturbance Areas B4 and B10 as there are no trees (in the area inspected)	Compliant	<p>None:</p> <p>Sufficient evidence sighted with stringing activities yet to occur.</p> <p>Previous audit recommendation</p> <p>None</p> <p>Recommendation</p> <p>Subsequent biodiversity audit to confirm that stringing activities were undertaken in accordance with a bespoke stringing methodology.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD20	<p>Between towers 243–249* a bespoke construction methodology would be employed which would minimise impacts as far as practical to the mapped PVP located between the tower 243 and 249 location worksites. This methodology would include at a minimum:</p> <ul style="list-style-type: none">• during detailed design and review of temporary design, opportunities to site items in locations where impacts to matters of biodiversity conservation significance are reduced, will occur, in accordance with RMM B1;• pre-clearing induction of all contractors that work in this area to discuss this special biodiversity protection zone;• areas within this special biodiversity protection zone which will not be cleared will be delineated with flagging or other highly visible markers;• during clearing an ecologist shall be on site at all times to monitor activities within this special biodiversity protection zone;• A-Frame Fence Hurdles will be utilised when stringing transmission lines within the special biodiversity protection zones and / or the transmission cable will be walked through on foot if traversing through the PVP, if required;• access being prioritised from existing tracks;• clearing being restricted to the identified tower 243–249* worksite locations and short new perpendicular access track sections. These would provide access between the existing access track along the proposal alignment and the tower 243–249* locations; and• alternative line installation techniques which do not require clearing of Disturbance Area A - centreline;• clearing will not occur within Disturbance Area B4 and B10 unless absolutely required to meet the transmission line clearance requirements. <p>Refer to Section 5.4 of the Pre-clearing and Clearing Procedure for detail of the measures which are to be implemented within this special biodiversity protection zone.</p>	<p>Not triggered:</p> <p>Due to limited time during the site inspection, this area was not assessed by the biodiversity specialist. It was confirmed by Elecnor that stringing is yet to occur in this area.</p>	Not triggered	<p>None:</p> <p>Due to limited time during the site inspection, this area was not assessed by the biodiversity specialist.</p> <p>Previous audit recommendation</p> <p>None</p> <p>Recommendation</p> <p>Subsequent biodiversity audit to confirm that stringing activities were undertaken in accordance with a bespoke stringing methodology.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD21	Areas subject to partial clearance will be monitored within three months from commencement of Stage 2 construction. If partial clearing has not commenced within three months of the commencement of Stage 2 construction, the project will monitor areas of partial clearance within three months of the commencement of partial clearing. A verification report will be produced to confirm whether any changes are required to Appendix A – Pre-clearing and Clearing Procedure.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">Interview with:<ul style="list-style-type: none">Ben Harper (Senior Environmental Advisor, Elecnor)Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)Luke Fania (Environment and Sustainability Manager, Transgrid)Site inspection at the following partial clearing locations:<ul style="list-style-type: none">Line 2, Tower 180, PCT 15 - Black Box open woodland wetland, where centreline (Disturbance Area A), B4 and B10 clearing was observed (which occurred during the audit period) (Photograph D.17, Photograph D.18, and Photograph D.19)Location of 600 year old tree (cultural significance) which occurs within B4 clearing zone, with minimal trimmed branches to comply with 4 m clearance requirements, and ongoing maintenance required (a ‘hot spot’ tree) in order to retain tree (Photograph D.20 and Photograph D.21)Line 2, Tower 661, Thyme Rice-flower records (Photograph D.1, Photograph D.2, and Photograph D.3)Line 2, Tower 557, an example of Disturbance Area A – centreline full clearance within mallee, where B4 and B10 zones did not require clearance (Photograph D.4)Line 2, Tower 544-543, <i>Acacia melvillei</i> Shrubland TEC (Photograph D.7)Line 5, Tower 245-246, Colombo Creek crossing riparian zone (Photograph D.40 and Photograph D.41)Line 5, Tower 198-199, location of BCS inspection (Photograph D.45, Photograph D.46, Photograph D.47, Photograph D.48, Photograph D.49, Photograph D.50)Review of the following related documents:<ul style="list-style-type: none">GIS project design layers (Photograph D.12) (viewed during inspection)GIS layers used for clearing calculations (Photograph D.31) (viewed during inspection)Pre-clearing reports from the audit period (viewed post inspection)Post-clear report from the audit period (viewed during inspection) (Photograph D.34)Clearing and land disturbance permits (CDP) (provided post inspection)Verification Report - Project EnergyConnect (NSW – Eastern Section) (45860-HSE-REP-D-0050) (Elecnor, 2025a) (viewed during and post inspection)Update on Partial Impacts under the NSW Biodiversity Assessment Method for Project EnergyConnect East (WSP, 2025) (viewed during and post inspection)It was confirmed that:<ul style="list-style-type: none">Partial clearing commenced on 16 August 2023A verification report (Elecnor, 2025a) has been prepared:<ul style="list-style-type: none">provides assessment of the clearing protocols and outcomes of clearing over the three-month period between 16 August 2023 and 16 November 2023concludes that clearing activities have been implemented in accordance with approved procedures and environmental commitmentsconcludes that the current vegetation clearing protocols remain effective in managing biodiversity impacts from vegetation clearing, and no procedural changes are necessary	Compliant	<p>None:</p> <p>Sufficient evidence sighted that areas subject to partial clearance have been monitored with a verification report produced to demonstrate that no changes are required to Appendix A – Pre-clearing and Clearing Procedure of the BMP.</p> <p>Previous audit recommendation:</p> <p>Improvement recommendation – Biodiversity 4 (refer to C23(b) above).</p> <p>The status of this improvement recommendation is addressed within Table 3.3 of this report.</p>
Threatened species management				
BD22	Detailed design will incorporate conductor line-marking techniques to minimise bird strike within one kilometre of wetland/riverine habitats. Use of bird diverters, most likely of the “flapper” variety, will be implemented. Positioning and diverter model will be finalised during detailed design but at minimum these will be used within one kilometre of wetland / riverine habitats to reduce impacts on aerial fauna species from collision and allow safer passage within these areas.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">Interview with:<ul style="list-style-type: none">Luke Fania (Environment and Sustainability Manager, Transgrid) <p>The interview confirmed that:</p> <ul style="list-style-type: none">This requirement has not been triggered for PEC East	Not triggered	<p>None:</p> <p>Requirement not triggered.</p> <p>Previous audit recommendation</p> <p>None</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD23	The Unexpected Threatened Species Finds Procedure (Appendix B) will be implemented if threatened ecological communities and threatened flora and fauna species, not assessed in the biodiversity assessment, are identified in the disturbance area.	<p>Transgrid and Elecnor confirmed that an unexpected find occurred during the audit period. Accordingly, the following evidence was collected:</p> <ul style="list-style-type: none">• Site inspection at Line 2, Tower 661 where Thyme Rice-flower individuals occur (previously mapped records and additional unexpected finds) (Photograph D.1, Photograph D.2, and Photograph D.3)• Interview (on site at Line 2, Tower 661) with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Ozlem Anar (Environmental Coordinator, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Review of the following related documents:<ul style="list-style-type: none">– Thyme Rice Flower toolbox talk (PowerPoint) (viewed during inspection)– Flagging register (viewed during inspection)– Clearing and land disturbance permit (CDP) (provided post inspection)– Unexpected finds register (Thyme Rice Flower) (viewed during site inspection, Photograph D.29, and provided post inspection)– Bespoke stringing method document (Thyme Rice Flower) (viewed post inspection)– Unexpected Threatened Species Finds Procedure (Appendix B of BMP)– Unexpected finds memo – <i>Eleocharis obicis</i> (including significance assessment)• The site inspection, site interviews and documents viewed/provided confirm that:<ul style="list-style-type: none">– Pre-clearing surveys were undertaken (when the unexpected find occurred)– Suitable flagging was installed to protect Thyme Rice Flower individuals, including in the unexpected finds area– Pre-clearing induction was provided for contractors– An ecologist and environmental coordinator were present during clearing activities (when the unexpected find occurred and during all clearing activities)– An alternative stringing technique was used to prevent clearing of vegetation within the Disturbance Area A<ul style="list-style-type: none">– centreline– Clearing within Disturbance Area A – centreline was restricted to the trimming of one mallee tree to fit the height requirements of below 4 m for transmission line requirements (Photograph D.2)– Clearing did not occur within Disturbance Area B4 and B10– Clearing did not occur within the unexpected finds area and no Thyme Rice Flower were impacted in the unexpected finds area– As per the flow chart in Appendix B of the BMP (Unexpected Threatened Species Finds Procedure) no further action was required, as the Thyme Rice Flower in the unexpected find area was not impacted by the works	Compliant	<p>None:</p> <p>Sufficient evidence sighted that the Unexpected Threatened Species Finds Procedure was followed for the unexpected find of Thyme Rice Flower during the audit period.</p> <p>Previous audit recommendation</p> <p>Improvement recommendation - Biodiversity 6: Update the BMP to include the specific requirements for EPBC Act and BC Act considerations for the Significance Review identified as part of the Unexpected Threatened Species Finds Procedure.</p> <p>This recommendation was not relevant to the current audit period as no EPBC Act or BC Act significance assessments were required to be undertaken, given no unexpected Thyme Rice Flower plants were impacted by construction. A significance assessment (WSP, 2024) has been undertaken for the <i>Eleocharis obicis</i> that was unexpectedly found during the previous audit period.</p> <p>The status of this improvement recommendation is addressed within Table 3.3 of this report.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD24	<p>Threatened species and their habitats will be identified through the GIS or sensitive area plans (SAPs), which would be updated/confirmed from the results of pre-clearing surveys. Mapping from SAPs would be provided to the construction workforce.</p> <p>Impacts to threatened species will be avoided as far as practicable during detailed design and when determining construction methodologies.</p> <p>In the event that unexpected threatened species are identified, the Unexpected Threatened Species Finds Procedure will be implemented.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Keeley Hartzer (Environmental Advisor - Biodiversity, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection at the following threatened species locations:<ul style="list-style-type: none">– Line 2, Tower 661 where Thyme Rice-flower individuals occur (previously mapped records and additional unexpected finds) (Photograph D.1, Photograph D.2, and Photograph D.3)– Line 2, Tower 154 where Plains Wanderer habitat occurs (Photograph D.23 and Photograph D.24).– Line 5, Tower 279a where Plains Wanderer habitat occurs (Photograph D.36 and Photograph D.37).– Line 2, Tower 544-543 where <i>Acacia melvillei</i> Shrubland Threatened Ecological Community (TEC) occurs, in proximity to stringing activities (which occurred during the audit period) (Photograph D.7)– Line 2, Tower 383 where <i>Eleocharis obicis</i> occurs (Photograph D.8 and Photograph D.9)– Line 2, Tower 162 where Austral Pillwort occurs (Photograph D.22)• Review of the following related documents:<ul style="list-style-type: none">– SAPs for Natural Grasslands of the Murray Valley Plains TEC, Plains Wanderer habitat, Thyme Rice Flower, Austral Pillwort– GIS project design layers (Photograph D.12) (viewed during inspection).– Pre-clearing reports from the audit period (viewed post inspection)– Post-clear report from the audit period (viewed during inspection) (Photograph D.34)– Flagging register (viewed during inspection) (Photograph D.28)– Unexpected finds register (Thyme Rice Flower) (viewed during site inspection, Photograph D.29, and provided post inspection)• The site inspection, site interviews and documents viewed/provided confirm that:<ul style="list-style-type: none">– Threatened species and their habitats are identified through GIS or SAPs, which are provided to the construction workforce– Impacts to threatened species are avoided as far as practicable during detailed design and when determining construction– The Unexpected Threatened Species Finds Procedure is being implemented (see audit response to BD23)	Compliant	<p>None:</p> <p>Sufficient evidence sighted that threatened species and their habitats are identified through GIS/SAPs, species are avoided as far as practicable during detailed design and the Unexpected Threatened Species Finds Procedure is being implemented.</p> <p>Previous audit recommendation</p> <p>None (recommendation on unexpected finds addressed in row above, BD23).</p>
BD25	<p>Where clearing of any hollow bearing trees within PCT 8 and PCT 11 at the crossing of the Murrumbidgee River is required, this will be undertaken outside of the Regent Parrot’s breeding season (September to December).</p>	<p>Not triggered:</p> <p>Clearing at the Murrumbidgee River crossing was not undertaken during the audit period</p>	Not triggered	<p>None:</p> <p>Not applicable to the current audit.</p> <p>Previous audit recommendation</p> <p>None.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
Habitat retention and rehabilitation				
