



Independent Environmental Audit

SSI 36656827 – Hume Link East

Trigalana Environment Pty Ltd
13 May 2026

Independent Environmental Audit

SSI 36656827 – Hume Link East

Prepared By:

Richard Peterson

Trigalana Environment Pty Ltd

ABN: 67 638 805 848

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Table of Contents

| | |
|--|------------|
| Executive Summary | 3 |
| 1 Project Overview | 6 |
| 1.1 Project Background | 6 |
| 1.2 HumeLink East Scope | 6 |
| 1.3 Project Approval | 7 |
| 1.4 Supplementary Approvals | 7 |
| 1.5 Audit Team | 10 |
| 1.6 Audit Objectives | 11 |
| 1.7 Audit Scope and Period | 11 |
| 1.8 Definitions..... | 12 |
| 2 Independent Audit Methodology | 14 |
| 2.1 Scope Development..... | 14 |
| 2.2 Stakeholder Consultation – Key Issues | 14 |
| 2.3 Summary of Audit Processes | 14 |
| 2.4 Opening Meeting | 14 |
| 2.5 Site Inspection | 15 |
| 2.6 Audit Interview | 17 |
| 2.7 Document Review | 18 |
| 2.8 Compliance Descriptors | 18 |
| 2.9 Closing Meeting..... | 19 |
| 3 Audit Findings | 20 |
| 3.1 Compliance Performance..... | 20 |
| 3.2 Summary of Agency Notices, Orders, Penalty Notices and Prosecutions..... | 29 |
| 3.3 Incidents | 29 |
| 3.4 Complaint management | 29 |
| 3.5 Status of recommendations from previous Audits | 29 |
| 3.6 Adequacy of Environmental Management Plans and Strategies..... | 30 |
| 3.7 Key Strengths..... | 30 |
| 3.8 Stakeholder Consultation Outcomes..... | 31 |
| 4 Assessment of actual versus predicted impacts | 41 |
| 4.1 Predictions made by the EIS..... | 41 |
| 4.2 Project boundary | 41 |
| 4.3 Biodiversity Clearing limits | 42 |
| Appendix A DPHI Auditor Approval | 43 |
| Appendix B Auditor Declaration | 47 |
| Appendix C Audit Table | 49 |
| Appendix D Stakeholder Consultation Records | 125 |
| Appendix E Photographs | 159 |
| Appendix F Specialist Report - Biodiversity | 195 |

Executive Summary

Trigalana Environmental Pty Ltd has been engaged to undertake an independent Audit of the HumeLink East Project (HLE). The HLE Project involves the expansion of the existing Bannaby 500 kV substation, along with the design and construction of a new 500 kV double circuit transmission line. This new transmission line will connect the Bannaby 500 kV substation at the Wondalga interface point with HumeLink West. Development Consent (SSI 36656827) covers both the construction and operational phases of the Project. The Project Proponent is NSW Electricity Networks Operations Pty Ltd) (from here referred to as Transgrid). The construction contractor is the Acciona Genus Joint Venture (AGJV).

The Audit is required by the Conditions of Approval (CoA) and has been undertaken in accordance with the Department of Planning, Housing and Infrastructure (DPHI) Independent Audit Post Approval Requirements (May 2020) (IAPAR's).

The Audit covers construction activities for the period from the date of commencement of the Project on 22 November 2024 to the date of the Audit site inspection on 3 February 2026. The Audit consisted of a site inspection, interview with key project personnel and a review of relevant management plans, project documents and management records.

A general site inspection was undertaken on 3 and 4 February 2026 by the Lead Auditor and a separate inspection undertaken by the Biodiversity Specialist on 11 February 2026. Members of AGJV and Transgrid teams were present for both inspections.

Key findings of the Audit are:

- The Project is in the early stages with initial site activities undertaken during the Audit period including the establishment and operation of accommodation camps, upgrading the existing substation at Bannaby, construction of internal access roads, localised clearing for tower PAD establishment, construction of footings and erection of towers, with six completed at the time of the Audit. At the time of the Audit site inspection, main line clearing had not commenced
- The construction contractor for the main works (AGJV) has mobilised with experienced and appropriately sized teams of environmental managers supported by technical specialists to oversee the implementation of the construction phase environmental management plans
- No reportable environmental incidents occurred during the Audit period
- A total of 46 complaints have been received during that period. An established process for recording and responding to complaints has been implemented which appears to be effective
- Four non compliances have been identified during the Audit period resulting in breaches of 5 conditions of consent. The non compliances related to:
 - Project boundary exceedances
 - Late reporting of a non-compliance
 - Commencement of an early work activity prior to obtaining the necessary ER authorisation
- Fourteen observations are made with associated recommendations for improvement
- Five key strengths have been identified relating to the establishment of water treatment and recycling programs to minimise the consumption of water and a range of positive observations made by the Biodiversity Specialist.

IAPAR Compliance Table

Table 1 demonstrates how the requirements of the IAPARs have been met in this audit report.

Table 1: IAPAR Compliance Table

| Section | IAPAR Requirement | Addressed | |
|--|--|--|-----------------|
| Introduction | | | |
| 4.2.1 | • Background of the project | Sections 1.1 and 1.2 | |
| | • Audit team (including qualifications and experience) | Section 1.5 | |
| | • Audit objectives | Section 1.6 | |
| | • Audit period and scope | Section 1.7 | |
| Audit Methodology | | | |
| 4.2.2 | • Documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s) | Appendix A | |
| | • How the audit scope was developed | Section 2.1 | |
| | • A summary of the audit process adopted to determine the compliance status and assess if documents are adequate | Section 2.3 | |
| | • Details of site inspections undertaken | Section 2.5 Appendix E | |
| | • Site personnel interviewed including their name and position title | Section 2.6 | |
| | • Meanings of compliance status descriptors used, as set out in this document. | Section 2.8 | |
| | • A summary of the consultation undertaken | Section 3.7 | |
| | 4.2.3 | • A list of the approvals and documents audited | Appendix C |
| | | • A summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances | Section 3.1 |
| | | • Exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique noncompliance 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 3.1 |
| | | • Brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action | Section 3.5 |
| | | • 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 3.6 |
| | | • Other matters considered relevant by the auditor | None Identified |
| • 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 3.7 | |
| • A summary of complaints and the adequacy of responses to and management of complaints | | Section 3.4 | |
| • Details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents | | Section 3.3 | |
| • 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 | | Section 4 | |
| • Evidence collected through site inspections undertaken during the audit | | Appendix C & E | |
| • Evidence to support compliance assessments by personnel during the audit | | Appendix C&E | |
| • A brief discussion of any continual environmental management improvement opportunities identified as part of the audit | | Section 3.1 | |
| • Key strengths of the developments environmental management system and performance identified by the auditor. | Section 3.7 | | |
| 4.2.4 | • Recommendations and opportunities for improvement | Section 3.1 | |
| Appendices | | | |
| 4.2.5 | • A copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); | Appendix A | |

| Section | IAPAR Requirement | Addressed |
|---------|---|------------|
| | <ul style="list-style-type: none"> A completed Independent Audit Table with all relevant conditions of consent, identifying each requirement with compliance status assessed | Appendix C |
| | <ul style="list-style-type: none"> Documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee | Appendix D |
| | <ul style="list-style-type: none"> Completed and signed Independent Audit Declaration Form(s); | Appendix B |
| | <ul style="list-style-type: none"> Any reports prepared by the agreed technical specialist(s), as required | Appendix F |

1 Project Overview

1.1 Project Background

The Australian energy landscape is transitioning to a greater mix of low-emission renewable energy sources, such as wind and solar. To support this transition, Transgrid has received approval to increase the energy network capacity in southern New South Wales (NSW) through the development of around 365 kilometres of new 500 kilovolt (kV) high-voltage transmission lines and associated infrastructure between Wagga Wagga, Bannaby and Maragle. This project is collectively referred to as HumeLink. The Project is located across six Local Government Areas (LGAs) including Wagga Wagga City, Snowy Valleys, Cootamundra-Gundagai Regional, Upper Lachlan Shire, Yass Valley and Goulburn-Mulwaree.

HumeLink involves construction of a new substation east of Wagga Wagga as well as connection to existing substations at Wagga Wagga and Bannaby and a future substation at Maragle in the Snowy Mountains (referred to as the future Maragle 500 kV substation). The future Maragle 500 kV substation was subject to a separate major project assessment and approval (reference SSI-9717, EPBC 2018/836).

HumeLink is a priority project for the Australian Energy Market Operator (AEMO) and the Commonwealth and NSW governments and has been declared as Critical State Significant Infrastructure (CSSI). The Project will deliver a cheaper, more reliable and more sustainable grid by increasing the amount of renewable energy that can be delivered across the national electricity grid, helping to transition Australia to a low carbon future. It will achieve this by supporting the transfer of energy from existing renewable generation as well as facilitate development of new renewable generation in the declared South West Renewable Energy Zone (REZ) and candidate Wagga Wagga and Tumut REZs. The Project will provide the required support for the network in southern NSW, allowing for the increase in transfer capacity between new renewable generation sources and the state's demand centres of Sydney, Newcastle and Wollongong. The Project will also improve the efficiency and reliability of the current energy transfer in this part of the network. Furthermore, HumeLink will form a key part of the transmission line infrastructure that supports the transfer of energy within the National Electricity Market (NEM) by connecting with other major interconnectors.

1.2 HumeLink East Scope

The key components of the HumeLink East Project includes:

- Modification of the Bannaby 500/330 kV substation (Bannaby 500 kV substation) to accommodate the new transmission line connections
- Delivery of a new 227km 500KV double circuit transmission line connecting the augmented 500kV substation to the interface point where it will connect with the HumeLink West project
- Delivering infrastructure required at the interface point to enable connection of the HumeLink West and HumeLink east transmission line works – including the interface
- Additional telecommunications connections to existing substations
- Establishment of new and/or upgraded temporary and permanent access tracks
- Establishment and operation of worker accommodation camps at Yass and Adjungbilly
- Ancillary works required for construction of the Project such as construction compounds, utility connections and/or relocations, brake and winch sites, and helipad/helicopter support facilities.

Figure 1 shows the overall alignment of the Hume Link Project, Figure 2 shows the key features and extent of the Hume Link East Project, the subject of this Audit.

1.3 Project Approval

The Project is designated Critical State Significant Infrastructure (CSSI) and was subject to an Environmental Impact Statement (EIS). The EIS, with accompanying documents were publicly displayed. Following public display, response to submissions and further studies, the EIS was approved by the NSW Minister for Planning. The Project instrument of approval (SSI 36656827) was issued on 13 November 2024 and documents conditions that are to be complied with during the construction and operational stages of the HumeLink Project.

1.4 Supplementary Approvals

In addition to the Planning Approval (SSI 36656827), approval under the Commonwealth Environmental Protection and Biodiversity Conservation Act has been obtained. This approval (reference EPBC 2021/9121) was granted by the Australian Minister for the Environment on 18th of December 2024.

The conditions of the EPBC Approval (EPBC 2021/9121) are outside the scope of this Audit.

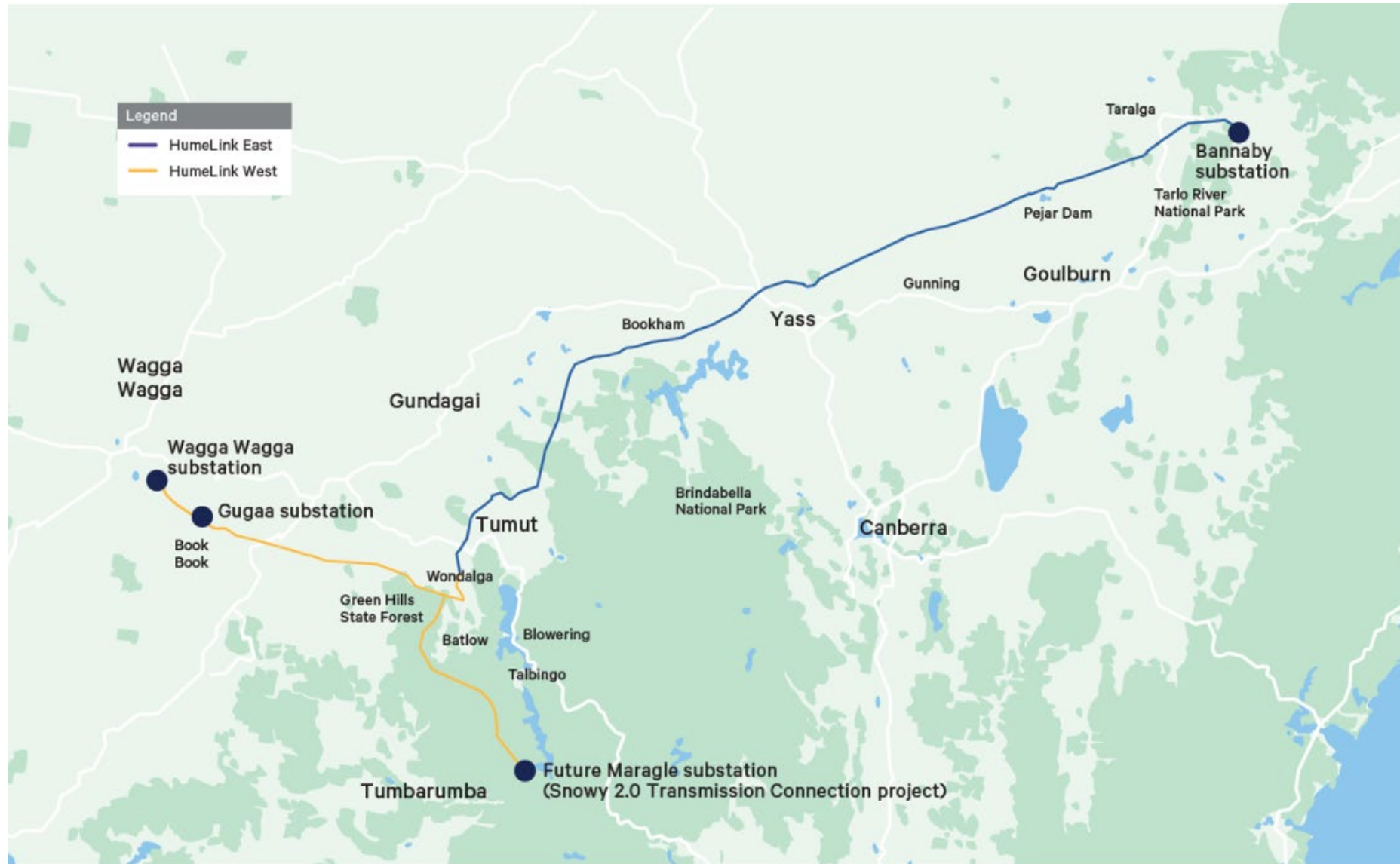


Figure 1: Humelink project – general alignment (source – Transgrid HumeLink East Project Website)



Figure 2: Humelink East – Key project features (source – Transgrid HumeLink East Project Website)

1.5 Audit Team

Trigalana Environmental Pty Ltd has been appointed to undertake this independent environmental Audit and to perform the role as Lead Auditor. Nature Positive were appointed as the Biodiversity Specialist/Expert.

The Audit team was approved by the Department of Planning and Environment in accordance with condition A38.

Details of the Audit Team are provided in Table 2.

Table 2: Audit team details.

| Name and Role | Qualifications | Key Experience |
|--|--|--|
| Richard Peterson Lead Auditor | B. E Civil M. Environmental Management Management Systems Auditing Leading Management Systems Audit teams Exemplar Global Lead Auditor | 30 years of environmental management experience in the infrastructure sector. Have undertaken over 150 Audits including independent DPHI Audits for major infrastructure and energy projects including: <ul style="list-style-type: none"> • EnergyConnect. • Hunter Power Station • Upper South Creek Advanced Water Recycling Centre • Crudine Ridge Windfarm. • Sapphire Windfarm. • Rye Park Windfarm. • Albion Park Bypass. • Walla Walla Solar Farm • Culcairn solar farm • Warrell Creek to Nambucca Heads. • Northern Road upgrade. • Tweed Valley Hospital. • Windsor Bridge. |
| Ken Holmes Peer Review. | B Sc Industrial Chemistry Master of Applied science (Waste Management) Master of Business Administration (MBA) Exemplar Global Lead Auditor | Ken's extensive Environmental Audit, Infrastructure Planning and Approvals experience includes preparation of environmental impact statements for major projects, pre-construction approvals, and operations. Some of his recent audit experience includes the following: <ul style="list-style-type: none"> • Energy Connect • Hunter Power Project • Kurri Kurri Lateral Pipeline • Port Waratah Coal Loader • Newcastle Coal Infrastructure Group – Kooragang Island • Cowal Gold Mine (Central NSW) • Dargues Gold Mine • Mt Thorley / Warkworth Mine |
| Nathan Garvey Biodiversity / ecology expert | BSc GradDip (BioSci) BAM Accredited Assessor (BAAS17037) CEnvP FEIANZ | Nathan is an experienced ecologist with over 25 years' practice in leading ecological assessments and approvals across eastern Australia. He is one of NSW's leading experts in biodiversity approvals and offsetting. Nathan is an accredited BAM assessor and a current serving member of both the Independent Expert Advisory Panel for Energy Assessment and Independent Expert Advisory Panel for Mining. Relevant project experience includes: <ul style="list-style-type: none"> • Mount Pleasant Operations independent environmental audit • Kooragang Island Waste Emplacement facility independent environmental audit • Independent Expert Advisory Panel for Mining: Metropolitan Mine Longwalls 312 to 316 Extraction Plan Review • Independent Expert Advisory Panel for Energy Assessment: Stratford Pumped Hydro • Springvale Colliery Independent Monitoring Panel – Biodiversity expert |

| Name and Role | Qualifications | Key Experience |
|---------------|----------------|---|
| | | <ul style="list-style-type: none"> Independent Expert Advisory Panel for Mining: Large Swamp Environmental Assessment Requirements for Extraction Plan for Metropolitan Mine Longwalls 311 to 316 Independent Expert Advisory Panel for Mining: Dendrobium Coal Mine - Longwall 19A Subsidence Management Plan Independent Expert Advisory Panel for Mining: Moolarben Coal Complex Stage 2 Modification 4 |

DPHI Letters of approval for the Audit team are provided in Appendix A.

1.6 Audit Objectives

The key objectives of the Independent Environmental Audit are to assess compliance of the Project with the CoA and the implementation of management plans as outlined in the CoA. The Audit is to recognise good practices while providing practical and reasonable recommendations for improvement that can be implemented throughout the project as construction continues.

1.7 Audit Scope and Period

This Audit has been undertaken in accordance with Condition C13 of the Ministers Conditions of approval. These conditions are outlined in Table 3.

Table 3: Independent Audit – Requirements

| Condition Reference | Condition | Comment |
|---------------------|--|--|
| C13 | Independent Audits of the development must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> or as updated from time to time and published on the Department’s website. | <p>The scope of the Audit was undertaken in accordance with the Independent Audit Post Approval Requirements (IAPARs) (2020). Refer to Table 1 for further details regarding compliance with the IAPARs.</p> <p>The audit scope was developed in consultation with DPHI and other relevant stakeholders as requested by DPHI. Prior to the commencement of the Audit, the Audit team and the biodiversity specialist were approved by DPHI (refer to Appendix A) for DPHI letters of approval.</p> |

The Audit period is from the commencement of work on 22 November 2024 to the date of the Audit site inspection on 3 February 2026.

1.8 Definitions

Commonly used acronyms in this Audit report are as described in Table 4.

Table 4: Common acronyms

| Acronym | Description |
|-----------------|---|
| AACHAR | Addendum Aboriginal Cultural Heritage Assessment Report |
| AG DCCEEW | Australian Government, Department of Climate Change, Energy Environment and Water |
| AGJV | Acciona Genus Joint Venture |
| CA | Consistency Assessment |
| CoA | Conditions of Approval |
| Councils | Wagga Wagga City, Snowy Valleys, Cootamundra-Gundagai Regional, Upper Lachlan Shire, Yass Valley and Goulburn-Mulwaree Councils |
| CCS | Community Consultation Strategy |
| CEMP | Construction Environmental Management Plan |
| CHPR | Conservation, Programs, Heritage and Regulation, within the NSW Department of Climate Change, Energy, the Environment and Water |
| CPESC | Certified Professional in Erosion and Sediment Control |
| CSSI | Critical State Significant Infrastructure |
| Department | NSW Department of Planning, Housing and Infrastructure |
| DPHI | Department of Planning Housing and Infrastructure (formerly the Department of Planning and Environment) |
| EIS | The Environmental Impact Statement titled HumeLink - Environmental Impact Statement, prepared by Aurecon, dated August 2023 |
| EP&A Act | Environmental Planning and Assessment Act 1979 |
| EP&A Regulation | Environmental Planning and Assessment Regulation 2021 |
| EPA | NSW Environment Protection Authority |
| EPBC Act | Environmental Protection and Biodiversity Conservation Act 1999 |
| EPL | Environmental Protection Licence |
| ER | Environmental Representative |
| ESCP | Erosion and Sediment Control Plan |
| FLP | Final Layout Plan |
| FRNSW | Fire and Rescue NSW |
| GIS | Geographical Information System |
| GPS | Global Positioning System |
| Heritage NSW | Heritage Division within NSW DCCEEW |

| Acronym | Description |
|--------------------|---|
| ICNG | Interim Construction Noise Guideline *ICNG) |
| IEA | Independent Environmental Audit |
| IAPAR | DPHI Independent Audit Post Approval Requirements, (May 2020) |
| HLE | Hume Link East |
| HLW | Hume Link West |
| LGA | Local Government Area |
| NEM | National Energy Market |
| NSW DCCEEW | NSW Department of Climate Change, Energy, the Environment and Water |
| Planning Secretary | The Planning Secretary under the EP&A Act or nominee |
| POEO Act | <i>Protection of the Environment Operations Act, 1997</i> |
| REZ | Renewable Energy Zone |
| RFS | Rural Fire Service |
| SSI | State Significant Infrastructure |
| TfNSW | Transport for New South Wales |
| Water Group | Water Group within NSW DCCEEW |

2 Independent Audit Methodology

2.1 Scope Development

The Audit scope was developed in consideration of:

- The NSW Department of Planning, Housing and Infrastructures Independent Audit Post Approval Requirements (IAPAR) (May 2020)
- Project Conditions of Approval (SSI 36656827) dated 13 November 2024
- Stakeholder feedback from relevant government stakeholders including:
 - Department of Planning, Housing and Infrastructure (DPHI)
 - Registered Aboriginal Parties (RAPs) from the EIS
 - Australian Government Department of Climate Change, Energy, Environment and Water
 - Forestry Corporation of NSW
 - Fire and Rescue NSW
 - NSW Rural Fire Service
 - Heritage Division within NSW DCCEEW
 - DPE Water / Water NSW / NRAR
 - Local Councils - Wagga Wagga City, Snowy Valleys, Cootamundra-Gundagai Regional, Upper Lachlan Shire, Yass Valley and Goulburn-Mulwaree Council
 - Environment Protection Authority
 - NSW DCCEEW CPHR
 - Transport for NSW.

The scope of the Audit did not include an assessment of compliance with any supplementary approvals or licences or verification of design aspects of the project.

2.2 Stakeholder Consultation – Key Issues

In undertaking the Audit, key issues raised by the government agencies groups that are relevant to the Audit are summarised in Section 3.8.

2.3 Summary of Audit Processes

- Opening meeting
- Site inspection, noting environmental practices and controls
- Audit Interviews
- Review of documents and records
- Closing meeting.

2.4 Opening Meeting

An opening meeting was held on 14th of January 2026 where the Auditor provided an overview of the Audit process and confirmed the agenda for the Audit. Attendees at the opening meeting are detailed in Table 5.

Table 5 – Opening meeting attendance

| Name | Organisation | Role |
|------------------|--------------|--|
| Sam Pathammavong | Transgrid | Environment and Sustainability Manager |
| Peter Monsted | Transgrid | Senior Biodiversity Business Partner |
| Priya Murthy | Transgrid | Environmental Business Partner |
| Shani Walton | Transgrid | Senior Environmental Approvals Coordinator |
| Jon May | AGJV | Environment and Sustainability Manager |
| Colm Kennedy | AGJV | Environment Manager |

| Name | Organisation | Role |
|------------------|--------------------------|--|
| Amy Lee Conroy | AGJV | Environmental Manager Southern Section |
| Laurenne Coetzee | AGJV | Environmental Consultant |
| Ken Holmes | Trigalana Environmental | Audit Peer Review |
| Nathan Garvey | Nature Positive Advisory | Biodiversity Specialist |

2.5 Site Inspection

The following site inspections were undertaken:

- General inspection undertaken by the Lead Auditor on 3 and 4 February 2026
- Targeted biodiversity inspection by the Biodiversity specialist, undertaken on 11 February 2026.

At the time of the site inspection, the following activities were underway or completed:

- Establishment and operation of accommodation camps
- Upgrade to existing substation at Bannaby
- Installation of environmental controls, boundary fencing and monitoring stations
- Installation of traffic controls including signage, access points and access gates
- Establishment of fire safety equipment and resources including water tanks, fire extinguishers and mobile
- Construction of internal access roads on private property to tower PADs
- Localised clearing for tower PAD establishment
- Construction of footings and tower base
- Erection of towers, with 6 completed at the time of the Audit
- Mainline clearing activities had not commenced.

Key observations made during those inspections are summarised in [Table 6](#) with site inspection photographs provided in Appendix E. Observations made by the Biodiversity specialist are provided in Appendix F.

Table 6 – Site inspection – key observations

| Aspect | Observations | Photographic reference (Appendix E) |
|--------------------------------|---|-------------------------------------|
| Yass Accommodation Camp | | |
| General | Accommodation camp was fully established and operational with kitchen, mess hall, dwellings, gymnasium, recreational room, common areas and carpark. The site was well organised, housekeeping was a high standard with no litter or rubbish observed. | 1-3 |
| Noise and vibration | The site is located in an industrial setting with surrounding landuse predominantly agriculture. The site is located approximately 2.5 kilometres from the township of Yass. There were no activities observed that would produce excessive noise or vibration. External bunds placed at the boundary fence may provide some noise attenuation. Photographs were provided to the Auditor with evidence of an acoustic blanket applied to a generator at the site to reduce noise emissions. | 4 |
| Dust | Access roads, laydown areas, carparking and internal access routes were fully paved to prevent dust generation. Exposed batters were stabilised with spray grass/bitumen. A water cart was available on site to suppress dust during hot, dry and windy conditions. | 4-9 |

| Aspect | Observations | Photographic reference (Appendix E) |
|--|---|-------------------------------------|
| | There were no observed dust emissions from the camps or construction areas observed during the site inspection. | |
| Water management | <p>Drainage, erosion and sediment controls were installed including stabilised batters, diversion bunds, internal drains, coir logs, sediments basins with advisory signage installed regarding requirements to obtain permit to pump.</p> <p>Water treatment facility established and operational to treat water supplied from local council as well as roof runoff water. Water is re-used for construction purposes, dust suppression, fire water and toilet flushing.</p> | 4-11 |
| Fire and Emergency | Equipment and resources available on site included fire water tank, fire extinguishers (including testing tag) and trailer mounter mobile water tanks. A recommendation has been made to place a highly visible sign on the fire water tank, so it is easily identified by emergency services in the event of a fire. The Bushfire and Emergency Management Plan and emergency information package was available in a readily accessible location. Daily prestarts include an assessment of fire risk with daily weather information provided by NSW Forestry. | 12-19 |
| Spill prevention and management, waste | <p>A diesel fuel farm was established at the Yass Accommodation Camp site with a double skinned tank and spill containment sump and bund.</p> <p>Chemicals were stored in bunded and covered work areas on hardstand areas. Mobile bunds were provided for chemical storage in the field. Properly constructed facilities were provided for vehicle refuelling and for concrete washout.</p> <p>Spill kits were readily accessible for deployment in the event of a chemical or fuel spill. There was no evidence of a chemical leak or fuel spill observed such as soil staining or odour.</p> <p>Appropriate waste and recycling bins were provided for both domestic waste (from the camp) and for construction waste. There was no evidence of mixing of wastes observed. A food dehydration unit was provided to enable the reuse of food waste.</p> | 20-27 |
| Visual | As noted above, the site is located in an industrial setting and away from visually sensitive receptors such as residential areas etc. Camp facilities are shaded grey and were observed to be non-reflective. Amenity and security lighting is provided for the accommodation camp as well as low level directional lighting for the car park. | 2,6,12,28 |
| Biodiversity and Sustainability | <p>Next boxes were stored at the site for deployment into the field. Two types of next boxes were available for both small and larger animals. Fitting devices were non-destructive wire coil to prevent damage to the tree.</p> <p>Evidence of sustainability initiatives included electric vehicle recharging station as well as food waste dehydration unit.</p> | 29-32 |
| Bannaby Substation | | |
| General | The site was fully established with construction compounds, sealed access roads, lockable gates with traffic advisory signage installed. Construction activities were focussed on piling and ground preparation for substation foundations. Rehabilitation of exposed embankments was observed. The site was well organised, housekeeping was a high standard with no litter or rubbish observed. | 33-38 |
| Erosion and Sediment Control, Dust | Internal drainage systems were established with a sediment basin installed to capture and treat runoff. Internal roads were stabilised and water carts were operational on both the internal haul road and on active stockpiles. There was no observed dust or offsite mud tracking observed. | 39-41 |

| Aspect | Observations | Photographic reference (Appendix E) |
|---|---|-------------------------------------|
| Fire and emergency, spill prevention and waste | Equipment and resources available on site included fire water tank, and trailer mounter mobile water tanks. Daily prestarts include an assessment of fire risk. Minor quantities of chemicals were stored in a bunded and ventilated container. Appropriate waste and recycling skip bins were provided. | 42-45 |
| Biodiversity | Tree protection flagging and “no go” signage was installed around a retained tree. There were no stored materials or evidence of disturbance within the tree dripline. The colour of the flagging is inconsistent with the advisory signage at the site compound and a recommendation is made to review the colour coding of environmental protection fencing across the project | 46-47 |
| Access tracks and tower pad construction sites | | |
| General | <p>At the time of the site inspection, access points and graded access tracks were constructed with sealed intersections, signage and cattle grids installed. Tower pads were in various stages of construction and rehabilitation with construction of some tower bases and towers underway. Localised rehabilitation of access tracks, batters and PADs appeared to be effective. Boundary markers were placed to provide a visual reference of the project boundary.</p> <p>There was no mud tracking observed onto connecting roads.</p> | 48-54 |
| Soil and Water Management, Dust | <p>A consistent and systematic approach to the establishment of erosion and sediment controls and rehabilitation of construction pad sites has been implemented with standardised drawings prepared and implemented. Natural materials including rock checks and timber windrows have been utilised in lieu of manufactured sediment fences which create an environmental hazard and may be ingested by farm animals.</p> <p>Stabilisation of access roads, sealed intersections, stabilised construction PADs, progressive rehabilitation and polymer spray are effectively minimising the generation of dust and the reliance of water carts and sprays as a dust suppression measure.</p> <p>Installation of culvert crossings consisting of piped drainage and rock scour protection appeared to be consistent with the relevant conditions of consent.</p> | 55-60 |
| Biodiversity, vehicle hygiene | <p>Biodiversity measures observed in the field include nest boxes retained timber and rock to create habitat features.</p> <p>Signposted vehicle hygiene stations to prevent the proliferation of weeds.</p> | 61-66 |
| Fire and emergency, spill prevention | Trailer mounted firefighting units were available to be deployed in the event of a fire, spill kits were available in the event of a spill. | 67-68 |

2.6 Audit Interview

The following audit interviews were held throughout the audit with interviewees listed in Table 7.

Table 7 – Audit interviews

| Name | Organisation | Role | Key Focus Areas |
|-----------------|--------------|--|---------------------------|
| Jon May | AGJV | Environment and Sustainability Manager | General compliance |
| Colm Kennedy | AGJV | Environment Manager | General compliance |
| Jacques Coetzee | AGJV | Construction Manager | Transport and Logistics |
| Suzie Presswell | AGJV | Community Investment Lead | Community and Stakeholder |

| Name | Organisation | Role | Key Focus Areas |
|-----------------------------|--------------------|--|--|
| Emma Hassett | AGJV | Operational Services Director | Community and Stakeholder |
| Peter Barnard | AGJV | Design Director | Design Aspects |
| Aalia Nasser | AGJV | Undergraduate | Design Aspects |
| Peter Scott | AGJV | Safety Manager | Bushfire and Emergency |
| Michael Moroney | Transgrid | Senior Environmental Business Partner | General compliance, Transgrid responsibilities |
| Shani Walton | Transgrid | Senior Environmental Approvals Coordinator | General compliance, Transgrid responsibilities |
| Shaun Da Costa | Transgrid | Interface Manager, Major Projects | Radio Communications |
| Derek Low | WolfPeak | Environmental Representative | Environmental Representative (ER) |
| Peter Monsted ¹ | Transgrid | Senior Biodiversity Business Partner | Biodiversity |
| Ciara Moriarty ¹ | AGJV | Environmental Approvals Advisor, HumeLink East | Biodiversity |
| Ellis Lloyd ¹ | AGJV | Environmental Co-ordinator | Biodiversity |
| Mira Segaran ¹ | AGJV | Environmental Co-ordinator | Biodiversity |
| Chris Keogh ¹ | East Coast Ecology | Project Manager, Senior Ecologist | Biodiversity |
| Dom Wagner ¹ | East Coast Ecology | Project Ecologist | Biodiversity |

Notes to table

¹. Interviews undertaken by Biodiversity Specialist with all other interviews conducted by the Lead Auditor

2.7 Document Review

In undertaking the Audit, a broad range of documents were reviewed and referenced, including:

- Project conditions of approval (SSI 36656827)
- Project Environmental Impact Statement
- Environmental Management Plans, developed in accordance with the Project Conditions
- Correspondence with relevant authorities
- Consultation records
- Specialist reports
- Environmental monitoring records
- Records of implementation of the environmental management plans including checklists, inspection reports, work packs,

A detailed list of the documents reviewed in undertaking the Audit is provided in Appendix C - Audit Table.

2.8 Compliance Descriptors

The compliance status of each condition was determined using the relevant descriptors in and as described in the DPE (now DPHI) 2020 Auditing Post Approval Requirement and summarised in Table 8.

Table 8 - Compliance Descriptors

| Status | Description |
|---------------------|---|
| Compliant (C) | Sufficient verifiable evidence to demonstrate that all elements of the requirement have been completed |
| Non- Compliant (NC) | One or more specific elements of the conditions or requirements have not been complied with within the scope of the Audit |
| Not Triggered (NT) | A requirement has an activation or timing trigger that has not been met at the time when the Audit was undertaken |

2.9 Closing Meeting

A closing meeting was held on 27 March 2026 where the Auditor provided a summary of audit findings, recommendations and outlines the next steps for completion of the audit report. The closing meeting was attended by representatives of AGJV and Transgrid as detailed in [Table 9](#). A separate closing meeting was held to cover the biodiversity aspects of the Audit. Details are provided in Appendix F.

Table 9 – Closing Meeting Attendance

| Name | Organisation | Role |
|------------------|--------------|--|
| Sam Pathammavong | Transgrid | Environment and Sustainability Manager |
| Shani Walton | Transgrid | Senior Environmental Approvals Coordinator |
| Michael Moroney | Transgrid | Senior Environmental Business Partner |
| Jon May | AGJV | Environment and Sustainability Manager |
| Colm Kennedy | AGJV | Environment Manager |

3 Audit Findings

3.1 Compliance Performance

A summary of compliance performance is provided in Table 10. Details of non compliances, observations and recommendations are provided in Table 11.