BD26	<p>Nest boxes will be provided to offset the loss of tree hollow fauna habitat in accordance with a Supplementary Hollow and Nest Strategy. The strategy will include:</p> <ul style="list-style-type: none">• a survey of tree hollows and nests within the proposed clearing extents;• the size, type, number and location of nest boxes based on the results of the ecological surveys;• appropriately sized nest boxes will be installed within the vicinity of hollow-bearing trees (subject to landholder agreement and suitable existing trees being present) no more than two weeks prior to clearing of the tree;• nest boxes will include consideration of natural tree hollow re-use and new tree hollow creation; and• measures to address and manage nests (such as raptor nests) pre-clearing will be included.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor , Elecnor)– Keeley Hartzer (Environmental Advisor - Biodiversity, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Kim Lemcke (Senior Biodiversity Business Partner, Transgrid)– Luke Fania (Environment and Sustainability Manager, Transgrid)– Adam Elliot (Fauna Spotter Catcher, NGH)– Latasha Painter (Ecologist, NGH)• Site inspection at the following locations:<ul style="list-style-type: none">– Viewed nest box installation at Colombo Creek (Photograph D.38 and Photograph D.39)– Installed next boxes at:<ul style="list-style-type: none">– Line 2, Tower 661– Line 2, Tower 180 (Photograph D.19)– Line 2, Tower 557– Line 5, Tower 245-246,– Line 5, Tower 198-199 (Cullivel State Forest)• Review of the following related documents:<ul style="list-style-type: none">– Nest box reports– Pre-clear reports• The site inspection, site interviews and documents viewed/provided confirm that:<ul style="list-style-type: none">– As a result of recommendations from the previous audit, Elecnor recognised that an Environmental Advisor<ul style="list-style-type: none">– Biodiversity role was required to drive the Supplementary Hollow and Nest Strategy, with Keeley Hartzer appointed– In addition, Kim Lemcke (Senior Biodiversity Business Partner, Transgrid) is assisting Keeley with the Supplementary Hollow and Nest Strategy– Nest boxes are being installed to offset the loss of tree hollow fauna habitat in accordance with a Supplementary Hollow and Nest Strategy– The pre-clear and nest box reports include:<ul style="list-style-type: none">– survey of tree hollows and nests within the proposed clearing extents– size, type, number and location of nest box based on results of pre-clear surveys– installation of appropriately sized nest boxes in accordance with above surveys	Compliant	<p>None:</p> <p>Sufficient evidence sighted that nest boxes are being provided to offset the loss of tree fauna habitat in accordance with a Supplementary Hollow and Nest Strategy.</p> <p>Previous audit recommendation</p> <p>Refer to NC1.</p> <p>The status of this improvement recommendation is addressed within Table 3.3 of this report.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD27	The project will establish a series of 20-metre-wide connectivity corridors near tower locations that occur in woodland vegetation in accordance with the Connectivity Strategy (Appendix G). The connectivity corridors will involve native vegetation retention up to the 10-metre-wide temporary construction centreline clearing zone to better facilitate woodland connectivity. In addition to the connectivity corridors, under transmission glider poles will be installed in accordance with the <i>Connectivity Strategy</i> to assist Squirrel Glider movement.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Julie Vaillancourt (Environmental Advisor, Elecnor)– Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Kim Lemcke (Senior Biodiversity Business Partner, Transgrid)– Luke Fania (Environment and Sustainability Manager, Transgrid)• Site inspection at the following locations:<ul style="list-style-type: none">– Line 5, Tower 198-199 (Cullivel State Forest) Squirrel Glider habitat (Squirrel Glider Corridor number 7, of a total of 9 identified within the BDAR and BMP)• Review of the following related documents:<ul style="list-style-type: none">– BMP (Appendix G – Connectivity Strategy)• The site inspection, site interviews and documents viewed/provided confirm that:<ul style="list-style-type: none">– As a result of recommendations from the previous audit, Elecnor recognised that an Environmental Advisor – Biodiversity role was required to drive the Connectivity Strategy, with Keeley Hartzler appointed– In addition, Kim Lemcke (Senior Biodiversity Business Partner, Transgrid) is assisting Keeley with the Connectivity Strategy– Partial clearance was observed at Line 5, Tower 198-199 (Culliver State Forest) which is mapped as Squirrel Glider habitat and is the location of an identified connectivity corridor for Squirrel Glider (refer to Figure 8.3 in Appendix of the BMP)– This is identified in the BDAR and BMP as an area proposed for under-transmission glider poles. Elecnor indicated that works are underway to implement under transmission line glider poles at this location– The partial clearing undertaken at Line 5, Tower 198-199 and in collaboration with the project arborists, has resulted in some retained trees near the tower pad. This is where taller trees can be retained closer to the infrastructure, due to the height of the strings closer to the tower, as opposed to the slacker strings mid tower. The retained trees are intended to create perching posts and could be utilised for the under-transmission line glider pole installation (Photograph D.47 and Photograph D.49). The project ecologist is currently exploring options for the under-transmission glider poles at this location	Compliant	<p>None:</p> <p>Sufficient evidence sighted under transmission glider poles are planned to be installed in accordance with the Connectivity Strategy to assist Squirrel Glider movement. Due to limited time during the site inspection, only one connectivity corridor was able to be inspected.</p> <p>Previous audit recommendation</p> <p>None</p> <p>Recommendation</p> <p>Subsequent biodiversity audit to inspect further locations identified for connectivity corridors.</p>
BD28	The opportunity to stockpile and supply felled trees for Key Fish Habitat rehabilitation or improvement works would be discussed with DPI Fisheries.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Liaison with:<ul style="list-style-type: none">– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)• Site inspection at the following locations:<ul style="list-style-type: none">– None• Review of the following related documents:<ul style="list-style-type: none">– None• The interview confirms that:<ul style="list-style-type: none">– The project has liaised with DPE Fisheries and has provided logs to them– Consultation occurred during the audit period– Logs from construction activities were provided for their Trout Cod breeding program for the Murray River after the audit period	Compliant	<p>None:</p> <p>Sufficient evidence provided.</p> <p>Previous audit recommendation</p> <p>None</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
Biosecurity				
BD29	<p>The biosecurity controls outlined in the Biosecurity Management Plan (Appendix D) will be implemented during construction to minimise the risk of off-site transport or spread of disease, pests or weeds. Controls will include (but not limited to):</p> <ul style="list-style-type: none">inspections and cleaning of vehicles, machinery, and personnel equipment prior to movement on and off the construction work areas; andminimising movements across adjoining farmland including trip numbers and locations where possible. <p>Additional measures where localised areas of high biosecurity risks have been identified will be implemented. The effectiveness of these controls will be regularly monitored.</p>	<p>The following evidence was collected:</p> <ul style="list-style-type: none">Attendance at morning pre-start meeting on 3 June and 4 June 2025 (Line 2) where biosecurity measures and environmental flagging were discussedEnvironmental notice boards reviewed on Line 2 (Photograph D.11 and Photograph D.27), which contained information on:<ul style="list-style-type: none">Biosecurity measures including car/plant cleaning guideWash bay logsInterview (at various locations) with:<ul style="list-style-type: none">Ben Harper (Senior Environmental Advisor, Elecnor)Bobby Simpson (Environmental Advisor, Elecnor)Frank Team (Environmental Coordinator, Elecnor)Julie Vaillancourt (Environmental Advisor, Elecnor)Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor)Ozlem Anar (Environmental Coordinator, Elecnor)Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)Alozie Agomoh (Senior Environmental Business Partner, Transgrid)Kim Lemcke (Senior Biodiversity Business Partner, Transgrid)Luke Fania (Environment and Sustainability Manager, Transgrid)Site inspection:<ul style="list-style-type: none">Washdown station/rip raps and washdown at Camp 4 (Photograph D.13 and Photograph D.14)Confirmation from Elecnor Environmental team of car park audits in the afternoon then communication of cars that need washdown during the morning toolboxSouthern Bell Frog hygiene station and clean-down log with instructions and sign on sheet with multiple entries for the day of inspection where line works were occurring (Photograph D.25 and Photograph D.26)Natural Grasslands of the Murray Valley Plains TEC special biodiversity protection zone/Property Vegetation Plan (PVP) induction on entrance gate (Photograph D.44)Biosecurity forms at entrance to Morona property (Photograph D.15 and Photograph D.16)Review of the following related documents:<ul style="list-style-type: none">Biosecurity Management Plan (Appendix D of BMP) (viewed post inspection)Biosecurity toolbox talk (PowerPoint) (viewed during inspection)Biosecurity forms at various property gates (viewed during the inspection)The site inspection, site interviews and documents viewed/provided confirm that:<ul style="list-style-type: none">The Biosecurity Management Plan (Appendix D) is being implementedAdditional measures where localised areas of high biosecurity risks have been identified will be implemented (Southern Bell Frog unexpected find area)	Compliant	<p>None:</p> <p>Sufficient evidence sighted that the Biosecurity Management Plan (Appendix D) is being implemented during construction and that additional measures are being identified where required.</p> <p>Previous audit recommendation</p> <p>None</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD30	Where present in locations that would be accessed for construction activities, weeds would be managed in consultation with the relevant landholder. Consultation would also occur with the relevant authority (LLS Local Land Services, the relevant local council, or NSW DPI) in relation to notifiable weeds.	<p>The following evidence was collected:</p> <ul style="list-style-type: none"> Attendance at morning pre-start meeting on 3 June and 4 June 2025 (Line 2) where biosecurity measures and environmental flagging were discussed Environmental notice boards reviewed on Line 2 (Photograph D.11 and Photograph D.27), which contained information on: <ul style="list-style-type: none"> Biosecurity measures including car/plant cleaning guide Wash bay logs Interview (at various locations) with: <ul style="list-style-type: none"> Ben Harper (Senior Environmental Advisor, Elecnor) Bobby Simpson (Environmental Advisor, Elecnor) Frank Team (Environmental Coordinator, Elecnor) Julie Vaillancourt (Environmental Advisor, Elecnor) Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor) Ozlem Anar (Environmental Coordinator, Elecnor) Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor) Alozie Agomoh (Senior Environmental Business Partner, Transgrid) Kim Lemcke (Senior Biodiversity Business Partner, Transgrid) Luke Fania (Environment and Sustainability Manager, Transgrid) Site inspection: <ul style="list-style-type: none"> Washdown station/rip raps and washdown at Camp 4 (Photograph D.13 and Photograph D.14) Confirmation from Elecnor Environmental team of car park audits in the afternoon then communication of cars that need washdown during the morning toolbox Natural Grasslands of the Murray Valley Plains TEC special biodiversity protection zone/Property Vegetation Plan (PVP) induction on entrance gate (Photograph D.44) Morona property (Line 2) (Photograph D.15 Photograph D.16) Review of the following related documents: <ul style="list-style-type: none"> Biosecurity Management Plan (Appendix D of BMP) (viewed post inspection) Biosecurity toolbox talk (PowerPoint) (viewed during inspection) Biosecurity forms at various property gates (viewed during the inspection) Biosecurity complaints from landholders during the audit period (viewed post inspection) The site inspection, site interviews and documents viewed/provided confirm that: <ul style="list-style-type: none"> Weeds are being managed in consultation with landholders No new infestations of notifiable weeds were detected by Elecnor/TransGrid during the audit period 	Compliant	<p>None:</p> <p>Sufficient evidence sighted that no new infestations of notifiable weeds were detected by Elecnor/TransGrid during the audit period</p> <p>Previous audit recommendation</p> <p>None.</p>
BD31	In the event of new infestations of notifiable weeds as a result of construction activities, the relevant control authority will be notified as per <i>Biosecurity Act 2015</i> and Biosecurity Regulation 2017.	<p>The following evidence was collected:</p> <ul style="list-style-type: none"> Interview (at various locations) with: <ul style="list-style-type: none"> Ben Harper (Senior Environmental Advisor, Elecnor) Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor) Kim Lemcke (Senior Biodiversity Business Partner, Transgrid) Luke Fania (Environment and Sustainability Manager, Transgrid) Review of the following related documents: <ul style="list-style-type: none"> Biosecurity Management Plan (Appendix D of BMP) (viewed post inspection) Biosecurity toolbox talk (PowerPoint) (viewed during inspection) Biosecurity forms at various property gates (viewed during the inspection) The site inspection, site interviews and documents viewed/provided confirm that: <ul style="list-style-type: none"> No new infestations of notifiable weeds were detected by Elecnor/TransGrid during the audit period 	Compliant	<p>None:</p> <p>Sufficient evidence sighted that no new infestations of notifiable weeds were detected by Elecnor/TransGrid during the audit period</p> <p>Previous audit recommendation</p> <p>None.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
Soil and water quality				
BD32	Soil and water quality management measures will be implemented in accordance with the Soil and Water Management Plan (45860-HSE-PL-D-0112) to minimise erosion during clearing.	Not triggered	Not triggered	None: This item falls within the scope of the lead auditor.
BD33	<p>An Erosion and Sediment Control Strategy (ESCS) (45860-HSE-PR-D-0016) has been provided in Appendix A of the Soil and Water Management Plan. It has been prepared in line with the principles and requirements in:</p> <ul style="list-style-type: none">• <i>Managing Urban Stormwater – Soils and Construction</i>, Volume 1 (Landcom 2004), commonly referred to as the ‘Blue Book’;• <i>Managing Urban Stormwater – Soils and Construction</i>, Volumes 2A and 2C (NSW Department of Environment, Climate Change and Water 2008);• <i>Best Practice Erosion and Sediment Control</i> (IESCA – 2008);• Transgrid’s <i>Environmental Guidance Notes</i>; and• <i>Guidelines for Controlled Activities on Waterfront Land</i> (NRAR 2018). <p>The ESCS will be implemented to guide the development of the Progressive Erosion and Sediment Control Plan (PESCPs) for the project.</p>	Not triggered	Not triggered	None: This item falls within the scope of the lead auditor.
BD34	Transmission line towers will be located and constructed to minimise impact to vegetated riparian corridors, wherever practicable.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Keeley Hartzler (Environmental Advisor - Biodiversity, Elecnor)• Site inspection:<ul style="list-style-type: none">– Line 5, Tower 245-246, Colombo Creek crossing riparian zone (Photograph D.40 and Photograph D.41)• Review of the following related documents:<ul style="list-style-type: none">– Clearing and land disturbance permit (CDP) for Colombo Creek (viewed post inspection)– Pre-clear report for Colombo Creek crossing (viewed post inspection)– Nest box report for Colombo Creek crossing (viewed post inspection)• It was confirmed that:<ul style="list-style-type: none">– Clearing of the Colombo Creek riparian zone occurred during the last audit period and was previously deemed as compliant, refer to Umwelt (2025)– Epicormic shoots were noted on the River Red Gum trunk bases that were left in situ in the B4 and B10 clearing zones. Trunk bases that are retained in situ will require ongoing vegetation management to limit their height in accordance with the height limits for transmission corridors– No other riparian zones were clearing during the audit period	Compliant	None: Not applicable to the current audit (Colombo Creek crossing was cleared previously). Epicormic shoots on River Red Gum in B4 and B10 clearing zones demonstrate that trunk bases were left in situ. Previous audit recommendation None

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD35	<p>The project will ensure that:</p> <ul style="list-style-type: none"> all activities on waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012), 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 and Conservation and Management (NSW Fisheries, 2013), unless DPE Water agrees otherwise; and the geomorphic condition of the major rivers and distributary channels crossed by the project is not impacted. 	<p>The following evidence was collected:</p> <ul style="list-style-type: none"> Interview with: <ul style="list-style-type: none"> Ben Harper (Senior Environmental Advisor, Elecnor) Keeley Hartzer (Environmental Advisor - Biodiversity, Elecnor) Site inspection: <ul style="list-style-type: none"> Line 5, Tower 245-246, Colombo Creek crossing riparian zone (Photograph D.40 and Photograph D.41) Review of the following related documents: <ul style="list-style-type: none"> Clearing and land disturbance permit (CDP) for Colombo Creek (viewed post inspection) Pre-clear report for Colombo Creek crossing (viewed post inspection) Nest box report for Colombo Creek crossing (viewed post inspection) It was confirmed that: <ul style="list-style-type: none"> Clearing of the Colombo Creek riparian zone occurred during the last audit period and was previously deemed as compliant, refer to Umwelt (2025) No other riparian zones were clearing during the audit period. 	Compliant	<p>None:</p> <p>Not applicable to the current audit (Colombo Creek crossing was cleared previously).</p> <p>Previous audit recommendation</p> <p>None</p>
Bushfire management				
BD36	Construction activities will be managed in accordance with the Emergency Plan (45860 HSE-PL-D- 0129). The Emergency Plan includes measures to minimise the potential for bushfire risk and will be prepared in consultation with Rural Fire Service. It will be made publicly available upon approval.	Not triggered	Not triggered	<p>None:</p> <p>This item falls within the scope of the lead auditor.</p>
BD37	<p>A minimum 50–metre–wide managed APZ would be provided to the hazard perimeter of the fixed construction equipment and camp site buildings unless an alternative fire protection approach that achieves the same level of bushfire risk management is identified by a suitably qualified specialist.</p> <p>Any APZ would be regularly maintained to provide a maximum grass height of up to or less than 100 millimetres at substations, compounds and accommodation camps during the prescribed Bushfire Danger Period and when the grassland fuel reaches 70 per cent cured.</p> <p>Vegetation inside the main construction compounds and accommodation camp sites would be regularly maintained to a maximum height of 75 millimetres.</p>	Not triggered	Not triggered	<p>None:</p> <p>This item falls within the scope of the lead auditor.</p>
BD38	<p>Controls to minimise potential ignition of vegetation would be implemented and a water supply (suitable extinguisher) and trained operator on hand during all outdoor hot works/grinding activities, and during vegetation slashing within and adjacent to the construction compounds and accommodation camps.</p> <p>No outdoor hot works would be undertaken during periods of Total Fire Ban and Catastrophic Fire Weather Days unless there is a suitable fire suppression unit present on site and only with prior agreement with local fire services.</p>	Not triggered	Not triggered	<p>None:</p> <p>This item falls within the scope of the lead auditor.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
Monitoring				
BD39	Monitoring will occur in accordance with Section 6.3 of this plan.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">• Interview with:<ul style="list-style-type: none">– Ben Harper (Senior Environmental Advisor, Elecnor)– Bobby Simpson (Environmental Advisor, Elecnor)– Frank Team (Environmental Coordinator, Elecnor)– Julie Vaillancourt (Environmental Advisor, Elecnor)– Keeley Hartzer (Environmental Advisor - Biodiversity, Elecnor)– Ozlem Anar (Environmental Coordinator, Elecnor)– Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)– Alozie Agomoh (Senior Environmental Business Partner, Transgrid)– Kim Lemcke (Senior Biodiversity Business Partner, Transgrid)– Luke Fania (Environment and Sustainability Manager, Transgrid)– Adam Elliot (Fauna Spotter Catcher, NGH)– Latasha Painter (Ecologist, NGH)• Site inspection at the following locations:<ul style="list-style-type: none">– Line 2, Tower 180, PCT 15, where centreline (Disturbance Area A), B4 and B10 clearing was observed (which occurred during the audit period) (Photograph D.17, Photograph D.18, and Photograph D.19)– Line 2, Tower 661, Thyme Rice-flower records (Photograph D.1, Photograph D.2, and Photograph D.3)– Line 2, Tower 557, an example of Disturbance Area A – centreline full clearance within mallee, where B4 and B10 zones did not require clearance (Photograph D.4)– Line 2, Tower 544-543, <i>Acacia melvillei</i> Shrubland TEC (Photograph D.7)– Line 2, Tower 385-386, Optical Ground Wire (OPGW) sites– Sturt Highway crossing site– Line 5, Tower 245-246, Colombo Creek crossing riparian zone (Photograph D.40 and Photograph D.41)– Line 5, Tower 241-242, Natural Grasslands of the Murray Valley Plains TEC special biodiversity protection zone (Photograph D.44)– Line 5, Tower 198-199, location of BCS inspection (Photograph D.45, Photograph D.46, Photograph D.47, Photograph D.48, Photograph D.49, Photograph D.50)• Review of the following related documents:<ul style="list-style-type: none">– GIS project design layers (Photograph D.12) (viewed during inspection)– GIS layers used for clearing calculations (Photograph D.31) (viewed during inspection)– Pre-clearing reports from the audit period (viewed post inspection)– Post-clear report from the audit period (viewed during inspection) (Photograph D.34)– CDPs from the audit period (viewed during and post inspection)– Nest box reports from the audit period (viewed post inspection)– Clearing registers from the audit period (viewed during and post inspection)– Verification Report - Project EnergyConnect (NSW – Eastern Section) (45860-HSE-REP-D-0050) (Elecnor, 2025a) (viewed during and post inspection)– Update on Partial Impacts under the NSW Biodiversity Assessment Method for Project EnergyConnect East (WSP, 2025) (viewed during and post inspection)• It was confirmed that:<ul style="list-style-type: none">– Monitoring is occurring in accordance with Section 6.3 of the BMP	Compliant	<p>None:</p> <p>Sufficient evidence sighted that monitoring is in accordance with Section 6.3 of the BMP.</p> <p>Previous audit recommendation:</p> <p>Improvement recommendation - Biodiversity 7: Update BMP to include annual reporting requirement for the required annual nest box monitoring.</p> <p>The status of this improvement recommendation is addressed within Table 3.3 of this report.</p>