Table 10: Compliance summary

| Section | Number of Conditions | Compliant | Non-Compliant | Not Triggered |
|--------------|----------------------|-----------|---------------|---------------|
| A | 25 | 18 | 1 | 6 |
| B | 67 | 49 | 3 | 15 |
| C | 15 | 9 | 1 | 5 |
| Total | 107 | 76 | 5 | 26 |

Table 11 Non compliances, observations, and recommendations

| Unique ID | Condition (s) | Auditor Observations | Recommendation |
|------------------------|---------------|---|--|
| Non-Compliances | | | |
| HLE-NC-01 | A2/B30 | <p>Lead Auditor Observations (HLE-NC-01)</p> <p>On 28/11/25 DPHI were notified of four instances where access track construction resulted in impacts outside the project boundary and potential for non-compliance with Conditions A2 (d) and B30.</p> <p>Following the identification and reporting of the non compliance, a number of preventative actions were undertaken as noted below:</p> <p>Procedural Controls</p> <ul style="list-style-type: none"> • Implement controls that have since been developed and documented in the Biodiversity Management Plan (BMP), specifically BD6, BD11 and BD16 • Flagging intervals to be reviewed based on terrain and track alignment and amended accordingly • Re-brief all site staff on boundaries and the process to follow for delineating the boundary. <p>Boundary Communication</p> <ul style="list-style-type: none"> • Provide physical signage and fencing to delineate boundaries • Reinforce boundary rules at toolbox/pre-start, with site crews. <p>Organisational / Resource Allocation:</p> <ul style="list-style-type: none"> • Ensure sufficient resources for survey team to delineate project boundaries for future works • Ensure that all machine controls are uploaded and ready for use. <p>At the time of the Audit, the recommended actions were noted as complete. Please also refer to observations by the Biodiversity Specialist below and the specialist biodiversity report (Appendix F).</p> | <p>Lead Auditor Recommendations (HLE-NC-01)</p> <p>The Auditor reviewed the actions taken in response to the non compliance and considers them to be appropriate.</p> <p>However, should any breaches of the boundary disturbance protocols, or further boundary exceedences (or near misses) occur, a detailed review of the effectiveness of the relevant protocols are undertaken and revised with the objective of identifying and eliminating any systemic weaknesses to prevent further non compliance.</p> <p>Please also refer to the specialist biodiversity report (Appendix F) and to HLE-Obs-03 below regarding boundary flagging.</p> |

| Unique ID | Condition (s) | Auditor Observations | Recommendation |
|-----------|---------------|--|---|
| | | <p>Biodiversity Specialist Observations (HLE-NC-01)</p> <p>On 28 November 2025 DPHI were notified of four instances where access track construction resulted in impacts outside the project boundary (Lucidity ID 47487). The access tracks identified include AT 299 and AT 301 within property YG-027A, as well as AT 446-448 and AT 451 within property MA-051. This was considered a potential for non compliance with Conditions A2 (d) and B30.</p> <p>This incident arose due to boundary flagging being in the wrong position as well as the spacing between flagging being insufficient. For one site (AT446-448 in MA-051) insufficient sediment controls were in place and sediment spread outside the clearing boundary and development of a boghole led to construction of an alternate access for the landowner outside the project boundary.</p> <p>Clearing in MA-051 and YG-027A occurred in areas mapped as PCT 316 and PCT 1330. PCT 1330 is considered with White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland critically endangered ecological community (CEEC)</p> <p>The BAVR identifies AT 301 in YG-027A as habitat for the Striped Legless Lizard (<i>Delma impar</i>), Yass Daisy (<i>Ammobium craspedioides</i>), Hoary Sunray (<i>Leucochrysum albicans subsp. tricolor</i>) and Austral Toadflax (<i>Thesium australe</i>) noting none were observed during pre-clearing surveys.</p> <p>The BAVR identifies AT 299 in in YG-027A as habitat for Southern Myotis (<i>Myotis macropus</i>), Yass Daisy (<i>Ammobium craspedioides</i>), Hoary Sunray (<i>Leucochrysum albicans subsp. tricolor</i>) and Austral Toadflax (<i>Thesium australe</i>) noting none were observed during pre-clearing surveys.</p> <p>No threatened species habitat is mapped in MA-051.</p> <p>This incident has resulted in unintended impacts to biodiversity values.</p> | <p>Biodiversity Specialist Recommendations (HLE-NC-01)</p> <p>Ensure survey grade equipment is used to delineate clearing boundaries. GPS devices with less accurate positioning (e.g. mobile devices supporting FieldMaps) should not be used to delineate boundaries.</p> <p>Ensure flagging is at appropriate intervals to clearly delineate clearing boundaries, Intervals should be adapted to the alignment, with a lower interval on curves for example, and more flagging on steep terrain.</p> <p>AGJV should review use of flagging to determine whether this is appropriate and easily observed by all</p> <p>As advised by AGJV during the site inspection, large plant used during clearing works should be equipped with survey grade GPS with the clearing boundaries loaded to ensure clearing does not extend outside approved limits</p> |
| HLE-NC-02 | B64 | <p>Lead Auditor Observations (HLE-NC-02)</p> <p>On 10/9/25 Transgrid Notified DPHI of a potential non-compliance with Condition B64.</p> <p>The post construction review of as-built drone imagery identified two areas of an access track within property MA-099 breaching the project boundary by a maximum of 6.5m. The works were associated with Minor Impact Checklist (MIC) # 15, which was approved by the ER.</p> | <p>Lead Auditor Recommendations (HLE-NC-02)</p> <p>The Auditor reviewed the actions taken in response to the non compliance and considers them to be appropriate.</p> |

| Unique ID | Condition (s) | Auditor Observations | Recommendation |
|-----------|---------------|--|---|
| | | <p>Following the identification and reporting of the non compliance, an internal investigation was undertaken which recommended a number of actions to be undertaken as follows:</p> <p>Immediate Actions</p> <ul style="list-style-type: none"> • Review of all current project boundaries with survey/foreman • Site-wide re-briefing on boundary rules and delineation requirements • Requirement that machine controls are confirmed as being operational prior to works commencement. <p>Short Term Actions</p> <ul style="list-style-type: none"> • Targeted re-training for all delivery teams on appropriate use of GIS vs GPS tools • Toolbox talks rolled out to reinforce correct boundary delineation processes • Improved base station deployment planning to avoid future delays. <p>Medium Term Actions</p> <ul style="list-style-type: none"> • Additional survey resources allocated to boundary • Survey team to sign off all Clearing and Land Disturbance Permits as an additional control • Risk-based requirement for survey delineation of all access track works outside 200m corridor or near environmental constraints. <p>At the time of the Audit, the recommended actions were noted as complete.</p> | <p>However, should any breaches of the boundary disturbance protocols, or further boundary exceedences (or near misses) occur, a detailed review of the effectiveness of the relevant protocols are undertaken and revised with the objective of identifying and eliminating any systemic weaknesses to prevent further non compliance.</p> <p>Please also refer to the specialist biodiversity report (Appendix F) and to HLE-Obs-03 below regarding boundary flagging.</p> |
| | | <p>Biodiversity Specialist Observations (HLE-NC-02)</p> | <p>Biodiversity Specialist Recommendations (HLE-NC-02)</p> |
| | | <p>On 4 September 2025 Transgrid Notified DPHI of a potential non compliance with Condition B64 (Lucidity ID 47912). The post construction review of as built drone imagery identified two areas of an access track within property MA-099 breaching the project boundary by a maximum of 6.5 m. The works were undertaken as a part of Enabling Works and were associated with Minor Impact Checklist (MIC) # 15, which was approved by the Environmental Representative. This incident arose due to the use of ArcGIS FieldMaps to delineate the clearing boundary with accuracy of >5 m. Further, spacing between was insufficient due to alignment of the track and terrain.</p> <p>The Response to Request for Information identified that although the project boundary was exceeded, the total disturbance was less than the approved disturbance (13,272 m² vs 23,587 m²). This document also states that a review</p> | <p>The impacts should be incorporated into the updates to condition B25 currently being sought by Transgrid.</p> |

| Unique ID | Condition (s) | Auditor Observations | Recommendation |
|------------------|---------------|--|--|
| | | <p>by the Project Ecologist indicated the area was low conservation value grassland and “would have resulted on a negligible impact to biodiversity “ (p.2). This conclusion does not draw on the data from the BDAR or BAVR.</p> <ul style="list-style-type: none"> • Clearing occurred in areas mapped as a mix of PCT 280 and PCT 2774. PCT 277 is considered with White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland critically endangered ecological community (CEEC). Land adjacent is mapped as Category 1 Land • The BDAR identifies these areas as habitat for a variety of threatened fauna species Key's Matchstick Grasshopper (<i>Keyacris scurra</i>), Yass Daisy (<i>Ammobium craspedioides</i>), Small Purple-pea (<i>Swainsona recta</i>), Silky Swainson-pea (<i>Swainsona sericea</i>) and Striped Legless Lizard (<i>Delma impar</i>) <p>Given the total disturbance was less than the approved disturbance, and occurred in areas contiguous with the approved disturbance boundary, it is considered likely that impacts to biodiversity are consistent with or even less than the predicted impacts.</p> | |
| HLE-NC-03 | B65 | <p>On 29/05/25, Transgrid notified DPHI of a non-compliance with Condition B65 relating related to works commencing at access Point T180 prior to the ER signoff of the minor impacts checklist (A5) (checklist No 39).</p> <p>Corrective actions noted included:</p> <ul style="list-style-type: none"> • Checking controls to be implemented for enabling works • Targeted retraining on enabling works approvals and controls • Revision to geofencing configuration. <p>A response was received by DPHI dated 30/09/2025 acknowledging the corrective actions implemented. The Actions noted above are deemed to be appropriate and were confirmed by Transgrid and AGJV to have been completed.</p> | <p>The non-compliance is in regard to a timing issue and relates to the enabling works. The relevant approvals were subsequently obtained from the ER.</p> <p>The enabling works have now been completed, and the relevant obligations incorporated into the construction environmental management plans.</p> <p>A general recommendation is to ensure all authorisations and signoffs are obtained prior to the commencement of any new activity.</p> |
| HLE-NC-04 | C11 | <p>Non-compliance with Condition C11 relating to late notification of a non-compliance. The notification related to works commencing prior to the ER signoff of the minor impacts checklist (A5).</p> <p>In relation to the non-compliance with Condition C11, the formal notification was made to DPHI on 8/9/25, more than 7 days following the identification on the non-compliance on 29/5/25. Accordingly, the notification timeframes have not been met. DPHI confirmed the non-compliance on 1/10/25.</p> | <p>A general recommendation is to review the internal communication and notification processes and amend as required to ensure any non-compliance is reported to DPHI within the required timeframes.</p> |

| Unique ID | Condition (s) | Auditor Observations | Recommendation |
|--|---------------|--|--|
| Observations and recommendations – Lead Auditor | | | |
| HLE-Obs-01 | A19 | <p>The Auditor was provided with a copy of the Incident and NCR register for the Audit period. During the Audit period, a total of 7 minor incidents occurred (e.g oil spills) which were classified as minor and non-reportable with minimal impact.</p> <p>The incident register does not include a description of the actions taken to remedy the incident or any additional measures to prevent further incident and this information would be beneficial in demonstrating due diligence in the event of a major spill.</p> | It is recommended the register is reviewed and updated to include this information. |
| HLE-Obs-02 | B24 | The Sediment Basin at the Yass Accommodation Camp has a sign installed that ensures relevant personnel understand the requirements of the "Permit to Pump" to minimise the risk of an unauthorised discharge incident. | Place similar signage at all sediment basins where there is a risk of unauthorised discharge of potentially contaminated water to the environment. |
| HLE-Obs-03 | B30 | <p>A colour coding system for boundary flagging and the delineation of project boundary and environmentally sensitive areas has been implemented at the Bannaby substation site.</p> <p>The colour of the flagging is inconsistent with the advisory signage at the site compound and it appears that a similar system has not been implemented on other parts of the project</p> | <p>Review the colour coding system for the identification and delineation of environmental protection fencing across the project. The review should also include mechanisms for communicating colour coding systems to ensure consistency including:</p> <ul style="list-style-type: none"> • Visual signage (e.g. Bannaby Substation) • Site inductions • EWMS/ECMS and Workpacks. |
| HLE-Obs-04 | B51 | <p>Condition B51 requires the 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.</p> <p>Water supply tanks have been installed as required by this condition. 20,000 L Water tanks were available at the Yass Accommodation Camp and the Bannaby substation sites, however it was not clear to the Auditor that the tank was a dedicated fire water tank which may lead to confusion and loss of response time in the event of a bushfire emergency.</p> | Install highly visible signage on water supply tanks at all locations so emergency services can quickly identify the water supply tank in the event of an emergency. |
| HLE-Obs-05 | B55/B56 | <p>On 25/8/25, DPHI were notified of a potential non-compliance with conditions B55 and B56 relating to site won material from the Faulder Ave compound to property number BY-150. The potential non-compliance notification noted that an approved notice under Section 143 of the <i>Environment Operations Act 1997</i> did not accompany the material to the receiving location.</p> <p>On 10/10/25 DPHI wrote to Transgrid acknowledging the potential non-compliance noting that no further action would be taken.</p> | <p>The Auditor has reviewed the information provided by Transgrid as noted and agrees with the findings of the Transgrid investigation and interpretation of compliance.</p> <p>The Auditor acknowledges the transparent approach in reporting the potential non-compliance to DPHI and makes no recommendations in relation to this condition at this time.</p> |

| Unique ID | Condition (s) | Auditor Observations | Recommendation |
|---|--------------------------------------|--|---|
| | | <p>The Auditor notes that the notification to DPHI was initially made as a precaution, with further investigations undertaken to further assess compliance status. In their response to a request for information issued by DPHI Transgrid noted that:</p> <ul style="list-style-type: none"> Following further sampling and analysis of the material, the test results confirmed the material classification to be Excavated Natural Material (ENM) The material was placed with the approved EIS project boundary and not exported off site The material was beneficially re-used in line with the Early Works Management Plan. | |
| Observations and recommendations – Biodiversity Specialist | | | |
| HLE-Obs-06 | A1 | <p>Revised constraints mapping, updated following completion of the Biodiversity Assessment Verification Report (BAVR), is not included in the current version of the BMP.</p> <p>Despite not being included in the current version of the BMP, mapping derived from BAVR (vegetation mapping and species polygons) has been used by AGJV in the revised constraints mapping. This constraints mapping is used to microsite development, when assessing impacts during consistency assessments, and in the clearing and permitting process and assessment of clearing.</p> | The BMP is updated to include revised constraints mapping. |
| HLE-Obs-07 | B30 / Unexpected Finds Protocol | <p>During the site inspection, a daily ecology checklist from the 10 February 2026 potential unexpected find (see Table 2-1). This had not been reported through to project personnel,</p> <p>No clear process for reporting and resolving potential unexpected finds was evident. To ensure compliance with the requirements of the BMP a clear process is required.</p> | AGJV and their Project Ecologist develop a process to report, track and resolve potential unexpected finds and that this procedure be incorporated into an updated Unexpected Finds Protocol. |
| HLE-Obs-08 | B30 / Vegetation Clearing Procedures | <p>During the site inspection a difference in the data layers being used by the Project Ecologists (East Coast Ecology) and AGJV was observed (see Table 2-1).</p> <p>A lack of consistency in data layers being used may lead to discrepancies between areas assessed as a part of the pre-clearing process and subsequent clearing works.</p> | AGJV explore improved data sharing processes with their Project Ecologists to ensure consistent datasets are used. |

| Unique ID | Condition (s) | Auditor Observations | Recommendation |
|------------|--|--|--|
| HLE-Obs-09 | B30 / Vegetation Clearing Procedure / Biosecurity Management Plan | <p>Two different procedures are provided in the Vegetation Clearing Procedure and Biosecurity Management Plan regarding documenting weed species within a property.</p> <p>The pre-clearing report for BY-040 did not adequately document occurrence and distribution of priority weed species to allow management to occur.</p> <p>There is a lack of consistency between the two procedures, along with very onerous requirements in the Vegetation Clearing Procedure. It is likely that this is leading to inadequate mapping of weed species as a part of the pre-clearing surveys.</p> <p>The intent of weed mapping should be focused on understanding baseline conditions and control of priority weeds during construction, to prevent spread and ensure compliance is achieved.</p> | <p>AGJV engage with CPHR with a view to simplifying baseline data collection for weed species. This could include:</p> <ul style="list-style-type: none"> noting priority weeds occurring at low densities which teams need to be aware of, and undertaking detailed mapping of weed infestations which will need to be managed during construction. This information should be spatial in nature. |
| HLE-Obs-10 | B30 / C8 | <p>During the site inspection, a potential incident was observed where a bund wall around a tower pad had collapsed, and sediment had been deposited outside the TCZ.</p> <p>This potential incident occurred due to a gap in sediment control measures around the tower pad. It is the auditor's opinion that had sediment control measures been installed this event would not have extended beyond the TCZ.</p> | <p>AGJV should assess the extent of any damage to determine whether or not the event is classified as an incident or non-compliance as defined by the consent.</p> <p>For all areas of earthworks at future construction locations, ensure sediment control measures are installed around the entire extent of any earthworks and are suitable to ensure sediment is retained within clearing limits.</p> |
| HLE-Obs-11 | B25 | <p>The clearing limits set out in condition B25 and Table 2-1 include distinction between full and partial clearing. Partial clearing is likely to have a lower level of impact on biodiversity values than full clearing and has resulted in a reduced offset liability for the HumeLink project.</p> <p>The Clearing Limits Dashboard used by AGJV does not include separate tracking of full and partial clearing, meaning compliance with clearing limits set out in Table 2-1 cannot be assessed in future.</p> <p>The Clearing Limits Dashboard does not account for future clearing arising from elements of the project yet to be cleared, despite this being assessed in the permitting process. The tracking of this during the permitting process provides a proactive step for ensuring compliance with the clearing limits set in condition B25. This proactive step should be incorporated into the Dashboard.</p> | <p>The Clearing Limits Tracking Dashboard is updated to:</p> <ul style="list-style-type: none"> allow tracking of full and partial clearing to ensure alignment with condition B25 and Table 2-1, allow for future clearing to ensure potential exceedances are identified early so that appropriate actions can be implemented to prevent non compliance, and allow delineation of clearing permits that have been applied for (but not approved), approved and completed. |

| Unique ID | Condition (s) | Auditor Observations | Recommendation |
|-------------------|---------------|---|---|
| | | <p>The initial review of the Clearing Limits Dashboard appeared to identify that HLE has exceeded the allocated clearing limits for two PCTs and one fauna species. However, feedback provided by AGJV identified that this was a result of the inclusion of clearing permits which had not been approved, and that this is used to flag potential exceedances early. This process, of including clearing associated with unapproved clearing permits, could lead to confusion over whether the clearing limits set in Condition B25, and the allocation to HLE, had been exceeded.</p> | |
| HLE-Obs-12 | B26 | <p>The current BOP does not provide evidence of consultation with CPHR and the BCT, as required by condition B26.</p> | <p>Updates to the BOP, as required by condition B26(d), should include evidence of the date and timing for consultation with CPHR and the BCT.</p> |
| HLE-Obs-13 | B30 | <p>Condition B30 requires that the BMP is prepared in consultation with these agencies. The BMP does not provide evidence of consultation with CPHR or FCNSW, other than in the document control tab.</p> <p>Condition B30 requires that the BMP includes a description of the measures which would be implemented to minimise impacts to entities at risk of SAIL. Specific measures were not identified in the BAVR and the general measures outlined in the BMP do not provide specific mitigation measures for these entities.</p> | <p>Updates to the HLE BMP should include evidence of the date and timing for consultation with CPHR and the FCNSW.</p> <p>Include specific mitigation measures to be implemented for entities at risk of SAIL.</p> |
| HLE-Obs-14 | B30 | <p>A system is in place for marking of the project boundary. However, during the site inspection the marking was difficult to identify in some areas. There is a risk that these clearing limits are not sufficient to prevent incidents occurring, and this is consistent with the findings of the incident investigation for HLE-NC-01 (see above).</p> | <p>Review the colour coding system for the identification and delineation of environmental protection fencing across the project. The review should also include mechanisms for communicating colour coding systems to ensure consistency including:</p> <ul style="list-style-type: none"> • Visual signage • Site inductions • EWMS/ECMS and Workpacks |

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

No agency notices, warning letters, orders, penalty notices or prosecutions have been issued to the project to date.

3.3 Incidents

The Auditor was provided with a copy of the Incident and NCR register for the Audit period. During the Audit period, a total of seven minor incidents occurred (e.g. oil spills) which were classified as minor and non-reportable with minimal impact.

One potential incident was reported to DPHI on the 28/11/25 as a precaution. The potential incident related to four instances of access track construction resulting in impacts outside the project boundary and potential non-compliance with Conditions A2 (d) and B30.

3.4 Complaint Management

Mechanisms to make a complaint include

- The HumeLink complaints hotline
- HumeLink project email address

Contact details are provided on the project website, community notifications and factsheets.

During the Audit period a total of 46 complaints were received specifically relating to the HLE construction. A breakdown of the complaints is presented below.

- Traffic and transport including driver behaviour/speeding, road condition, use of incorrect traffic routes -16
- Dust – 12
- Property impacts including unauthorised access, gates left open - 6
- Consultation and communication - 5
- Parking in town centres – 2
- Project participation/work opportunities -2
- Noise – 1
- Visual impact, economic impact -1
- Offsite material removal – 1.

A complaints register is maintained and is available on the project website. The complaints register includes the following information.

- Date and time of the complaint
- How the complaint was made (e.g phone call, email)
- Local government area
- Topics raised
- Whether the complaint was avoidable or unavoidable
- A summary of the complaint
- Details of responses and any investigations
- Complaint reference number
- Outstanding and date closed.

Information documented on the complaints register was appropriate. All complaints were noted as being closed out. The AGJV has appointed an experienced and dedicated team of communications and stakeholder liaison professionals to oversee the implementation of the complaints management process. It can therefore be reasonably concluded that the complaints management system is effective.

3.5 Status of Recommendations From Previous Audits

This is the initial Audit and there are therefore no recommendations from previous Audits.

3.6 Adequacy of Environmental Management Plans and Strategies

Management plans and strategies relevant to this audit are summarised in Table 12.

Table 12: Environmental Management Plans relevant to this Audit

| Condition | Management Plan |
|------------------|--|
| A25 | Community Consultation Strategy |
| B16 | Noise and Vibration Management Plan |
| B24 | Soil and Water Management Plan |
| B28 ¹ | Supplementary Biodiversity Strategy |
| B30 ¹ | Biodiversity Management Plan |
| B33 | Heritage Management Plan |
| B36 | Transport Strategy |
| B39 | Traffic Management Plan |
| B52 | Emergency Plan |
| B57 | Waste Management Plan |
| B59 | Accommodation Camp Management Plan |
| B60 | Local Business and Employment Strategy |
| B61 | Social Impact Management Plan |
| B64 | Enabling Works Management Plan |
| C1 | Environmental Management Strategy |

Note to table:

1. Refer to the specialist biodiversity report (Appendix F)

The management plans and strategies implemented for this construction phase have been prepared by suitably qualified personnel, endorsed by the independent Environmental Representative, and approved by DPHI following consultation with relevant stakeholders. The plans meet the conditions of approval and other relevant legislative requirements. The management plans are adequate for the current scope of work and were observed to be implemented effectively in the field.

3.7 Key Strengths

Key strengths identified by the Audit are noted below

Water Resource Efficiency

Key strengths relating to water resource efficiency measures included the following:

- Water treatment facilities installed at accommodation camps for recycling of sewage and greywater
- Reuse of site runoff water in sediment basins for dust suppression
- Reduced in reliance on water carts for dust suppression through the implementation of:
 - Sealed access tracks
 - Progressive rehabilitation of exposed areas
 - Use of polymer spray to stabilise exposed surfaces
- Monitoring and tracking water consumption throughout the project.

Biodiversity

Key strengths relating to biodiversity include the following:

- AGJV have developed a strong permitting process which will assist in identifying both current and future compliance against condition B25 of the Infrastructure Approval. The permitting process includes an assessment of actual clearing for each permit against predicted clearing, flagging if clearing is predicted to exceed approved limits for each individual permit and requiring additional approvals. This process allows AGJV to proactively manage clearing against clearing limits set by condition B25, reducing the likelihood of a non-compliance in the future.
- During the site inspection the visit to BY-040 indicated that AGJV had permits and induction materials stored at entry to the property and these were readily provided to the auditor. This ease of access provides confidence that personnel coming to each property have ready access to the material required to ensure the HLE project minimises harm to the environment.
- The Project Ecologists, East Coast Ecology, were present during the site inspection. During the course of the site inspection, it was very clear that the Project Ecologist team had a comprehensive understanding of the project, the values present and were actively advising AGJV.
- The nest box installation program on HLE was a key positive observed during the site inspection. The installation team were well organised, had clear goals and were well led by Nea Pilgrim (Environmental Advisor, AGJV). To date, the HLE team has installed 1,575 nest boxes or artificial hollows. Given that only TCZ clearing has occurred and ECZ and HTZ clearing is yet to commence, this level of installation is impressive and well exceeds the commitment to install 30% of required nest boxes prior to clearing.

3.8 Stakeholder Consultation Outcomes

Issues raised by project stakeholders that were consulted with prior to undertaking the Audit are summarised in [Table 13](#) with the Auditor's response to each issue.

Table 13: Key stakeholder issues and Auditor response

| Organisation | Key Issues/Comments | Auditor Response |
|---|--|--|
| Government Agencies | | |
| Department of Planning, Housing and Infrastructure (DPHI) | Ensure you assess compliance with all conditions of consent applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans (including the Early Works Management Plan). | Noted. Refer to the Audit Table provided in Appendix C. |
| | Review the environmental performance of the development including actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary. | Refer to Sections 3 and 4. |
| | A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate. | Refer to Section 3.6. |
| | Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction etc. | Relevant notifications have been provided covering non compliances, commencement of construction etc. Further information is provided in the Audit Schedule (Appendix C) |
| | Ensuring all environmental controls have been installed, maintained and are being used in a fit and proper manner. | As observed in the Audit site inspection environmental controls covering key risks including erosion and sediment control, spills and chemical management, biodiversity, hazards and risks, noise, dust and traffic have been installed and appeared to be used in a fit and proper manner. Refer to observations made during the Audit site inspections (Section 2.5) with photographic evidence provided in Appendix E. |
| | Erosion and sediment management and maintenance across the Project. | AGJV have appointed an experienced CPESC to oversee the design and implementation of erosion and sediment controls. The role of the CPESC includes the preparation of standard drawings for implementation in the field as well as routine site inspections to confirm compliance with the requirements of these conditions. Additional inspections are undertaken by the ER and the AGJV Environment team which includes pre and post rainfall inspections. Reasonable and practical measures were observed to be implemented to minimise erosion and sediment generation by the project. Included: <ul style="list-style-type: none"> • Polymer soil binder application • Sealed access points and tracks to construction sites |

| Organisation | Key Issues/Comments | Auditor Response |
|--------------|---|---|
| | | <ul style="list-style-type: none"> • Sealed compound, carpark and recreational areas • Topsoil retention and rehabilitation • Sediment basins, clean water diversions and energy dissipators. |
| | Water management – surface and groundwater monitoring and management/reuse management and appropriate water licences have been obtained. | Refer to the Auditors response to issues raised by NSW DECCW (Water) as noted below. |
| | Compliance with all commitments/actions/monitoring/ reporting in all management plans, including evidence of the management plans being reviewed and revised. | <p>Transgrid have prepared and keep up to date a program for reviewing and updating environmental management plans. Management plans have also been updated in response to directions from DPHI made in accordance with Condition A3,</p> <p>Refer to observations made during the Audit site inspections (Section 2.5) with photographic evidence provided in Appendix E demonstrating the implementation of commitments made within management plans. Further evidence is documented in the Audit Table (Appendix C).</p> |
| | Compliance with overall approved project footprint. | Refer to Section 4.2 |
| | Traffic management/Truck movements/Vehicle use of approved routes. | <p>The AGJV has implemented a digital system and other mechanisms to ensure compliance with the approved vehicle routes. This includes</p> <ul style="list-style-type: none"> • Preparation and issue of a Vehicle Management Plan with approved routes to heavy vehicle drivers • Oversize/Overmass form includes VMP and is issues as a permit • Implementation of a GPS tracking system with vehicles including a geofence that alerts drivers in the circumstance that they are using an unapproved route. An alert is also issued to the management team • The GPS tracker is installed in all heavy and light vehicles as well as items of plant • All subcontractors are registered on the system and are required to do a pre-start prior to commencing their activities <p>Implementation of a Heavy Vehicle driver code of conduct which includes requirements to comply with all designated heavy vehicle routes</p> <p>Refer to the Auditors response to conditions B34- B39 for further detail.</p> |
| | Dust management, monitoring and control. | <p>Reasonable and practical measures observed during the site inspection to minimise the generation of dust included:</p> <ul style="list-style-type: none"> • Water carts |

| Organisation | Key Issues/Comments | Auditor Response |
|--------------|---|--|
| | | <ul style="list-style-type: none"> • Polymer soil binder application • Sealed access points and tracks to construction sites • Sealed compound, carpark and common areas at accommodation camps • Topsoil retention and rehabilitation • Speed limits <p>Realtime dust monitoring stations have been established with alerts issued when dust trigger levels are exceeded.</p> <p>There were no dust issues observed during the Audit site inspection.</p> |
| | Compliance with Noise limits as required in Noise Policy for Industry 2017 (EPA). | <p>Refer to the Auditors response to Conditions B5, B6, B7, B9 and B10 in relation to construction phase noise impacts.</p> <p>As noted in Condition B14 a corona and radio noise report has been prepared that assesses potential impacts associated with radio interference voltage, tv interference voltage, corona losses and surface voltage gradient.</p> <p>Condition B15 requires an operational noise compliance verification report to be completed following the commencement of operation with further assessment required in the operational phase audit to confirm compliance with operational noise limits.</p> |
| | Evidence of compliance with Community engagement commitments, complaints register monitoring, management and responses. | <p>Evidence of implementation of the Community Communications Strategy included:</p> <ul style="list-style-type: none"> • Project website • Project contact form and details • Works notifications • Complaints register • Quarterly newsletters and construction notices • Complaints register updated monthly and provided on project website. <p>Refer to the Auditors response to Condition A25 in Appendix C for further information as well as Section 3.4 regarding complaints management.</p> |
| | Emergency preparedness including but not limited to appropriate fire equipment such as water tanks and mobile water karts, training etc, working in hot weather processes/policies. | <p>As required by Condition B52, an Emergency Management Plan has been prepared. Evidence of implementation of the plan included:</p> <ul style="list-style-type: none"> • Installation 20,000 litre water supply tanks fitted with a 65mm Storz fitting and a FRNSW compatible suction connection located at construction compounds • Provision of the Emergency Management plan and procedures in a prominent position at construction compounds • Mobile trailer mounted water carts for deployment in the field in the event of a fire |

| Organisation | Key Issues/Comments | Auditor Response |
|--------------|--|--|
| | | <ul style="list-style-type: none"> • Tagged and tested fire extinguishers provided in site vehicles and construction compounds • Pre-start toolbox talks with fire danger risk assessments undertaken daily • Incorporation of hazards and safety risks into work packs covering emergency response, fire risk activities, hazardous substances and requirements hot works procedures and permit requirements. <p>Refer to observations made during the Audit site inspections (Section 2.5) with photographic evidence provided in Appendix E.</p> |
| | <p>In relation to the Biodiversity expert/s it is requested that they review in detail the implementation of the below management plans as well as the specific conditions of approval relevant to Biodiversity.</p> | <p>Noted. Refer to Appendix C, specifically Conditions B25- B30 and the specialist Biodiversity Report – Appendix F.</p> |
| | <p>The experts 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</p> | <p>The Biodiversity Expert attended the site on the 11th of February 2026. Observations and findings made by the biodiversity expert are presented in Appendix F.</p> |
| | <p>Consult with the following organisations:</p> <ul style="list-style-type: none"> • Registered Aboriginal Parties (RAPs) from the EIS • Australian Government Department of Climate Change, Energy, Environment and Water • Forestry Corporation of NSW • Fire and Rescue NSW • NSW Rural Fire Service • Heritage Division within NSW DCCEEW • DPE Water / Water NSW / NRAR • Local Councils - Wagga Wagga City, Snowy Valleys, Cootamundra-Gundagai Regional, Upper Lachlan Shire, Yass Valley and Goulburn-Mulwaree Council • Environment Protection Authority • NSW DCCEEW CPHR (previously known as BCS) • Transport for NSW. | <p>These organisations were consulted with prior to undertaking the Audit. Issues raised are summarised with the Auditors response below. Consultation records are provided in Appendix D.</p> |

| Organisation | Key Issues/Comments | Auditor Response |
|--|--|---|
| Conservation, Programs, Heritage and Regulation, within the NSW Department of Climate Change, Energy, the Environment and Water (CPHR) | Issues raised in by CPHR are documented in Appendix F with the Biodiversity Specialists response provided there. | Responses to issues raised by CPHR are provided in Appendix F. |
| NSW EPA | Implementation, maintenance and effectiveness of relevant environmental controls and mitigation measures to prevent offsite impacts/disturbances (e.g., in relation to dust, noise, vibration, etc.) | As observed in the Audit sites inspection environmental controls covering key risks including erosion and sediment control, spills and chemical management, biodiversity, hazards and risks, noise, dust and traffic have been installed and appeared to be operating in a fit and proper manner. Refer to observations made during the Audit site inspections regarding environmental controls (Section 2.5) with photographic evidence provided in Appendix E. |
| | Complaints handling procedure(s) | Refer to Section 3.4 |
| | Waste management (including relevant details regarding the various waste streams and their appropriate/lawful disposal). | Refer to the Auditors response to conditions B53-B57 Observations made during the Audit site inspections in relation to waste management practices are provided in Section 2.5 with photographic evidence provided in Appendix E. |
| | Please note, the EPA is currently investigating several community complaints made in relation to the Humelink project. Should our investigations reveal any additional issues, we will notify you accordingly. | Noted. EPA have not contacted the Auditor following EPA's initial response. |
| Fire and Rescue NSW | FRNSW have no relevant matters, issues or focus areas be considered by the audit. | Noted |
| NSW Rural Fire Service | RFS do not have any specific concerns that need to be addressed as part of this process. | Noted |
| NSW DCCEEW Water Group | The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: <ul style="list-style-type: none"> • Water Management Plans and related sub-plans e.g. Site Water Balance, Erosion and Sediment Control Plan, Surface and Groundwater Management Plan. | Key management plans prepared relating to water management include the following: <ul style="list-style-type: none"> • Soil and Water Management Plan prepared in accordance with Condition B24 • Accommodation Camp Management Plan, prepared in accordance with Condition B59 |

| Organisation | Key Issues/Comments | Auditor Response |
|--|---|--|
| | <ul style="list-style-type: none"> Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan. <p>The requirement to prepare and implement trigger action response plans for water source impacts for water source impacts which set clearly defined limits and actions. This is to be reported on within annual an exceedance-based reporting.</p> <ul style="list-style-type: none"> Water supply availability is clearly defined for the project. Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025. Water meeting at the site is in accordance ith 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 exceeds and how these are managed/ mitigated. | <p>These management plans have been prepared in consultation with relevant stakeholders and approved by DPHI.</p> <p>The management plans are comprehensive and describe the control measures to be implemented for:</p> <ul style="list-style-type: none"> Water supply, storage, discharge and re-use Waste water treatment and re-use from accommodation camps Erosion and sediment control Management of water intensive operations such as concrete batching Opportunities for reuse of site water for dust suppression and general construction Monitoring and reporting. <p>Refer to the Audit Schedule in Appendix C for further information regarding their implementation.</p> |
| Natural Resources Access Regulator (NRAR). | The responsible department for enquiries regarding SSI Consultation, controlled activity approvals, works on waterfront land and licences and approvals for large water users, is the Department of Climate Change, Energy, Environment & Water - Water Licensing (DCCEEW - Water). | Noted. The Auditor consulted separately with the NSW DEECCW. Issues raised and the Auditors response is noted above. |
| Heritage NSW | Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. It is recommended that the Department of Planning Housing and infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project. | The Auditor confirms that the conditions of approval and management plans relating to heritage have been considered by the Audit. Refer to the Audit schedule in Appendix B for further information. DPHI compliance team were contacted prior to the Audit as noted above with no non compliances relating to heritage identified. |

| Organisation | Key Issues/Comments | Auditor Response |
|--|--|--|
| Transport for NSW | <p>TfNSW noted the following issues to be considered by the Audit</p> <ul style="list-style-type: none"> • Compliance with conditions of consent as noted in Part B of issued consent - conditions B34 to B39; in particular: • Compliance with the requirements of the Traffic Management Plan (Condition B39). • Adherence to Drivers' Code of Conduct is appropriately monitored. • Adherence to program that ensures drivers working on the development receive suitable training on the code of conduct and any relevant obligations under the Traffic and Transport Management Plan. • Road Maintenance (Condition B38). • Road upgrade/intersection treatment works are conducted as outlined within the Consent(Condition B37) and as noted in Appendix 4. | Refer to the Auditors response to Conditions B34- B39 in Appendix C. |
| DCCEEW (Commonwealth) | No issues raised, referred the Auditor to the NSW DCCEEW. | Noted. The Auditor consulted separately with the NSW DEECCW. Issues raised and the Auditors response is noted above. |
| Forestry Corporation NSW | No response received. | N/A. |
| Rural Fire Service | No response received. | N/A. |
| Aboriginal Stakeholders | | |
| Various RAPS and aboriginal stakeholders that were involved with the EIS | No responses received or issues raised in relation to HLE | N/A. |

| Organisation | Key Issues/Comments | Auditor Response |
|--|--|---|
| Local Government (Councils) | | |
| Goulburn Mulwaree Council (GMC) | <p>GMC raised a number of historical issues and concerns a copy of the full GMC submission is included in Appendix D. Key issues raised by GMC related to the planning for and consultation regarding the temporary accommodation camps including:</p> <ul style="list-style-type: none"> • Cumulative impact of other State Significant projects (quarries, renewables, energy from waste) • High occupancy in accommodation year-round, low rental availability and associated impacts • Moving workers in/out for major events and peak periods <p>The Updated SIMP (Stage 2) included reference to a dedicated accommodation coordinator to manage social impacts under the dispersed accommodation model (Table 12). It would be good to understand when and how this role will be resourced as we have not received monthly reports, pulse checks or any further detail.</p> <p>With regards to 5.4 Foundational Monitoring Tools and 5.5 Mitigation and Management Framework - can they please ensure the listed impacts are being reported on and that the monitoring and reporting frequency detailed in Table 12 is being adhered to.</p> | <p>A full copy of the GMC submission in relation to this Audit is provided in Appendix D.</p> <p>GMC comments are noted. The main issues appear to be in relation to the implementation of the SMP. A summary of the Auditors response to these issues are as follows:</p> <ul style="list-style-type: none"> • Both the Yass Valley and Adjungbilly accommodation camps have appointed dedicated camp managers whose role is to oversee the day-to-day operations and implement the Accommodation Camp Management Plans. They are supported by a separate team of specialists whose role is to oversee the implementation of the SIMP • Quarterly Reporting for the first quarter after the commencement of construction in accordance with the SIMP is scheduled to be completed by the end of March 2026, which will be publicly available on the project website in accordance with Condition B61(h)(vi). |
| Snowy Valleys Council (SVC) | SVC identified a number of conditions that they considered to be relevant to the Audit as follow B16, B17, B36, B38, B39, B52, B57, B59, B60, B61, B64, C7, C10 and C11. | The Auditor confirms these conditions have been considered and assessed by the Audit with responses to each individual condition provided in Appendix C. |
| Cootamundra Gundagai Regional Council (CGRC) | <p>CGRC raised the following issues of concern:</p> <ul style="list-style-type: none"> • Unsafe driving and speeding vehicles associated with the project. • Vehicles speeds through Adjungbilly village area; and • Vehicles not giving way at the intersection of Fern Hill Road and Nanangroe Road. • Council have met with the local Police Inspector and the concerns of unsafe driving and speeding in the Adjungbilly area by truck drivers working on the Humelink project this were | <p>In response to issues raised by GGRC, AGJV noted the following:</p> <p>Meetings with Police and Councils</p> <ul style="list-style-type: none"> • HumeLink East (and Transgrid) has regular meetings with Councils along the project alignment, including the Cootamundra-Gundagai Regional Council • From April 2026, a police representative will be attending HumeLink East meetings with both the Yass Valleys Council and Upper Lachlan Shire Councils. HumeLink East is open to a police representative also joining the monthly meeting with Cootamundra-Gundagai Regional Council. |

| Organisation | Key Issues/Comments | Auditor Response |
|--------------|--|--|
| | <ul style="list-style-type: none"> raised. The Inspector has indicated that she would like to be involved in the meeting with Transgrid and residents. Possible deviations from the Vehicle Movement Plan (VMP) Council was consulted on. Council have received multiple National Heavy Vehicle Regulator permit applications for vehicles which are not within the Humelink East Approved Vehicle Movement Plan. These have been refused where they do not align with the approved VMP, however, raises doubt as to which roads they are using for general access vehicles. | <ul style="list-style-type: none"> HumeLink East will also be attending the next regional Local Emergency Management Committee LEMC meeting in Snowy Valleys on 24, March 2026. <p>Heavy vehicles</p> <ul style="list-style-type: none"> HumeLink East is currently rolling out tracking devices to subcontractor water carts and concrete trucks working on the project. The rollout is expected to be completed by mid-May 2026. The trackers will allow the project to monitor both their speed and routes being travelled and respond accordingly. <p>Speeding</p> <ul style="list-style-type: none"> HumeLink East has developed a disciplinary framework for speeding. The framework sets out a range of disciplinary measures for project employees and subcontractors which may include written warnings and formal disciplinary proceedings, loss of driving privileges on the project and termination of employment. <p>Travelling on approved routes:</p> <ul style="list-style-type: none"> All necessary permits and approvals are in place for heavy vehicles operating on HumeLink East in accordance with the Heavy Vehicle National law (NSW) <p>Refer also to the Auditors response to Conditions B34- B39 in Appendix C.</p> |

4 Assessment of Actual Versus Predicted Impacts

4.1 Predictions Made By The EIS

The Auditor conducted a high-level review of the EIS to determine consistency of the actual and predicted impacts with the current impacts of the HLE Project. The EIS identified key environmental risks with the potential to cause environmental impact as follows:

- Biodiversity
- Aboriginal Heritage
- Bushfire
- Land use and property
- Non-Aboriginal heritage
- Economic
- Social
- Landscape character and visual
- Noise and Vibration
- Soils, contamination and geology
- Surface water and groundwater
- Hydrology and flooding
- Hazards and risks
- Traffic and transport
- Air quality
- Climate change and greenhouse gases
- Waste
- Cumulative impacts

In accordance with the conditions of approval, management plans have been prepared with appropriate resources applied to implement the plans, with independent appointments and technical specialists to check and monitor their implementation.