Biodiversity Management Plan				
BMP number	Requirements	Evidence collected	Compliance status	Recommendations
BD40	Clearing of native vegetation will be monitored to confirm actual impacts to biodiversity values to inform any final biodiversity offset requirements and allow for comparison of actual clearing with the predicted clearing extents outlined in Table 12-11 of the Final BDAR.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">Interview with:<ul style="list-style-type: none">Ben Harper (Senior Environmental Advisor, Elecnor)Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)Luke Fania (Environment and Sustainability Manager, Transgrid)Site inspection at the following locations:<ul style="list-style-type: none">Various locationsReview of the following related documents:<ul style="list-style-type: none">GIS project design layers (Photograph D.12) (viewed during inspection)GIS layers used for clearing calculations (Photograph D.31) (viewed during inspection)Clearing registers from the audit period (viewed during and post inspection)Verification Report - Project EnergyConnect (NSW – Eastern Section) (45860-HSE-REP-D-0050) (Elecnor, 2025a) (viewed during and post inspection)Biodiversity Report – Voluntary Update - Project EnergyConnect (NSW – Eastern Section) (45860-HSE-REP-D-0049) (Elecnor, 2025b) (viewed post inspection)Update on Partial Impacts under the NSW Biodiversity Assessment Method for Project EnergyConnect East (WSP, 2025) (viewed during and post inspection)It was confirmed that:<ul style="list-style-type: none">Clearing of native vegetation is being monitored to confirm actual impacts to biodiversity values to inform final biodiversity offset requirements and allow for comparison of actual clearing with the predicted clearing extents outlined in Table 12-11 of the Final BDARA verification report has been produced to assess areas of partial clearing	Compliant	<p>None:</p> <p>Sufficient evidence sighted that native vegetation clearing is being monitoring to confirm actual impacts to biodiversity values to inform final biodiversity offset requirements. Clearing is still underway.</p> <p>Previous audit recommendation</p> <p>Improvement recommendation – Biodiversity 8 - The clearing register should be updated to separately report on the partial clearing and total clearing areas, with comparison to the partial and total clearing extents provided in the BDAR for PCTs and threatened species. Determination of areas of partial and total clearing should be informed by a verification report and land survey and/or GIS mapping informed by post-clearing orthorectified aerial imagery.</p> <p>The status of this improvement recommendation is addressed within Table 3.3 of this report.</p> <p>Improvement recommendation 1</p> <p>Calculations were not undertaken by the biodiversity auditor due to the size of the dataset and limited time for the audit. Transgrid confirmed that a third-party check (WSP consultants) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery. A report by the third-party reviewer should be provided to the auditor during the next audit period, to satisfy that auditor that clearing has not exceeded the limits specified in the BMP.</p>
BD41	Areas subject to partial clearance will be monitored within three months from commencement of construction. A verification report will be produced to confirm whether any changes are required to the Appendix A – Pre-clearing and Clearing Procedure.	<p>The following evidence was collected:</p> <ul style="list-style-type: none">Interview with:<ul style="list-style-type: none">Ben Harper (Senior Environmental Advisor, Elecnor)Rebecca Walker-Edwards (Environmental/Approvals Manager, Elecnor)Luke Fania (Environment and Sustainability Manager, Transgrid)Site inspection at the following locations:<ul style="list-style-type: none">Various locationsReview of the following related documents:<ul style="list-style-type: none">GIS project design layers (Photograph D.12) (viewed during inspection)GIS layers used for clearing calculations (Photograph D.31) (viewed during inspection)Clearing registers from the audit period (viewed during and post inspection)Verification Report - Project EnergyConnect (NSW – Eastern Section) (45860-HSE-REP-D-0050) (Elecnor, 2025a) (viewed during and post inspection)Biodiversity Report – Voluntary Update - Project EnergyConnect (NSW – Eastern Section) (45860-HSE-REP-D-0049) (Elecnor, 2025b) (viewed post inspection)Update on Partial Impacts under the NSW Biodiversity Assessment Method for Project EnergyConnect East (WSP, 2025) (viewed during and post inspection)It was confirmed that:<ul style="list-style-type: none">Clearing of native vegetation is being monitored to confirm actual impacts to biodiversity valuesA verification report has been produced to assess areas of partial clearing	Compliant	<p>None:</p> <p>Sufficient evidence sighted that areas subject to partial clearance are being monitored. A verification report has been produced confirming no changes are required to Appendix A – Pre-clearing and Clearing Procedure of the BMP.</p> <p>Previous audit recommendation</p> <p>Improvement recommendation – Biodiversity 4 (refer to C23(b) above).</p> <p>The status of this improvement recommendation is addressed within Table 3.3 of this report.</p>