There were no observed off-site impacts such as:

- Dust or mud tracking on local roads
- Excessive noise or vibration emissions, noting that current activities are at a substantial distance from residential or other sensitive receivers
- No incidents of fuel, chemical spills, unlawful waste disposal or pollution of waters observed or reported.

Given the degree of compliance with the CoA, the observations made during site investigations, Audit interviews and records reviewed as part of the Audit, it may be reasonably concluded that the environmental impacts of construction activities to date are consistent with predictions made in the EIS.

4.2 Project Boundary

In assessing compliance with the project boundary, the Auditor undertook a high-level review of the site layouts of the key areas inspected as part of the Audit site inspection including the Yass Accommodation Camp, the Bannaby Substation and activities being undertaken on the general project alignment. The project boundaries observed in the field generally appeared to be consistent with the site layouts as depicted in the EIS. Other observations made by the Auditors during the site inspections and Audit interviews in relation to the project boundary are as follows:

- Site boundaries at main compounds and constructions sites were clearly delineated with robust fencing provided to prevent activities outside the project boundary
- There were no stockpiles or other materials observed to stored outside the main work sites
- There was no evidence observed of tyre tracking outside established access tracks
- Visual markers were placed on the general alignment to advise operators of the approved EIS project boundary
- Survey markers were placed to identify the tower construction sites

- A GPS system has been implemented to track the location of both plant and equipment and construction vehicles including trucks and personal vehicles to ensure they stay within the EIS boundary and along approved vehicle access routes.
- An alarm system has been implemented with alerts issued to operators as well as management to enable preventative action to be taken to avoid a boundary excursion.

Although the systems appear to be appropriate to prevent unauthorised activities outside the approved project boundary, there have been several instances where exceedances of the project boundary have occurred and reported to DPHI. Please refer to Section 3.1 for further details.

4.3 Biodiversity Clearing Limits

An assessment of the Biodiversity Clearing Limits was undertaken by the Biodiversity Specialist and is reported in Section 4.3 of Appendix F. The assessment notes that:

“At this stage of the project, minimal clearing has been undertaken, with clearing limited to the TCZ only. It is highly unlikely that clearing limits have been exceeded. However, future clearing is not currently accounted for due to the proposed modification of Condition B25.

Further assessment will need to be undertaken in future Audits to confirm compliance with (or otherwise) of the project clearing limits”.

Appendix A DPHI Auditor Approval

Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-36656827-PA-119

Jeremy Roberts
Major Project Delivery Director (HumeLink)
NSW Electricity Networks Operations Pty Limited
23/09/2025

Sent via the Major Projects Portal only

Subject: HumeLink - Auditor Approval Request

Dear Mr. Roberts

I refer to your request, submitted to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 19 September 2025, seeking the Planning Secretary's approval of suitably qualified, experienced, and independent team to conduct an Independent Audit, as required by Schedule 2, Condition C13 for the HumeLink Project SSI-36656827 (Approval).

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Schedule 2 Condition C13 of the Approval and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Mr Richard Peterson (Lead Auditor) - Trigalana Environmental Pty Ltd
- Mr Ken Holmes (Alternative Auditor) - Barnett and May

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of Approval and the NSW Planning *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- Construction Audits – The above audit team is approved for the duration of construction and the initial operational audit of the development. However, NSW Planning reserves the right to request an alternate auditor or audit team at any time.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.

Department of Planning, Housing and Infrastructure

- Endorsed experts/specialists must attend the site inspection component of the audit unless otherwise agreed by the Planning Secretary.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact me on 0242471851 or email compliance@planning.nsw.gov.au

Yours sincerely



Jennifer Rowe
A/Team Leader Compliance - South
Compliance

As nominee of the Planning Secretary



Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-36656827-PA-157
Mr Jeremy Roberts
Major Project Delivery Director (HumeLink)
NSW Electricity Networks Operations Pty Limited
10/12/2025

Sent via the Major Projects Portal only

**Subject: HumeLink – Independent Environment Audit (IEA) Team - Biodiversity Expert
Endorsement Request**

Dear Mr. Roberts

I refer to your request for the Planning Secretary's approval of a suitably qualified, experienced, and independent Biodiversity Expert to assist in the Independent Environmental Audit (IEA) of the HumeLink (East and West), SSI-36656827 as modified (the approval), submitted to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 5 December 2025.

NSW Planning has reviewed the independent 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 Part C Condition C13 of the approval and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse Nathan Harvey of Nature Positive Advisory as the Biodiversity Expert.

Please note:

- This correspondence must be appended to the Independent Audit Report.
- Nathan Harvey is approved for the duration of construction and the initial operational audit of the development. However, NSW Planning reserves the right to request an alternate auditor or audit team at any time.
- Nathan Harvey must attend site (unless otherwise agreed by the Secretary) and the IEA report must include specific sections (and/or an appended report) prepared by Nathan Harvey which addresses his assessment of compliance (and recommendations for improvements) in respect to the conditions, BDAR, EIS, management plans and any other matters considered relevant for his area 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

Appendix B Auditor Declaration

| | |
|-------------------------------|---|
| Project name | Hume Link East |
| Consent Number | SSI 36656827 |
| Description of Project | Expansion of the existing Bannaby 500 kV substation, a new 500 kV double circuit transmission line connecting at the Wondalga interface point with HumeLink West.Development Consent (SSI 36656827) |
| Land | Land in the Snowy Valleys, Cootamundra-Gundagai Regional, Upper Lachlan Shire, Yass Valley and Goulburn Mulwaree local government areas as described in the EIS and shown on the development plans. |
| Proponent | NSW Electricity Networks Operations Pty Ltd (Transgrid) |
| Approval Authority | Minister for Planning and Public Spaces |
| Date | 13 May 2026 |

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

I declare that

- (i) the Audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- (ii) the findings of the Audit are reported truthfully, accurately and completely;
- (iii) I have exercised due diligence and professional judgement in conducting the Audit;
- (iv) I have acted professionally, objectively and in an unbiased manner;
- (v) I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Audit, or by relationship as spouse, partner, sibling, parent, or child;
- (vi) I do not have any pecuniary interest in the Audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- (vii) neither I nor my employer have provided consultancy services for the Audited project that were subject to this Audit except as otherwise declared to the Department prior to the Audit; and
- (viii) I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for Auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so

Notes:

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

Name of Auditor Richard Peterson

Signature



Qualification BE Civil, M Environmental Management

Company: Trigalana Environmental Pty Ltd

Appendix C Audit Table

Part A – ADMINISTRATIVE CONDITIONS

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|---|--|--|---|-------------------|
| OBLIGATION TO MINIMISE HARM TO ENVIRONMENT | | | | |
| A1 | <p>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 pre-construction minor works, road upgrades, construction, operation, rehabilitation or decommissioning of the development.</p> | <p>Lead Auditor</p> <ul style="list-style-type: none"> • Site Inspection, 3 and 4 February 2026 • Audit Interview 5 February 2026 • Documents reviewed as part of the audit and noted below <p>Biodiversity Specialist</p> <ul style="list-style-type: none"> • Site visit to BY-040 • Audit interview on 11 February 2026 • Additional information provided by HLE on 13 March 2026 | <p>Lead Auditor</p> <p>Reasonable and feasible measures were observed to be implemented at the areas inspected during the audit site inspection as noted in this Audit report with photographic evidence provided in Appendix E. The measures observed were consistent with the measures committed to within the various construction environmental management plans and covered the key environmental risks including erosion and sediment control, dust, land disturbance, biodiversity, biosecurity, noise, traffic and transport.</p> <p>Biodiversity Specialist</p> <p>Data collected as a part of the BAVR has been utilised to update the constraints layers referred to in Section 7.7 and shown in Appendix J of the BMP. This constraints layer is used to define micro-siting efforts and assess any design changes.</p> <p>It is noted that this information is not included in the BMP review as a part of this audit. It is recommended that the BMP is updated to include revised constraints mapping.</p> <p>Efforts to minimise harm were observed during the site visit to BY-040</p> | Compliant |
| TERMS OF APPROVAL | | | | |
| A2 | <p>The development must be carried out;</p> <ol style="list-style-type: none"> In compliance with the conditions of this approval In accordance with all written directions of the of the Planning Secretary; Generally in accordance with the EIS; and Generally in accordance with the Development Layout in Appendix 1. | <ul style="list-style-type: none"> • Site Inspection, 3 and 4 February 2026 • Audit Interview, 5 February 2026 • HLE Obligations Register • Transgrid site inspection records (various) • AGJV site inspection records (various) | <p>Acciona Genus Joint Venture (AGJV) were able to demonstrate through the preparation, review, approval and the implementation of the Construction Environmental Management Plans that the commitments and obligations set out in the documents listed in Condition A2 are being fulfilled. AGJV have a detailed obligations register to document and track compliance with commitments within the EIS, CoA's EPBC approval, and obligations in the environmental management plans.</p> <p>Both AGJV and Transgrid have appointed teams of experienced environmental managers and co-ordinators who provide oversight of compliance matters and undertake regular inspections to check the obligations in the management plans are implemented on site. Additional independent oversight is provided by the Environmental Representative.</p> | Non-Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | | <p>AGJV confirmed there have been no written directions from the Planning Secretary.</p> <p>As noted in conditions A19 and C11, five non compliances have been reported to DPHI in accordance with this condition. This included:</p> <ul style="list-style-type: none"> • Non-compliance with Conditions A2 (d) and B30 relating to four instances of access track construction resulting in impacts outside the project boundary. • Potential non-compliance with conditions B55 and B56 relating to the offsite export of material from the Faulder Ave Compound (Auditor note: this was later assessed as compliant following further investigations) • Non-Compliance with Condition B64 relating to works occurring outside the project boundary • Non-compliance with Condition C11 relating to late notification of a non-compliance. The notification related to works commencing prior to the ER signoff of the Minor Impacts Checklist (A5) <p>Therefore based on the reported non-compliance with Conditions A2, B30, B64 and C11 compliance with Condition A2 has not been achieved in its entirety.</p> | |
| A3 | <p>The Proponent must comply with any requirement/s of the Planning Secretary arising from the Department’s assessment of:</p> <ol style="list-style-type: none"> Any strategies, plans, or correspondence that are submitted in accordance with this approval; Any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and The implementation of any actions or measures contained in these documents. | <ul style="list-style-type: none"> • Audit Interview 5 February 2026 • Documents reviewed as part of the audit and noted below • Letter from DPHI to Transgrid titled “HumeLink East – Addendum Aboriginal Cultural Heritage Assessment Report” dated 5/12/25 • Letter from WolfPeak to Transgrid titled “Transgrid: ER Review of Heritage Management Plan, HumeLink East (SSI36656827), dated 18/12/25 • Letter from DPHI to Transgrid titled “HumeLink – HumeLink East Heritage Management Plan” dated 16/1/26 | <p>The Addendum Cultural Heritage Assessment Report (Addendum ACHAR) was prepared by Kelleher Nightingale Consulting and approved by DPHI on 5/12/25. In their letter of approval, DPHI issued a requirement under condition A3 as follows: <i>An amended Heritage Management Plan (HMP) in respect of HumeLink East (Stage 3a) must be submitted to the Planning Secretary for approval under Condition B33 by 23 December 2025. The amended HMP must incorporate the management and mitigation measures from Sections 11 and 12 in the Addendum ACHAR approved by the Planning Secretary (reference number SSI-36656827-PA-118)</i></p> <p>Accordingly the Heritage Management Plan was updated and endorsed by the ER on the 18/12/26 noting “ <i>the HMP is consistent with the terms of the Approval and that the update is in line with the Departments 5 December 2025 Direction</i>” DPHI approved the revised HMP on 16/1/26</p> | Compliant |
| A4 | <p>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</p> | <ul style="list-style-type: none"> • “Yass Valley Way Accommodation Facility, Accommodation Camp Consistency Assessment, February 2025” Rev B, dated 19/2/25 | <p>The project is being undertaken generally in accordance with the terms and conditions of this approval and the environmental assessment documentation. Consistency Assessments (CAs) are undertaken to</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>A2(c), or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.</p> | <ul style="list-style-type: none"> • “Minor Consistency Assessment Checklist – 007 AP454”, AGJV, dated 17/03/25 • “Minor Consistency Assessment Checklist- 008, Non-Destructive Testing (NDD at Gadara Road and Visy”, AGJV, dated 01/04/25 • “Minor Consistency Assessment Checklist – 009 Barnaby Substation Permanent Fill Area” AGJV, dated 22/04/25 • “Minor Consistency Assessment Checklist” AGJV, dated 17/04/25 • “Construction of a Groundwater bore at Adjungbilly Camp, Minor Consistency Assessment Report August 2025” Revision 01, (undated) • “HumeLink East Construction Worker Accommodation, Consistency Assessment Report July 2025” Rev 1, dated August 2025 • Access Point 433 Signage Installation on Gocup Road, Minor Consistency Assessment Report, July 2025” rev 0, (undated) • Work Pack 07 Signage Installation, Minor Consistency Assessment Report, October 2025” Revision 00, (undated) • “Work Pack 06 Signage Installation, Minor Consistency Assessment Report, October 2025” Revision 00, • “Access Track 432 (Work Pack 26) and Access Track 456 (Work Pack 27), Minor Consistency Assessment Report, November 2025” Rev 00, • “Access Track AT353-358, MA-100, Consistency Assessment Report, November 2025” revision 00, (undated) | <p>ensure consistency with project approvals (and documents listed). A register of consistency assessments is utilised to track project changes.</p> <p>Examples of CA’s prepared during the Audit period and provided to the Auditor as evidence include:</p> <ul style="list-style-type: none"> • Yass Valley Way Accommodation Facility • Access points 454 and 456 • Non-destructive testing at Gadara Road and Visy • Barnaby Station Permanent Fill Area • Yass Industrial Park Laydown • Construction of a Groundwater bore at Adjungbilly Camp • Signage Installation • Construction worker accommodation • Access tracks 432 and 435 • Access Track AT353-358, MA-100, | |
| A5 | <p>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 C7.</p> | <ul style="list-style-type: none"> • Letter from DPE to NSW Electricity Networks Operations, titled “Subject: Request for extension of time to undertake Enabling Works (Stage 2) under Condition B66, and update approved management plans under Condition B67” dated 08/05/25 • Letter from DPHI to Transgrid titled” HumeLink Independent Environmental Audit, timing request” dated 20/11/25 • Letter from DPHI to Transgrid, titled “Timing Amendment for the updated Biodiversity Assessment Verification Report” dated 05/12/25 • Letter from Transgrid titled to DPHI “HumeLink – Request to Amend the Timeframe for Updating the | <p>During the Audit period, amended or extended timeframes were granted by DPHI for the following:</p> <ul style="list-style-type: none"> • Extension of time to undertake enabling works (under condition B66) and update approved management plans (under condition B67) • Extension of time to undertake Independent Environmental Audits under Condition C13 • Timing amendment for the updated Biodiversity Assessment Verification Report • Extension of time for the Biodiversity Offset Package. | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | <ul style="list-style-type: none"> BAVR – SSI-36656827” dated 26/11/25 Letter from DPE to Transgrid titled “HumeLink – Extension Request for Biodiversity Offset Package” dated 20/03/25 Letter from Transgrid to DPHI, titled “HumeLink Biodiversity Offset Package – Request for Extension of Conditional Approval – SSI-36656827 Condition B26” dated 17/03/25 | | |
| LAPSE OF APPROVAL | | | | |
| A6 | <p>This approval will lapse if the Proponent does not physically commence the development within 5 years of the date on which it is granted.</p> | <ul style="list-style-type: none"> Infrastructure Approval SSI 36656827, dated 13/11/24 Letter from DPHI to HumeLink titled “HumeLink Commencement of Construction Stage 3 A (ii) HumeLink East” dated 24/9/25 Letter from Transgrid to DPHI titled “HumeLink – Notification of the Commencement of Construction – Stage 3A (ii) HumeLink East Condition C7” dated 24/9/25 | <p>The commencement of construction of HumeLink East was the 29/9/25 and within 5 years of the date of consent (13/11/24)</p> | Compliant |
| LIMITS OF APPROVAL | | | | |
| A7 | <p>This approval does not authorise the development of any quarry operation, including:</p> <ul style="list-style-type: none"> a) Coffee Pot Quarry; and b) Three Mile Quarry <p><i>Note: This condition does not preclude use of extractive material from these quarries in accordance with a valid development consent or other approval or modifying this Approval to permit the development of these quarries in the future.</i></p> | <ul style="list-style-type: none"> Audit Interview 5 February 2026 Site Inspection, 3 and 4 February 2026 | <p>It was noted that these quarry operations are not within the HLE project and are not being utilised by the HLE project team</p> | Not triggered |
| EVIDENCE OF CONSULTATION | | | | |
| A8 | <p>Where conditions of this approval require consultation with an identified party, the Proponent must:</p> <ul style="list-style-type: none"> a) Consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and | <ul style="list-style-type: none"> A8 Consultation Report, Accommodation Camp Management Plan, June 2025” Revision B, A8 Consultation Report, Yass Accommodation Camp Management Plan, September 2025” Revision C, | <p>Consultation reports have been prepared in accordance with this condition. Reports are comprehensive and includes the following information:</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>b) Provide details of the consultation undertaken including;</p> <p>(i) The outcome of that consultation, matters resolved and unresolved; and</p> <p>(ii) Details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved.</p> | <ul style="list-style-type: none"> • “A8 Consultation Report Addendum Aboriginal Cultural Heritage Assessment Report, November 2025” revision A, • “A8 Consultation Report, Bushfire Emergency Management and Evacuation Plan, August 2025” Rev C, • “A8 Consultation Report, Biodiversity Management Plan, August 2025” Re B • Enabling Works Consultation Report” Rev A • Table titled “HMP Agency Consultation (refer to HMP for RAP consultation” dated 16/12/24 • “A8 Consultation Report, Local Business and Employment Strategy, June 2025” Rev A, • Table titled “OOHW protocol agency consultation” dated 21/01/25 • “A8 Consultation Report, Social Impact Management Plan, June 2025” Rev A • “A8 Consultation Report, Social Impact Management Plan, October 2025” Rev B • “A8 Consultation Report, Soil and Water Management Plan, June 2025” Rev A • Table, titled “Waste Management Plan agency consultation” dated 16/01/25 | <ul style="list-style-type: none"> • Details of the stakeholder consulted with • Type of engagement (e.g. email, document review request) • Engagement date • Response date • Details of stakeholder comments • AGJV response/action • Issue status (resolved/unresolved) and details of any disagreements • Evidence of consultation with stakeholder. | |
| PAYMENT OF REASONABLE COSTS | | | | |
| A9 | 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. | <ul style="list-style-type: none"> • Audit Interview 5 February 2026 | No experts have been appointed to undertake such reviews for the HLE project | Not triggered |
| ENVIRONMENTAL REPRESENTATIVE | | | | |
| A10 | Prior to commencing the development, an Environmental Representative (ER) must be approved by the Planning Secretary and engaged by the Proponent. | <ul style="list-style-type: none"> • Letter from Transgrid titled “HumeLink – Nomination of Environmental Representative for the Planning Secretary’s Approval – SSI-36656827 Condition A10” dated 14/11/24 • Letter from DPHI to Transgrid titled “HumeLink – Environmental Representative Approval” dated 15/11/24 • Letter from DPHI to Transgrid, titled “Subject: HumeLink – Approval of Additional Alternate | <p>DPHI approved a lead Environmental Representative (ER) and an additional alternate ER on 15/11/24.</p> <p>The lead and alternate ERs were approved by DPHI prior to the commencement of the development on 22/11/24. An additional, alternate ER was approved by DPHI on 5/2/25.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | <ul style="list-style-type: none"> • Environmental Representative” dated 05/02/25 • Letter from DPHI to Transgrid, titled • Letter from Transgrid, to DPHIE, titled “Re: HumeLink – Nomination of Environmental Representative for the Planning Secretary’s Approval – SSI-36656827 Condition A10” dated 14/11/24 • Letter from Transgrid, titled “HumeLink – Nomination of additional Environmental Representative for the Planning Secretary’s Approval – SSI-36656827 Condition A13” dated 04/02/25 • Letter from DPHI to Transgrid titled “HumeLink – Environmental Representative Review Requirements” dated 03/12/24 | | |
| A11 | The Planning Secretary’s approval of an ER must be sought no later than one week before commencing the development. | <ul style="list-style-type: none"> • Letter from Transgrid to DPHI titled “HumeLink – Notification of the Commencement of Development – Stage 1A HumeLink East SSI36656827 Condition C7” dated 22/11/24 • Letter from Transgrid, titled “HumeLink – Nomination of additional Environmental Representative for the Planning Secretary’s Approval – SSI-36656827 Condition A13” dated 04/02/25 • Letter from Transgrid titled “HumeLink – Nomination of Environmental Representative for the Planning Secretary’s Approval – SSI-36656827 Condition A10” dated 14/11/24 • Letter from DPHI, titled “HumeLink – Environmental Representative Review Requirements” dated 03/12/24 | DPHI were notified of the commencement of the Development on the 22/11/24. Approval of the ER was sought on the 14/11/24 no later than 1 week prior to the commencement of the development. The ER was subsequently approved on 15/11/24. | Compliant |
| A12 | 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 section 2.2, 2.3, 2.4 and 3 in the <i>Environmental Representative Protocol</i> (Department of Planning and Environment, October 2018). | <ul style="list-style-type: none"> • Letter from Transgrid to DPHI titled “HumeLink – Notification of the Commencement of Development – Stage 1A HumeLink East SSI36656827 Condition C7” dated 22/11/24 • Letter from DPHI to Transgrid titled “HumeLink – Approval of Additional Alternate Environmental Representative” dated 05/02/25 • Letter from DPHI to Transgrid, titled “HumeLink – Environmental Representative Approval” dated 15/11/24 • Letter from Transgrid, titled “HumeLink – Nomination of additional Environmental Representative for the Planning Secretary’s Approval – SSI-36656827 Condition A13” dated 04/02/25 | The nominated ER’s have substantial experience in performing the role of ER on SSI projects including large scale linear infrastructure projects in regional areas. The nominated ERs meet the requirements of this condition. | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | <ul style="list-style-type: none"> Letter from Transgrid to DPHI titled "HumeLink – Nomination of Environmental Representative for the Planning Secretary's Approval – SSI-36656827 Condition A10" dated 14/11/24 Letter from DPHI to Transgrid, titled "HumeLink – Environmental Representative Review Requirements" dated 03/12/24 | | |
| A13 | <p>The Proponent shall engage the Environmental Representative(s) during all construction activities, or as otherwise agreed by the Planning Secretary. The Environmental Representative(s) shall be the Proponent's principal point of advice in relation to the environmental performance of the project and shall have responsibility for;</p> <p>a) Reviewing the documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so;</p> <p>(i) Make a written statement (including a 'Review Table' in a Word format) to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or</p> <p>(ii) Make a written statement to this effect before the implementation of such documents (if those documented are required to be submitted to the Department for information or are not required to be submitted to the Department);</p> <p>b) As may be required by the Planning Secretary, assisting the Department in the resolution of community complaints;</p> <p>c) Considering any minor amendments to be made to the plans/ strategies in Table 1, Schedule 1 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;</p> <p>d) Overseeing the implementation of all construction environmental management plans and monitoring programs required under this approval, and advise</p> | <ul style="list-style-type: none"> Excel spreadsheet titled "GEN-R-AGJV-GEN-00324.08-ACMP Comments Register Rev1.4 ER Comments" dated 17/12/24 Letter from WolfPeak to Transgrid, titled "Re: ER Review of Accommodation Camp Management Plan – HumeLink East (SSI-36656827)" dated 27/06/25 Xcel Spreadsheet titled "AMCP GEN-R-AGJV-GEN-000618.10-Yass AMCP Comments Register_RevE_ER comments" dated 07/09/25 Letter from WolfPeak to Transgrid, titled "RE: ER Review Of Accommodation Camp Management Plan – HumeLink East (SSI – 36656837)" dated 12/08/25 HumeLink ER Monthly Report 2509_Rev 2.0 Xcel spreadsheet titled "GEN-R-AGJV-GEN-000479.03-BEMP Rev 1.5 Comments Register TG+ER" dated 02/10/25 Letter from WolfPeak to Transgrid, titled "RE: ER Review of Emergency Plan – HumeLink East (SSI-36656827)" dated 12/08/25 Excel spreadsheet titled "BMP East ER Comments Register Rev 7 AG response 2" dated 16/04/25 Letter from WolfPeak to Transgrid, titled "RE: ER Review of Biodiversity Management Plan – HumeLink East (SSI-36656827)" dated 15/08/25 Letter from WolfPeak to Transgrid, titled "RE: Transgrid: ER Review of Heritage Management Plan HumeLink East (SSI 36656827) – Conditions B31-B33" dated 04/03/25 Xcel spreadsheet titled "GEN-R-AGJV-GEN-000350.09-HMP Comments Register KNC (1)" dated 06/02/25 Letter from WolfPeak to Transgrid, titled "RE: Transgrid: ER Review of Noise and Vibration Management Plan HumeLink East (SSI-36656827)" dated 04/03/25 Excel spreadsheet titled "GEN-R—1" dated 25/11/24 Xcel spreadsheet titled "GEN-R-AGJV-GEN- | <p>Substantial evidence of the ER's involvement in the Project during the Audit period was provided to the Auditor included the following:</p> <ul style="list-style-type: none"> Letters of review, written statements and review tables for the various management plans prepared as required by the consent Comments registers Letters of review and comments registers for minor updates to management plans that are of an administrative nature and do not increase impacts ER site inspection reports ER monthly reports <p>The ER noted they have not</p> <ul style="list-style-type: none"> been asked to assist the Department with the resolution of community complaints made any recommendations to the proponent to stop work in order to mitigate a significant risk. | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>the Proponent upon the achievement of these plans/ programs;</p> <p>e) Considering and advising the Proponent on its compliance obligations against all matters specified in the conditions of this approval, and permits and licences; and</p> <p>f) Having the authority and independence to recommend to the Proponent reasonable steps to be taken to avoid or minimise unintended or advise environmental impacts and failing the effectiveness of such steps, to recommend to the Proponent that relevant activities are to be ceased as soon as reasonably practicable if there is a significant risk that an adverse impact on the environment will be likely to occur.</p> | <p>000482.01-250306 Combined Transgrid and ER comments on rev1.3" dated 17/01/25</p> <ul style="list-style-type: none"> • Letter from WolfPeak to Transgrid, titled "RE: ER Review of Social Impact Management Plan HumeLink East (SSI-36656827)" dated 16/07/25 • Xcel spreadsheet titled "GEN-R-WOLFPEAK-GEN-000009.05-SWMP Comments Register AC edit (ER comms)" • Letter from WolfPeak to Transgrid titled "RE: Transgrid: ER Review of Soil and Water Management Plan HumeLink East (SSI-36656827)" dated 16/04/25 • Excel spreadsheet titled "GEN-R-AGJV-GEN-000322.06-TTMP Rev1.4 Comments Register ER" dated 12/11/24 • Letter from WolfPeak to Transgrid, titled "RE: ER Review of Traffic and Transport Management Plan – HumeLink East (SSI-36656827)" dated 16/06/25 • Excel Spreadsheet titled "GEN-R—1" dated 18/11/24 • Letter from WolfPeak to Transgrid, titled "RE: Transgrid: ER Review of Waste Management Plan HumeLink East (SSI-366546827)" dated 12/03/25 • Letter from WolfPeak to Transgrid titled "RE: ER Review of update to Social Impact Management Plan – HumeLink East (SSI-36656827)" dated 10/10/25 • Xcel spreadsheet titled "SIMP Stg 2 Comments Register" dated 24/09/25 • Xcel spreadsheet titled "GEN-R-AGJV-GEN-000705.03-SWMP Rev2.1 ER Comments Register" dated 10/01/25 • Letter from WolfPeak to Transgrid, titled "RE: ER Review of update to Soil and Water Management Plan – HumeLink East (SSI-36656827)" dated 15/10/25 • Letter from WolfPeak to Transgrid titled "RE: ER Review of update to Traffic and Transport Management Plan – HumeLink East (SSI – 36656827)" dated 14/10/25 • Report from WolfPeak titled "HumeLink - CSSI 36656827, HumeLink East, Environmental Representative's Inspection Report" dated 20/02/25 • Report from WolfPeak titled "HumeLink - CSSI 36656827, HumeLink East, Environmental Representative's Inspection Report" dated 20/03/25 • Report from WolfPeak titled "HumeLink - CSSI | | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | <p>36656827, HumeLink East, Environmental Representative's Inspection Report" dated 28/04/25-30/04/25</p> <ul style="list-style-type: none"> • Report from WolfPeak titled "HumeLink - CSSI 36656827, HumeLink East, Environmental Representative's Inspection Report" dated 19/06/25 • Report from WolfPeak titled "HumeLink - CSSI 36656827, HumeLink East, Environmental Representative's Inspection Report" dated 14/08//25 • Report from WolfPeak titled "HumeLink - CSSI 36656827, HumeLink East, Environmental Representative's Inspection Report" dated 15/10/25 • ER Audit Interview 19 January 2026 | | |
| A14 | 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 A13, as well as the complaints register for any complaints received (on the day they are received) | <ul style="list-style-type: none"> • ER Audit Interview 19 January 2026 | The ER confirmed they are provided with all necessary documentation and site access to perform their role in accordance with this condition. Evidence of Complaints Register submission to the ER was sighted. | Compliant |
| PROTECTION OF PUBLIC INFRASTRUCTURE | | | | |
| A15 | <p>Unless the Proponent and the applicable authority agree otherwise, the Proponent must;</p> <ol style="list-style-type: none"> a) Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and b) Relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. <p><i>Notes: This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this approval.</i></p> | <ul style="list-style-type: none"> • Audit Interview 5 February 2026 • Site Inspection, 3 and 4 February 2026 | There has not been any public infrastructure damaged by the development during the Audit period. This is consistent with observations made by the Auditor during the Site Inspection. | Not triggered |
| DEMOLITION | | | | |
| A16 | The Proponent must ensure that all demolition work on site is carried out in accordance with AS 2601-2001: <i>The Demolition of Structures</i> (Standards Australia, 2011), or its latest version. | <ul style="list-style-type: none"> • Audit Interview 5 February 2026 • Site Inspection, 3 and 4 February 2026 | There has not been any demolition works undertaken during the Audit period. There was no evidence of demolition having taken place or being undertaken observed during the Site Inspection. | Not triggered |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| STRUCTURAL ADEQUACY | | | | |
| A17 | <p>All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the Building Code of Australia is not applicable, to the relevant Australian Standard.</p> <p>Notes:</p> <ul style="list-style-type: none"> Under Part 6 of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development. | <ul style="list-style-type: none"> Audit Interview 5 February 2026 Electrical Design Criteria Report HLE-AUR-TRN-TLCE-RPT-1010-00001, Acciona, dated 05/12/25 Independent Verifier Form of Design Certificate, GHD, dated 13/11/25 | <p>AGJV have appointed a design and engineering team to oversee the design of structures to ensure compliance with designs prepared by Aurecon and independently checked by GHD.</p> <p>There have not been any alterations of additions to existing buildings during the Audit period. There was no evidence of alterations or additions to existing buildings or structures observed during the Site Inspection.</p> | Not triggered |
| COMPLIANCE | | | | |
| A18 | <p>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.</p> | <ul style="list-style-type: none"> Audit Interview 5 February 2026 PowerPoint Presentation, Transgrid, titled "Toolbox Talk" dated 05/11/25 PowerPoint Presentation, Transgrid, titled "Toolbox Talk" dated 12/11/25 PowerPoint Presentation, Transgrid, titled "Toolbox Talk" dated 19/11/25 PowerPoint Presentation, Transgrid, titled "Toolbox Talk" dated 26/11/25 PowerPoint Presentation by Transgrid "Welcome to HumeLink East team, Project onboarding" (undated) Contract Extract by HumeLink East | <p>All workers (including subcontractors) are required to attend a project specific induction prior to their commencement on the project. The Auditor completed onboarding induction prior to attending the site.</p> <p>Specific environmental issues are communicated through the delivery of site toolbox talks. Several examples of toolbox talks were provided for specialist issues including:</p> <ul style="list-style-type: none"> Erosion and sediment control Clearing and land disturbance permitting process Threatened flora Environmental controls during the Xmas shutdown process <p>Subcontracts mandate compliance with the CEMP and management plans which incorporate the requirements of the Development Consent.</p> <p>Site notice boards provide information and environmental management documents relevant to the works being undertaken.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| A19 | <p>The Applicant must notify the Department within 24 hours of becoming aware of an incident. The notification must be made via the NSW planning portal (Major Projects) and address details of the incident including;</p> <ul style="list-style-type: none"> a) Date, time and location; b) A brief description of what occurred and why it has been classified as an incident; c) A description of what immediate steps were taken in relation to the incident; and d) Identifying a contact person for further communication regarding the incident. | <ul style="list-style-type: none"> • 251128 Notification of Potential Incident YG-027A, Acciona, dated 28/11/25 • 251205 HLE Environmental NCR Report – YG-027A, dated 28/11/25 • Letter from Transgrid to DPHI, titled “Re: HumeLink – Incident Notification – Condition C10” dated 28/11/25 • Incident 47487 – Manage, Acciona, dated 28/11/25 • HumeLink East Incidents and NCR Register, Acciona, dated 21/01/26 • Letter from DPHI to TfNSW titled “HumeLink – Notification – Non-Compliance – Enabling Works Management Plan – 28 Nov – AT299,301, 446-448- Minor work outside Development Layout” dated 12/12/25 | <p>The Auditor was provided with a copy of the Incident and NCR register for the Audit period. During the Audit period, a total of 7 minor incidents occurred (e.g. oil spills) which were classified as minor and non-reportable with minimal impact.</p> <p>One potential incident was reported to DPHI on the 28/11/25 as a precaution until further investigations could be completed. The potential incident related to four instances of access track construction resulting in impacts outside the project boundary and potential non-compliance with Conditions A2 (d) and B30.</p> <p>DPHI wrote to Transgrid on 12/12/25 confirming non-compliance with conditions A2 (d) and B65.</p> <p>Recommendation</p> <p>The incident register does not include a description of the actions taken to remedy the incident or any additional measures to prevent further incident. It is recommended the register is reviewed and updated to include this information.</p> | Compliant |
| A20 | <p>The Applicant must provide the Department with a subsequent incident report in accordance with Appendix 5 (Incident Notification and Reporting Requirements).</p> | <ul style="list-style-type: none"> • 251128 Notification of Potential Incident YG-027A, Acciona, dated 28/11/25 • 251205 HLE Environmental NCR Report – YG-027A, dated 28/11/25 • Letter from Transgrid to DPHI, titled “Re: HumeLink – Incident Notification – Condition C10” dated 28/11/25 • Incident 47487 – Manage, Acciona, dated 28/11/25 • HumeLink East Incidents and NCR Register, Acciona, dated 21/01/26 • “Incident report 46735” by Acciona, dated 28/08/25 • “Incident Report 46751” by Acciona, dated 29/08/25 • “Incident Report 47418” by Acciona dated 20/11/25 • “Incident Report 47278” Acciona dated 03/11/25 • “Incident Report 47540 – Manage 05/12/25 | <p>As noted above, one potential incident was reported to DPHI on the 28/11/25 as a precaution. Following further investigation, the impacts of the incident were reviewed by Transgrid and it was determined that the incident did not trigger the definition of “Material Harm” as defined by the consent. Accordingly a subsequent incident report was not issued in accordance with this condition. Non compliances with condition A2 and B30 are noted.</p> | Not triggered |
| OPERATION OF PLANT AND EQUIPMENT | | | | |
| A21 | <p>All plant and equipment used on site, or in connection with the development must be:</p> <ul style="list-style-type: none"> a) Maintained in proper and efficient condition; b) Operated in a proper and efficient manner. | <ul style="list-style-type: none"> • Site Inspection, 3 and 4 February 2026 • Service record by A One Earthworks Pty Ltd, titled “Completed Jobcard # S-141” dated 28/04/24 • Document titled “PM 2 Perform (1000 Hours Interval)” dated 29/04/25 | <p>All plant and equipment were observed to be operating in a proper and efficient manner with no excessive noise or exhaust emissions observed.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|---|--|---|--|-------------------|
| | | <ul style="list-style-type: none"> PDF titled "PM2 Perform (1000 Hours Interval)" dated 29/04/25 Plant inspection record, undated "Plant prestart check" (undated) "Appendix C – Hygiene Check – Paperform" by Transgrid, dated 24/11/25 Appendix D Hygiene Check – Mobile Plant" by Transgrid, dated 28/11/25 "Appendix C – Hygiene Check" dated 18/11/25 Plant Onboarding Guide – additional documents, Acciona, dated 22/04/25 Plant Onboarding guide – documents rev 3, Acciona, dated 22/04/25 | <p>Appropriate records were provided to the Auditor demonstrating planned maintenance and vehicle hygiene checks are undertaken routinely with plant onboarding requirements issued prior to the commencement on site.</p> | |
| APPLICABILITY OF GUIDELINES | | | | |
| A22 | 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. | <ul style="list-style-type: none"> EMS and Construction Environmental Management Plans as referenced in this report | The EMS and construction management plans reference the relevant policies, guidelines, protocols and standards in accordance with the conditions of this approval. | Compliant |
| A23 | However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may, when issuing directions under this approval in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, standard or policy, or a replacement of them. | <ul style="list-style-type: none"> Audit Interview 5 February 2026 | Noted. No directions have been issued by DPHI that have triggered the requirements of this condition. | Not triggered |
| COMMUNITY COMMUNICATION STRATEGY | | | | |
| A24 | Prior to commencing the development, 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 Enabling Works and construction. | <ul style="list-style-type: none"> "Community Communication Strategy" AGJV, Rev C dated November 2024 | The Community Communications Strategy (CCS) was prepared in November 2024, prior to commencing the development. The CCS is comprehensive and meets the requirements of Condition A25 as noted below. | Compliant |
| A25 | The Community Communication Strategy must; <ul style="list-style-type: none"> a) Identify landowners and potentially impacted receivers; b) Ensure that the landowners identified in (a) are consulted during Enabling Works and construction; | <ul style="list-style-type: none"> Audit Interview 5 February 2026 "Community Communication Strategy" AGJV, Rev C dated November 2024 Works Notification January 2026 – Steel Deliveries to Bookham, Dalton Merrill and Yass | The CCS is comprehensive and meets the requirements of this condition as follows: <ul style="list-style-type: none"> Section 5.1 identifies landowners and potentially impacted receivers | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|----|---|---|--|-------------------|
| | <p>c) Set out procedures and mechanisms for the regular distribution of information;</p> <p>d) Establish a public liaison officer(s) to engage with the local community; and</p> <p>e) Set out procedures and mechanisms</p> <p>(i) Through which the community can discuss or provide feedback to the Proponent;</p> <p>(ii) Through which the Proponent will respond to enquiries or feedback from the community; and</p> <p>(iii) To resolve any issues and mediate any disputes that may arise in relation to Enabling Works and construction of the development.</p> <p>The Proponent must implement the Community Communication Strategy for the duration of Enabling works and construction.</p> | <ul style="list-style-type: none"> • Works Notification December 2025, Steel Deliveries to Bannister and Garrundah • Works Notification August 2025, Start of Main Construction • Works Notification June 2025, Traffic Changes in Gocup Road • HumeLink East, Quarterly Newsletter December 2025 • HumeLink East Quarterly Newsletter June 2025 • HumeLink East Quarterly Newsletter April 2025 • HumeLink East Project Update • Salesforce example • HumeLink East Community Newsletter, Transgrid, dated December 2025 • Powerpoint by Transgrid, titled "HumeLink NSW Police Force Briefing" dated November 2025 • Awareness Survey – CIS Example, Transgrid, (undated) • Awareness Survey – CIS, Transgrid, (undated) • BY-154 – Signed Property Alignment Statement, Acciona, dated 07/02/23 • BY-154 – Signed_Compacted Property Alignment Statement, Acciona, dated 07/02/23 • BY-154_GIS_MAP-FIELD NOTES HumeLink East, Acciona, (undated) • Photograph titled "FieldDays 2025-203" (undated) • HumeLink Community Attitudes Survey, Orima, Feb 2025 • Video titled "Murrumbateman Field Days" by Transgrid, (undated) • Community Consultation Record screenshot, Transgrid 29/12/25 • Telephone record, Transgrid, dated 29/01/26 • Power Generation record, Transgrid, 03/12/25 • Work notification Assembly and erection of towers near Adjungbilly, Transgrid, dated November 2025 • Work Notification Start of Main Construction Work, Transgrid, dated August 2025 | <ul style="list-style-type: none"> • Sections 5.3 and 5.4 describe processes to ensure that the landowners identified in (a) are consulted during Enabling Works and construction; • Sections 5.3 and 5.4 set out procedures and mechanisms for the regular distribution of information; • Section 5.2 provides details of a public liaison officer(s) to engage with the local community; and • Section 2, and 6.1-6.3 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 Enabling Works and construction of the development. <p>AGJV have appointed an experienced stakeholder management and community engagement team to oversee the implementation of the CCS.</p> <p>Evidence of implementation of the Community Communications Strategy included:</p> <ul style="list-style-type: none"> • Project website (refer to condition C15 below) • Project contact form and details • Works notifications • Complaints register • Salesforce consultation records • Quarterly newsletters and construction notices • Complaints register updated monthly and provided on project website • Presentations to special interest groups (e.g Police) • Community surveys • Landowner agreements and consultation records. | |

Part B – SPECIFIC ENVIRONMENTAL CONDITIONS

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|---|--|--|---|-------------------|
| NOISE AND VIBRATION | | | | |
| CONSTRUCTION HOURS | | | | |
| B1 | <p>Preconstruction minor works, road upgrades, Enabling Works, construction (including operation of construction compounds) demolition, upgrading or decommissioning activities (excluding blasting) may only be undertaken between;</p> <ul style="list-style-type: none"> a) 7am to 6pm Monday to Friday; b) 8am to 1pm Saturdays; and c) At no time on Sundays and NSW public holidays; | <ul style="list-style-type: none"> • Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 • PowerPoint Presentation by Transgrid “Welcome to HumeLink East team, Project onboarding” (undated) • Audit Interview 5 February 2026 • Work Pack #1 HLE-AGJ-CN-ALE-WP-0000-00001 Rev 0, Acciona, dated 16/06/24 • Work Pack #11 HLE-AGJ-CN-TLCE-WP-0000-00011 Rev 01, Acciona, dated 06/08/25 • Work Pack #27 HLE-AGJ-CN-TLCE-WP-0000-00027 rev 01, Acciona, dated 14/04/25 | <p>Section 6.1.1 of the Noise and Vibration Management Plan describes the standard construction hours as consistent with this condition.</p> <p>Section 14.4 of work packs communicates the standard working hours.</p> <p>Further communication of the approved working hours is provided in the site induction.</p> <p>There were no reported breaches of the approved working hours during the Audit period with hour of hours activities assessed and approved in accordance with condition B2 as noted below.</p> | Compliant |
| EXCEPTIONS TO CONSTRUCTION HOURS | | | | |
| B2 | <p>The following activities may be carried outside the hours specified in condition B1 above;</p> <ul style="list-style-type: none"> • The delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; • Emergency work to avoid the loss of life, property or prevent material harm to the environment; • 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; • Activities that do not result in noise affected sensitive receivers, as defined in <i>Interim Construction Noise Guidelines</i> (DECC, 2009) (or its latest version); • Road upgrades required by the relevant road authority to be undertaken outside the standard construction hours; • Where a rail authority requires a rail possession for the activities to be performed outside of standard | <ul style="list-style-type: none"> • Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 • “Out of Hours Work Permit” Acciona, dated 07/05/25 • “Out Of hours work permit” AGJV, dated 04/06/25 • “Out of Hours Work Permit” AGJV, dated 22/06/25 • “Out of Hours Work Permit” by AGJV, dated 01/10/25 • “Out of Hours Work Permit”, by Acciona, dated 13/07/25 • “Out of Hours Work Permit” by Acciona, dated 31/08/25 • “Out of Hours Work Permit” by Acciona, dated 09/08/25 • “Out of Hours Work Permit” by Acciona, dated 31/01/26 • “Out of Hours Work Permit” by Acciona, dated 28/09/25 • “Out of Hours Work Permit” by Acciona, dated 28/09/25 • “Out of Hours Work Permit” by Acciona, dated 19/10/25 | <p>Section 6.1.2 of the Noise and Vibration Management Plan describes the requirements of undertaking works outside the hours described in condition B1. Section 6.2 and Appendix A provide details of the out of hours protocol. The Auditor was provided with multiple examples of out of hours works permits as evidence of implementation of the OOH works protocol. OOH works permits include:</p> <ul style="list-style-type: none"> • Description of the work • Justification for works occurring outside the standard hours • Assessment of relevant conditions (B9, B10) • Proposed mitigation measures assessed against “reasonable and feasible criteria” • Assessment of noise impacts • Authorisation by project Environmental Manager, Community and Stakeholder Relations Manager and the Project/Construction Manager <p>During the Audit period, works have also been undertaken with community agreement with a signed example provided to the Auditor as evidence.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>construction hours;</p> <ul style="list-style-type: none"> • Activities that require a network outage on another utility, distribution or transmission network, and the operator of the network requires the outage and associated works outside standard construction hours; • Where different hours are permitted or required under an EPL in force in request of the CSSI; or • Works carried out in accordance with an Out-of-Hours Work Protocol in accordance with condition B16. | <ul style="list-style-type: none"> • “Out of Hours Work Permit” by Acciona, dated 14/12/25 • “Out of Hours Work Permit” by Acciona, dated 26/10/25 • “Out of Hours Work Permit” by Acciona, dated 26/10/25 • “Out of Hours Work Permit” by Acciona, dated 25/10/25 • “Out of Hours Work Permit” by Acciona, dated 02/11/25 • “Out of Hours Work Permit” by Acciona, dated 09/11/25 • “Out of hours work permit” by Acciona, dated 09/11/25 • “Out of Hours work Permit” by Acciona, dated 23/11/25 • “Out of Hours Work Permit” by Acciona, dated 21/12/25 • “Out of Hours Work Permit” by Acciona, dated 10/12/25 • “Out of Hours Work Permit” by Acciona, dated 30/11/26 • “Out of Hours Work Permit” by Acciona, dated 07/11/25 • “Out of Hours Work Permit” by Acciona, dated 07/12/25 • “Out of Hours Work Permit” by Acciona, (undated) • “Out of Hours Work Permit” by Acciona, dated 04/12/25 • “Out of Hours Work Permit” by Acciona 08/12/25 • “Out of Hours work notice – Extended Hours” by Acciona, dated 25/01/26 | | |
| MEMORIAL AVENUE CONSTRUCTION COMPOUND | | | | |
| B3 | <p>The following activities must not be carried out at the Memorial Avenue Construction Compound:</p> <ol style="list-style-type: none"> a) Any activities outside of the hours specified in condition B1; b) Helicopter arrivals or departures; c) Crushing or screening; d) Concrete batching; or e) Any other noise generating activity that would result | <ul style="list-style-type: none"> • Audit Interview 5 February 2026 | <p>Not applicable to the HLE project, the Memorial Avenue Compound is located in the Hume Link West section of the Project.</p> | Not triggered |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|---|--|--|--|----------------------|
| | <p>in noise levels at sensitive receivers or sensitive land uses exceeding the construction 'highly noise affected' noise management level criteria established using the <i>Interim Construction Noise Guideline</i> (DECC, 2009).</p> | | | |
| HELICOPTER ACTIVITIES | | | | |
| B4 | <p>Helicopter use associated with the development may only be carried out:</p> <ul style="list-style-type: none"> a) Between 9am to 5pm Monday to Friday; b) Between 9am to 1pm on Saturday; and c) No helicopter use is allowed on Sunday or NSW public holidays; <p>Unless different hours are permitted or required under an EPL in force in respect of the CSSI or the Planning Secretary agrees otherwise.</p> | <ul style="list-style-type: none"> • Audit Interview 5 February 2026 | <p>Helicopter use has not commenced and will commence upon commencement of stringing of conductors.</p> | <p>Not triggered</p> |
| CONSTRUCTION AND DECOMMISSIONING | | | | |
| B5 | <p>The Proponent must take all reasonable and feasible steps to minimise the pre-construction minor works, Enabling Works, road upgrade, construction, upgrading or decommissioning noise of the development in locations where the noise is audible to sensitive receivers, including any associated traffic noise.</p> | <ul style="list-style-type: none"> • Audit Interview 5 February 2026 • Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 • Powerpoint titled "HumeLink East Project, Toolbox Talk" by Transgrid, dated 22/10/25 • Pre Start Bannaby NVMP Training, Transgrid, date 27/08/25 • Noise and Vibration monitoring register, (undated) • Sound Levels Record, SiteHive, dated 21/12/25 • Construction Noise and Vibration Impact assessment, Acciona, dated 18/02/26 • Photo of Yass Noise Mats Installation, (undated) | <p>Reasonable and feasible steps and measures observed during the Audit site inspection and discussed in the Audit interview included the following:</p> <ul style="list-style-type: none"> • Locating the Yass accommodation camp in an industrial area and away from residential receivers • Use of non-tonal reversing alarms (squawkers) in lieu of tonal reversing beepers • Design of site layouts to minimise the need for reversing • Locating property access tracks away from sensitive receivers • Noise awareness training • Application of driver code of conduct to minimise traffic noise • Real time noise monitoring • Use of noise mats around point noise sources (such as generators). | <p>Compliant</p> |
| B6 | <p>The Proponent must ensure that the noise generated by any construction, upgrading or decommissioning activities is managed in accordance with the requirements outlined in the <i>Interim Construction Noise Guidelines</i> (DECC, 2009) (or its latest version).</p> | <ul style="list-style-type: none"> • Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 | <p>The Construction Noise and Vibration Management Plan incorporates the requirements of the ICNG with evidence of implemented noted in condition B5 as above.</p> | <p>Compliant</p> |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|----|--|--|--|-------------------|
| B7 | <p>The Proponent must implement mitigation measures with the aim of achieving the road traffic noise assessment criteria for uses from <i>NSW Road Noise Policy</i> (DECCW, 2011).</p> | <ul style="list-style-type: none"> Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 Hume Link East, Construction Related Noise Assessment – Barton Highway, AGJV/Hutchison Weller Hume Link East, Construction Related Noise Assessment –Murrumbateman, AGJV/Hutchison Weller Hume Link East, Construction Related Noise Assessment – Brayton Road, AGJV/Hutchison Weller Hume Link East, Construction Related Noise Assessment – Masons Hill Road, AGJV/Hutchison Weller | <p>Acoustic consultant Hutchison Weller have been appointed to assess the impacts of traffic noise impacts associated with the project. Examples provided to the Auditor to demonstrate an appropriate level of assessment. No additional mitigation measures have been identified as required to mitigate the effects of road traffic noise from the development.</p> | Compliant |
| B8 | <p>The Proponent must comply with the following vibration limits at any residence or sensitive receiver;</p> <ol style="list-style-type: none"> Vibration criteria established using the <i>Assessing vibration: a technical guideline</i> (DEC, 2006) (for human exposure); <i>BS 7385 Part 2 – 1993 “Evaluation and measurement for vibration in buildings Part 2”</i> as they are “applicable to Australian conditions”; and Vibration limits set out in the <i>German Standard DIN 4150-3: Structural Vibration – effects of vibration on structures (for structural damage)</i>. | <ul style="list-style-type: none"> Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 Noise and Vibration monitoring register, (undated) | <p>Section 6.5 of the CNVMP provides details of vibration criteria for human comfort and structural damage in accordance with these guidelines. Section 6.5.3 of the CNVMP sets minimum working distances for vibration intensive activities (such as vibratory rolling, vibratory pile drivers and jackhammers). As observed during the Site Inspection, compliance with these buffer distances has been achieved. There were no vibration complaints received or vibration related incidents recorded during the Audit period.</p> <p>Tables 18 and 19 of the CNVMP notes that vibration monitoring is to be undertaken on an as required basis when works are planned within minimum working distances.</p> <p>The Auditor was advised that there have not been any activities within the minimum working distances during the Audit period. This is consistent with observations made by the Auditor during the site Inspection with the nearest sensitive receivers located at significant distances away from construction sites with no activities being undertaken such as blasting or rock breaking that would generate high levels of vibration.</p> <p>Vibration monitoring undertaken confirms compliance with the vibration limits.</p> | Compliant |
| B9 | <p>Where a sensitive receiver is identified as potentially exceeding the construction ‘noise affected’ noise management level or sleep disturbance criteria established using the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version, as a result of the construction or operation of the accommodation camps or construction compounds, mitigation measures must be implemented with the objective of reducing</p> | <ul style="list-style-type: none"> Noise and Vibration Management Plan, Humelink East, Transgrid, Rev 03 dated 14/10/25 Noise and Vibration monitoring register, (undated) Noise and Vibration monitoring register, (undated) Sound Levels Record, SiteHive, dated 21/12/25 Construction Noise and Vibration Impact | <p>Construction activities have been undertaken during the day. For any works undertaken outside the approved working hours, a noise assessment is undertaken as part of the OOH works process.</p> <p>The assessments have confirmed noise levels do not exceed the sleep disturbance criteria for any sensitive receivers.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>construction noise below the relevant criteria at each relevant sensitive receiver.</p> <p>Activities that would exceed the 'noise affected' noise management level or sleep disturbance criteria during construction or operation of these facilities must not commence until the measures identified in this condition have been implemented, unless otherwise agreed with the Planning Secretary. However, this does not apply if the Proponent has an agreement with the relevant owner(s) of these receivers to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.</p> <p><i>Note: Mitigation measures may include path barrier controls, at-property treatment, or a combination of path controls and at-property treatment.</i></p> | <ul style="list-style-type: none"> assessment, Acciona, dated 18/02/26 OOH Works Permit 008 for Faulder Avenue Compound, dated 10/7/25 | <p>In instances where the noise affected (noise management level) was predicted to be exceeded, agreements with the Landowner was obtained. The OOH permit, community notification and landowner agreement for the Faulder Avenue Compound was provided to the Auditor as an example.</p> | |
| B10 | <p>Where a sensitive receiver is identified as potentially exceeding the 'highly noise affected' noise management level established using the <i>Interim Construction Noise Guideline (DECC, 2009)</i>, or its latest version, during Enabling Works or construction, mitigation measures must be implemented with the objective of reducing construction noise below the highly noise affected noise management level at each relevant sensitive receiver.</p> <p>Activities that would exceed the 'highly noise affected' noise management level during construction must not commence until the measures identified in this condition have been implemented, unless otherwise agreed with the Planning Secretary. However, this does not apply if the Proponent has an agreement with the relevant owner(s) of these receivers to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.</p> <p><i>Note: Mitigation measures may include path barrier controls, at-property treatment, or a combination of path controls and at-property treatment.</i></p> | <ul style="list-style-type: none"> Acciona and Genus Plus Joint Venture HumeLink East 500kv transmission line Construction noise and vibration impact statement, Hutchison Weller, dated 19/11/25 | <p>Construction activities have been undertaken during the day. For any works undertaken outside the approved working hours, a noise assessment is undertaken as part of the OOH works process.</p> <p>The assessments have confirmed noise levels do not exceed the sleep disturbance criteria for any sensitive receivers.</p> | Not Triggered |
| BLASTING | | | | |
| B11 | <p>Blasting may only be carried out on the site:</p> <ol style="list-style-type: none"> Between 9am to 5pm Monday to Friday; Between 9am to 1pm on Saturday; and No blasting is allowed on Sunday or NSW public holidays. | <ul style="list-style-type: none"> Audit Interview 5 February 2026 Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 | <p>Section 6.1.1 of the CNVMP defines working hours and notes that "blasting may only be carried out on the site between 9am and 5pm M-F and between 9am to 1pm on a Saturday. No blasting is allowed on Sundays or Public Holidays"</p> | Not triggered |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status | | | | | | | | | | | |
|--------------------------|--|--|---|-------------------|----------------------|---------------------------------------|-------------------------|----------------------|--------------------------|-----|----|----|-----|---|---|
| | | | No blasting has been undertaken at this stage in the project as advised during the Audit interview. There was no evidence of blasting observed during the Audit Site Inspection. | | | | | | | | | | | | |
| B12 | The Proponent must ensure that any blasting carried out on site does not exceed the criteria in Table 2. | <ul style="list-style-type: none"> Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 | No blasting has been undertaken at this stage in the project as advised during the Audit interview. There was no evidence of blasting observed during the Audit Site Inspection. | Not triggered | | | | | | | | | | | |
| | Table 2: Blasting Criteria <table border="1" data-bbox="107 600 1910 751"> <thead> <tr> <th data-bbox="107 600 557 643">Location</th> <th data-bbox="557 600 1008 643">Airblast Overpressure (dB (Lin Peak))</th> <th data-bbox="1008 600 1458 643">Ground Vibration (mm/s)</th> <th data-bbox="1458 600 1910 643">Allowable exceedance</th> </tr> </thead> <tbody> <tr> <td data-bbox="107 643 557 686" rowspan="2">Any residential receiver</td> <td data-bbox="557 643 1008 686">120</td> <td data-bbox="1008 643 1458 686">10</td> <td data-bbox="1458 643 1910 686">0%</td> </tr> <tr> <td data-bbox="557 686 1008 751">115</td> <td data-bbox="1008 686 1458 751">5</td> <td data-bbox="1458 686 1910 751">5% of the total number of blasts or events over a rolling period of 12 months</td> </tr> </tbody> </table> | | | | Location | Airblast Overpressure (dB (Lin Peak)) | Ground Vibration (mm/s) | Allowable exceedance | Any residential receiver | 120 | 10 | 0% | 115 | 5 | 5% of the total number of blasts or events over a rolling period of 12 months |
| | Location | Airblast Overpressure (dB (Lin Peak)) | Ground Vibration (mm/s) | | Allowable exceedance | | | | | | | | | | |
| Any residential receiver | 120 | 10 | 0% | | | | | | | | | | | | |
| | 115 | 5 | 5% of the total number of blasts or events over a rolling period of 12 months | | | | | | | | | | | | |
| OPERATION | | | | | | | | | | | | | | | |
| B13 | Except for corona discharge noise, the Proponent must ensure that the noise generated by the operation of the development does not exceed the project noise trigger levels (PNTL) established in accordance with the <i>Noise Policy for Industry</i> (NPfI), at the reasonably most affected point of the residence, at any residential receiver. | <ul style="list-style-type: none"> Substation Noise Study rev D, Acciona, dated 02/07/25 Noise and Vibration Management Plan Rev 03, Acciona, dated 14/10/25 | <p>A noise assessment undertaken for the substation concludes “ <i>Based on the worst case operational scenarios considered, noise emissions predicted compliance with all Project Noise Trigger Levels (PNTL’s), suggesting noise levels are unlikely to cause adverse emissions.</i>”</p> <p>It is noted that full compliance with this condition will be assessed following operation and completion of the Operational Noise Compliance Verification report prepared in accordance with Condition B15</p> <p>Therefore this condition is not triggered at this stage.</p> | Not triggered | | | | | | | | | | | |
| B14 | <p>The Proponent must:</p> <ol style="list-style-type: none"> Take all reasonable and feasible steps to minimise corona discharge noise during operation of the project; Identify residences predicted to experience corona discharge noise levels above the PNTL at the reasonably most affected point of the residence, determined in accordance with the NPfI, and how | <ul style="list-style-type: none"> Corona and Radio Noise Report Rev D, Acciona, 02/07/25 Substation Noise Study Rev D, Acciona, dated 02/07/25 | <p>A corona and radio noise report has been prepared that assesses potential impacts associated with radio interference voltage, tv interference voltage, corona losses and surface voltage gradient.</p> <p><i>It is noted that full compliance with this condition will be assessed following operation, therefore this condition is not triggered at this stage.</i></p> | Not triggered | | | | | | | | | | | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>often corona noise is expected to be above this level per year;</p> <p>c) Identify residences predicted to experience circuit breaker noise levels above the PNTL at the reasonably most affected point of the residence, determined in accordance with the NPfI, and how often this happens during the night-time period; and</p> <p>d) Implement all reasonable and feasible noise mitigation measures, determined in accordance with the NPfI, at receivers predicted, or identified by noise monitoring, to experience corona discharge noise levels or circuit breaker noise levels that exceed the PNTL.</p> | | | |
| OPERATIONAL NOISE COMPLIANCE VERIFICATION | | | | |
| B15 | <p>Within 12 months of the commencement of operation of the development, the Proponent must submit to the Planning Secretary, an Operational Noise Compliance Verification report. The assessment must include;</p> <p>a) The results of monitoring of operational noise undertaken following the commencement of operation, including but not limited to, at residences predicted to experience corona discharge noise levels or circuit breaker noise levels above the PNTL;</p> <p>b) A comparison of the actual noise performance of the development against PNTLs established in accordance with the NPfI;</p> <p>c) Identification of any additional reasonable and feasible noise mitigation measures that would be required to be implemented to achieve the objective of meeting the PNTIs, a schedule of when these measures are to be implemented and how their effectiveness is to be measured.</p> <p>Any additional noise mitigation measures identified under (c) must be implemented within 12 months of submitting the Operational Noise Compliance Verification report, unless otherwise agreed by the Planning Secretary.</p> | <ul style="list-style-type: none"> N/A | <ul style="list-style-type: none"> Operational requirement – not triggered | Not triggered |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| NOISE AND VIBRATION MANAGEMENT PLAN | | | | |
| B16 | <p>Prior to the commencement of construction (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Noise and Vibration Management Plan to the satisfaction of the Planning Secretary. This plan must:</p> <ol style="list-style-type: none"> Include measures and process to ensure the requirements in conditions B1 and B14 are complied with; Include a description of the reasonable and feasible measures that would be implemented to minimise noise and vibration impacts of the development; Include a description of the measures that would be implemented to minimise aircraft noise at sensitive receivers, including measures relating to the number and timing of trips, flight paths and consultation with affected receivers; Include a detailed description of the noise and vibration management system for the development; Include a protocol for the identification, notification and management of works that exceed the noise management levels Include a monitoring program that evaluates and reports on the effectiveness of the noise and vibration management systems and identify additional noise mitigation measures that are to be implemented and the timeframe to be implemented; Include a monitoring program that evaluates and reports on the operational noise performance of the development and the effectiveness of the operational noise mitigation measures; and If the monitoring programs in B16 ((f) and (g)) identify exceedances, then identify additional noise mitigation measures that are to be implemented and the timeframe to be implemented; Include an Out-of-Hours Work Protocol to identify a process for the consideration, management and approval of works outside the hours defined in conditions B1 and B11, which must: <ol style="list-style-type: none"> Be prepared in consultation with the relevant Council; Identify low risk activities that can be undertaken without the approval of the | <ul style="list-style-type: none"> Letter from DPPI to Transgrid titled "HumeLink East Construction Noise and Vibration Management Plan" dated 17/4/25 Noise and Vibration Management Plan, HLE-AGJ-ENV-ALE-PLN-0000-00027 HumeLink East, Transgrid, Rev 01.4 dated 14/5/25 Powerpoint titled "Toolbox Talk", Acciona, dated 22/10/25 Powerpoint titled, "SR-45 Advanced", soilmec, (undated) Photo of Yass Noise Mats installation, undated | <p>DPPI approved the HumeLink East Construction Noise and Vibration Management Plan on 17/4/25 noting the HumeLink East Construction Noise and Vibration Management Plan:</p> <ul style="list-style-type: none"> Includes and out of hours works protocol that has been prepared in consultation with Goulburn Mulwaree Council, Snow Valleys Council, Cootamundra-Gundagai Regional Council, Yass Valley Council and Upper Lachlan Shire Councils This document has been prepared to address Stage 3a Construction Works HumeLink East in accordance with the approved staging approach (PA-5, 22 November 2024). Has been reviewed by Transgrid and no issues have been raised with the Department Has been endorsed by the ER Contains the information required by the conditions of approval <p>Evidence of implementation of the Noise and Vibration Management Plan included the following:</p> <ul style="list-style-type: none"> Out of hours works permits as noted in condition B2 Noise and vibration monitoring results Installation of at source noise controls such as acoustic mats. Community agreements to undertake works outside approved hours of construction Plant and equipment noise emissions technical data | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>(iii) Planning Secretary; Identify high risk activities that must be approved by the Planning Secretary</p> <p>(iv) Identify the Department, Council and community notification arrangements for approved out of hours work.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Noise and Vibration Management Plan. <i>Note: The Noise and Vibration Management Plan must incorporate all relevant aspect of the development, including Enabling Works consistent with the requirements of condition B67.</i></p> | | | |
| AIR QUALITY | | | | |
| B17 | <p>In addition to the performance outcomes, commitments and mitigation measures specified in the EIS, the Proponent must take all reasonable steps to:</p> <p>a) Minimise the off-site dust, fume, blast emissions and other air pollutants of the development; and</p> <p>b) Minimise the surface disturbance of the site.</p> | <ul style="list-style-type: none"> • Audit Interview 5 February 2026 • Image BY-125 • Image BY-128 • Image BY-128-01 • Image BY-130-09-01 • Image (6) • Image (7) • Image (8) • Image (9) • Image (51) • Image (52) • Image (54) • Image (55) • SiteHive_PM10_Dec 2025 • SiteHive_PM10_Jan 2026 | <p>Reasonable and practical measures observed during the site inspection to minimise the generation of dust included:</p> <ul style="list-style-type: none"> • Water carts • Polymer soil binder application with photographic examples of application provided to the Auditor) • Sealed access points and tracks to construction sites • Sealed compound and carpark areas at accommodation camps • Topsoil retention and rehabilitation of areas disturbed for enabling works and site access roads • Speed limits • Sitehive dust monitoring station with alerts issued when dust trigger levels are exceeded. • Real-time dust monitoring | Compliant |
| SOIL AND WATER | | | | |
| WATER SUPPLY | | | | |
| B18 | <p>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. <i>Note: Under the Water Act 1912 and/ or the Water</i></p> | <ul style="list-style-type: none"> • Audit Interview 5 February 2026 • Agreement for Supply of water, Commercial Customer Agreement, Snowy Valleys Council, dated 05/06/25 | <p>Key management plans prepared relating to water management include the following:</p> <ul style="list-style-type: none"> • Soil and Water Management Plan prepared in accordance with | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p><i>Management Act 2000, the Proponent is required to obtain the necessary water licences before commencing any works which intercept or extract groundwater or surface water (unless an exemption applies).</i></p> | <ul style="list-style-type: none"> WAL approval register, dated 28/01/26 | <p>Condition B24</p> <ul style="list-style-type: none"> Accommodation Camp Management Plan, prepared in accordance with Condition B59 <p>The management plans describes the control measures to be implemented for:</p> <ul style="list-style-type: none"> Water supply, storage, discharge and re-use Waste water treatment and re-use from accommodation camps Management of water intensive operations such as concrete batching Opportunities for reuse of site water for dust suppression and general construction Monitoring and reporting <p>In addition to recycled site water, potable and raw water is supplied under agreement with Snowy Valleys Council. Water access licences are being procured with a register of licences provided to the Auditor as evidence.</p> | |