Appendix D

Site inspection photos



Photograph D.1 Thyme Rice-flower special biodiversity protection zone to delineate areas of avoidance during clearing (L2, Tower 661)



Photograph D.2 Trimming of mallee to meet Disturbance Area A transmission line clearance requirement in proximity to Thyme Rice-flower records (L2, Tower 661)



Photograph D.3 Unexpected find of Thyme Rice-flower during stringing activities in area previously cleared for fibre optics (L2, Tower 661)



Photograph D.4 Centre line (Disturbance Area A) full clearance within mallee habitat (Line 2, Tower 557) (not cleared during the audit period)



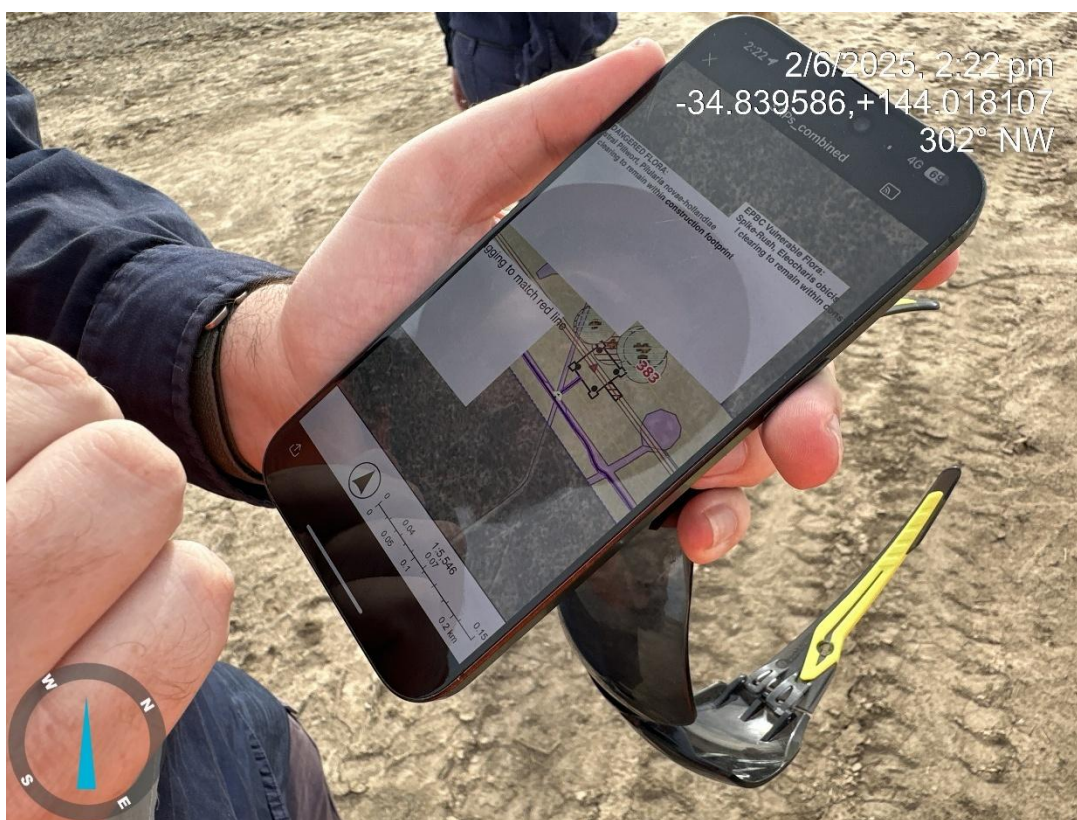
Photograph D.5 **Construction pad for stringing activities over the Sturt Highway**



Photograph D.6 **The edge of clearing area for Sturt Highway crossing construction pad with Plant Community Type (PCT) 163 - chenopod shrubland shown adjacent to the pad**



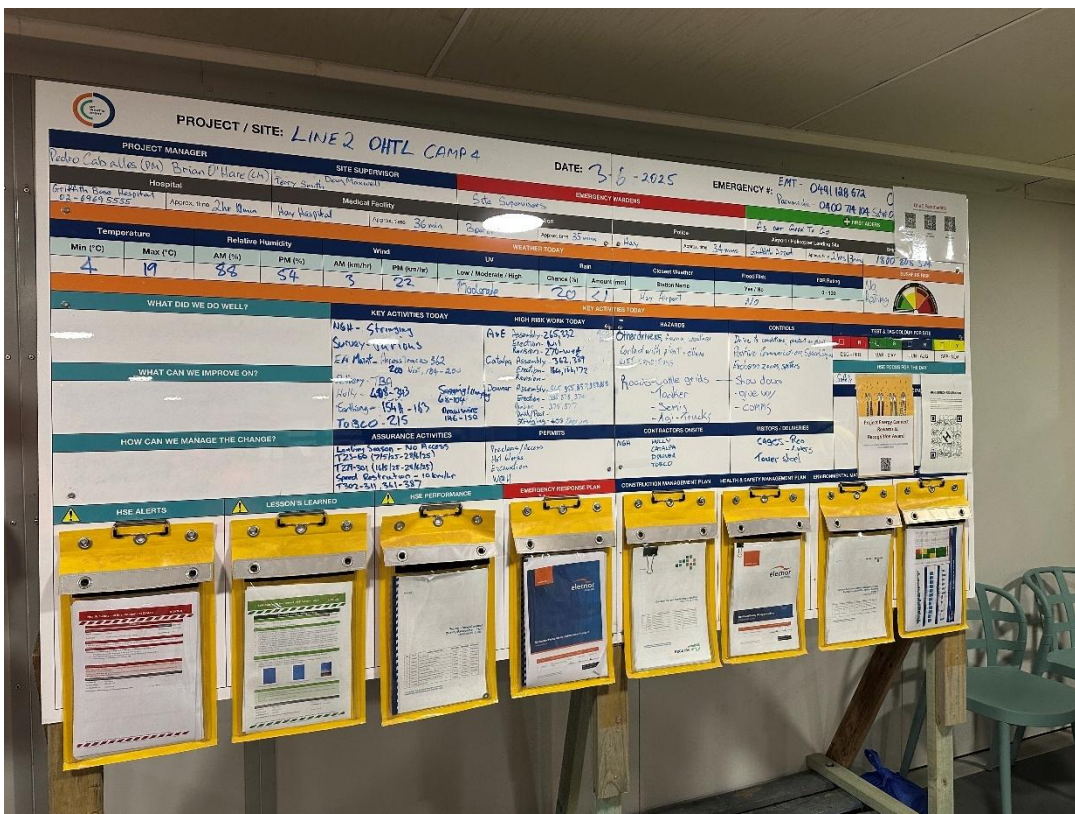
Photograph D.7 *Acacia melvillei* Shrubland Threatened Ecological Community (TEC), in proximity to stringing activities which occurred during the audit period (Line 2, Tower 544-543)



Photograph D.8 GIS clearing layers viewed on mobile device at location of recorded *Eleocharis obicis* (Spike-rush) (Line 2, Tower 383)



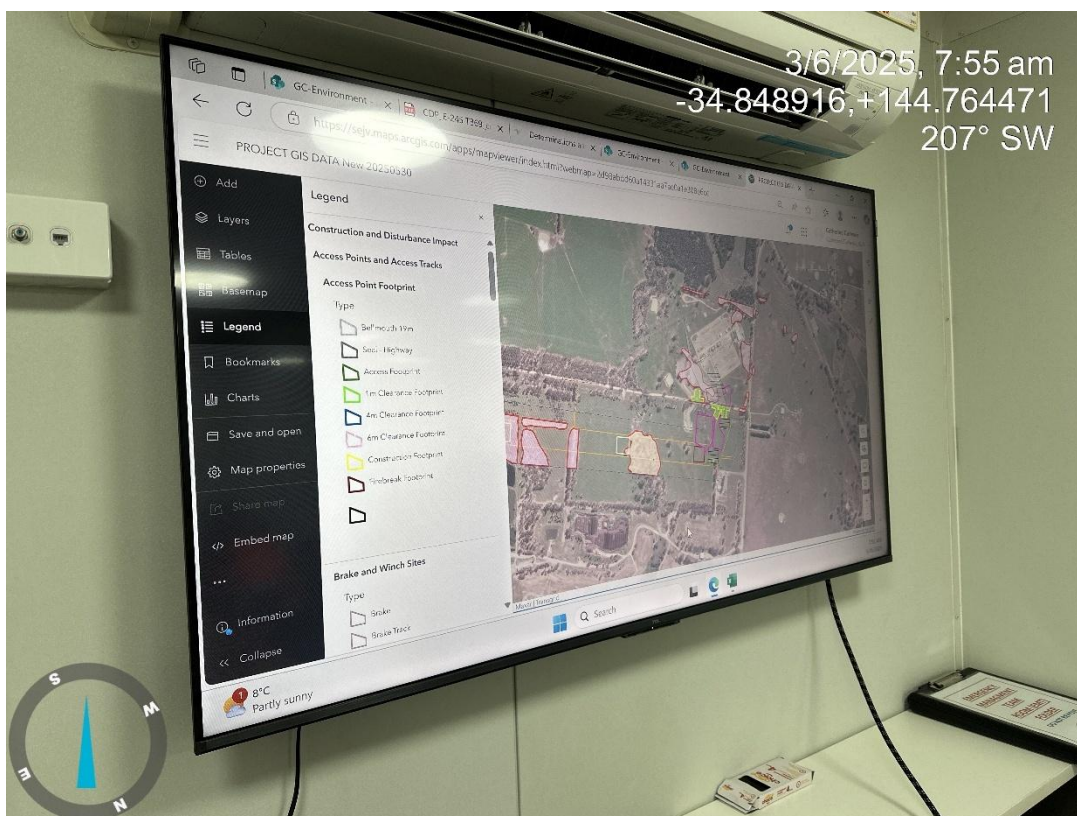
Photograph D.9 **Flagging tape observed around *Eleocharis obicis* that occur in proximity to tower 383, noted as second level of defence as bunds and pegs around the tower site are the first level (Line 2, Tower 383)**



Photograph D.10 **Project notice board at toolbox talk for Line 2, observed 3 June 2025**



Photograph D.11 Environmental notice board at Line 2, Camp 4, observed 3 June 2025