EROSION AND SEDIMENTATION

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| B19 | <p>The Proponent must:</p> <ol style="list-style-type: none"> Minimise erosion and control sediment generation; and Ensure all land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with <i>Best Practice Erosion and Sediment Control</i> (IECA, 2008), <i>Managing Urban Stormwater – Soils and Construction Volume 1</i> (Landcom, 2004), <i>Managing Urban Stormwater – Soils and Construction Volume 2A Installation of Services</i> (DECC, 2008) and <i>Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads</i> (DECC, 2008), or their latest versions. | <ul style="list-style-type: none"> Audit Interview 5 February 2026 Letter from SEEC to Acciona, titled “Independent Inspection of Erosion and Sediment Controls: HumeLink East Project (North), 12 September 2025” dated 15/09/25 Letter from SEEC to Acciona, titled “Independent Inspection of Erosion and Sediment Controls: HumeLink East Project (North), 12 September 2025”, dated 15/09/25 Letter from SEEC to Acciona, titled “Independent Inspection of Erosion and Sediment Controls: HumeLink East Project (North), 15 October 2025” dated 15/10/25 Letter from SEEC to Acciona, titled Independent Inspection of Erosion and Sediment Controls: Humelink East Project (Bannaby), 16 October 2025” dated 16/10/25 “Letter from SEEC to Acciona, titled “Independent Inspection of Erosion and Sediment Controls: HumeLink East Project (Bannaby and Yass), 28 January 2026” dated 28/01/26 Letter from SEEC to AGJV, titled “HumeLink East: | <p>AGJV have appointed an experienced CPESC to oversee the design and implementation of erosion and sediment controls. The role of the CPESC includes the preparation of standard drawings for implementation in the field as well as routine site inspections to confirm compliance with the requirements of this condition and recommend any actions to improve outcomes.</p> <p>Additional inspections are undertaken by the ER, Transgrid and the AGJV Environment team which includes pre and post rainfall inspections.</p> <p>Reasonable and practical measures were observed to be implemented to minimise erosion and sediment generation by the project. Included:</p> <ul style="list-style-type: none"> Polymer soil binder application Sealed access points and tracks to construction sites Sealed compound, carpark and common areas Topsoil retention and rehabilitation Sediment basins, clean water diversions and energy dissipators <p>In addition to the above, targeted training has been delivered by the CPESC in the form of a half day workshop. The training is aimed at site supervisors and engineers to improve their knowledge and the effective implementation of the Soil and Water Management Plan.</p> | Compliant |
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| | | <ul style="list-style-type: none"> • Temporary Waterway Crossings” dated 17/12/24 • Letter from SEEC to AGJV, titled “Erosion and Sediment Control for HumeLink East: Pad Sites” dated 16/08/24 • Letter from SEEC to AGJV, titled “Erosion and Sediment Control for HumeLink East” dated 09/08/24 • Booklet titled “HumeLink: Ersed Access Track Information” (undated) • Training attendance sheet, Acciona, dated 20/08/25 • Toolbox meeting, Acciona, dated 19/08/25 • Ersed workshop, dated 22/05/25 • Training attendance, Acciona, dated 08/02/26 • Training attendance, Acciona, dated 17/02/26 • Powerpoint, “toolbox talk” Acciona, dated 12/03/25 • Toolbox meeting form, Acciona, dated 14/01/25 | | |
| POLLUTION OF WATERS | | | | |
| B20 | <p>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.</p> | <ul style="list-style-type: none"> • Site inspection 3,4 February 2026 • HumeLink East Incidents and NCR Register, Acciona, dated 21/01/26 | <p>As observed in the site inspection, chemicals were stored in bunded and covered work areas on hardstand areas. Mobile bunds were provided for chemical storage in the field.</p> <p>Properly constructed facilities were provided for vehicle refuelling and concrete washout.</p> <p>Spill kits were readily accessible for deployment in the event of a chemical or fuel spill. There was no evidence of a chemical leak or fuel spill observed such as soil staining or odour.</p> <p>The Auditor was provided with a copy of the Incident and NCR register for the Audit period. During the Audit period, a total of 7 minor incidents occurred (e.g oil spills) which were classified as minor and with no offsite impacts.</p> <p>Further details are provided in Section 2.5 with photographic evidence provided in Appendix E.</p> | Compliant |
| B21 | <p>The Proponent must:</p> <ol style="list-style-type: none"> a) Design, construct and maintain an appropriate water management system at all substations, concrete batching plants, construction compounds and accommodation camps to prevent pollution; | <ul style="list-style-type: none"> • HumeLink East Adjungbilly Camp, SEEC, dated 19/12/24 • 23000436_PO2_ESCP_REV00, SEEC, dated 19/12/24 • 23000436_PO2_ESCP_REVA, SEEC, dated | <p>As observed during the Audit site inspection, appropriate water management systems were provided and installed for construction activities . These included:</p> <ul style="list-style-type: none"> • Water treatment plant to treat sewage and greywater | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>b) Ensure that all liquid waste captured by the substations spill oil containment system is classified, transported and disposed of at a facility that can lawfully accept the waste; and</p> <p>c) Minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.</p> | <p>19/12/24</p> <ul style="list-style-type: none"> • 23000436_PO2_ESCP_REVA_AC Comments, SEEC, dated 19/12/24 • Concept Functional Layout, Pit & Sherry, dated 12/11/24 • Progressive Erosion and Sediment Control Plan Rev 2, Acciona, dated 19/03/25 • Progress Erosion and Sediment Control Plan Rev 02, Acciona, dated 19/03/25 • HumeLink East Adjungbilly Camp 250220, Acciona, (undated) • Progressive Erosion and Sediment Control Plan Rev 0, Acciona, dated 21/05/24 • Progressive Erosion and Sediment Control Plan Rev 2, Acciona, dated 19/03/25 • Progressive Erosion and Sediment control rev 2, Acciona, dated 19/03/25 • Progressive Erosion and Sediment control rev 2, Acciona, dated 15/12/25 | <ul style="list-style-type: none"> • Concrete wastewater capture and reuse • Bunded storage of chemicals and fuels • Collected sediment basin site water re-used for dust suppression and construction water • Erosion and sediment controls installed and maintained <p>At the time of the site inspection, the Bannaby Substation was in the early stages of construction and liquid waste/spill containment systems for the operational phase have not been completed.</p> <p>Refer to the Auditors response to Condition B20 relating to spill prevention and response.</p> <p>Refer to Appendix E for photographic evidence of construction phase water management systems.</p> <p>Key Strength</p> <p>A key strength has been identified relating to the implementation of sewage and greywater recycling systems and the efficient use of water resources.</p> <p>Refer to section 3.7 of the main report for further information.</p> | |
| RIPARIAN AREAS | | | | |
| B22 | <p>The Proponent must ensure all activities on waterfront land are constructed in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i> (DPE 2022), <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 Water Group and DPRID Fisheries agrees otherwise.</p> | <p>Lead Auditor</p> <ul style="list-style-type: none"> • Waterway Crossing Memo Consultation, dated 16/04/25 • Waterway Crossing Methodology Rev 1, Acciona, dated 22/04/25 • Email from SEEC to HumeLink East, titled "RE: HLE Water crossing ERSED plan for review and endorsement", dated 17/01/25 • Environmental Work Method Statement (EWMS) – Earthworks, Stockpile Management and Fencing (EWMS06), Acciona, dated 10/12/25 • Environmental Work Method Statement (EWMS) – Working near Sensitive Areas and Fencing (EWMS04), Acciona, dated 12/02/25 • Progressive Erosion and Sediment Control Plan for Waterway Crossings – General Design | <p>Lead Auditor</p> <p>Planning for and design of waterway crossings was undertaken in consultation with DCCEEW and DPI Fisheries. Documents prepared to ensure compliance with these requirements included:</p> <ul style="list-style-type: none"> • Progressive Erosion and Sediment Control Plan (PESCP) for waterway crossings – general design • Environmental Work Method Statements prepared for sensitive areas. <p>Erosion and sediment control plans were reviewed and endorsed by the CPESC.</p> <p>Refer to Appendix E for photographic evidence of the implementation of a typical waterway crossing as observed during the site inspection.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | <p>Biodiversity Specialist</p> <ul style="list-style-type: none"> • Site visit to BY-040 • Audit interview on 11 February 2026 • Additional information provided by HLE on 13 March 2026 | <p>Biodiversity Specialist</p> <p>Data collected as a part of the BAVR has been utilised to update the constraints layers referred to in Section 7.7 and shown in Appendix J of the BMP. This constraints layer is used to define micro-siting efforts and assess any design changes.</p> <p>It is noted that this information is not included in the BMP review as a part of this audit. It is recommended that the BMP is updated to include revised constraints mapping.</p> <p>Efforts to minimise harm were observed during the site visit to BY-040</p> | |
| FLOODING | | | | |
| B23 | <p>Except for the Gugaa Substation, the Proponent must ensure that the development does not materially alter the flood storage capacity, flows or characteristics in the development area or off-site.</p> | <ul style="list-style-type: none"> • Design Compliance Matrix V38 report, Aurecon, dated 17/03/25 • Flood Response Plan Rev 00, Acciona, dated 08/06/25 • HumeLink Hydrology and Flooding Impact Assessment Addendum Technical Report 11 rev 0, Transgrid, dated May 2024 • HumeLink Hydrology and Flooding Impact assessment EIS Technical Report, Transgrid May 2023 • Mail correspondence to HumeLink East, titled "FW: WaterNSW response – Request for Endorsement – Bannaby Substation Extension Design Compliance with NorBE Requirements" dated 19/02/26 | <p>The Auditor reviewed a range of technical documents as discussed below:</p> <ul style="list-style-type: none"> • EIS technical Report 11 – Hydrology and Flooding • Hydrology and Flooding Impact Assessment Addendum Technical Report 11 <p>EIS technical Report 11 identified generally minor adverse impacts on flood behaviours as a result of the development. The addendum technical report agreed with this conclusion.</p> <p>No activities were observed during the site inspection to be undertaken that would materially impact flood storage levels or flows. There have been no reported flood events during the Audit period. A flood response plan has been prepared for response in the event of a flood.</p> <p>A design compliance matrix has been prepared and is updated by AGJV. The matrix notes the following</p> <p><i>"The design has positioned towers to avoid flood zones wherever possible within the provided transmission centreline alignment and standard easement (refer to Section 4.3.16 of the HLE-AUR-TRN-TLCE-RPT-1010-00002 report). Where flood zones cannot be avoided, the flood zone conductor clearances are checked to meet the maintenance safe approach distance to the 1 in 100 year flood level. Where towers are expected to be located in the 1:100 flood zone, the towers were referred to the structural and foundation team to undertake flood foundation designs."</i></p> | Compliant |

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| SOIL AND WATER MANAGEMENT PLAN | | | | |
| B24 | <p>Prior to the commencement of construction (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Applicant must prepare a Soil and Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must;</p> <ol style="list-style-type: none"> Be prepared in consultation with the relevant Council, BCS and Water Group; Ensuring the requirements in conditions B18 to B23 are met; Managing flood risk during construction and operation; Investigating, assessing and managing contaminated land, soils, groundwater and blasting in the development area; Investigating, assessing and managing the potential for asbestos and other hazardous materials in the development area; Managing any unexpected and/ or suspected contaminated land, asbestos and unexploded ordinance excavated, disturbed or otherwise discovered during construction; and A program to monitor and report on the impacts and environmental performance of the development. <p>Following the Planning Secretary's approval, the Proponent must implement the Soil and Water Management Plan. <i>Note: The Soil and Water Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</i></p> | <ul style="list-style-type: none"> Soil and Water Management Plan, HLE-AGJ-ENV-ALE-PLN-0000-00028 HumeLink East, Transgrid, Rev 01.4 dated 6/02/26 Letter from DPHI to Transgrid titled "HumeLink-HumeLink East Soil and Water Management Plan" dated 4/7/25 Training attendance record, Acciona, dated 25/07/25 Humelink east Asbestos Training, (undated) | <p>DPHI approved the Soil and Water Management Plan on 4/7/25 noting the HumeLink East Soil and Water Management Plan:</p> <ul style="list-style-type: none"> Addresses stage 3 of the Project being the Construction Works HumeLink East Has been prepared in consultation with Goulburn Mulwaree, Snowy Valleys, Cootamundra-Gundagai Regional, Yass Valley and Upper Lachlan Shire Councils, BCS (now CPHR and DCCEEW Water Has been reviewed by Transgrid and no issues have been raised with the Department Has been endorsed by the ER Contains the information required by the conditions of this approval <p>Sufficient evidence was provided to the Auditor to demonstrate the effective implementation of the Soil and Water Management Plan included asbestos awareness and unexpected finds training, although it was noted that there have not been any unexpected contamination finds during the Audit period.</p> <p>Refer to the Auditors response to Conditions B19 – B23 for further information with photographic evidence provided in Appendix E.</p> <p>Recommendation</p> <p>The Sediment Basin at the Yass Accommodation Camp has a sign installed that ensures relevant personnel understand the requirements of the "Permit to Pump" to minimise the risk of an unauthorised discharge incident.</p> <p>It is recommended that similar signage is placed at all sediment basins where there is a risk of unauthorised discharge of water to the environment.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| BIODIVERSITY | | | | |
| RESTRICTIONS ON CLEARING AND HABITAT | | | | |
| B25 | <p>Unless otherwise agreed with the Planning Secretary, the Proponent must:</p> <ul style="list-style-type: none"> a) Ensure that the vegetation and habitat clearing limits specified in Table 2-1, Table 2-2 and Table 2-3 of Appendix 2 are not exceeded; and b) Minimise: <ul style="list-style-type: none"> (i) The impacts of the development on hollow-bearing trees; (ii) The impacts of the development on threatened species; and (iii) The clearing of native vegetation and key habitat; and c) Not undertake any works that result in ground disturbance within a minimum setback distance of 50 metres from PCT 637 – <i>Alpine and Sub-Alpine peatlands, damp herfields and fens, South Eastern Highlands Bioregion and Australian Alps Bioregion</i> and 30 metres from known locations of <i>Prasophyllum bagoense</i>, <i>Prasophyllum keltonni</i> and <i>Pterostylis oreophila</i> as mapped in the BDAR. | <ul style="list-style-type: none"> • Clearing permit for BY-103 (Permit no. VEG-160) • Clearing Limits Tracking Dashboard | <p>The clearing limits outlined in Condition B25 and set out in Tables 2-1, 2-2 and 2-3 of the Infrastructure Approval have been apportioned to HLE and HLW by Transgrid.</p> <p>During the site visit and audit interviews evidence was presented demonstrating a robust process for tracking clearing against the clearing limits:</p> <ul style="list-style-type: none"> • Prior to clearing: as a part of the permitting process, AGJV undertakes a check against the clearing limits for each permit to ensure clearing proposed is within allocation for that permit area. If an exceedance is identified additional approvals are required. • Post clearing: Transgrid captures detailed imagery via drone survey every 6 weeks. Actual clearing is then verified using this imagery, with both total (TCZ) and partial (ECZ and HTZ) clearing tracked. Data is compiled by HLE and input into the Clearing Limits Tracking Dashboard with updates provided to Transgrid every 3 months. The Clearing Limits Tracking Dashboard for HLE does not apportion clearing to full impact or partial impact, as per condition B25 and Table 2-1. <p>Transgrid is responsible for compiling data across both HLE and HLW.</p> <p>At the time of the audit, only the FLP for the TCZ had been finalised (with FLP for the ECZ and HTZ yet to be finalised). As a result, tracking of clearing limits is restricted to the TCZ. The Clearing Limits Tracking Dashboard provided by HLE indicates that allocated clearing limits for two PCTs (306 and 1256) and one threatened fauna species (Little Eagle) have been exceeded. It is noted that the clearing for HLE does not exceed the limits set out in Tables 2-1 or 2-3 of the Infrastructure Approval, only the allocation for HLE. However, this could lead to a non-compliance in future if HLW uses their full allocation. It is anticipated this will be rectified via an update to the clearing limits set out in condition B25 (see below).</p> <p>A key gap identified is the allowance for future clearing. The Clearing Limits Tracking Dashboard not currently accounted for future clearing.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | | <p>Whilst HLE has a process for ensuring exceedances do not occur during the pre-clearing process, this does not flow through to the post-clearing tracking and means that exceedance of clearing limits could inadvertently occur in future.</p> <p>It is noted that Transgrid has prepared and submitted a draft application for revised clearing limits to DPHI. This is a complex process that needs to account for issues such as polygon smoothing, single use access tracks (to areas of partial clearing in the ECZ), assumes ECZ clearing along 4 m centreline, etc. This is being done by HLE and HLW and reviewed by Transgrid. The ECZ and HTZ has now been provided by HLE. It is understood that the ECZ has been expanded significantly.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> The Clearing Limits Tracking Dashboard is updated to allow tracking of full and partial clearing to ensure alignment with condition B25 and Table 2-1. The Clearing Limits Tracking Dashboard is updated to allow for future clearing to ensure potential exceedances are identified early. Transgrid assess clearing for PCTs 306 and 1256 and the Little Eagle to ensure non-compliance with condition B25 has not occurred. | |
| BIODIVERSITY OFFSET PACKAGE | | | | |
| B26 | <p>Prior to carrying out any development that would impact on biodiversity values requiring offset or within 3 months of the date of the Project Approval whichever is sooner, the Proponent must update the Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT and to the satisfaction of the Planning Secretary in writing. The Package must include, but not necessarily be limited to;</p> <ol style="list-style-type: none"> Details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS; The cost for each specific biodiversity offset measure, as determined in accordance with a BCF Charge Statement indexed on a monthly basis in accordance with the Biodiversity Offsets Payment Calculator Order 2022; The timing and responsibilities for the | <ul style="list-style-type: none"> HumeLink Biodiversity Offset Package, Version 4 (dated 19 December 2024) HumeLink Biodiversity Offset Package, Version 5 (dated 19 May 2025) HumeLink Biodiversity Offset Package (letter from DPHI to Transgrid dated 21 May 2025, reference SSI-36656827-PA-76) HumeLink Biodiversity Offset Package, Version 6 (dated 20 November 2025) Six-Monthly Update Report – HumeLink Biodiversity Offset Package (letter from Transgrid to DPHI, dated 20 November 2025) | <p>Condition B26 requires the preparation of the BOP <i>"Prior to carrying out any development that would impact on biodiversity values requiring offset or within 3 months of the date of the Project Approval whichever is sooner . . ."</i>. The Infrastructure Approval was dated 13 November 2024 . Development commenced on 25 September 2025. Under condition B26, the update to the BOP was required by 13 March 2025.</p> <p>An initial BOP was prepared by Niche (Version 4, dated 19 December 2024) with conditional approval received on 20 December 2024, subject to further consultation with CPHR. The BOP was amended and a revised version (Version 5, dated 19 May 2025) submitted. The BOP was approved by DPHI (letter dated 21 May 2025).</p> | Compliant (C) |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>implementation and delivery of the measures required in the Package;</p> <p>d) A report to be provided every 6 months from the approval of the updated Package to the Planning Secretary, BCS and the BCT setting out the progress towards delivering each specific biodiversity offset measure; and</p> <p>e) Confirmation that the biodiversity offset measures will have been implemented and delivered no later than 13 November 2026, unless otherwise agreed with the Planning Secretary.</p> <p>Following the Planning Secretary's approval, the Proponent must implement and deliver the Biodiversity Offset Package.</p> | | <p>The BOP does not provide clear evidence of consultation with BCS (now CPHR) or the BCT.</p> <p>Section 4 of the BOP outlines the offset measures to be implemented:</p> <ul style="list-style-type: none"> • future surveys to reduce the offset liability, • establishment of BSAs, • purchase of existing credits via both the like-for-like and variation rules (once all options to secure like-for-like credits been exhausted, and subject to an application to DPHI), • payment into the BCF for residual offsets. <p>Section 5.1 outlines the projected cost of payment into the BCF (\$502,332,107) noting that the offset liability will be reduced through further survey and offset will be secured via other means prior to payment into the BCF.</p> <p>Section 6 outlines timing and responsibilities for the implementation and delivery of the BOP.</p> <p>Condition B26 requires a report to be provided to the Planning Secretary, BCS (now CPHR) and the BCT every 6 months from the approval of the updated BOP setting out the progress towards delivering each specific biodiversity offset measure with the BOP committing to 6-monthly updates (Section 5.4). The BOP was approved in May 2025 and an update was due to November 2025. An update was submitted to DPHI (dated 20 November 2025) with a response received from DPHI (dated 24 November 2025).</p> <p>The BOP has been updated with the results of the BAVR (Version 6, dated 20 November 2025) with a reduction in species credits from 232,233 to 152,406 and reduction in associated cost of payment into the BCF from \$410,851,830 (total inclusive of ecosystem credits of \$502,332,107) to \$261,018,440.74 (total inclusive of ecosystem credits of \$352,498,718). There has been no change in ecosystem credits required by the project as a result of the BAVR (15,128).</p> <p>The BOP and offset liability will be updated following finalisation of the FLPs, expected in early 2026.</p> <p>Implementation of the BOP is ongoing. As of 20 November 2025, Transgrid had delivered the following:</p> | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | | <ul style="list-style-type: none"> 13,273 ecosystem credits met via credits held by Transgrid, generated by BSAs undertaken by Transgrid or credits purchased from the market. 1,401 species credits met via credits held by Transgrid or credits purchased from the market (<1%). <p>Transgrid is due to implement the measures outlined in the BOP by 13 November 2026. Strong progress has been made against the ecosystem credit liability with 88% delivered to date; based on this, it is likely that the residual paid into the BCF will be minor. However, given the extent of assumed presence for species credits a large species credit liability remains (99%) and the residual payment into the BCF is estimated at \$259M.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> Updates to the BOP, as required by condition B26(d), should include evidence of the date and timing for consultation with CPHR and the BCT. | |
| B27 | 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 \$502,332,107 in accordance with the Deed of Agreement with the Planning Secretary (or delegate) executed on 10 October 2024. The Proponent must comply with the terms of the Deed. | <ul style="list-style-type: none"> Transgrid Bank Guarantees (letter from Transgrid to DPPI, dated 20 December 2024) | The bank guarantee was lodged by Transgrid on 20 December 2024. | Compliant |
| SUPPLEMENTARY BIODIVERSITY STRATEGY | | | | |
| B28 | Prior to carrying out any development that would impact on the relevant biodiversity values (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Supplementary Biodiversity Strategy as committed to the EIS, in consultation with BCS and to the satisfaction of the Planning Secretary. Unless otherwise agreed by the Planning Secretary, the Strategy must; <ul style="list-style-type: none"> a) Be peer reviewed by a suitably qualified, experienced and independent biodiversity consultant with Biodiversity Assessment Method (2020) (BAM) Accreditation whose appointment has | <ul style="list-style-type: none"> HumeLink Supplementary Biodiversity Strategy, Version 13.2 (dated 5 June 2025) HumeLink – Supplementary Biodiversity Strategy (letter from DPPI to Transgrid, dated 6 June 2025, reference SSI-36656827-PA-67) HumeLink – Supplementary Biodiversity Strategy – Peer Review (letter from DPPI to NSW Electricity Network Operations Pty Ltd, dated 20 November 2024, reference SSI-36656827-PA-2) | <p>Condition B28 requires Transgrid to prepare the SBS to the satisfaction of the Planning Secretary <i>"Prior to carrying out development that would impact on the relevant biodiversity values . . ."</i>.</p> <p>The SBS was prepared and submitted to DPPI on 5 June 2025 (V13.2). Development commenced on 25 September 2025. The SBS was approved by DPPI (letter dated 6 June 2025).</p> <p>Evidence of consultation with BCS (now CPHR) is provided in the Document Control, with four reviews by CPHR (V9, V10, V12 and V13) and dates of consultation are outlined in Section 1.11.</p> | Compliant |

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| | <p>been endorsed by the Planning Secretary;</p> <p>b) Detail survey methods for all entities to be targeted by the Strategy, in accordance with the <i>Biodiversity Assessment Method (2020)</i> and any other guidance document that is relevant and applicable at the time surveys were undertaken or the BDAR was prepared, including but not limited to;</p> <p>(i) Surveys within unsurveyed areas of the development area identified in the EIS where a reduction in credit liability for the relevant biodiversity value assumed present is being sought;</p> <p>(ii) Surveys for the following serious and irreversible impact (SAIL) entities:</p> <ul style="list-style-type: none"> • Prasophyllum bagoense • Pterostylis oreophila • Caladenia concolor • Genoplesium superburn • Pomaderris delicatata • Litoria castanea • Parasophyllum innubum • Solanum armourense • Calotis gladulosa • Pseudomy fumeus • Pimelea bracteata • Grevillea iaspicula • Pomaderris pallida • Mixophyes balbus • Prasophyllum keltonii • Bossia fragrans • Eucalyptus robertsonii subsp, hemisphaerica • Grevillea wilkinsonii • Chalinolobus dwyeri • Tyto tenebriscosa | | <p>The SBS was peer reviewed by Adam Cavallaro. Mr Cavallaro was endorsed by DPHI as a suitably qualified, independent and experienced (letter dated 20 November 2024). Evidence of the peer review is provided in the Document Control table, with Mr Cavallaro reviewing version V8, and outlined in Section 1.10 with finding of the peer review provided in Appendix C. Transgrid's response to these recommendations provided in Attachments A and B of Appendix C.</p> <p>Survey methods for entities targeted by the SBS are described in Section 3 and Appendix F. Section 4 outlines a process for quantifying the results of supplementary surveys and any revised offset liabilities.</p> | |
| BIODIVERSITY ASSESSMENT VERIFICATION REPORT | | | | |
| B29 | <p>Unless otherwise agreed by the Planning Secretary, prior to carrying out any development that would impact on the relevant biodiversity values subject to the survey in the Supplementary Biodiversity Strategy in condition B28 (excluding Enabling Works, if the relevant requirements of this</p> | <ul style="list-style-type: none"> • HumeLink Biodiversity Assessment Verification Report, Version R5.1 (dated 29 August 2025) | <p>Condition B29 requires Transgrid to prepare the BAVR to the satisfaction of the Planning Secretary "<i>Prior to carrying out development that would impact on the relevant biodiversity values . . .</i>" .</p> | Compliant |

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| | <p>condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Biodiversity Assessment Verification Report in consultation with BCS and to the satisfaction of the Planning Secretary. The Report must:</p> <ul style="list-style-type: none"> a) Be prepared by a suitably qualified, experienced and independent biodiversity consultant with Biodiversity Assessment Method (2020 (BAM) Accreditation whose appointment has been endorsed by the Planning Secretary; b) Be prepared in accordance with the Biodiversity Assessment Method (2020) and any other guidance document that is relevant and applicable at the time surveys were undertaken or the BDAR was prepared; c) Be prepared with regard to the final layout plans for the development required under condition C8, including the location of final access routes within each clearing zone and stockpile locations; d) Include: <ul style="list-style-type: none"> (i) Detail of the outcomes of surveys undertaken in accordance with condition B28; (ii) Where species are found to be present following the surveys undertaken under condition B28 or that are assumed to be present, identify measures to avoid and/or mitigate the impact to those entities for inclusion in a revised version of the Biodiversity Management Plan required under condition B30; e) Provide findings and recommendations relating to the matters in (d), including but not limited to, reducing the relevant credit obligations and calculating credit obligations for unexpected finds. <p>Any required changes to biodiversity offset or mitigation measures arising from the Biodiversity Assessment Verification Report must be incorporated into an updated version of the Biodiversity Offset Package under condition B26 in consultation with BCS and BCT and addressed in a revised version of the Biodiversity Management Plan required under condition B30, in consultation with BCS and FCNSW, to the satisfaction of the Planning Secretary.</p> | <ul style="list-style-type: none"> • HumeLink Biodiversity Assessment Verification Report (letter from DPHI to NSW Electricity Network Operations Pty Ltd dated 5 September 2025, reference SSI-36656827-PA-107) • Timing Amendment for the updated Biodiversity Assessment Verification Report (letter from DPHI to NSW Electricity Network Operations Pty Ltd dated 5 December 2025, reference SSI-36656827-PA-155) | <p>The BAVR was prepared by Niche and submitted to DPHI on 29 August 2025 (Version R5.1). Development commenced on 25 September 2025. The BAVR was approved by DPHI (letter dated 6 June 2025). This approval is subject to a number of items:</p> <ol style="list-style-type: none"> 1. unless otherwise agreed by the Planning Secretary, a revised BAVR addressing the requirements of points 2 and 3 of this letter must be provided to the Department for the approval of the Planning Secretary within 3 months of the date of this letter; 2. revisions to the BAVR must have regard to the final layout plans as required by Condition B29(c) including an analysis of the approved BAVR (Rev 5.1) and any new information reported in future versions of the BAVR against the final layout plans, including the location of final access routes within each clearing zone and stockpile locations; 3. revisions to the BAVR must be submitted in accordance with Section 1.4 of BAVR Rev 5.1; 4. Transgrid must supply the Department with a list of lot and DPs that were not accessed for survey, either entirely or for certain times of the day prior to the lodgement of a revised BAVR. <p>Transgrid sought and an extension to the due date for the revised BAVR of 5 December 2025 due to the FLPs for HLE being ongoing. This extension was granted with a revised due date of 30 April 2026 (letter from DPHI dated 5 December 2025).</p> <p>Evidence of consultation with BCS (now CPHR) is provided in the Document Control, with four reviews by CPHR (R0, R1, R2 and R3) and dates of consultation outlined in Section 1.6.</p> <p>Table 3 of the BAVR addresses the requirements of condition B29.</p> <ul style="list-style-type: none"> • The BAVR has been prepared by Thea Kane and reviewed by Chani Wheeler of Niche. The BAVR has been independently peer reviewed by Adam Cavallaro, as approved by DPHI. • The BAVR has been prepared in accordance with the BAM and relevant guidance documents, unless otherwise stated | |

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| | | | <p>and agreed with CPHR. Table 5 of the BAVR addresses compliance with Section 5.2 of the BAM.</p> <ul style="list-style-type: none"> The BAVR has been prepared based on the approved project footprint (i.e. not the FLP). This deviation has been approved by DPHI (see above). Results of the supplementary surveys are outlined in Section 4 and measures to avoid and/or mitigate impacts are provided in Section 9.1 and Annex 12 for inclusion in the BMP. Recommendations regarding the revised offset liability are outlined in Section 9. <p>The IEA found that the recommendations in Section 9 of the BAVR do not targeted measures for avoidance based on the findings of the BAVR, as required by B29 (d(ii)).</p> <p>The BAVR surveys have resulted in significant reductions in predicted impacts for some species when compared to the clearing limits set in the Infrastructure Approval, including reductions to nil impacts for:</p> <ul style="list-style-type: none"> Flockton Wattle (<i>Acacia flocktoniae</i>) Blue-tongued Greenhood (<i>Pterostylis oreophila</i>) - SAIL species Alpine Sun-orchid (<i>Thelymitra alpicola</i>) Mauve Burr-Daisy (<i>Calotis glandulosa</i>) Smoky Mouse (<i>Pseudomys fumeus</i>) Large-eared Pied Bat (<i>Chalinolobus dwyeri</i>) - SAIL species <p>Overall, 37 flora species and 22 fauna species had a reduction in impacts when compared to clearing limits sets under condition B25. This may change as the FLPs are finalised and impact calculations are updated.</p> <p>As outlined above, Transgrid have prepared a revised BOP and have submitted a draft application for revised clearing limits set in condition B25 to DPHI. Updates to the BMP arising from the BAVR are discussed below, under condition B30.</p> <ul style="list-style-type: none"> The Squirrel Glider (<i>Petaurus norfolcensis</i>) was recorded during surveys undertaken for the SBS in areas where a reduction in offset liability was sought as part of Revised | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | | BDAR. These were not reported in the BAVR as the Squirrel Glider was not a target species for the BAVR. This is being rectified through updates to the BAVR following finalisation of FLPs (anticipated to occur in April 2026). | |

BIODIVERSITY MANAGEMENT PLAN

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| B30 | <p>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> a) Be prepared by a suitably qualified and experienced biodiversity expert(s); b) Be prepared in consultation with BCS and FCNSW; c) Be prepared generally in accordance with the <i>Revised Biodiversity Development Assessment Report</i> (Revision 0, dated 21 June 2024); d) Include a description of the measures that would be implemented for: <ul style="list-style-type: none"> (i) Meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29; (ii) Minimising; <ul style="list-style-type: none"> • The amount of vegetation clearing on site; • The loss of key fauna habitat (including tree hollows); • The impacts of fauna on site, including undertaking pre-clearance surveys; and • Potential indirect impacts on threatened flora and fauna species; (iii) Ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint; (iv) Protocols for unexpected finds or threatened species and threatened ecological communities within the | <ul style="list-style-type: none"> • HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 Revision 02 (dated 15 September 2025) • HumeLink – HumeLink East Biodiversity Management Plan (letter from DPHI to NSW Electricity Network Operations Pty Ltd dated 9 September 2025, reference SSI-36656827-PA-3) • A8 Consultation Report Biodiversity Management Plan Revision B (dated 15 August 2025) • HumeLink Connectivity Corridor BMP Review (letter from Transgrid to NSW DCCEEW, dated 29 July 2025) • Conductor Line-Marking Plan (email from Niche to Transgrid, dated 30 January 2026) • Transgrid's proposals for additional and appropriate measures to compensate the likely serious and irreversible impacts arising from HumeLink (letter from Transgrid to NSW DCCEEW, dated 2 September 2024) • LAMP Workshop Minutes (dated 10 March 2025) • Transgrid - DCCEEW – Yass Area Network Landcare, Box Gum Woodland Local Area Management Programme, Terms of Reference (undated) • BGW LAMP Advisory Group – Meeting minutes (dated 17 December 2025) | <p>Condition B30 requires Transgrid to prepare the BMP to the satisfaction of the Planning Secretary "<i>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting . . .</i>" .</p> <p>The HLE BMP (Revision 0.1.7) was prepared and submitted to DPHI on 2 September 2025. This version of the HLE BMP was approved by DPHI (letter dated 9 September 2025). Development commenced on 25 September 2025.</p> <p>An updated version of HLE BMP (Revision 02) was provided as a part of the IEA and this document was reviewed. The document control indicates no changes to the version approved by DPHI, stating that Revision 02 was "Issued for Use".</p> <p>The HLE BMP has been prepared by Alex Graham and Dr Jack Tattler who are Principal Ecologists at East Coast Ecology. Both are considered suitably qualified and experienced persons. The BMP has been prepared in accordance with the Revised BDAR.</p> <p>Section 4.1 of the BMP states that the document "<i>will be prepared in consultation with Biodiversity, Conservation and Science of the Environment and Heritage Group of NSW DCCEEW (BCS) and FCNSW.</i>" The document control tab indicates that revisions have occurred in response to CPHR comments. A detailed consultation report has been provided indicating extensive consultation with both FCNSW and CPHR.</p> | Non Compliant |
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| | <p>disturbance footprint including the requirements for;</p> <ul style="list-style-type: none"> • All work in the associated location to stop and prevent further impact, and • Notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • Relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; <p>(v) Connectivity strategy for the potentially impacted species identified in the <i>Revised Biodiversity Development Assessment Report</i> (Revision 0, dated 21 June 2024) and a Supplementary Hollow and Nest Strategy;</p> <p>(vi) Protecting the conservation values of McPhersons Plain and avoiding impacts to <i>Prasophyllum bagoensis</i>, <i>Prasophyllum keltonni</i> and <i>Pterostylis oreophilla</i>;</p> <p>(vii) Rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable native species;</p> <p>(viii) Progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan;</p> <p>(ix) 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 revegetation of the site;</p> <p>(x) Collecting and propagating seed (where relevant);</p> <p>(xi) Controlling erosion, weeds and feral</p> | <ul style="list-style-type: none"> • BGW LAMP Advisory Group – Project Area Mapping Workshop / Quarterly Meeting Minutes (dated 25 February 2026) • Proposal to guide conservation of <i>Pimelea bracteata</i> (Rice Flower) through genomically diverse seed collection strategies (Botanic Gardens of Sydney) • Quarterly meeting - <i>Pimelea bracteata</i> - A&AM for HumeLink (email from Transgrid dated 16 December 2025) • RE: Landholder access request - <i>Pimelia</i> sampling (email from Transgrid dated 6 January 2026) • Sooty Owl - meeting notes 17/2/26 (email from Transgrid to NSW DCCEEW and DPHI, dated 4 March 2026) | <p>The BMP incorporates measures to meet the mitigation measures outlined in condition sB25 and B29 (see Sections 7.15 and Table 4) and to minimise clearing of native vegetation and fauna habitat as well as indirect impacts.</p> <p>A pre-clearing process is included to ensure clearing does not occur outside the disturbance footprint (noting proposed amendments to the FLPs - see above).</p> <p>An Unexpected Finds Protocol is outlined in Appendix A.</p> <p>Transgrid prepared a Connectivity Corridor BMP Review to identify and recommend priority actions to support fauna movement and habitat connectivity. The Connectivity Strategy provided at Appendix F of the HLE BMP builds on this.</p> <p>A draft HumeLink Conductor Line Marking Plan has been developed by Niche (dated 30 January 2026) and submitted to Transgrid for review. The plan sets out areas where there is a collision risk and provides recommendations for mitigating this risk (flappers, spirals etc). The review has found that initial modelling parameters were not sufficiently specific and did not adequately differentiate areas of higher collision risk from other areas. The plan is to be updated prior to finalisation.</p> <p>A Supplementary Hollow and Nest Strategy is provided at Appendix E. HLE does not interact with the biodiversity values of McPhersons Plain so measures to protect conservation values of the Plain are not required. Measures to rehabilitate temporary disturbance are outlined in Section 7.12 of the HLE BMP.</p> <p>A process for monitoring clearing is outlined above, with further information incorporated into the HLE BMP (see Appendix B: Vegetation Clearing Procedure). Partial clearing is yet to commence on HLE, so no verification report has been triggered at the time of the audit. Regardless, recommendations are provided above to improve tracking of partial clearing.</p> <p>Measures to salvage habitat resources are outlined in Section 3.3 of the HLE BMP.</p> | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>(xii) pests; Bushfire management;</p> <p>(xiii) Minimising impacts on entities at risk of a serious and irreversible impact (SAIL), including for Box Gum Woodland, Rice Flower (<i>Pimelea bracteata</i>) and Sooty Owl (<i>Tyto tenebricosa</i>) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September 2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); and</p> <p>e) Include a program to monitor, evaluate and publicly report on the effectiveness of these measures. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan. <i>Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</i></p> | | <p>Minimal measures are incorporated for the collection and propagation of seed, excluding as a part of additional and appropriate measures (AAMs) for <i>Pimelea bracteata</i>.</p> <p>Table 3 of the HLE BMP states that measures to minimise impacts on entities at risk of SAIL are outlined in Sections 7.3 and 7.6. Section 7.3 discusses the BAVR process, while Section 7.6 discusses clearing limits. As outlined above, specific mitigation measures are not provided in the BAVR and none have been incorporated into the HLE BMP. The general mitigation measures and clearing limits are considered insufficient to address the requirements of the condition B30 (d(xiii)).</p> <p>Transgrid has outlined AAMs for Box Gum Woodland, Sooty Owl and <i>Pimelea bracteata</i> in a letter to NSW DCCEEW in September 2025. In their RFI response, Transgrid provided an update to the implementation of AAMs:</p> <ul style="list-style-type: none"> • Transgrid has established the Box Gum Woodland Local Area Management Programme (LAMP) in collaboration with DCCEEW and Yass Area Network Landcare. • Transgrid has entered into a contract with the Royal Botanic Gardens to undertake genomically diverse seed collection. To date, three field trips have been undertaken to collect genetic material and place bags over seed heads. <p>A review by Transgrid and CPHR has determined that the Project will not impact caves within Sooty Owl habitat. Accordingly, the project will not result in SAIL for this species and AAMs are no longer required.</p> <p>A flora and fauna monitoring program is outlined in Appendix H.</p> <p>Two non-compliances in relation to condition B30. These are discussed in Section 3.1 and Table 3-2.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Updates to the HLE BMP should include evidence of the date and timing for consultation with CPHR and the FCNSW. • Updates to monitoring of partial clearing (see recommendations under condition B25). | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | | <ul style="list-style-type: none"> • Include specific mitigation measures to be implemented for entities at risk of SAIL. • Implement recommendations in Table 3-2 to avoid further instances of clearing outside project boundaries. | |
| HERITAGE | | | | |
| UNSURVEYED AREAS | | | | |
| B31 | <p>Prior to carrying out any development within the unsurveyed areas of the development area identified in the EIS, untested areas of moderate and high sensitivity, 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. The report must:</p> <ol style="list-style-type: none"> Include details of consultation with the Aboriginal stakeholders; Describe the additional Aboriginal heritage surveys that were undertaken, including test excavations of PADs; Describe any potential additional impacts to heritage items; Identify further mitigation measures, including avoidance or salvage; Include detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and 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. | <ul style="list-style-type: none"> • Humelink East, Unsurveyed Areas, SSI-36556827, Addendum Aboriginal Cultural Heritage Assessment Report, Prepared for Acciona Genus Joint Venture, Kelleher Nightingale Consulting Pty Ltd, Draft V03 dated October 2025 • Letter from DPPI to Transgrid titled "HumeLink East – Addendum Aboriginal Cultural Heritage Assessment Report" dated 5/12/25 | <p>The Addendum Cultural Heritage Assessment Report (Addendum ACHAR) was prepared by Kelleher Nightingale and approved by DPPI on 5/12/25. In their letter of approval, DPPI noted the AACHAR:</p> <ul style="list-style-type: none"> • <i>Contains the information required by Condition B31</i> • <i>Has been prepared in consultation with Registered Aboriginal Parties and Heritage NSW</i> • <i>Has been reviewed by Transgrid and no issues have been raised with the Department</i> <p>In their letter of approval DPPI issued a requirement under condition A3 as follows:</p> <ol style="list-style-type: none"> 1. <i>An amended Heritage Management Plan (HMP) in respect of HumeLink East (Stage 3a) must be submitted to the Planning Secretary for approval under Condition B33 by 23 December 2025. The amended HMP must incorporate the management and mitigation measures from Sections 11 and 12 in the Addendum ACHAR approved by the Planning Secretary (reference number SSI-36656827-PA-118)</i> <p>Please refer to Condition A3 for further assessment regarding compliance with this condition.</p> | Compliant |

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| PROTECTION OF HERITAGE ITEMS | | | | |
| B32 | <p>The Proponent must:</p> <ul style="list-style-type: none"> a) Ensure the development does not cause any harm to any Aboriginal heritage objects/ sites or historic heritage items located outside the approved construction area (see Table 3-1 and Table 3-3 of Appendix 3); b) Manage the sites identified in Table 3-2 of Appendix 3 in accordance with the specified mitigation and management measures and in accordance with the requirements of the Heritage Management Plan, as outlined in condition B33, including any subsequent revision of this plan; c) Implement all reasonable and feasible measures to avoid and minimise harm to historic heritage items within the approved construction area (identified in Table 3-4 of Appendix 3); and d) Salvage and relocate items that would be impacted to a suitable location, in accordance with the Heritage Management Plan described in condition B33. | <ul style="list-style-type: none"> • Email from KNC to Humelink East, titled "Heritage in YG-036" dated 11/11/25 • Environmental Control Map rev 1, Acciona, dated 03/12/25 • Clearing and Land Disturbance Permit – Vegetation and Topsoil rev 4, Acciona, dated 23/12/25 | <p>AGJV have appointed experienced heritage consultant Kelleher Nightingale to oversee the implementation of the heritage plan and to provide advice to the construction team throughout the project. Measures implemented to prevent harm to heritage items during the construction phase include the following:</p> <ul style="list-style-type: none"> • Preparation of environmental control maps with details of any known heritage items • GPS tracking of plant and vehicles with a geofence and alarm system in place to alert operators on approach to any heritage items • Implementation of a clearing and land disturbance permit including a requirement for heritage surveys and clearance • Involvement of RAPs in salvage and testing activities • Pre – clearance collection of artefacts and temporarily stored at the Heritage consultants office. | Compliant |
| HERITAGE MANAGEMENT PLAN | | | | |
| B33 | <p>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements are adequately addressed in the Enabling Works Management Plan of condition B64) that could harm heritage values, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must;</p> <ul style="list-style-type: none"> a) Be prepared by a suitably qualified and experienced Aboriginal cultural heritage specialist whose appointment has been endorsed by the Planning Secretary; b) Be prepared in consultation with Aboriginal Stakeholders, NPWS and reviewed, NPWS and reviewed by Heritage NSW; c) Undertake an assessment of the unsurveyed areas of the construction areas in accordance with the <i>Code of practice for archaeological investigation of Aboriginal objects in NSW</i> (DECCW, 2010); d) Include a description of the measures that would be | <ul style="list-style-type: none"> • Heritage Management Plan, HLE-AGL-MGT-ALE-PLN-000-026, Rev 01.8, AGJV, dated 10/6/25 • Letter from DPHI to Transgrid titled "HumeLink – HumeLink East Heritage Management Plan" dated 2/7/25 | <p>The HumeLink East Heritage Management Plan was approved by DPHI on the 2nd of July 2025 noting the HMP:</p> <ul style="list-style-type: none"> • Addresses stage 3a of the project being the construction works, HumeLink East • Has been prepared by the endorsed Aboriginal Cultural heritage specialist Dr Matthew Kelleher • Has been prepared in consultation with Aboriginal Stakeholders, NPWS and reviewed by Heritage NSW • Has been reviewed by Transgrid and no issues have been raised with the Department • Has been endorsed by the ER • Contains the information required by the conditions of the approval. <p>Refer to the Auditors response to B33 as above regarding implementation of the plan.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>implemented for:</p> <ul style="list-style-type: none"> (i) Protecting heritage items in accordance with conditions B32(a); (ii) Undertaking the management activities specified in Table 3-2 of Appendix 3, including a detailed methodology for each of the approved management activities; (iii) Avoiding harm to the heritage items specified in Table 3-1 and Table 3-3 of Appendix 3; (iv) Undertaking detailed reporting on the outcomes of management activities including, but not limited to archival recording and analysis of stone artifact assemblages and other information relevant to addressing research questions; (v) A strategy for the management of any salvaged Aboriginal objects; (vi) A contingency plan and reporting procedure if: <ul style="list-style-type: none"> • Heritage items outside the approved construction area are harmed; • Previously unidentified heritage items are found; or • Skeletal material is discovered; (vii) Ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and the records are kept of these inductions; and (viii) Ongoing consultation with Aboriginal Stakeholders during the implementation of the plan; and <p>e) Include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan. <i>Note: The Heritage Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</i></p> | | | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| TRAFFIC AND TRANSPORT | | | | |
| DESIGNATED HEAVY AND HEAVY VEHICLES REQUIRING ESCORT ROUTES | | | | |
| B34 | All heavy vehicles requiring escort associated with the development must only travel to and from the site via the construction routes described in the EIS, as identified in Figure 4-2 in Appendix 4, unless the Planning Secretary agrees otherwise. | <ul style="list-style-type: none"> • Audit Interview 5 February 2026 • A&D Mooney OSOM Permit Checklist, Acciona, dated 08/01/26 • Heavy Vehicle Driver Code of Conduct, Acciona, (undated) | <p>During the Audit interview, AGJV provided a demonstration of the digital in vehicle management system and mechanisms to ensure compliance with the requirements.</p> <p>This included:</p> <ul style="list-style-type: none"> • Preparation and issue of a Vehicle Management Plan with approved routes to heavy vehicle drivers • Oversize/Overmass form includes VMP and is issues as a permit • Implementation of a GPS tracking system with vehicles including a geofence that alerts drivers in the circumstance that they are using an unapproved route. An alert is also issued to the management team • The GPS tracker is installed in all heavy and light vehicles as well as items of plant • All subcontractors are registered on the system and are required to do a pre-start prior to commencing their activities • Implementation of a Heavy Vehicle driver code of conduct which includes requirements to comply with all designated heavy vehicle routes • Development of a disciplinary framework for speeding. The framework sets out a range of disciplinary measures for project employees and subcontractors which may include written warnings and formal disciplinary proceedings, loss of driving privileges on the project and termination of employment. | Compliant |
| B35 | All heavy and light vehicles associated with construction, upgrading and decommissioning of the development must travel to and from the site via the construction routes as described in the EIS and identified in the Figure 4-1 in Appendix 4, unless the Planning Secretary agrees otherwise. | <ul style="list-style-type: none"> • Letter from Transgrid to DPHI titled "HumeLink – Request for Agreement from Planning Secretary – SSI-36656827 Condition B35" dated 6/3/25 • Letter from DPHI to Transgrid titled "HumeLink – Request for agreement from Planning Secretary – SSI-36656827 Condition B35" dated 6/3/25 • Letter from Transgrid to DPHI, titled "RE: HumeLink East – Request for use of additional roads – SSI-36656827 Condition B35" dated 04/02/26 | <p>During the Audit period, submissions made to the Planning Secretary in accordance with this condition are as follows:</p> <ul style="list-style-type: none"> • Approval to use alternative local roads due to the relocation of the Yass Compound (DPHI Approval granted on 6/3/25) • Approval to use alternative local roads due for supply of site construction materials. At the time of the audit DPHI approval was pending) | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| TRANSPORT STRATEGY | | | | |
| B36 | <p>Prior to commencing the relevant road upgrades referenced in Table 4-1 of Appendix 4, the Proponent must prepare a Transport Strategy of those road upgrades, in consultation with the TfNSW and relevant Council(s), to the satisfaction of the Planning Secretary, which;</p> <ul style="list-style-type: none"> a) Identifies the location and type of any necessary road upgrades (including roads, intersections and access points); b) Ensures the road upgrades comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), unless the relevant road authority agrees otherwise; c) Includes strategic concept designs prepared in accordance with <i>Austroads Guide to Road Design</i> (as amended by TfNSW supplements); d) Includes a detailed assessment of potential impacts of any necessary road upgrades (such as heritage and biodiversity impacts) and appropriate mitigation measures including consideration of cumulative traffic impacts from approved projects; e) Include a schedule for the commencement and completion of all necessary road upgrades; f) Identifies whether intersections and access points would be permanent or temporary. | <ul style="list-style-type: none"> • Letter from DPHI, titled "HumeLink Staging requests" dated 22/11/24 • Letter from Transgrid, titled "Proposed Staging of Humelink – SSI-36656827 Condition C3" dated 22/11/24 | <p>On 22/11/24 Transgrid wrote to DPHI in relation to the staging of the project in accordance with condition C3. The staging request noted that this condition only applied to the HLW portion and would not be triggered by the HLE section of the Project. This was confirmed by DPHI on 22/11/24.</p> | Not triggered |
| ROAD UPGRADES | | | | |
| B37 | <p>Unless the planning secretary agrees otherwise, the Proponent must implement the road upgrades and the mitigation measures identified in Appendix 4 in accordance with the relevant standard and timing requirements in Appendix 4, and to the satisfaction of the relevant road's authority.</p> <p>If there is a dispute about the road upgrade works, or the implementation of these works, then either party may refer to the matter to the Planning Secretary for resolution.</p> | <ul style="list-style-type: none"> • Letter from DPHI to Transgrid titled "Proposed Changes to the AC03 upgrade" dated 16/7/25 • Letter from DPHI to Transgrid titled "HumeLink – B37 Extension Request for AC07 Road Upgrade" dated 14/7/25 • Letter from Upper Lachlan Shire Council, titled "HumeLink East Road Maintenance Agreement and Water Charges" dated 17/10/25 • Road Maintenance Agreement Rev 6, Snowy Valleys Council, dated 07/10/25 | <p>Approval was granted by DPHI on the for an alternate timeframe to deliver the AC03 Road upgrade noting the Project cannot undertake the vegetation clearing necessary for the AC03 road treatments during the early Works phase as it requires biodiversity offsets.</p> <p>All road upgrades and maintenance works are being undertaken by Snow Valleys and Upper Lachlan Shire Councils under agreement with AGJV. Evidence of payment of council fees in relation to the road upgrade works was provided to the Auditor.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| ROAD MAINTENANCE | | | | |
| B38 | <p>The Proponent must:</p> <p>a) Undertake an independent dilapidation survey:</p> <p>(i) Assessing the existing condition of all local roads on the transport route shown in Figure 4-1 in Appendix 4 (including local road crossings) prior to Enabling Works, construction, upgrading or decommissioning works; and</p> <p>(ii) Assessing the condition of all local roads on the transport route (including local road crossing);</p> <ul style="list-style-type: none"> • Within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed by the relevant roads authority/ manager; • On an annual basis during construction, or within a timeframe agreed to by the relevant roads authority/ manager; <p>b) Repair (or pay the full costs associated with repairing) any damage to local roads on the transport route (including local road crossings) as a result of development related road traffic.</p> <p>(i) As soon as possible after the damage is identified but within 7 days at the latest if it could endanger road safety; and</p> <p>(ii) Within 2 months of the completion of the survey;</p> <p>(iii) Unless the relevant roads authority agrees otherwise;</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> | <ul style="list-style-type: none"> • HLE Dilapidation Report – Brungle Road, esosurveyors, dated 31/01/25 • Dropbox document transmission records – road dilapidation reports, submission to Councils” dated 7/8/25 • HLE Dilapidation Report – Gadara Road, esosurveyors, dated 24/01/25 • HLE Dilapidation Report – Red Hill Road, esosurveyors, dated 30/01/25 • Letter from Upper Lachlan Shire Council, titled “HumeLink East Road Maintenance Agreement and Water Charges” dated 17/12/25 • Remittance Advice, Acciona, dated 11/02/26 | <p>Road dilapidation reports were undertaken with evidence provide demonstrating they were submitted to Councils.</p> <p>As noted, maintenance and repair works are being undertaken by Snow Valleys and Upper Lachlan Shire Councils under agreement with AGJV. Evidence of payment of council fees in relation to the road upgrade works was provided to the Auditor.</p> <p>Evidence of payment of council fees in relation to the road upgrade works was provided to the Auditor.</p> <p>There have been no disputes with any local authority about the road maintenance works or implementation of these works to date.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| TRAFFIC AND REPORT MANAGEMENT PLAN | | | | |
| B39 | <p>Prior to commencing construction or road upgrades identified in condition B37 (whichever comes first) but excluding Enabling Works where the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64, the Proponent must prepare a Traffic Management Plan for the development in consultation with FCNSW, TfNSW, Snowy Valleys Council, Wagga Wagga City Council, Cootamundra-Gundagai Regional Council, Yass Valley Council, Upper Lachlan Shire Council and Goulburn-Mulwaree Council, and to the satisfaction of the Planning Secretary. This plan must include:</p> <ol style="list-style-type: none"> a) Details of the transport route to be used for all development-related traffic; b) Details of the road upgrade works required by condition B37; c) Details of the measures that would be implemented to comply with the transport management requirements in conditions B34 to B38: d) Details of the measures that would be implemented to; <ol style="list-style-type: none"> (i) 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 timeframe and schedule of construction works; • A description of the proposed dilapidation surveys required by condition B38; • Strategic concept designs and procedures for stringing cables and transmission lines across roads to ensure compliance with Austroads Guidelines and TfNSW requirements (for crossing of state roads); • Scheduling heavy vehicle movements to avoid peak periods where reasonable and feasible; • Reducing the speeds of | <ul style="list-style-type: none"> • Letter from DPHI, titled "HumeLink – HumeLink East Traffic and Transport Management Plan" dated 07/08/25 • Heavy Vehicle Checklist, Acciona, dated 08/01/26 • Oversize and/or Overmass (OSOM) Mass or Dimension Exemption, NHVR, dated 03/10/25 • Powerpoint titled "HumeLink East Project, AGJV: Critical Activity Review – Steel Delivery and Unloading" Acciona, (undated) • Heavy Vehicle Driver code of conduct, Acciona, (undated) • Email from HumeLink East, titled "Street Parking Guidelines for Goulburn Office" dated 04/02/26 • Report titled "Acciona Genus – HumeLink East – Driver Code of Conduct, module of" dated 02/06/25 • HLE Full Plant Matrix, (undated) • HLE Laydown Quick Guides, (undated) • HumeLink East Project AGJV Chain of Responsibility Awareness – Heavy Vehicle Drivers, Acciona, (undated) • Plant Onboarding Guide – Additional Documents, Acciona rev 0, dated 22/04/25 • Plant Onboarding Documents Rev 3, Acciona, dated 22/04/25 • Remittance Advice, Acciona, dated 11/02/26 • Flood Response Plan Rev 00, Acciona, dated 08/06/25 | <p>DPHI approved the HumeLink East Traffic and Transport Management Plan on 7/8/25 noting the TMP:</p> <ul style="list-style-type: none"> • addresses the Construction Works HumeLink East stage of the project (Stage 3a), excluding cable stringing over State roads (Stage 3a(iii)) and the OSOM delivery of reactors to the existing Bannaby 500 kV substation (Stage 3a(v)), in accordance with the approved staging of the HumeLink project under Condition C3 of the approval (our ref. SSI-36656827-PA-5 & SSI-36656827-PA-78); • has been prepared in consultation with FCNSW, TfNSW, Upper Lachlan Shire Council, Goulburn Mulwaree Council, Snowy Valleys Council, Cootamundra-Gundagai Regional Council and Yass Valley Council; • has been reviewed by Transgrid and no issues have been raised with the Department; • has been endorsed by the ER, • contains the information required by the conditions of approval, as per the approved staging. <p>Evidence of implementation of the TMP included the following:</p> <ul style="list-style-type: none"> • Preparation and issue of a Vehicle Management Plan with approved routes • Oversize/Overmass form includes VMP and is issued as a permit • Implementation of a GPS tracking system with vehicles including a geofence that alerts drivers in the circumstance that they are using an unapproved route or are speeding. An alert is also issued to the management team. • The GPS tracker is installed in all heavy and light vehicles as well as items of plant and tracks the vehicle number with no exceedance of the EIS traffic volumes reported during the Audit period • All subcontractors are registered on the system and are required to do a pre-start prior to commencing their activities • Implementation of a Heavy Vehicle driver code of conduct which includes requirements to comply with all designated heavy vehicle routes • Driver code of conduct | Compliant |

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| | <p>development-related traffic at key intersections (not applicable to Hume Highway);</p> <ul style="list-style-type: none"> • Temporary traffic controls, including detours and signage; • 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 busses, 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 standard construction hours; • Minimising dirt and debris tracked on to the public road network from development related traffic; • Details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; • Measures for managing light vehicle peak numbers, such as car-pooling or ride sharing by employees; • Scheduling the haulage vehicle | | <ul style="list-style-type: none"> • Development of a disciplinary framework for speeding. The framework sets out a range of disciplinary measures for project employees and subcontractors which may include written warnings and formal disciplinary proceedings, loss of driving privileges on the project and termination of employment. • Provision of traffic advisory signage at exit points • Community notifications issued regarding traffic impacts • Complaints handling procedure • Flood response plan | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <ul style="list-style-type: none"> • movements to minimise convoy lengths or platoons; • Responding to local climate conditions 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 and leave site in a forward direction; • A schedule for the periodic inspection an maintenance of the condition of all local roads used by development-related traffic; • Responding to any emergency repair or maintenance requirements; • Provisions for maintaining emergency vehicle access to the site at all times; • A traffic management system for managing over-dimensional vehicles; and • Fatigue management ; <p>(ii) Minimise the impacts of the road and intersection upgrades of the development;</p> <p>(iii) Minimises parking on the public road network;</p> <p>(iv) Maintain all roads and water related infrastructure on site in a safe and serviceable condition;</p> <p>(v) Minimise the traffic noise impacts of the development;</p> <p>e) Include a drivers code of conduct that addresses;</p> <ul style="list-style-type: none"> (i) Travelling speeds; (ii) Procedures to ensure that drivers to and from the development adhere to the designated heavy vehicles requiring escort and heavy vehicle routes; (iii) Procedures to ensure that drivers to and from the development implement safe driving practices; and (iv) Including a detailed program to monitor | | | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>and report on the effectiveness of these measures and the code of conduct.</p> <p>f) Include a program to;</p> <p>(i) Ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic and Transport Management Plan; and</p> <p>(ii) Monitor and publicly report on the effectiveness of these measures.</p> <p>g) A flood response plan detailing procedures and options for safe access to and from the site in the event of flooding.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Traffic and Transport Management Plan. <i>Note: The Traffic and Transport Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</i></p> | | | |

AVIATION

AERIAL ACTIVITIES

| | | | | |
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| B40 | <p>Prior to submitting the Final Layout Plans for the section of the transmission line with 3 nautical miles of the aircraft landing area located at Lot 108 DP757214 (as identified in additional information dated 1 October 2024), the Proponent must provide reasonable and feasible measures or negotiated agreement to minimise impacts commensurate to the impact to aerial activities that are affected by the erection and/ or operation of the transmission line and towers/ the project, such as increasing setbacks, funding the cost difference between the pre-development aerial activities and a reasonable alternative method and/ or funding the cost to relocate the landing area in consultation with owners or managers of these aircraft landing areas to the satisfaction of the Planning Secretary.</p> <p>Following approval by the Planning Secretary, the Proponent must implement these measures.</p> | <ul style="list-style-type: none"> N/A | This condition relates to HLW | Not triggered |
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| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| VISUAL AMENITY | | | | |
| VISUAL IMPACT MITIGATION | | | | |
| B41 | <p>Unless the Planning Secretary agrees otherwise, for a period of 2 years from the commencement of operations, the owners of residences A29, A33, A67, C35, H56, K40, K44, K45, K46, K47, K48, O18, O45, Q20, R12, R24, S12, T14, T15 AND T16 as identified in the EIS 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. 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, 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 location on the property other than the residence and its curtilage.</p> | <ul style="list-style-type: none"> Letter from Transgrid to DPHI titled "HumeLink East – Visual Impact Mitigation – Request for the Planning Secretary's Approval – SSI-36656827 Conditions B41 and B42" dated 25/11/25 Letter from DPHI to Transgrid titled " Humelink – HumeLink East Request for Planning Secretary's resolution of Condition B42 (Residence R12 and R24) and Extension of Timeframe of Condition B 41 (Residence R24" dated 10/12/25 | <p>The Auditor notes that on 10/12/25 DPHI granted approval to extend the timeframe associated with Condition B41 for residence R12 and R24 from 2 years to 2.5 years</p> <p>As this condition relates to the operational phase, it is therefore not triggered at this stage.</p> | Not triggered |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| B42 | <p>Prior to submitting the Final Layout Plans for any towers located within 450m of residence A29, K23, Q20, R12, R24 and S12, the Proponent must provide reasonable and feasible measures or negotiated agreement to minimise the visual impacts on residence A29, K23, Q20, R12, R24 and S12, including increasing setbacks, in consultation with the owner of the residence, to the satisfaction of the planning Secretary.</p> <p>Following approval by the Planning Secretary, the Proponent must implement these measures.</p> | <ul style="list-style-type: none"> Letter from Transgrid to DPHI titled "HumeLink East – Visual Impact Mitigation – Request for the Planning Secretary's Approval – SSI-36656827 Conditions B41 and B42" dated 25/11/25 Letter from DPHI to Transgrid titled "HumeLink – HumeLink East Request for Planning Secretary's resolution of Condition B42 (Residence R12 and R24) and Extension of Timeframe of Condition B 41 (Residence R24" dated 10/12/25 Letter from Email from Transgrid, titled "Re: HumeLink – Mitigation for visual impact to your residence" dated 21/07/25 Email from Transgrid, titled "HumeLink – mitigation for visual impact to your residence" dated 11/07/25 Email from Transgrid, titled "HumeLink Project" dated 22/07/25 Email from Transgrid, titled Re: Greendale Uniting Church [Public]" dated 27/07/25 Email from Transgrid titled "Visual Impact Mitigation – Scheduling meeting" dated 11/07/25 Email from Transgrid, titled "HumeLink Project – Visual Impact Mitigation [Official]" dated 22/07/25 Email from Transgrid, titled "HumeLink – visual impact [Official]" dated 16/07/25 | <p>On 10/12/25, DPHI wrote to Transgrid noting they are satisfied with the requirements for Condition B42 for residence R12 and R24 have been met noting the requirements under Condition B41 of the approval, including the 2-year period still apply to residence R12.</p> <p>DPHI also noted that:</p> <p><i>"Condition B42 has now been met project wide following PA-126, PA 137 and this PA 154. Transgrid has consulted with all residents listed under condition B42 (A29,K23, Q20 R12 R24 and S12 and have negotiated agreements to minimise visual impacts in consultation with the owner of those residences (except for R24 as noted above.</i></p> <p>The Final Layout Plans have been submitted to DPHI. Refer to the Auditors response to C8 for further information.</p> | Compliant |
| B43 | <p>Prior to submitting the Final Layout Plans for towers located within 1000m of V23 (the 'Hillas Homestead and Outbuildings'), the Proponent must provide reasonable and feasible measures commensurate to the level of visual impact to minimise impacts on the heritage item and its curtilage, in consultation with the landowner and Heritage Council, to the satisfaction of the Planning Secretary. The Final layout Plans must be informed by photomontages (or equivalent representation) of existing views from V23 and its curtilage.</p> <p>Following approval by the Planning Secretary, the Proponent must implement these measures.</p> | <ul style="list-style-type: none"> Letter from Transgrid to DPHI titled "HumeLink East – Visual Impact Mitigation – Request for the Planning Secretary's Approval – SSI-36656827 Condition B43" dated 12/11/25 Letter from DPHI to Transgrid Titled "Humelink Hillas Heritage Visual Impact Mitigation" dated 3/12/25 | <p>On 31/12/25, DPHI approved measures to mitigate the visual impacts of the Humelink project on the Hillas Homestead and outbuildings as required by Condition 43.</p> <p>The Final Layout Plans have been submitted to DPHI. Refer to the Auditors response to C8 for further information.</p> | Compliant |
| VISUAL APPEARANCE | | | | |
| B44 | <p>The Proponent must:</p> <ol style="list-style-type: none"> Take reasonable steps to minimise the visual impacts of the development; and | <ul style="list-style-type: none"> Site inspection 3, 4 February 2026 | <p>As observed during the site inspection, the Yass Accommodation Camp is located in an industrial area and away from any sensitive receivers.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>b) Not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.</p> | | <p>Camp facilities are shaded grey and were observed to be non-reflective. Amenity and security lighting is provided for the accommodation camp as well as low level directional lighting for the car park.</p> <p>There were no advertising signs or logos observed on site other than traffic or safety signage.</p> <p>Refer to Appendix E for photographic evidence.</p> | |
| LIGHTING | | | | |
| B45 | <p>The Proponent must:</p> <p>a) Take all the reasonable steps to minimise the off-site visual impacts of the development; and</p> <p>b) Ensure that any external lighting associated with the development;</p> <p>(i) Is installed as low intensity lighting (except where required for safety or emergency purposes);</p> <p>(ii) Does not shine above the horizontal; and</p> <p>(iii) Complies with <i>Australian/ New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting</i>.</p> | <ul style="list-style-type: none"> Site inspection 3, 4 February 2026 | <p>As observed during the site inspection, the Yass Accommodation Camp is located in an industrial area and away from any sensitive receivers. Lighting is limited to low level safety and amenity lighting for the accommodation camp with low level directional lighting for the carpark.</p> <p>Refer to Appendix E for photographic evidence</p> | Compliant |
| RADIOCOMMUNICATIONS | | | | |
| B46 | <p>Prior to submitting the Final Layout Plans for tower locations, the Proponent must take all reasonable and feasible measures to avoid impacts to the Public Safety Network microwave link paths, including relocating towers to avoid the 100m exclusion zone in consultation with the NSW Telecommunications Authority.</p> | <ul style="list-style-type: none"> HumeLink East HLE-136 Radio Interference Assessment (Addendum) Review of Amendments to Tower Locations, Acciona, dated 27/02/25 Meeting Minutes Humelink Project – NSW Police Link Review Meeting, dated 2/1/25 General Correspondence Response, Transgrid, dated 12/2/26 Transgrid email titled “HumeLink – Point to Point Link – Gullen Range to Crookwell” Email from NSW Telco Authority to Transgrid titled “Pole Locations 51-226 – L (Left), 51-226-M (Middle), 51-226- R (Right), dated 22/20/25 Letter from Transgrid to ICT and Digital Government Division, Department of Customer Service, NSW Government titled “HumeLink Project and NSW Telco Authority (NSWTA) – | <p>AGJV have appointed SAT Pty Ltd to undertake a radio interference assessment with regard to a review of amendments to tower locations. The scope of the review is to analyse information provided by HLE identifying the proposed changes to be made to antenna locations and structure height, and provide an assessment as to whether these changes will eliminate the risk of structures impacting on link performance and assesses tower amendments as follows:</p> <ul style="list-style-type: none"> Optus Site – Telstra Site, Telegraph Hill <ul style="list-style-type: none"> Tower #: 5C1/5C2-451 (PI Point) Police Site, Talmo – Commsite Lerida <ul style="list-style-type: none"> Tower #: 5C1/5C2-292 NSW FRS Site, St Mary Water Reservoir Gunning <ul style="list-style-type: none"> Tower #: 5C1/5C2-150 (PI point) NSW FRS Site, St Mary- Pacific Power Site, Mt Spring <ul style="list-style-type: none"> Tower #: 5C1/5C2-150 (PI point) | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | <ul style="list-style-type: none"> Technical Memorandum" dated 20/11/25 General Correspondence Response – HumeLink East, titled Change Assessment – NSW Police point to point communication link – Tower 292_PIFC_Closeout Hold IDs 14 and 21" dated 12/2/26 NSWTA Interface Constraints Meeting Record titled "Pole Locations 51-226-L (Left), 51-226 – M (Middle), 51-226- R (Right), dated 22/10/25 Audit Interview 11 February 2026 | <ul style="list-style-type: none"> Transgrid, Gullen Range, Transgrid Site Crookwell <ul style="list-style-type: none"> Tower #:5C1/5C2-103 <p>The assessments conclude the following</p> <p><i>"Of the five (5) instances summarised above, the point-to-point link licensed to the NSW Police between Police site, Talmo - Commsite, Lerida is the only one that remains at 'high risk' of being impacted by tower 5C1/5C2-292.</i></p> <p><i>The Optus link between Hays Land – Telstra site, Telegraph Hill is no longer at risk of being impacted by tower 5C1/5C2-451, with the 3 remaining links seeing a reduction in risk of being impacted upon by the amended tower location that Humelink East will need to consider prior to finalising transmission network design.</i></p> <p>The Auditor was provided with evidence of further consultation with NSW Police with regards to the High-Risk Site and correspondence documenting agreed changes to tower locations.</p> <p>Evidence of consultation with the NSW Telecommunications Authority was provided to the Auditor including:</p> <ul style="list-style-type: none"> A technical memorandum outlining the consultation undertaken and the design changes accepted by the Authority following the consultation. Records of NSWTA interface constraints meetings Email correspondence regarding specific design issues <p>The Final Layout Plans have been submitted to DPHI. Refer to the Auditors response to C8 for further information.</p> | |
| B47 | If the Proponent cannot avoid the 100m exclusion zone, the Proponent must ensure there is no disruption to the Public Safety Network microwave link paths in the area in consultation with the NSW Telecommunications Authority prior to constructing towers within the exclusion zone. | <ul style="list-style-type: none"> As above | <ul style="list-style-type: none"> As above | Compliant |
| B48 | If the development results in the disruption to any radio communications services (including point-to-point microwave links) in the area, then the Proponent 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. | <ul style="list-style-type: none"> N/A | <ul style="list-style-type: none"> Operational requirement – not triggered | Not triggered |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| HAZARD AND RISK | | | | |
| DANGEROUS GOODS | | | | |
| B49 | 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 <i>The storage and handling of flammable and combustible liquids</i> and AS/NZS 1596:2014 <i>The storage and handling of LP Gas, the Dangerous Goods Code</i> , and the EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Manual</i> . | <ul style="list-style-type: none"> Email from Fire and Rescue NSW, titled "Major Projects – Proponent Request for Advice – POST APPROVAL – Humelink East – SSI 36656827 – FRN22/599 BFS25/198" dated 05/08/25 | <p>AGJV wrote to FRNSW who confirmed on 5/8/25 that the project "does not meet thresholds quantities for Dangerous Goods, and the project is within the operational jurisdiction of the NSW Rural Fire Service.</p> <p>As observed during the site inspection, a diesel fuel farm was established at the Yass Accommodation Camp site with a double skinned tank and spill containment sump and bund.</p> <p>Chemicals were stored in banded and covered work areas on hardstand areas. Mobile bunds were provided for chemical storage in the field. Properly constructed facilities were provided for vehicle refuelling.</p> <p>Refer to Appendix E for photographic evidence.</p> | Compliant |
| ELECTRIC AND MAGNETIC FIELDS | | | | |
| B50 | 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 to the <i>Internal Commission on Non-ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to time varying electric and magnetic fields (1Hz – 100kHz)</i> (ICNIRP, 2010). | <ul style="list-style-type: none"> Electric and Magnetic Fields Assessment Report rev 0, Acciona, dated 08/12/25 EMF Study Report rev D, Acciona, dated 03/07/25 | <p>AGJV have appointed Aurecon to prepare separate Electronic and Magnetic Fields assessment reports for the operation of the transmission line and for the operation of the Bannaby Substation.</p> <p>Both of these studies provide a technical assessment of compliance with the ICNIRP with further design recommendations to be implemented to ensure compliance with these technical guidelines.</p> <p>Further assessment will be required in future audits to assess the status of the recommendations and following operation to confirm compliance with this condition (or otherwise).</p> <p>There were no construction activities observed during the Audit site inspection that are likely to generate EMF.</p> <p>The Auditor notes that an independent certifier has been appointed to review and certify compliance with design requirements of this condition and verification of design is not part of the Auditors Scope.</p> | Compliant |