Photograph D.12 Construction and biodiversity GIS layers, observed during site inspection





Photograph D.15 Biosecurity check at property boundary gate (Morona property Line 2)

3/6/2025, 9:57 am
-34.836052,+145.008837
163° S

PLEASE ENSURE PROPERTY DETAILS ARE INCLUDED.

secureenergy

Property Boundary Vehicle, Plant and Equipment Clean-down and Entry Log

Part A - Information

Property Crossing (Insert Holding Numbers)

Transmission Line Location (e.g. L1)

Tower Span (e.g. 39 - 40)

AP2069

Part B - Clean-down and Entry Log

Date	Time In	Time Out	Gate Locked? (End of Day requirement)	Clean-down Complete	Name and Company	Vehicle Registration / ID No.	Signature
1/6/25	16:30	16:30	Y	Yes	Robb / EA	DD4222	[Signature]
1/6/25	3:25	4:05	Y	Yes	Robb / EA	5979 CGU	[Signature]
2/6/25	7:20	7:20	Y	Yes	M... / EA	CV01	[Signature]
2/6/25	7:30	4:15	Y	Yes	KEYS / EA	FL427	[Signature]
2/6/25	7:41	4:15	Y	Yes	EMIR / EA	5YT006	[Signature]
2/6/25	8:00	8:00	Y	Yes	Kambo / EA	5XUJ28	[Signature]
2/6/25	12:15	13:00	Y	Yes	EMIR / EA	1805M7	[Signature]
2/6/25	07:27	09:30	Y	Yes	EMIR / EA	5XUJ28	[Signature]
2/6/25	07:27	08:59	Y	Yes	EMIR / EA	FL427	[Signature]
2/6/25	7:35	7:35	Y	Yes	EMIR / EA	FTT36	[Signature]
2/6/25	7:35	7:35	Y	Yes	Kambo / EA	5XUJ28	[Signature]

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Photograph D.16 Property boundary vehicle clean-down log (Morona property Line 2)



Photograph D.17 Partial clearing, showing centreline (Clearance Area A) delineated by flagging. B4 and B10 clearing zones with retained vegetation are beyond the flagging (Line 2, Tower 180)



Photograph D.18 Partial clearing, showing B4 and B10 clearing zones (with retained vegetation) beyond the centreline flagging (Line 2, Tower 180)



Photograph D.19 Nest box installation adjacent to partial clearing area (Line 2, Tower 180)



Photograph D.20 Retained 600-year-old birth tree, with hollows, partial clearing area (Line 2, Tower 178)



Photograph D.21 Retained 600 year old birth tree in partial clearing area, showing trimming to comply to transmission line clearance heights (Line 2, Tower 178)



Photograph D.22 Special biodiversity protection zone for Austral Pillwort, tower constructed during audit period, viewing from edge of tower construction pad (Line 2, Tower 162)



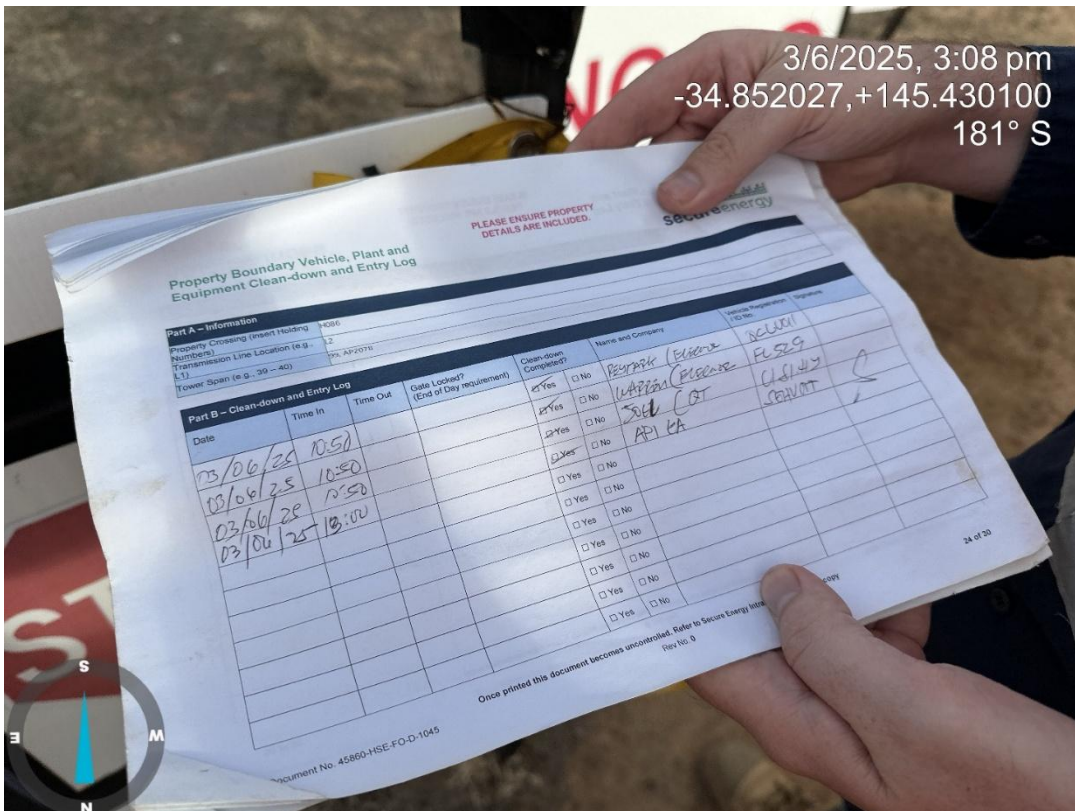
Photograph D.23 Plains Wanderer habitat (Line 2, Tower 154)



Photograph D.24 Plains Wanderer habitat (Line 2, Tower 154)



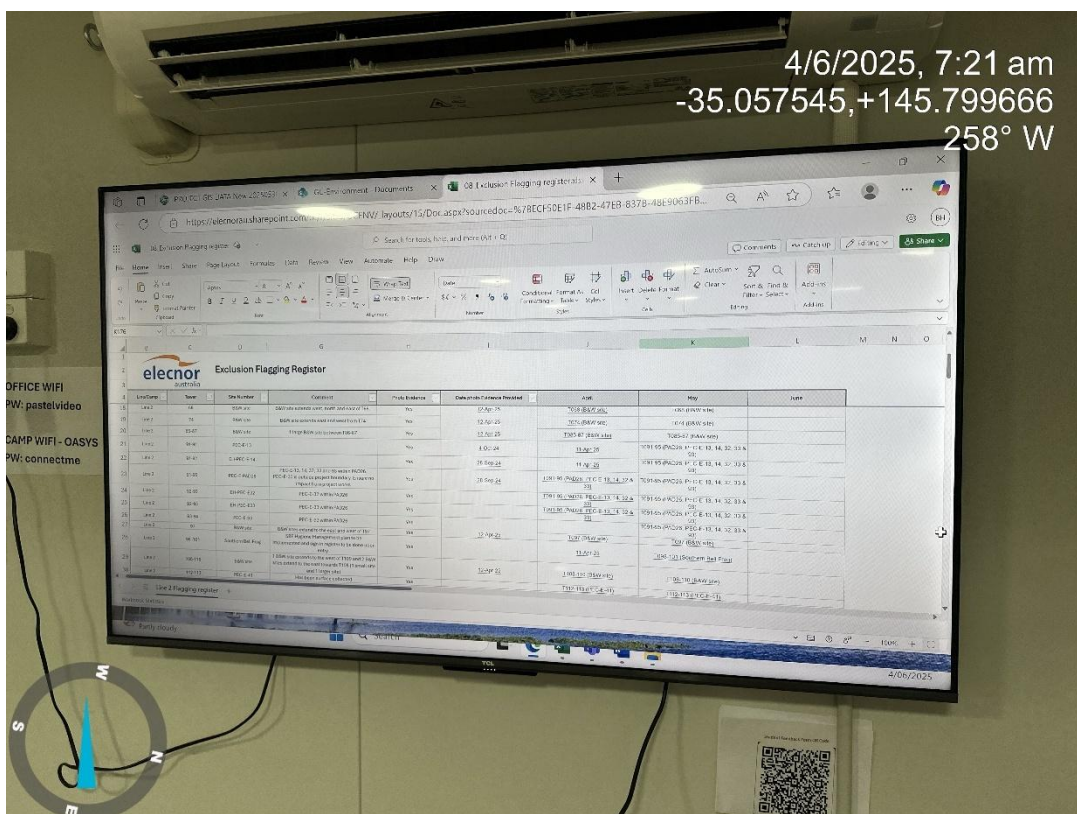
Photograph D.25 Southern Bell Frog hygiene station