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| BUSHFIRE SAFETY | | | | |
| OPERATING CONDITIONS | | | | |
| B51 | <p>The Proponent must:</p> <ul style="list-style-type: none"> a) Minimise the fire risks of the development, including managing vegetation fuel loads on-site; b) Ensure that the development; <ul style="list-style-type: none"> (i) Complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent) and Standards for Asset protection Zones; (ii) Is suitably equipped to respond to any fire on site, including provision of a 20,000 litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds. (iii) Incorporates the recommendations of a fire risk assessment as per the network operator's design standards; c) Ensure that buildings within the compounds comply with Australian Standard AS3959-2018 <i>Construction of buildings in bushfire prone areas</i> (or equivalent) and RFS's <i>Planning for Bushfire Protection 2019</i>; d) Ensure any fire trails on asset protection zones associated with the development are wholly contained within the approved disturbance area; e) Develop procedures to manage potential fires on site, in consultation with the RFS, FRNSW, FCNSW and NPWS; f) Assist the RFS, FRNSW, FCNSW, NPWS and emergency services as much as practicable if there is a fire in the vicinity of the site; and g) Notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations. | <ul style="list-style-type: none"> • HumeLink East, Bushfire Emergency Management and Evacuation Plan, Transgrid, dated 6/2/26 • Email from Fire and Rescue NSW, titled "Major Projects – Proponent Request for Advice – POST APPROVAL – Humelink East – SSI 36656827 – FRN22/599 BFS25/198" dated 05/08/25 | <p>AGJV have prepared a comprehensive Bushfire Emergency Management and evacuation plan. Refer to the Auditors response to B52 below in relation to the content of the plan</p> <p>Equipment and resources available on site included fire water tank, fire extinguishers (including testing tag) and trailer mounter mobile water tanks.</p> <p>The Bushfire and Emergency Management Plan and emergency information package was available in a readily accessible location adjacent to the site compound.</p> <p>It was noted in the Audit interview that:</p> <ul style="list-style-type: none"> • Daily prestarts include an assessment of fire risk. • Emergency response drills are undertaken quarterly • Evacuation drills are undertaken in conjunction with the site training plan • RFS have been consulted with and have attended site • One small fire has occurred during the Audit period, which was promptly extinguished with the Furphy cart with no offsite impacts. • Fire and Rescue have attended the site and provided advice regarding Dangerous Goods. <p>20,000 L Water tanks were available at the Yass Accommodation Camp and the Bannaby substation site, however it was not clear to the Auditor that the tank was a dedicated fire water tank which may lead to confusion and loss of response time in the event of a bushfire emergency.</p> <p>Recommendation</p> <p>Place a highly visible sign on the fire water tank so it is easily identified by emergency services in the event of a fire.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| EMERGENCY PLAN | | | | |
| B52 | <p>Prior to commencing Enabling Works (unless the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) and/ or construction, the Proponent must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, including an evacuation plan for the accommodation camps, and provide a copy of the plan to the local Fire Control Centre and FRNSW. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry point(s) to the construction compounds and substations at all times. The plan must:</p> <ol style="list-style-type: none"> a) Be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1 'Emergency Planning' and RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent); b) Be consistent with the NSW RFS document: <i>A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan</i>; c) 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; d) Include procedures for the storage and maintenance of any flammable materials; e) Include fire emergency management planning, including: <ol style="list-style-type: none"> (i) Details of the location, management and maintenance of the Asset Protection Zone and on-site water supply tanks; (ii) A list of works that should not be carried out during a total fire ban; (iii) Identify the fire risks and hazards and details measure for the development to prevent fires igniting; (iv) Include availability of fire suppression equipment, access and water; (v) Details of how RFS would be notified, and procedures that would be implemented in the event that: <ul style="list-style-type: none"> • There is a fire on-site or in the vicinity of the site; • There are any activities on site | <ul style="list-style-type: none"> • HumeLink East, Bushfire Emergency Management and Evacuation Plan, Transgrid, dated 6/2/26 • "A8 Consultation Report, Bushfire Emergency Management and Evacuation Plan, August 2025" Rev C, | <p>The Auditor reviewed the Bushfire, Emergency and Evacuation Plan and notes the following:</p> <p>Table 0-1 of the Plan notes the relevant legislation and guidelines that have been incorporated into the plan including</p> <ul style="list-style-type: none"> • <i>"Planning for Bush Fire Protection: A guide for councils, planners, fire authorities and developers (NSW RFS, 2019)"</i> • <i>Development Planning: A guide to developing a bush fire emergency management and evacuation plan NSW Rural Fire Service (NSW RFS) (2014)</i>. • Section 5.3 details access routes to the sites • Emergency Contact lists are provided in Appendix B – Emergency Service Information Packs • Section 5.9 provides details of hazardous goods storage • Section 5 provides details of bushfire prevention and mitigation measures including <ul style="list-style-type: none"> ○ Asset protection zones ○ Construction standards and building requirements ○ Construction activity limits relating to high-risk activities such as hot works as well as rules for elevated danger and total fire ban days • Section 4 provides details of fire risks and hazards • Section 5.6 provides details of water supply and services including the provision of a 20,000L water supply tank at each construction compound and accommodation camp. • Section 6 provides details of fire reporting and suppression • Appendix F is the Flood Response Plan and includes details regarding flood evacuation routes • Appendix C provides details of consultation with agencies – a copy of the A8 consultation report was provided to the Auditor • Appendix B provides the Emergency Services information pack • Section 5.12 addresses potential impacts to aerial activities • Section 5.14 addresses survivability of structures | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>that would have the potential to ignite surrounding vegetation; or</p> <ul style="list-style-type: none"> • There are any proposed activities to be carried out during a bushfire danger period; and <p>(vi) Detail specific response measures in the case of flood to ensure site safety;</p> <p>(vii) Describe the specific emergency exit routes to be used in the case of flood and include evidence of access agreements with relevant landowners (e.g. right of carriage way); and</p> <p>(viii) Include the Emergency Services Information Package in accordance with <i>Emergency Services information and tactical fire plan</i> (FRNSW, 2019) to the satisfaction of FRNSW and RFS;</p> <p>(ix) Operational procedures in the event of bushfires to minimise interference with aerial firefighting operations; and</p> <p>(x) Include details of how live transmission infrastructure can be safely isolated in an emergency.</p> <p><i>Notes: The Emergency Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</i></p> | | | |

WASTE

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| B53 | <p>Waste generated during pre-construction minor works, road upgrades, Enabling Works, construction, operation, upgrading and decommissioning must be dealt with in accordance with the following priorities:</p> <ol style="list-style-type: none"> a) Waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; b) Where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and c) Where re-using recycling or recovering waste is not possible, waste must be treated or disposed of. | <ul style="list-style-type: none"> • Waste Management Plan, HLE-AGV-ENV-ALE-PLN-0000-00032, HumeLink East, Transgrid, 19/2/25 • HL Waste and Spoil Register Rev1, dated Jan 26 | <p>As noted in B57, a Waste Management Plan has been prepared.</p> <p>Section 5 of the Plan describes waste management practices covering waste hierarchy, classification, reuse and recycling, handling and storage, waste disposal, transportation, importation and detailed management and mitigation measures.</p> <p>Appropriate waste and recycling bins were provided for both domestic waste (from the camp) and for construction waste. There was no evidence of mixing of wastes observed. A food dehydration unit was provided to enable the reuse of food waste.</p> <p>Waste generation is recorded and a register is kept up to date.</p> | Compliant |
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| B54 | The importation of waste and storage, treatment, processing, reprocessing or disposal of such waste must comply with the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , and orders or exemptions under the regulation. | <ul style="list-style-type: none"> Audit Interview 5 February Site Inspection, 3 and 4 February 2026 Environment Protection Licence, EPA NSW, dated 21/03/25 Practising Certificate, NSW Government, dated 01/08/24 | Management reported that no waste had been imported to the project a during this audit period. Quarry materials are imported from EPA Licenced facilities that are certified by the Resource Regulator. | Not triggered |
| B55 | Waste must only be exported to a site licenced 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 <i>Environment Operations (Waste) Regulation 2014</i> , or any other place that can lawfully accept such waste. | <ul style="list-style-type: none"> Environment Protection Licence (EPL 6671) HL East Camps Waste Report 20/10/25, dated 17/10/25 HL East Camps waste report 30/11/25, dated 31/10/25 HL East Camps Waste Report 30/01/26, dated 30/01/26 HL East Camps Waste Report 31/12/25, dated 20/12/25 Waste disposal docket (various) Smallmons HLE Waste Report Aug 25, dated 28/08/25 SVC RRC docket, dated 28/08/25 20250825 DPHI NCR Notification Faulder Ave 20250825 DPHI RFI Response Faulder Avenue Letter from DPHI to Transgrid Titled "HumeLink – Notification – Potential Non-Compliance B55 and B56 – material exported from the Faulder Ave Compound" dated 10/10/25 | <p>Waste dockets note the destination to be the Gregadoo Landfill located in Wagga Wagga LGA. The waste facility operates under an Environmental Protection Authority Licence (EPL 6671) and a review of the landfill licence for that facility confirmed that it is permitted to accept the wastes sent there from the Project.</p> <p>On 25/8/25, DPHI were notified of a potential non-compliance with conditions B55 and B56 relating to site won material from the Faulder Ave compound to property number BY-150. The potential non-compliance notification noted that an approved notice under Section 143 of the Environment Operations Act 1997 did not accompany the material to the receiving location.</p> <p>On 10/10/25 DPHI wrote to Transgrid acknowledging the potential non-compliance noting that no further action would be taken.</p> <p>Observation</p> <p>The Auditor notes that the notification to DPHI was initially made as a precaution, with further investigations undertaken to further assess compliance status. In their response to a request for information issued by DPHI Transgrid noted that:</p> <ul style="list-style-type: none"> Following further sampling and analysis of the material, the test results confirmed the material classification to be Excavated Natural Material (ENM) The material was placed with the approved EIS project boundary and not exported off site. The material was beneficially re-used in line with the Early Works Management Plan <p>The Auditor has reviewed the information provided by Transgrid as noted above and agrees with the findings of the Transgrid investigation and acknowledges the transparent approach in reporting potential non compliances to DPHI.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| B56 | All waste that is removed from site must be classified in accordance with the EPA's <i>Waste Classification Guidelines</i> , with appropriate records and disposal docket retained for audit purposes. | <ul style="list-style-type: none"> • HL East Camps Waste Report 20/10/25, dated 17/10/25 • HL East Camps waste report 30/11/25, dated 31/10/25 • HL East Camps Waste Report 30/01/26, dated 30/01/26 • HL East Camps Waste Report 31/12/25, dated 20/12/25 • Waste disposal dockets (various) • Smallmons HLE Waste Report Aug 25, dated 28/08/25 • SVC RRC docket, dated 28/08/25 • 20250825 DPHI NCR Notification Faulder Ave | <p>The majority of waste generated by the project is classified as General Waste, and mixed construction and demolition wastes. AGJV noted that there were no wastes such as contaminated soil generated during this audit period that would require testing and classification.</p> <p>Appropriate waste records (tip dockets) were provided to the Auditor as evidence.</p> <p>As observed during the site inspection, waste recycling facilities have been provided and a foot recycling facility established at the Yass Accommodation Camp. Waste and recycling volumes are monitored for diversion away from landfill.</p> | Compliant |
| B57 | <p>Prior to commencing construction (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare and implement a Waste Management Plan in consultation with Councils and the EPA. This program must detail:</p> <ol style="list-style-type: none"> a) The anticipated quantity, type and quality of the waste to be generated and their intended fate; b) Details of how waste will be segregated, handled, stored, managed and then collected and transported for treatment and/ or disposal; c) Any materials produced which will require a specific Resource Recovery Order; d) Any materials produced under a Resource Recovery Order, and the controls and procedures in place for meeting the conditions of that order; e) Any testing or monitoring procedures; f) How materials segregation will be achieved, particularly the segregation of contaminated soils, resource recovery materials and waste generated from the accommodation camps; and g) The capacity of the waste management facilities in Councils LGAs to accept the volumes of waste, including from the accommodation camps predicted to be deposited and any associated approvals required to create and/ or expand waste storage or disposal facilities and arrangements for transporting waste to the waste management facilities. <p><i>Note: The Waste Management Plan must incorporate all relevant aspects of the development, including Enabling</i></p> | <ul style="list-style-type: none"> • Waste Management Plan, HLE-AGV-ENV-ALE-PLN-0000-00032, HumeLink East, Transgrid, 19/2/25 • Email from DPHI titled "HumeLink – Waste Management Plan East" dated 17/03/25 | <p>The most recent version of the Waste Management Plan (WMP) is dated 19/2/25. Construction commenced on 24/9/25.</p> <p>The WMP addresses the requirements of these conditions as follows:</p> <ul style="list-style-type: none"> • Section 3.5 of the WMP provides details of consultation with the EPA and Councils. • Section 4.1 describes the waste streams providing details of the waste type, classification, planned outcome (intended fate) and quantities. • Section 5 describes waste management practices covering waste hierarchy, classification, reuse and recycling, handling and storage, waste disposal, transportation, importation and detailed management and mitigation measures. • Section 5.3 and Table 6 describe resource recovery orders and exemptions including general conditions and potential related construction activities. • Section 5.3 and Table 6 describe resource recovery orders and exemptions including general conditions and potential related construction activities. • Monitoring and testing procedures are provided in Sections 5.5.1 and Table 7 • Section 5.6 provides details of waste segregation, handling and storage • Details of proposed licenced waste facilities and the types of accepted waste are described in Appendix A. <p>On 17/3/25 DPHI acknowledged receipt of the WMP noting they had no comments on the plan at that time.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <i>Works consistent with the requirements of condition B67.</i> | | | |
| ACCOMMODATION CAMPS | | | | |
| B58 | Unless the Planning Secretary agrees otherwise, the proponent must construct and operate the accommodation camps as described in the EIS and in Appendix 1 of this approval, in accordance with staging set out in B59(e), prior to commencing construction. | <ul style="list-style-type: none"> Letter from Transgrid to DPHO titled "HumeLink Accommodation Camps – SSI 36656827 Condition B58 Request for Agreement from the Planning Secretary" dated 30/7/25 Letter from DPHI to Transgrid titled "HumeLink – Condition B58 request to not construct and operate AC06 Crookwell Accommodation Camp" dated 3/9/25 Letter from DPHI to Transgrid Titled "HumeLink Alternative Workforce Accommodation Facility Location and Access – Yass Valley Way" dated 12/3/25 | <p>At the time of the Audit site inspection, the Yass and Adjungbilly Camps had been constructed and were operational.</p> <p>On 12/3/25 DPHI approved a request for the Yass Accommodation Camp to be constructed in the Yass industrial area due to amenity issues at the original Faulder Avenue Accommodation facility.</p> <p>On 3/9/25, DPHI approved a request from TransGrid not to construct and operate the AC06 accommodation camp and instead lodge workers in commercial accommodation in Goulburn, Crookwell and Taralga.</p> | Compliant |
| B59 | <p>Prior to commencing construction of the accommodation camps, but excluding Enabling Works where the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64, the Proponent must prepare an Accommodation Camp Management Plan in consultation with the relevant Council and TfNSW, and to the satisfaction of the Planning Secretary. Unless the Planning Secretary agrees otherwise, the plan must;</p> <ol style="list-style-type: none"> Ensure utilities at the accommodation camps, including water, wastewater, waste and electricity, are designed and located in accordance with the relevant Council specifications and relevant standards; Ensure the accommodation camps comply with conditions B23 and B51; Ensure any treated wastewater from the accommodation camps used for dust suppression during construction: <ol 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) <i>Guidelines for irrigation water quality</i>; Meets the requirements for the Public | <ul style="list-style-type: none"> Accommodation Camp Management Plan, HLE-AGL-MGT-ALE-PLN-0000-0002, Transgrid Rev 01.5 dated 21/5/25 Letter from DPHI, titled "Adjungbilly (AC07) Accommodation Camp Management Plan (Condition B59 of SSI-36656827)" dated 09/07/25 Letter from DPHI, titled "HumeLink East Yass Accommodation Camp Management Plan" dated 24/09/25 Email from HumeLink East, titled "Please Disregard Earlier Report, WC 02/02/26, dated 30/01/26 Email from HumeLink East, titled "WC 05/01/26" dated 05/01/26 Email from HumeLink East, titled "WC 19/01/26" dated 16/01/26 Certificate of Analysis, ALS, dated 11/10/25 Certificate of Analysis, ALS, dated 06/11/25 Certificate of analysis, ALS, dated 07/11/25 | <p>Accommodation Camp Management Plans have been prepared for the Yass Valley and Adjungbilly Accommodation Camps.</p> <p>DPHI approved the Adjungbilly Accommodation Camp Management Plan on the 9/7/25 and the Yass Valley Accommodation Camp Management Plan on the 24/8/25 noting the plans:</p> <ul style="list-style-type: none"> Have been prepared in consultation with Council and TfNSW Have been reviewed by Transgrid with no issues raised Have been endorsed by the ER Contain the information as required by the conditions of consent. <p>The Auditor reviewed the site layout of the Yass Accommodation Camp and noted that the "as built" layout is generally consistent with the layout depicted in the plan.</p> <p>Key environmental controls at the Yass Accommodation Camp are described in Section 2.5 of the Audit report with photographic evidence provided in Appendix E.</p> <p>Water quality testing results were provided to the Auditor to demonstrate compliance with the requirements of part c of this condition.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>Health Act 2010;</p> <p>d) Include measures for dust suppression within the accommodation camp;</p> <p>e) Quantify the proposed capacity of workers accommodated at each accommodation camp or stage of accommodation camp and how the proposed staging of the camp meets the construction workforce for that stage timeframe;</p> <p>f) Provide the site layout including building locations, vehicle access and movement, site servicing utilities infrastructure;</p> <p>g) Include a blade throw risk assessment for the Crookwell temporary workers accommodation camp and detail any mitigation measures required as an outcome of the assessment;</p> <p>h) Include measures to support local suppliers in servicing the camp where possible; and</p> <p>i) Include measures to facilitate worker cohesion, safety, health and wellbeing and provision of on-site medical services.</p> <p>The Proponent must implement the Accommodation Camp Management Plan.</p> <p><i>Note: The Accommodation Camp Management Plan must incorporate all relevant aspects of the development, including Enabling Works, consistent with the requirements of condition B67.</i></p> | | | |
| LOCAL BUSINESS AND EMPLOYMENT STRATEGY | | | | |
| B60 | <p>Prior to commencing construction (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Local Business and Employment Strategy for the development in consultation with the relevant Council. This strategy must:</p> <p>a) Consider the cumulative impacts associated with other State significant projects in the area; and</p> <p>b) Investigate options for prioritising the employment of local and Aboriginal workforce and suppliers for the construction of the development, where feasible.</p> <p>The Proponent must implement the Local Business and Employment Strategy.</p> <p><i>Note: The Local Business and Employment Strategy must incorporate all relevant aspects of the development, including</i></p> | <ul style="list-style-type: none"> • Paper to Steering Committee, Acciona, dated 21/11/25 • Local Business and Employment Strategy Rev 02, Transgrid, dated 15/09/25 | <p>A Local Business and Employment strategy has been prepared with specialist managers appointed by AGJV including a Workforce Development Manager and a Local Business Engagement Manager.</p> <ul style="list-style-type: none"> • Section 8 of the Plan addresses the cumulative impacts of the development • Section 7 provides details of the Aboriginal employment strategy and pre-employment programs | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <i>Enabling Works consistent with the requirements of condition B67.</i> | | | |
| SOCIAL | | | | |
| SOCIAL IMPACT MANAGEMENT PLAN | | | | |
| B61 | <p>Prior to commencing construction or commencing operation of the accommodation camps (whichever is first) excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64, the Proponent must prepare a Social Impact Management Plan for the development, to the satisfaction of the Planning Secretary. This plan must:</p> <ol style="list-style-type: none"> Be prepared by suitably qualified and experienced person's; Be prepared having regard to the EIS commitments for the preparation of the Social Impact Management Plan; Be developed in consultation with Councils and relevant affected stakeholders; Include a summary of the social baseline and assessment of social impacts and risks, including the social impact ratings; Refer to and be consistent with the strategy in condition A22; Describe the measures that would be implemented to enhance positive social impacts from the development; Describe the measures that would be implemented to manage and mitigate negative (and cumulative) social impacts, including: <ol style="list-style-type: none"> Impacts to near neighbours and the broader community; Impacts to community cohesion, safety, health and wellbeing; Access to social infrastructure and services; Impacts to housing availability and affordability; Impacts to tourism; Labour draw and impacts to local | <ul style="list-style-type: none"> Social Impact Management Plan, HumeLink East, Transgrid, rev 05 dated 22/10/25 Letter from DPPI to Transgrid titled "HumeLink East Social Impact Management Plan" dated 5/8/25 Community Investment and Benefit Program (CIBP) Rollout Overview, Acciona, (undated) | <p>DPPI approved the Social Impact Management Plan on 8/8/25 noting the "Plan:</p> <ul style="list-style-type: none"> Addresses the Construction Works HumeLink East stage of the project (Stage 3a), excluding operation of the Crookwell Accommodation Facility (Stage 3a(iv)) in accordance with the approved staging of the HumeLink project under Condition C3 of the approval (our ref. SSI 36656827-PA-5 & SSI-36656827-PA-78) has been prepared in consultation with Upper Lachlan Shire Council, Goulburn Mulwaree Council, Snowy Valleys Council, Cootamundra-Gundagai Regional Council and relevant affected stakeholders has been reviewed by Transgrid and no issues have been raised with the Department; has been endorsed by the ER, Derek Low (endorsed Rev 01.7 dated 10 July 2025); and contains the information required by the conditions of approval, as per the approved staging" <p>AGJV has appointed a team of specialists to oversee the implementation of the Plan. An initiative implemented includes a community investment program with a commitment of approximately \$1.8M allocated to fund community-based projects.</p> <p>Quarterly Reporting for the first quarter (following the commencement of construction) with the SIMP is scheduled to be completed by the end of March 2026. The initial report will be publicly available on the project website in accordance with Condition B61(h)(vi).</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>(vii) businesses and services; Cumulative social impacts associated with other State significant development projects in the area</p> <p>h) Include a program to monitor, evaluate and publicly report on the effectiveness of these measures and any social impacts of the development, including;</p> <p>(i) Identifying performance indicators, incorporating trigger action response plan;</p> <p>(ii) A yearly independent survey of the attitudes of the community about the development;</p> <p>(iii) Procedures for analysing and comparing the results of monitoring and surveys against the baseline, the predicted social impacts and results of previous monitoring and surveys;</p> <p>(iv) Recording community engagement and complaints as they relate to social issues;</p> <p>(v) Adaptive management measures implemented or proposed; and</p> <p>(vi) Preparing a quarterly monitoring report, to be publicly available on the project website; and</p> <p>i) Include details of who would be responsible for monitoring, reviewing and implementing the plan.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Social Impact Management Plan for the duration of construction.</p> <p><i>Note: The Social Impact Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</i></p> | | | |
| REHABILITATION | | | | |
| B62 | <p>Unless the Planning Secretary agrees otherwise, within 6 months of the completion of construction, upgrading or decommissioning, the Proponent must rehabilitate the areas where ancillary facilities and earthwork material sites are located. This rehabilitation must comply with the objectives in Table 4.</p> | <ul style="list-style-type: none"> Audit Site Inspection, 3 and 4 February 2026 | <p>At the time of the Audit Site Inspection, construction activities had only recently commenced. The requirements of this condition are to be fulfilled within 6 months following the completion of construction</p> | Not triggered |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status | | | | | | | |
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| | <p>Table 3 Rehabilitation Objectives</p> <table border="1" data-bbox="107 360 1910 552"> <thead> <tr> <th data-bbox="107 360 848 403">Feature</th> <th data-bbox="848 360 1910 403">Objective</th> </tr> </thead> <tbody> <tr> <td data-bbox="107 403 848 552">Accommodation Camp</td> <td data-bbox="848 403 1910 552"> <ul style="list-style-type: none"> • Safe, stable and non-polluting • All infrastructure including above and below ground to be decommissioned and removed to a depth of 500mm, unless the Planning Secretary agrees otherwise • Restoring land capability to pre-existing productive capacity • Ensure public safety at all times </td> </tr> </tbody> </table> | | | Feature | Objective | Accommodation Camp | <ul style="list-style-type: none"> • Safe, stable and non-polluting • All infrastructure including above and below ground to be decommissioned and removed to a depth of 500mm, unless the Planning Secretary agrees otherwise • Restoring land capability to pre-existing productive capacity • Ensure public safety at all times | | | | |
| Feature | Objective | | | | | | | | | | |
| Accommodation Camp | <ul style="list-style-type: none"> • Safe, stable and non-polluting • All infrastructure including above and below ground to be decommissioned and removed to a depth of 500mm, unless the Planning Secretary agrees otherwise • Restoring land capability to pre-existing productive capacity • Ensure public safety at all times | | | | | | | | | | |
| B63 | <p>Unless the Planning Secretary agrees otherwise, within 6 months of the completion of construction, upgrading or decommissioning, the Proponent must rehabilitate the areas where ancillary facilities and earthwork material sites are located. This rehabilitation must comply with the objectives in Table 4.</p> | <ul style="list-style-type: none"> • Audit Site Inspection, 3 and 4 February 2026 | <p>At the time of the Audit Site Inspection construction activities had only recently commenced. The requirements of this condition are to be fulfilled within 6 months following the completion of construction</p> | Not triggered | | | | | | | |
| | <p>Table 4 Rehabilitation Objectives</p> <table border="1" data-bbox="107 837 1910 1066"> <thead> <tr> <th data-bbox="107 837 869 880">Feature</th> <th data-bbox="869 837 1910 880">Objective</th> </tr> </thead> <tbody> <tr> <td data-bbox="107 880 869 975">Ancillary Facilities</td> <td data-bbox="869 880 1910 975"> <ul style="list-style-type: none"> • Safe, stable and non-polluting • Progressively rehabilitate the site as soon as possible following disturbance • to be commissioned and removed, unless the Planning secretary agrees otherwise </td> </tr> <tr> <td data-bbox="107 975 869 1023">Land Use</td> <td data-bbox="869 975 1910 1023"> <ul style="list-style-type: none"> • Restore or maintain land capability to pre-existing use </td> </tr> <tr> <td data-bbox="107 1023 869 1066">Community</td> <td data-bbox="869 1023 1910 1066"> <ul style="list-style-type: none"> • Ensure public safety </td> </tr> </tbody> </table> | | | | Feature | Objective | Ancillary Facilities | <ul style="list-style-type: none"> • Safe, stable and non-polluting • Progressively rehabilitate the site as soon as possible following disturbance • to be commissioned and removed, unless the Planning secretary agrees otherwise | Land Use | <ul style="list-style-type: none"> • Restore or maintain land capability to pre-existing use | Community |
| Feature | Objective | | | | | | | | | | |
| Ancillary Facilities | <ul style="list-style-type: none"> • Safe, stable and non-polluting • Progressively rehabilitate the site as soon as possible following disturbance • to be commissioned and removed, unless the Planning secretary agrees otherwise | | | | | | | | | | |
| Land Use | <ul style="list-style-type: none"> • Restore or maintain land capability to pre-existing use | | | | | | | | | | |
| Community | <ul style="list-style-type: none"> • Ensure public safety | | | | | | | | | | |
| ENABLING WORKS MANAGEMENT PLAN | | | | | | | | | | | |
| B64 | <p>Prior to commencing Enabling Works, an Enabling Works Management Plan must be prepared which outlines the environmental management practices and procedures to be implemented. The Enabling Works Management Plan must be prepared in consultation with the relevant council(s) and government agencies. The Enabling Works Management Plan must include:</p> <p>a) A description of activities to be undertaken during Enabling Works (including scheduling and duration of work to be undertaken at the site), focusing on</p> | <ul style="list-style-type: none"> • Letter from DPHI to Transgrid titled "HumeLink-Enabling Works Management Plan (Revision 5.3.2 dated 6 June 2025), dated 26/6/25 • Letter from DPHI, titled "HumeLink Enabling Works Management Plan" dated, 13/12/24 • Letter from DPHI, titled "Request for extension of time to undertake Enabling Works (Stage 2) under Condition B66, and update approved management plans under Condition B67" dated 08/05/25 | <p>DPHI approved the initial Enabling Works Management Plan on 13/12/24 noting the Plan:</p> <ul style="list-style-type: none"> • Has been reviewed and endorsed by the Environmental Representative • Contains the information required by Schedule 2, Condition B64 and • Contains the information required by relevant conditions of approval for which refer to condition B64. | Non-Compliant | | | | | | | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | <p>low risk activities;</p> <p>b) Risk assessment for types of activities to be undertaken under the plan;</p> <p>c) Figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s);</p> <p>d) A program for the ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken prior to the commencement of site establishment work;</p> <p>e) Details of how the activities described in subsection (a) of this condition will be carried out to:</p> <p>(i) Meet the performance outcomes stated in the documents listed in Condition A1;</p> <p>(ii) Ensure the accommodation camps comply with conditions B23 and B51;</p> <p>(iii) Manage the risks identified in the risk analysis undertaken in subsection (b) of this condition; and</p> <p>f) A program for monitoring the performance outcomes, including a program for construction noise monitoring.</p> | <ul style="list-style-type: none"> Letter from Transgrid titled "HumeLink – Request for Extension of Enabling Works (Stage 2) – 36656827 Condition B66, B67" dated 05/05/25 Letter from Transgrid, titled "HumeLink – Request for Extension of Enabling Works (Stage 2) – SSI-36656827 Condition B66" dated 22/04/25 Letter from DPHI titled "HumeLink – Request for extension of Enabling Works (Stage 2) – Request for information, dated 30/04/25 Letter from DPHI, titled "HumeLink – Enabling Works Management Plan" dated 13/12/24 Letter from WolfPeak, titled "Transgrid: ER Review of Enabling Works Management Plan I HumeLink (SSI-36656827) – Condition B64" dated 05/12/24 Letter from DPHI titled "HumeLink Enabling Works Management Plan (Revision 5.3.2, dated 6 June 2025)" dated 26/10/25 Letter from WolfPeak, titled "ER Review of Enabling Works, Management Plan I HumeLink (SSI-36656827) – Condition B64" dated 10/06/25 20250904DPHI NCR Notification MA-099 Letter from DPHI to Transgrid titled "HumeLink – Notification – Non-Compliance Condition B64" dated 7/10/25 | <p>As noted in Condition C8, enabling works commenced on 06/01/25, therefore the timeframe requirements of this condition have been satisfied.</p> <p>On 4/9/25 Transgrid Notified DPHI of a potential non-compliance with Condition B64. The post construction review of as-built drone imagery identified two areas of an access track within property MA-099 breaching the project boundary by a maximum of 6.5m. The works were associated with Minor Impact Checklist (MIC) # 15, which was approved by the ER</p> <p>On 7/10/25, DPHI wrote to Transgrid noting the breaches would be record the breaches with no further enforcement action proposed at this time.</p> <p>Recommendation</p> <p>Refer to section 3.1 for recommendations regarding this non compliance.</p> | |
| B65 | <p>Following the Planning Secretary's approval, the Proponent must implement the Enabling Works Management Plan for the duration of the Enabling Works.</p> | <ul style="list-style-type: none"> Work Pack #27 Rev 0, Acciona, dated 12/10/24 Minor Impact Checklist #9 rev 2, Transgrid, (undated) Minor impact checklist #22 rev 1, Transgrid, (undated) Minor Impact Checklist #22 Addendum 1 rev 2, Transgrid, (undated) Letter from DPHI to Transgrid titled "HumeLink Notification of Non-Compliance Condition C1" dated 1/10/25 DPHI NCR notification reference 20250533 Letter from DPHI to Transgrid titled: HumeLink - Notification - non-compliance with Condition B65 and C11 - 21 May 2025 dated 30/09/2025 | <p>At the time of the Audit site inspection, enabling works had been completed. Evidence provided to the Auditor demonstrating compliance with the requirements of the Enabling Works Management Plan included work packs with details of environmental management measures and controls to be implemented during enabling works as well as minor environmental impact checklists used for enabling works undertaken at locations other than camps and compounds where ECM's are provided in the EWMP.</p> <p>On 29/05/25, Transgrid notified DPHI of a non-compliance with Condition B65 relating related to works commencing at Access Point T180 prior to the ER signoff of the minor impacts checklist (A5) (checklist No 39).</p> <p>DPHI, in their correspondence of 30/09/2025 advised that the reporting requirements of the approval had been satisfied and no further enforcement action is proposed. .</p> <p>Corrective actions noted included</p> <ul style="list-style-type: none"> Checking controls to be implemented for enabling works Targeted retraining on enabling works approvals and controls | Non-Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | | <ul style="list-style-type: none"> Revision to geofencing configuration. <p>The Actions noted above are deemed to be appropriate and were confirmed by Transgrid AGJV to have been completed.</p> <p>Recommendation</p> <p>The non-compliance related to a timing issue, with the relevant approvals subsequently obtained from the ER.</p> <p>The non-compliance is in relation to the enabling works which have now been completed, with the relevant obligations incorporated into the construction environmental management plans.</p> <p>A general recommendation is to ensure all authorisations and signoffs are obtained prior to the commencement of any new activity.</p> | |
| B66 | Unless otherwise agreed by the Planning Secretary, the Enabling Works must only be undertaken under the Enabling Works Management Plan for a period of 4 months from the commencement of the Enabling Works. | <ul style="list-style-type: none"> Letter from DPE to NSW Electricity Networks Operations, titled "Request for extension of time to undertake Enabling Works (Stage 2) under Condition B66, and update approved management plans under Condition B67" dated 08/05/25 Letter from DPHI, titled "Request for extension of time to undertake Enabling Works (Stage 2) under Condition B66, and update approved management plans under Condition B67" dated 08/05/25 Letter from Transgrid titled "HumeLink – Request for Extension of Enabling Works (Stage 2) – 36656827 Condition B66, B67" dated 05/05/25 Letter from Transgrid, titled "HumeLink – Request for Extension of Enabling Works (Stage 2) – SSI-36656827 Condition B66" dated 22/04/25 Letter from DPHI titled "HumeLink – Request for extension of Enabling Works (Stage 2) – Request for information, dated 30/04/25 Letter from DPHI, titled "HumeLink – Enabling Works Management Plan" dated 13/12/24 Letter from WolfPeak, titled "Transgrid: ER Review of Enabling Works Management Plan I HumeLink (SSI-36656827) – Condition B64" dated 05/12/24 Letter from DPHI titled "HumeLink Enabling Works Management Plan (Revision 5.3.2, dated 6 June 2025)" dated 26/10/25 Letter from WolfPeak, titled "ER Review of Enabling Works, Management Plan I HumeLink (SSI-36656827) – Condition B64" dated 10/06/25 | <p>An extension of time to complete the enabling works was approved by DPHI. The works are to be completed the works by 12/5/25.</p> <p>Enabling works to have now been completed and the EWMP has been retired.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| B67 | Unless otherwise agreed by the Planning Secretary, within 4 months of the commencement of the Enabling Works, the Proponent must update the approved management plans for the development to incorporate any relevant aspects of the Enabling Works Management Plan. | <ul style="list-style-type: none"> Letter from DPE to NSW Electricity Networks Operations, titled "Subject: Request for extension of time to undertake Enabling Works (Stage 2) under Condition B66, and update approved management plans under Condition B67" dated 08/05/25 | <p>An extension of time to complete the undertake enabling works were approved by DPHI. The works are to be completed the works by 12/5/25.</p> <p>Enabling works have now been completed and the EWMP has been retired. Construction environmental management plans noted elsewhere in this Audit report have been updated to incorporate the requirements of the EWMP.</p> | Compliant |