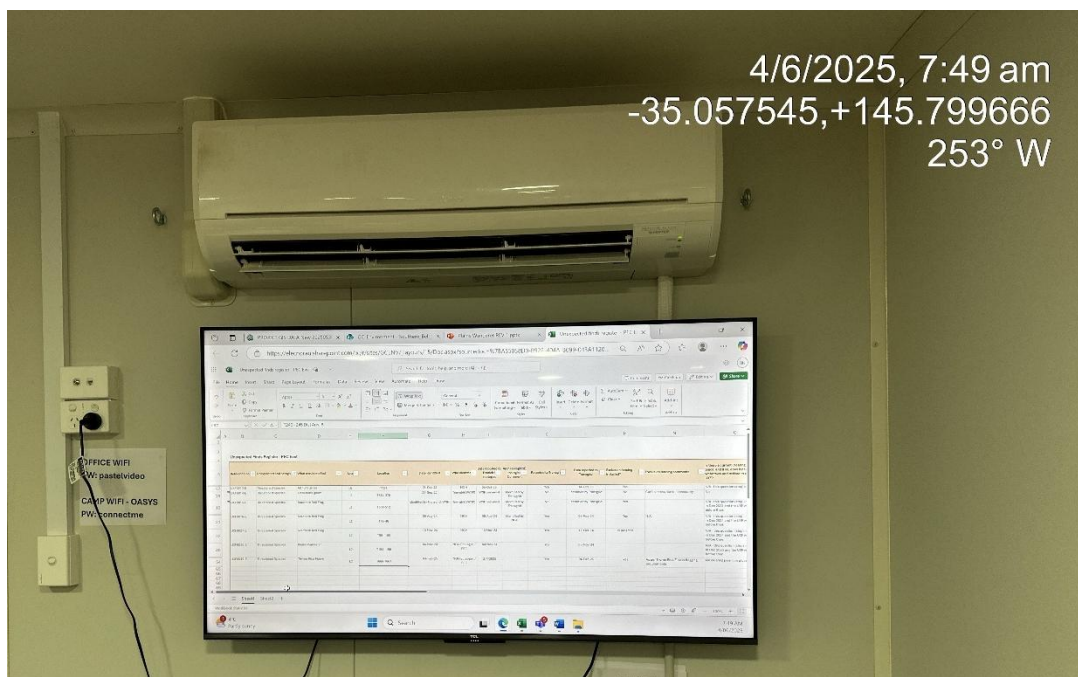
Photograph D.26 Southern Bell Frog hygiene station clean-down log



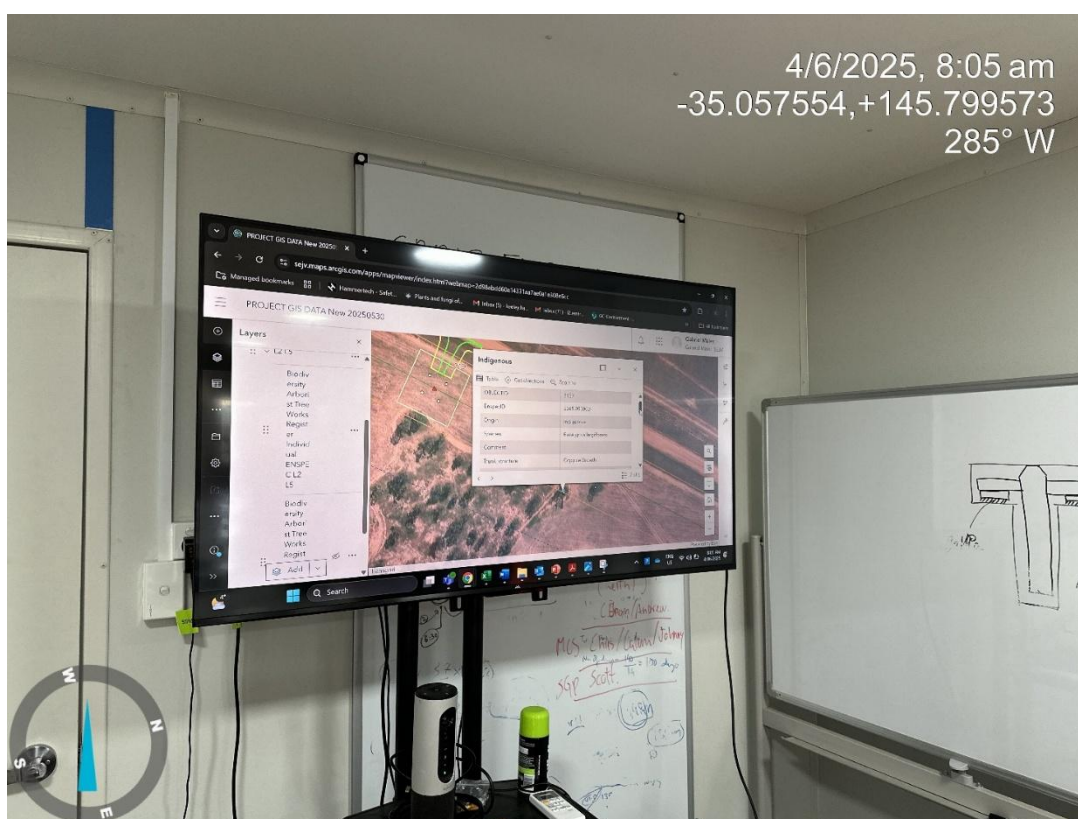
Photograph D.27 Environmental notice board at Line 2, Camp 3, observed 4 June 2025



Photograph D.28 Exclusion flagging register viewed during site inspection



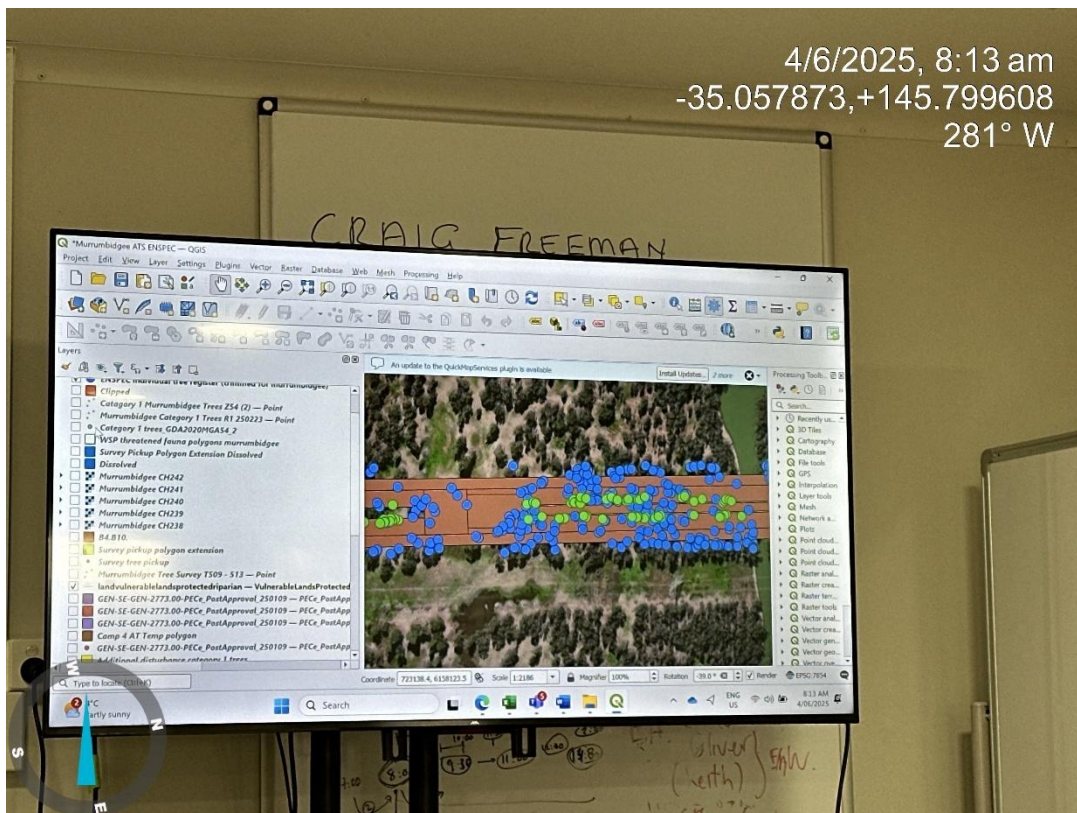
Photograph D.29 Unexpected finds register viewed during site inspection



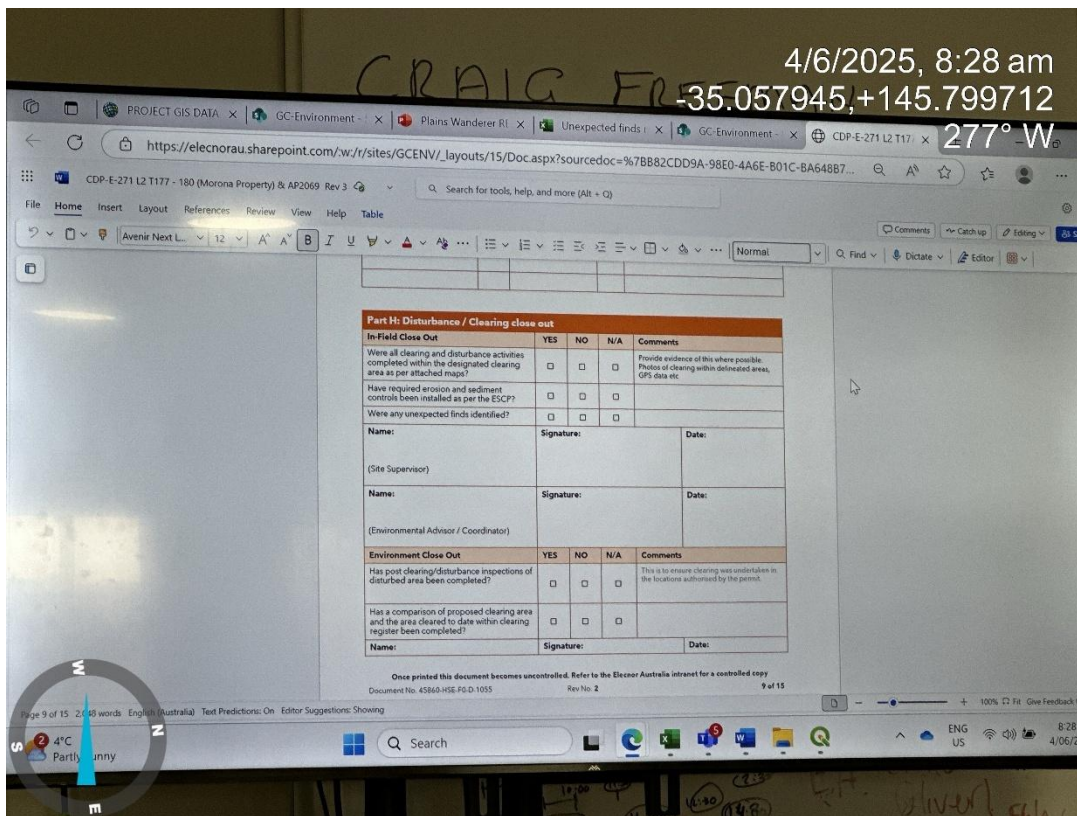
Photograph D.30 GIS showing detail on trees marked by an arborist in the transmission corridor



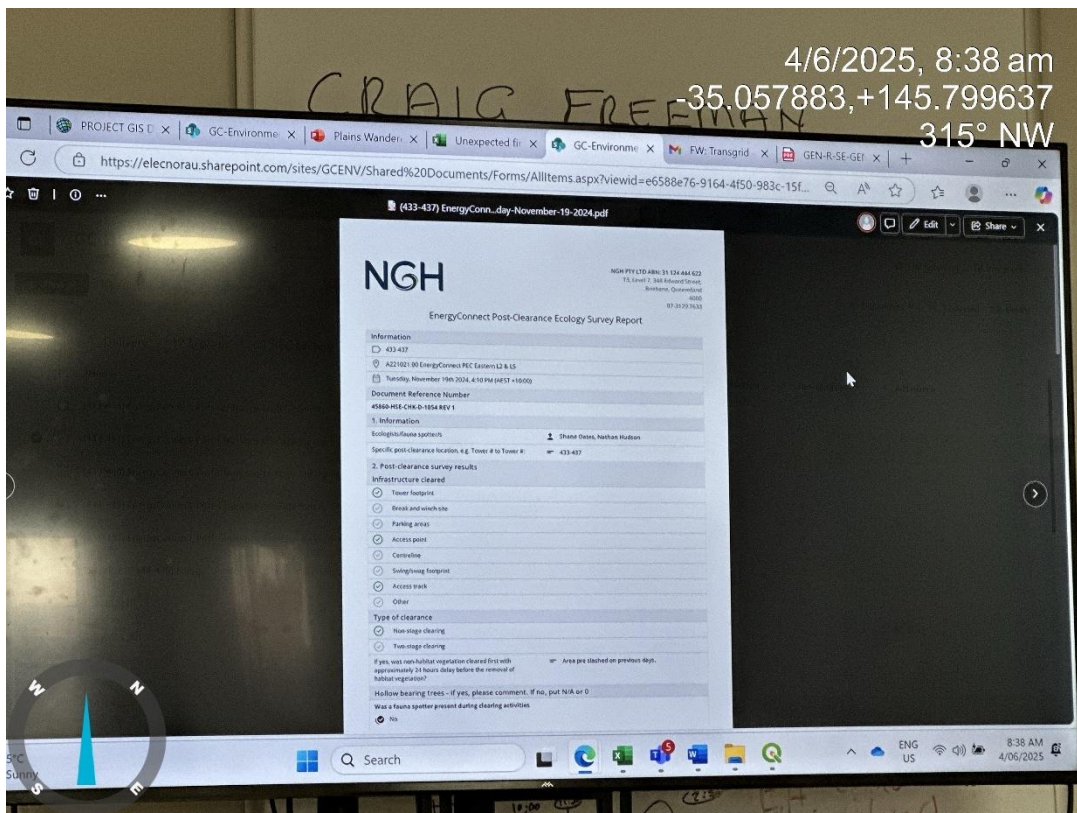
Photograph D.31 GIS showing detail on disturbance impact calculations



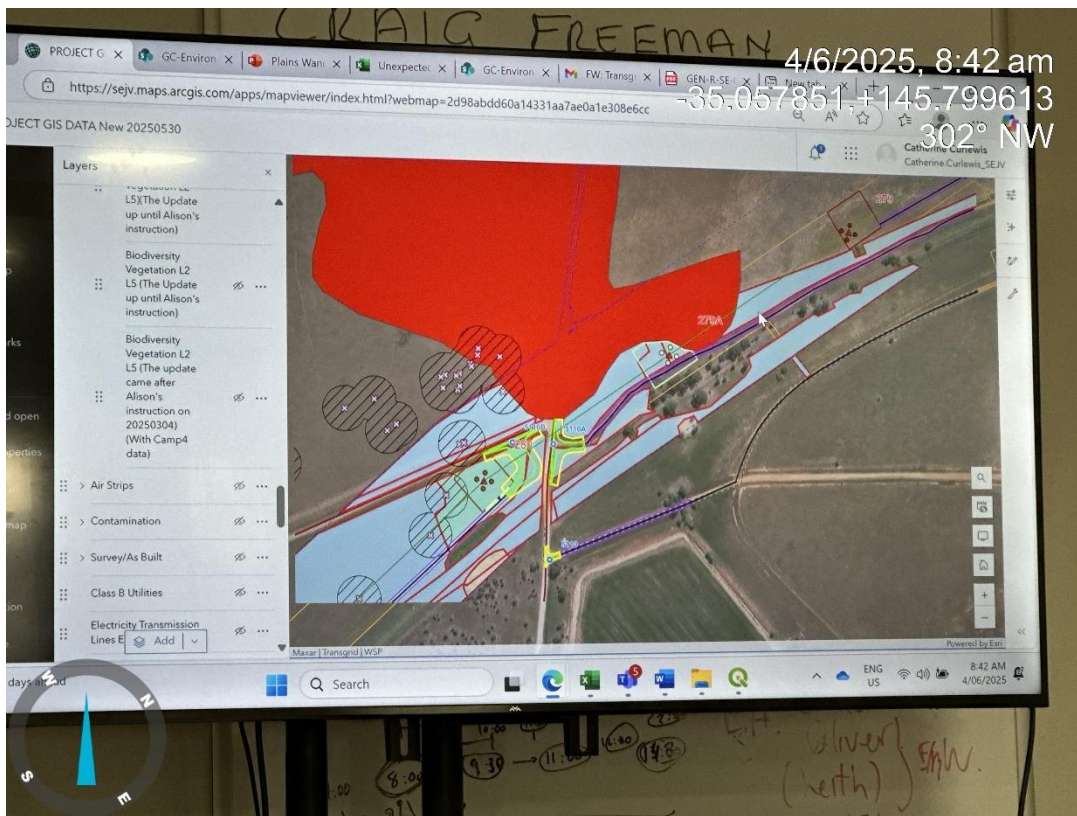
Photograph D.32 GIS showing detail on trees marked by an arborist in the transmission corridor



Photograph D.33 Clearing and land disturbance permit (CDP) viewed during site inspection



Photograph D.34 Post-clearance ecology survey report viewed during site inspection



Photograph D.35 Construction, Plains Wanderer habitat, and threatened species GIS layers viewed during site inspection



Photograph D.36 Structure pad designed to avoid Plains Wanderer habitat (Line 5, Tower 279a)



Photograph D.37 Structure pad designed to avoid Plains Wanderer habitat (Line 5, Tower 279a)



Photograph D.38 Nest boxes of various sizes being prepared for installation near Colombo Creek



Photograph D.39 **NGH Ecologists preparing to install a nest box near Colombo Creek**



Photograph D.40 **Colombo Creek riparian crossing**



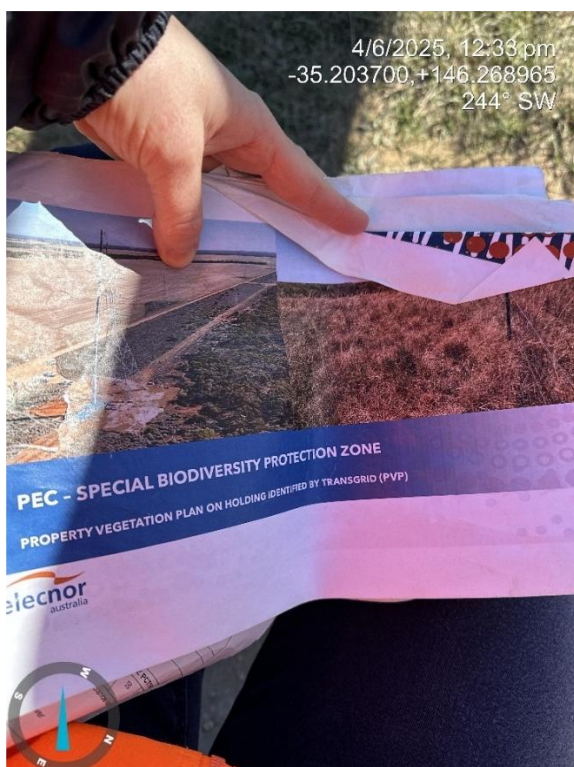
Photograph D.41 Colombo Creek riparian crossing showing epicormic growth on cut eucalyptus trees



Photograph D.42 Natural Grasslands of the Murray Valley Plains TEC special biodiversity protection zone (Line 5, Towers 241-242)



Photograph D.43 Natural Grasslands of the Murray Valley Plains TEC special biodiversity protection zone (Line 5, Towers 241-242)



Photograph D.44 Natural Grasslands of the Murray Valley Plains TEC special biodiversity protection zone, induction on entrance gate with biosecurity checks (Line 5, Towers 241-242)



Photograph D.45 Natural regeneration in B4 and B10 clearance areas (Line 5, Tower 198-199)



Photograph D.46 Natural regeneration in B4 and B10 clearance areas (Line 5, Tower 198-199)



Photograph D.47 Natural regeneration in B4 and B10 clearance areas (Line 5, Tower 198-199)



Photograph D.48 Tree trimming and nest box installation in B10 clearance area (Line 5, Tower 198-199)



Photograph D.49 Retained trees near the edge of the tower construction pad where taller trees are able to be retained due to line height (Line 5, Tower 198-199)



Photograph D.50 Native forb regeneration in Disturbance Area A (centreline) in previously cleared area (Line 5, Tower 198-199)

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