PART C – ENVIRONMENTAL MANAGEMENT, AUDITING AND REPORTING

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|--|--|---|--|-------------------|
| ENVIRONMENTAL MANAGEMENT STRATEGY | | | | |
| C1 | <p>Prior to commencing construction (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <ul style="list-style-type: none"> a) Provide the strategic framework for the environmental management of the development; b) Identify the statutory approvals that apply to the development; c) Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental performance of the development; d) Set out the procedures that would be implemented to; <ul style="list-style-type: none"> (i) Keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) Receive, handle, respond to and record complaints; (iii) Resolve any disputes that may arise; (iv) Respond to any non-compliance; (v) Respond to emergencies; and e) Include; <ul style="list-style-type: none"> (i) References to any strategies, plans and programs approved under the conditions of this approval; and (ii) A clear plan depicting all monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this approval. <p>The Proponent must not commence construction until the Environmental Management Strategy is approved by the Planning Secretary.</p> | <ul style="list-style-type: none"> • HumeLink – Environmental Management Strategy, Transgrid, Rev 1 dated 6/5/25 • Letter from DPHI, titled “HumeLink Environmental Management Strategy (EMS)” dated 20/06/25 • Letter from Wolf Peak, titled “ER Review of Environmental Management Strategy HumeLink (SSI-36656827)” dated 05/05/25 • Letter from WolfPeak, titled “ER Review of Environmental Management Strategy HumeLink (SSI-36656827) dated 06/06/25 • Letter from DPHI, titled “HumeLink (SSI-36656827) – Environmental Management Strategy (Rev 0 Dated 5 May 2025) – request for information” dated 15/05/25 | <p>An environmental management strategy (EMS) has been prepared and is comprehensive.</p> <p>The EMS provides a strategic framework for the environmental management of the development and includes the following information:</p> <ul style="list-style-type: none"> • Key legislative requirements including statutory approvals are described in Section 3 and Appendix C • Roles and responsibilities are described in Section 5.11 • Provides procedures for informing the community <p>DPHI approved the EMS on 20/6/25 noting the EMS:</p> <ul style="list-style-type: none"> • Has been reviewed by Transgrid and no issues have been raised with the Department • Has been endorsed by the ER • Contains the information required by the conditions of approval. | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | Following the Planning Secretary's approval, the Proponent must implement the Environmental Management Strategy. | | | |
| REVISION OF STRATEGIES, PLANS AND PROGRAMS | | | | |
| C2 | <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:</p> <ol style="list-style-type: none"> The submission of an incident report under condition C10; The submission of an Independent Audit under condition C14; Any modification of the conditions of this approval; or The issue of a direction of the Planning Secretary under condition A3 which requires a review. | <ul style="list-style-type: none"> HL Reviews of Strategies, Plans, Programs, dated 19/01/26 | <p>As noted in Condition A3 The Addendum Cultural Heritage Assessment Report (Addendum ACHAR) was prepared by Kelleher Nightingale and approved by DPPI on 5/12/25. In their letter of approval, DPPI issued a requirement under condition A3 as follows: <i>An amended Heritage Management Plan (HMP) in respect of HumeLink East (Stage 3a) must be submitted to the Planning Secretary for approval under Condition B33 by 23 December 2025. The amended HMP must incorporate the management and mitigation measures from Sections 11 and 12 in the Addendum ACHAR approved by the Planning Secretary (reference number SSI-36656827-PA-118)</i></p> <p>Accordingly, the Heritage Management Plan was updated and endorsed by the ER on the 18/12/26 noting “ <i>the HMP is consistent with the terms of the Approval and that the update is in line with the Departments 5 December 2025 Direction</i>”</p> <p>DPPI approved the revised HMP on 16/1/26.</p> <p>There have been no other formal requirements (e.g. incidents or audit reports) that would trigger the update and approval of a management plan in accordance with this condition.</p> <p>Transgrid has prepared and keep up to date a program for reviewing and updating environmental management plans.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS | | | | |
| C3 | <p>With the approval of the Planning Secretary, the Proponent may;</p> <p>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 further stages and the trigger for updating the strategy, plan or program);</p> <p>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</p> <p>c) Update any strategy required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</p> | <ul style="list-style-type: none"> • Letter from DPHI to Transgrid titled "HumeLink Final Layout Plans Staging Request" dated 22/8/25 • Letter from DPHI titled "HumeLink – Staging Requests" dated 22/11/24 • Letter from Transgrid, titled "Proposed staging of HumeLink – SSI 36656827 Condition C3" dated 22/11/24 • Team binder transmission record, dated 05/12/24 • Letter from DPHI, titled "HumeLink East Staging Request – Stage 3A Humelink East (Rev 2, 6 June 2025)" dated 25/06/25 • HLE Staging Request Rev 1, Undated • HumeLink Staging Request – Stage 3 A HumeLink East, Transgrid, dated 06/06/25 • HumeLink Staging Request – Stage 3 A HumeLink East, Transgrid, dated 06/06/25 • Letter from DPHI, titled "HumeLink – HumeLink East Staging Request Rev 1" dated 27/05/25 • Letter from DPHI, titled "HumeLink – HumeLink west (Stage 3B) Staging request" dated 22/07/25 • HumeLink Staging Request – Stage 3B HumeLink West, Transgrid, 17/07/25 • Letter from DPHI, titled "HumeLink – Final Layout Plans staging request" dated 22/08/25 • HumeLink Staging request – final layout Plans (conditions B40, B42, and B43) dated 18/08/25 • Attachment 1 – Indicative timing of submissions, (undated) • Attachment 1 – Indicative timing of submissions, dated September 2025 • Response to request for information, HumeLink East C3 staging request final layout plans, (undated) • Attachment 1 – indicative timing of submission, dated October 2025 • Response to request for information, HumeLink East C3 staging request final layout plans, (undated) • Letter from DPHI, titled "HumeLink – HumeLink East final layout Plans staging request" dated 11/09/25 • Response to request for information, HumeLink East C3 staging request final layout plans, Transgrid, (undated) • Staging request – HumeLink East final layout plans, Transgrid, dated 27/08/25 • Letter from DPHI, titled "HumeLink – HumeLink East Staging | <p>On 22/8/25 DPHI approved a request to stage the Final Layout Plans required under Condition C8 for both HumeLink East and Hume Link West. DPHI has approved the preparation and submission of all Final Layout Plans prior to the commencement of Construction except those subject to the relevant requirements of Conditions B40, B42 and B43. This staging has been sought to facilitate the commencement of the Construction in areas not subject to those requirements.</p> <p>Transgrid noted that TTMP;s have also been staged for OSOM and cable stringing over State Roads and FLP's have been staged for total clearing and partial clearing.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
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| | | <ul style="list-style-type: none"> request final layout plans" dated 03/09/25 • Email from Transgrid, titled "HumeLink – Humelink staging report" dated 04/11/25 • Email from Transgrid, titled "HumeLink – Post approval document received – (ssi-36656827-PA-141), dated 04/11/25 • Letter from DPHI, titled "HumeLink staging report Revision 1" dated 04/11/25 • Email from DPHI, titled "HumeLink – Humelink staging report" dated 16/11/25 • Email from DPHI titled "HumeLink - Post Approval Document Received - (SSI-36656827-PA-148)" dated 10/11/25 • Humelink staging report, Transgrid, dated 07/11/25 • Letter from DPHI, titled "HumeLink Staging Report Revision 1.1" dated 17/11/25 | | |
| C4 | If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this approval. | <ul style="list-style-type: none"> • Audit Interview 5 February | Noted. A request to DPHI has not been made in relation to this condition. | Not triggered |
| C5 | If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program. | <ul style="list-style-type: none"> • N/A | Administrative note | Compliant |
| C6 | If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing requirements of the relevant condition of this approval if those requirements are not applicable to the particular stage. | <ul style="list-style-type: none"> • Letter from DPHI to Transgrid titled "HumeLink Final Layout Plans Staging Request" dated 22/8/25 • Letter from DPHI titled "HumeLink – Staging Requests" dated 22/11/24 • Letter from Transgrid, titled "Proposed staging of HumeLink – SSI 36656827 Condition C3" dated 22/11/24 • Team binder, dated 05/12/24 • Letter from DPHI, titled "HumeLink East Staging Request – Stage 3A Humelink East (Rev 2, 6 June 2025)" dated 25/06/25 • HLE Staging Request Rev 1, Undated • HumeLink Staging Request – Stage 3 A HumeLink East, Transgrid, dated 06/06/25 • HumeLink Staging Request – Stage 3 A HumeLink East, Transgrid, dated 06/06/25 • Letter from DPHI, titled "HumeLink – HumeLink East Staging Request Rev 1" dated 27/05/25 • Letter from DPHI, titled "HumeLink – HumeLink west (Stage 3B) Staging request" dated 22/07/25 | <p>On 22/8/25 DPHI approved a request to stage the Final Layout Plans required under Condition C8 for both Hume Link East and Hume Link West. DPHI has approved the preparation and submission of all Final Layout Plans prior to the commencement of Construction except those subject to the relevant requirements of Conditions B40, B42 and B43. This staging has been sought to facilitate the commencement of the Construction in areas not subject to those requirements.</p> <p>Transgrid noted that TTMP;s have also been staged for OSOM and cable stringing over State Roads and FLP's have been staged for total clearing and partial clearing.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|----|-------------|---|--|-------------------|
| | | <ul style="list-style-type: none"> • HumeLink Staging Request – Stage 3B HumeLink West, Transgrid, 17/07/25 • Letter from DPHI, titled “HumeLink – Final Layout Plans staging request” dated 22/08/25 • HumeLink Staging request – final layout Plans (conditions B40, B42, and B43) dated 18/08/25 • Attachment 1 – Indicative timing of submissions, (undated) • Attachment 1 – Indicative timing of submissions, dated September 2025 • Response to request for information, HumeLink East C3 staging request final layout plans, (undated) • Attachment 1 – indicative timing of submission, dated October 2025 • Response to request for information, HumeLink East C3 staging request final layout plans, (undated) • Letter from DPHI, titled “HumeLink – HumeLink East final layout Plans staging request” dated 11/09/25 • Response to request for information, HumeLink east C3 staging request final layout plans, Transgrid, (undated) • Staging request – HumeLink East final layout plans, Transgrid, dated 27/08/25 • Letter from DPHI, titled “HumeLink – HumeLink East Staging request final layout plans” dated 03/09/25 • Email from Transgrid, titled “HumeLink – Humelink staging report” dated 04/11/25 • Email from Transgrid, titled “HumeLink – Post approval document received – (ssi-36656827-PA-141), dated 04/11/25 • Letter from DPHI, titled “HumeLink staging report Revision 1” dated 04/11/25 • Email from DPHI, titled “HumeLink – Humelink staging report” dated 16/11/25 • Email from DPHI titled “HumeLink - Post Approval Document Received - (SSI-36656827-PA-148)” dated 10/11/25 • Humelink staging report, Transgrid, dated 07/11/25 • Letter from DPHI, titled “HumeLink Staging Report Revision 1.1” dated 17/11/25 | | |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|-----------------------------------|--|--|---|-------------------|
| NOTIFICATIONS | | | | |
| NOTIFICATION OF DEPARTMENT | | | | |
| C7 | <p>Prior to commencing development, Enabling Works, construction, operations, upgrading or decommissioning of the development, the Proponent must notify the Department in writing via the Major Projects website portal of the date of commencing the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Proponent must notify the Department in writing prior to the commencing of the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p> | <ul style="list-style-type: none"> Infrastructure Approval SSI 36656827, dated 13/11/24 Letter from Transgrid to DPPI titled "HumeLink – Notification of the Commencement of Development – Stage 1A HumeLink East SSI36656827 Condition C7" dated 22/11/24 Letter from DPPI to HumeLink titled "HumeLink Commencement of Construction Stage 3A(ii) HumeLink East" dated 24/9/25 Letter from Transgrid to DPPI titled "HumeLink – Notification of the Commencement of Construction – Stage 3A (ii) HumeLink East Condition C7" dated 24/9/25 Letter from Transgrid to DPPI titled "HumeLink – Notification of the Commencement of Enabling Works – Stage 2 SSI36656827 Condition C7" dated 06/01/25 | <p>DPPI were notified of the commencement of:</p> <ul style="list-style-type: none"> The development (consisting of pre-construction minor works) on the 22/11/24 Enabling works on 06/01/25 Construction on 24/9/25 <p>Details of staging are provided on each letter.</p> | Compliant |
| FINAL LAYOUT PLANS | | | | |
| C8 | <p>Prior to commencing construction, the Proponent must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including.</p> <ol style="list-style-type: none"> Details on siting of transmission towers and ancillary infrastructure and/ or ancillary facilities; and Showing comparison to the approved layout and approved vegetation clearing. <p>The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans.</p> | <ul style="list-style-type: none"> Hume Link East Final Layout Plans – Work Packs 1-3, AGJV dated 3/11/25 Hume Link East Final Layout Plans – Work Packs 4-6, AGJV dated 22/10/25 Hume Link East Final Layout Plans – Work Packs 7-9, AGJV dated 31/10/25 Hume Link East Final Layout Plans – Work Packs 10-12, AGJV dated 3/11/25 Hume Link East Final Layout Plans – Work Packs 13-15, AGJV dated 23/9/25 Hume Link East Final Layout Plans – Work Packs 16-18, AGJV dated 3/11/25 Hume Link East Final Layout Plans – Work Packs 19-21, AGJV dated 4/11/25 Hume Link East Final Layout Plans – Work Packs 22-24, AGJV dated 3/11/25 Hume Link East Final Layout Plans – Work Packs 24-27, AGJV dated 23/9/25 Letter from DPPI to Transgrid titled "HumeLink Final Layout Plans Staging Request" dated 22/8/25 | <p>On 22/8/25 DPPI approved a request to stage the Final Layout Plans required under Condition C8 for both HumeLink East and HumeLink West, preparing and submitting all Final Layout Plans prior to the commencement of Construction except those subject to the relevant requirements of Conditions B40, B42 and B43 to facilitate the commencement of the Construction in areas not subject to those requirements. DPPI approval included several conditions that are noted in Condition A 3.</p> <p>The detailed layout plans are available on the Proponent's website in accordance with Condition C15.</p> <p>The ER endorsed the final layout plans prior to submission to DPPI.</p> <p>Final layout plans were submitted to DPPI progressively with letters of acknowledgement received from DPPI).</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|--------------------------------|--|---|--|-------------------|
| | | <ul style="list-style-type: none"> Letter from WolfPeak to Transgrid titled "ER Review of Final Layout Plans, Humelink East (various) | | |
| WORKS AS EXECUTED PLANS | | | | |
| C9 | 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. | <ul style="list-style-type: none"> N/A | Operational requirement – not triggered | Not triggered |
| INCIDENT NOTIFICATION | | | | |
| C10 | The Department must be notified via the Major Projects website portal immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5. | <ul style="list-style-type: none"> 251128 Notification of Potential Incident YG-027A, Acciona, dated 28/11/25 251205 HLE Environmental NCR Report – YG-027A, dated 28/11/25 Letter from Transgrid to DPPI, titled "Re: Humelink – Incident Notification – Condition C10" dated 28/11/25 Incident 47487 – Manage, Acciona, dated 28/11/25 Humelink East Incidents and NCR Register, Acciona, dated 21/01/26 | <p>The Auditor was provided with a copy of the Incident and NCR register for the Audit period. During the Audit period, a total of 7 minor incidents occurred (e.g oil spills) which were classified as minor and non-reportable with minimal impact.</p> <p>One potential incident was reported to DPPI on the 28/11/25 as a precaution. The potential incident related to four instances of access track construction resulting in impacts outside the project boundary and potential non-compliance with Conditions A2 (d) and B30.</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|------------------------------------|--|---|--|----------------------|
| NON-COMPLIANCE NOTIFICATION | | | | |
| C11 | <p>Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing and must be submitted via the NSW planning portal (Major Projects). The notification must identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply, the reasons for when the non-compliance (if known), and what actions have been undertaken, or will be undertaken, and when to address the non-compliance.</p> <p><i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</i></p> | <ul style="list-style-type: none"> Document "Non-Compliance Report", dated 04/08/25 "Response to Request for Information" by Transgrid, dated 04/11/25 Incident report, titled "Incident 47487" dated 28/11/25 Email from DPHI, titled "HumeLink – Post Approval Document Received – (SSI 36656827-PA-114)" dated 08/09/25 Letter from DPHI, titled "HumeLink – Notification of Non-Compliance Condition C11" dated 01/10/25 Letter from Transgrid to DPHI, titled "HumeLink – Notification of Non-Compliance – Condition C11" dated 08/09/25 HL Reportable incidents and NCRs, dated 15/04/25 Letter from DPHI to Transgrid titled "HumeLink Notification of Non-Compliance Condition C1" dated 1/10/25 Department of Planning, Housing and Infrastructure (DPHI) Non-Compliance Notification Reports (Various) | <p>During the Audit period, four non-compliances were reported to DPHI in accordance with this condition. This included:</p> <ul style="list-style-type: none"> Non-compliance with Conditions A2 (d) and B30 relating to four instances of access track construction resulting in impacts outside the project boundary Potential Non-compliance with conditions B55 and B56 relating to the offsite export of material from the Faulder Ave Compound Non-Compliance with Condition B64 relating to works occurring outside the project boundary Non-compliance with Condition C11 relating to late notification of a non-compliance. The notification related to works commencing prior to the ER signoff of the minor impacts checklist (A5) <p>Transgrid have developed a standard template for reporting non compliances which includes all the necessary information required by this condition.</p> <p>In relation to the non-compliance with Condition C11, the formal notification was made to DPHI on 8/9/25, more than 7 days following the identification on the non-compliance on 29/5/25. Accordingly, the notification timeframes have not been met. DPHI confirmed the non-compliance on 1/10/25 noting there would be no further enforcement action.</p> | Non-Compliant |
| NOTIFICATION OF LANDOWNERS | | | | |
| C12 | <p>Prior to the commencement of construction, the Proponent must notify the owners of receivers listed in conditions B40, B42, and B43 as identified in the EIS, of their rights under conditions B40, B42 and B43.</p> | <ul style="list-style-type: none"> Email from Transgrid, titled "Re: HumeLink – Mitigation for visual impact to your residence" dated 21/07/25 Email from Transgrid, titled "HumeLink – mitigation for visual impact to your residence" dated 11/07/25 Email from Transgrid, titled "HumeLink Project – Visual Impact Mitigation" dated 22/07/25 Email from Transgrid, titled "HumeLink Project" dated 22/07/25 Email from Transgrid, titled Re: Greendale Uniting Church [Public]" dated 27/07/25 | <p>Email correspondence and records of conversation were provided to the Auditor demonstrating the appropriate notifications have been made on 27/7/25 prior to the commencement of construction on 24/9/24</p> | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|--|--|---|---|-------------------|
| | | <ul style="list-style-type: none"> • Email from Transgrid, titled "Greendale United Church" dated 22/07/25 • Email from Transgrid, titled "Visual Impact Mitigation" dated 22/07/25 • Email from Transgrid, titled "Visual Impact Mitigation" dated 28/07/25 • Email from Transgrid titled "Visual Impact Mitigation – Scheduling meeting" dated 11/07/25 • Email from Transgrid, titled "HumeLink Project – Visual Impact Mitigation [Official]" dated 22/07/25 • Email from Transgrid, titled "HumeLink – visual impact [Official]" dated 16/07/25 • Stakeholder Consultation Record – visual impacts, dated 26/05/25 • Email from Transgrid, titled "HumeLink – mitigation for visual impact to your residence [Official]" dated 21/07/25 • Email from Transgrid, titled "HumeLink – Mitigation for visual impact to your residence" dated 11/06/25 • Stakeholder consultation record – Visual impact mitigation, dated 22/07/25 • Email from Transgrid, titled "HumeLink Project – Visual Impact Mitigation" dated 22/07/25 • Email from Transgrid, titled "Greendale Uniting Church [Public]" dated 27/07/25 • Email from Transgrid, titled "Greendale uniting Church" dated 22/07/25 • Stakeholder consultation record – Visual impact mitigation, dated 22/07/25 • Stakeholder consultation record – Visual impact mitigation, dated 28/07/25 • Stakeholder consultation record – Visual impact mitigation scheduling meeting, dated 11/07/25 • Email from Transgrid, titled "Hume Link Project – Visual Impact Mitigation (Official)" dated 22/07/25 • Email from Transgrid, titled "Hume Link Project – Visual Impact (Official)" dated 16/07/25 | | |
| INDEPENDENT ENVIRONMENTAL AUDIT | | | | |
| C13 | Independent Audits of the development must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> or as updated from time to time and published on the | <ul style="list-style-type: none"> • This Audit report • DPHI Independent Audit Post Approval Requirements (2020) • Letter from DPHI to Transgrid, titled "Subject: HumeLink – Independent Environmental Audit (IEA) Team – Biodiversity | This Audit has been undertaken in accordance with the DPHI independent Audit Guidelines. Table 1 demonstrates how the requirements of the DPHI IAPAR's have been addressed. | Compliant |

| ID | Requirement | Evidence Collected | Independent Audit Findings & Recommendations | Compliance Status |
|------------------------------|--|---|--|-------------------|
| | Department's website. | Expert Endorsement Request" dated 10/12/25 | | |
| C14 | Make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. | <ul style="list-style-type: none"> N/A | As this is the initial audit, the requirements of this condition are required to be fulfilled following the completion of this Audit report. | Not triggered |
| ACCESS TO INFORMATION | | | | |
| C15 | <p>The Proponent must:</p> <p>a) Make the following information and documents publicly available on its website as relevant to the stage of the development;</p> <p>(i) The EIS;</p> <p>(ii) The final layout plans for the development;</p> <p>(iii) Current statutory approvals for the development;</p> <p>(iv) Approved strategies, plans or programs required under the conditions of this approval;</p> <p>(v) The proposed staging plans for the development if the construction, operation and/ or decommissioning of the development is to be staged;</p> <p>(vi) A comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;</p> <p>(vii) How complaints about the development can be made;</p> <p>(viii) A record of complaints, which is to be updated on a monthly basis;</p> <p>(ix) Any independent environmental audit, and the Proponent's response to the recommendations in any audit; and</p> <p>(x) Any other matter required by the Planning Secretary; and</p> <p>b) Keep such information up to date.</p> | HumeLink East Transgrid | <p>HumeLink East has a designated project web page that is incorporated into the overarching HumeLink website for the entire project. The website is comprehensive and includes the following information:</p> <ul style="list-style-type: none"> Environmental Impact Statement and technical reports Submissions report and addendum reports Details of public exhibition Final layout plans Current statutory approvals including NSW Government Determination – issued by DPHI Commonwealth Government Determination issued by DCCEEW (Cth) Humelink Biodiversity Assessment Verification Report, and associated figures Project staging plans Details of how complaints can be made by email, toll free phone number or mail Complaints register Management plans Construction updates and community information. Information regarding business and employment opportunities <p>As this is the initial Audit, the independent Audit report and the Proponent's response was not available on the website in accordance with item (ix), however this will need to be placed on the website in accordance with Condition C14 following finalisation of this Audit report.</p> | Compliant |

Appendix D Stakeholder Consultation Records

Cc: Rebecca Eddington <rebecca.a.eddington@energyco.nsw.gov.au>

Subject: RE: SSI 36656827 - Independent Environmental Audit - Hume Link East

Good morning Richard,

In response to the request for consultation and our discussion last week, NSW Planning provides the following:

The Audit needs to ensure that it addresses all conditions of consent for the Project and meet the requirements of the *Independent Audit Post Approval Requirements (DPIE, 2020)*.

<https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf>

As part of your Audit can you please address/review the following aspects:

- Ensure you assess compliance with all conditions of consent applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans (including the Early Works Management Plan).
- Review the environmental performance of the development including actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.
- A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.
- Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction etc.
- Ensuring all environmental controls have been installed, maintained and are being used in a fit and proper manner.
- Erosion and sediment management and maintenance across the Project.
- Water management – surface and groundwater monitoring and management/reuse management and appropriate water licences have been obtained.
- Compliance with all commitments/actions/monitoring/reporting in all management plans, including evidence of the management plans being reviewed and revised.
- Compliance with overall approved project footprint.
- Traffic management/Truck movements/Vehicle use of approved routes.
- Dust management, monitoring and control.
- Compliance with Noise limits as required in Noise Policy for Industry 2017 (EPA)
- Evidence of compliance with Community engagement commitments, complaints register monitoring, management and responses.
- Emergency preparedness including but not limited to appropriate fire equipment such as water tanks and mobile water karts, training etc, working in hot weather processes/policies.

In relation to the Biodiversity expert/s it is requested that they review in detail the implementation of the below management plans as well as the specific conditions of approval relevant to Biodiversity.

The experts 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

| Modifications | Engagement | Post Approval | Compliance |
|-------------------------------------|--|--------------------|--------------|
| Case ID | Case name | Status | Date Created |
| SSI-36656827-PA-107 | Biodiversity Assessment Verification Report | Resolved-Completed | 05/08/2025 |
| SSI-36656827-PA-76 | Biodiversity Offset Package | Resolved-Completed | 19/05/2025 |
| SSI-36656827-PA-67 | Supplementary Biodiversity Strategy | Resolved-Completed | 02/05/2025 |
| SSI-36656827-PA-30 | HLW Biodiversity Management Plan | Resolved-Completed | 30/01/2025 |
| SSI-36656827-PA-19 | HumeLink Biodiversity Offset Package | Resolved-Completed | 19/12/2024 |
| SSI-36656827-PA-8 | Biodiversity Assessment Verification Report Expert | Withdrawn | 22/11/2024 |
| SSI-36656827-PA-2 | Supplementary Biodiversity Strategy Peer Review | Resolved-Completed | 14/11/2024 |
| SSI-36656827-PA-3 | HLE Biodiversity Management Plan | Resolved-Completed | 14/11/2024 |

Regarding consultation with other agencies, please consult with the following:

- Registered Aboriginal Parties (RAPs) from the EIS
- Australian Government Department of Climate Change, Energy, Environment and Water
- Forestry Corporation of NSW
- Fire and Rescue NSW
- NSW Rural Fire Service
- Heritage Division within NSW DCCEEW
- DPE Water / Water NSW / NRAR
- Local Councils - Wagga Wagga City, Snowy Valleys, Cootamundra-Gundagai Regional, Upper Lachlan Shire, Yass Valley and Goulburn-Mulwaree Council
- Environment Protection Authority
- NSW DCCEEW CPHR (previously known as BCS)
- Transport for NSW

This email is to be appended to the Audit Report.

The Proponent should review the Audit Report prior to submission to NSW Planning, to ensure all the requirements of the Consent relating to Independent Environmental Audits have been met.

Lastly, it is the expectation that the lead auditor attend audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to *provide the auditor with reasonable access to all requested development areas and activities*, thus the NSW Plannings expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise).

Should you have any further questions, please don't hesitate to contact me on the details below.

Regards
Katrina

Katrina O'Reilly
Team Leader

Our ref: OUT25/15105

Richard Peterson
Trigalana Environmental PTY Ltd
Email: Richard.peterson-trigalana@outlook.com

20/11/2025

Subject: Hume Link – SSI-36656827 - IEA

Dear Richard Peterson,

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

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

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

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

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

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alistair Drew".

Alistair Drew
A/ Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

richard.peterson-trigalana@outlook.com

From: Nick Van Lijf <Nicholas.VanLijf@epa.nsw.gov.au>
Sent: Monday, 1 December 2025 1:40 PM
To: richard.peterson-trigalana@outlook.com
Subject: RE: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Hi Richard,

Thank you for your email.

In accordance with your request, please note the EPA's key issues and focus areas as follows –

- Implementation, maintenance and effectiveness of relevant environmental controls and mitigation measures to prevent offsite impacts/disturbances (e.g., in relation to dust, noise, vibration, etc.);
- Complaints handling procedure(s); and
- Waste management (including relevant details regarding the various waste streams and their appropriate/lawful disposal).

Please note, the EPA is currently investigating several community complaints made in relation to the Humelink project. Should our investigations reveal any additional issues, we will notify you accordingly.

If you have any questions or concerns, please do not hesitate to contact me.

Regards,

Nick van Lijf
Unit Head
Regulatory Operations
NSW Environment Protection Authority
T 02 6969 0704
7/130-140 Banna Ave, GRIFFITH NSW 2680



www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the Traditional Custodians of the land, waters and sky where we work. As part of the world's oldest surviving cultures 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

richard.peterson-trigalana@outlook.com

From: Operational Liaison <OpsLiaison@fire.nsw.gov.au>
Sent: Tuesday, 18 November 2025 1:57 PM
To: richard.peterson-trigalana@outlook.com
Cc: Fire Safety
Subject: RE: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Good afternoon Richard,

Thank you for contacting FRNSW regarding the audit.

FRNSW have no relevant matters, issues or focus areas be considered by the audit.

Kind regards



STATION OFFICER RICHARD JAY
A/Team Leader
Fire Safety Liaison Unit | Fire and Rescue NSW
M: 0407 103 571 **E:** richard.jay@fire.nsw.gov.au
1 Amarina Avenue Greenacre NSW 2190

**PREPARED FOR
ANYTHING.**

www.fire.nsw.gov.au



Fire and Rescue NSW acknowledge the traditional custodians of the lands on which we stand and pay our respects to their Elders from the past and present.

From: Scott Martin <Scott.Martin@goulburn.nsw.gov.au>
Sent: Thursday, 11 December 2025 12:03 PM
To: Richard Peterson
Subject: Re: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Good Morning Richard

Thank you for the opportunity for Council to provide its comments in relation to any issues or focus areas that may be relevant to the Audit you are undertaking in relation to the Hume Link Project.

The key issue for Council is the project's approach to accommodation.

As background, Hume Link prepared a Temporary Workforce Accommodation Strategy as part of their amended Social Impact Management Plan (SIMP) following a significant change to their accommodation strategy.

Hume Link advised in April 2025 that due to a change in construction scheduling they could accommodate workers within the Goulburn Mulwaree LGA rather than constructing the planned accommodation camp at Graywood Siding Road. We were advised that this change was also necessary as there was a determined 'blade throw risk' due to proximity to a surrounding wind farm.

Following numerous consultations with Hume Link we reiterated our concerns including:

- Cumulative impact of other State Significant projects (quarries, renewables, energy from waste)
- High occupancy in accommodation year-round, low rental availability and associated impacts
- Moving workers in/out for major events and peak periods is simply not practical, as it is not only for major events. Peaks throughout the build period, and ongoing bookings will indicate unavailability to travellers looking to book in advance.

Following these discussions, Hume Link reserved 225 rooms in local hotel/motel accommodation for their workforce. We understand that some of this accommodation is in use now.

We provided a letter of support for Hume Link East's Temporary Workforce Accommodation Strategy with Council's acceptance noting "The Workforce Accommodation Strategy would not have adverse impacts on housing affordability and availability for local residents, or on temporary accommodation providers during major tourist events and peak seasons.

The Updated SIMP (Stage 2) included reference to a dedicated accommodation coordinator to manage social impacts under the dispersed accommodation model (Table 12). It would be good to understand when and how this role will be resourced as we have not received monthly reports, pulse checks or any further detail.

With regards to 5.4 Foundational Monitoring Tools and 5.5 Mitigation and Management Framework - can they please ensure the listed impacts are being reported on and that the monitoring and reporting frequency detailed in Table 12 is being adhered to.

Should you require any further information, please contact Danae Vitnell, Council's Economic Development Manager on (02) 4823 4493 or Danae.Vitnell@goulburn.nsw.gov.au

Kind regards
Scott

Scott Martin
Director Planning & Environment



richard.peterson-trigalana@outlook.com

From: Natural Resources Access Regulator <cspconnect@service-now.com>
Sent: Monday, 22 December 2025 9:58 AM
To: richard.peterson-trigalana@outlook.com
Subject: NRAR0019459 : Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Dear Richard,

Thank you for your email to natural Resources Access Regulator (NRAR). The responsible department for enquiries regarding SSI Consultation, controlled activity approvals, works on waterfront land and licences and approvals for large water users, is the Department of Climate Change, Energy, Environment & Water - Water Licensing (DCCEEW - Water).

All other licences and approvals continue to be managed by WaterNSW.

Your matter needs to be addressed by Department of Climate Change, Energy, the Environment & Water - Water Licensing (DCCEEW - Water) and you will have to email your enquiry to waterlicensing.servicedesk@dpie.nsw.gov.au or contact DCCEEW Water on 1300 081 047.

Further emails to Department of Climate Change, energy, the Environment & Water - Water Licensing (DCCEEW - Water) should be emailed to: waterlicensing.servicedesk@dpie.nsw.gov.au

Kind regards,
Annette

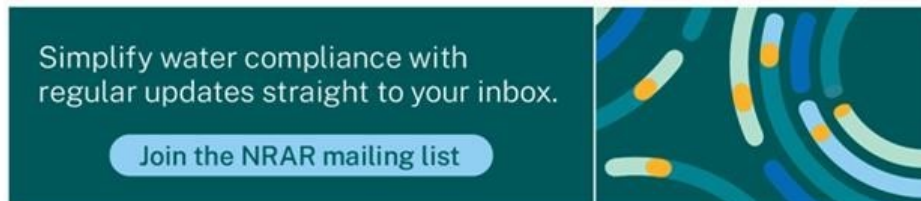
Regulatory Support Team

Natural Resources Access Regulator (NRAR)

E nrar.enquiries@nrar.nsw.gov.au | W nrar.nsw.gov.au | P 1800 633 362

Postal Address: Locked Bag 5022, Parramatta NSW 2124

Working Days: Monday to Friday | 9:00am - 5:00pm



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I acknowledge the traditional custodians of the land and pay respects to Elders past and present.

I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

richard.peterson-trigalana@outlook.com

From: Alison Lamond <alison.lamond@dcceew.nsw.gov.au>
Sent: Monday, 17 November 2025 11:41 AM
To: Richard Peterson
Subject: RE: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Hello Richard,

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

If you have any questions regarding these comments, please contact heritagemailbox@environment.nsw.gov.au.

Kind regards,

Alison Lamond *BSci, BA (Hons), (she/her)*

A/ Strategic Manager - Major Projects

Heritage NSW

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

M 0419 762 918 **E** alison.lamond@dcceew.nsw.gov.au

dcceew.nsw.gov.au

Level 3, 6 Stewart Ave
Newcastle West NSW 2303

Locked Bag 1002, Dangar NSW 2309

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



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.



Lauren Dawes
REC251118-LD-100100

Mr Richard Peterson
Trigalana Environmental Pty Ltd

[Via email: Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

Dear Richard,

RE: Council consultation – Hume Link Project – Independent Environmental Audit

Thank you for your correspondence of 17 November 2025 confirming your appointment to undertake the independent environmental audit on the Hume Link project.

To date the following issues have been brought to the attention of Council:-

1. Unsafe driving and speeding vehicles associated with the project. A copy of correspondence in this regard is attached for your information. In particular concerns raised with council have been:-
 - Vehicles speeds through Adjungbilly village area; and
 - Vehicles not giving way at the intersection of Fern Hill Road and Nanangroe Road;
2. Possible deviations from the Vehicle Movement Plan (VMP) Council was consulted on. Council have received multiple National Heavy Vehicle Regulator permit applications for vehicles which are not within the Humelink East Approved Vehicle Movement Plan. These have been refused where they do not align with the approved VMP, however, raises doubt as to which roads they are using for general access vehicles.

Council note your advice that you will be undertaking the audit in February 2026. Given, construction has only recently commenced it is anticipated that further matters may come to Council's attention in coming months. Any further concerns will be raised with you by the end of January 2026.

Should you require further information or wish to discuss the matter please contact the undersigned on 1300 459 689.

Yours faithfully

Trevor Dando
Acting Deputy General Manager

18 November 2025

From: Anne Shanahan <ashanahan@svc.nsw.gov.au>
Sent: Wednesday, 3 December 2025 3:58 PM
To: Richard Peterson
Subject: RE: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Hi Richard,

After reviewing the [Instrument of Approval](#) we have put together the below summary of focus areas that Council see relevant to the Audit.

| Condition | Notes |
|---|--|
| Part B – Environmental Conditions – General | |
| B16 | Noice vibration management plan |
| B17 | Air quality a) minimise the off-site dust, fume, blast emissions and other air pollutants of the development |
| B36 | Transport strategy |
| B38 | Road maintenance |
| B39 | Traffic and transport management plan |
| B52 | Emergency plan |
| B57 | Waste |
| B59 | Accommodation camps a) ensure utilities at the accommodation camps, including water, wastewater, waste and electricity, are designed and located in accordance with the relevant Council specifications and relevant standards Additional note concerning the camp kitchen and their required approvals (development approval / construction certificate / section 68) |
| B60 | Local business and employment strategy |
| B61 | Social impacts management |
| B64 | Enabling works management plan |
| Part C – Environmental Management, Reporting and Auditing | |
| C7 | Notification of Department |
| C10 | Incident notification |
| C11 | Non-compliance notification |

I hope this format is appropriate. Please let me know if you require any further information.

Kind regards,

Anne

Anne Shanahan

Interface Manager - HumeLink



76 Capper Street, Tumut, NSW 2720
P: 02 6941 2588
M:
W: www.svc.nsw.gov.au

Leading, engaging and supporting strong and vibrant communities



Snowy Valleys Council proudly acknowledges the traditional owners and custodians of this land and water and pay respects to their Elders past and present.

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0

From: Anne Shanahan <ashanahan@svc.nsw.gov.au>

Sent: Tuesday, 18 November 2025 9:19 AM

To: richard.peterson-trigalana@outlook.com <richard.peterson-trigalana@outlook.com>

Subject: RE: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Good morning Richard,

Thank you kindly for reaching out to Council.

We intend to provide you with our suggested areas of focus. I will endeavour to get this to you prior to the end of the month, to allow time for further consultation and discussion as required.

Kind regards,

Anne

Anne Shanahan

Interface Manager - Humelink



76 Capper Street, Tumut, NSW 2720
P: 02 6941 2588
M:
W: www.svc.nsw.gov.au

Leading, engaging and supporting strong and vibrant communities



Snowy Valleys Council proudly acknowledges the traditional owners and custodians of this land and water and pay respects to their Elders past and present.

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From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Wednesday, December 3, 2025 10:40:36 PM
To: info@fcnsw.com.au
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with Forestry Corporation NSW so any issues or focus areas that FCNSW may see relevant to the Audit may be considered by the Audit.

In this regard a response by 20 January 2026 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Saturday, November 15, 2025 12:59:20 AM
To: OEHD Heritage Mailbox <heritagemailbox@environment.nsw.gov.au>
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Shikha Jhaldiyal

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with Heritage NSW so any issues or focus areas that Heritage NSW may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Saturday, November 15, 2025 1:07:39 AM
To: Webmaster <webmaster@rfs.nsw.gov.au>
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Martha Dotter

Hi Martha

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with Rural Fire Service so any issues or focus areas that RFS may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Saturday, November 15, 2025 1:33:11 AM
To: Development South <development.south@transport.nsw.gov.au>
CC: Maurice Morgan <maurice.morgan@transport.nsw.gov.au>
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Maurice Morgan

Hi Maurice

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with Transport for NSW so any issues or focus areas that TfNSW may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Wednesday, December 3, 2025 10:32:59 PM
To: rewiringthenation@dcceew.gov.au
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

I have been appointed to undertake and Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with DCCEEW so any issues or focus areas that DCCEEW may see relevant to the Audit may be considered by the Audit.

In this regard a response by 20 January 2026 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Saturday, November 15, 2025 12:47:57 AM
To: ROG South East Region Mailbox <rog.southeast@environment.nsw.gov.au>
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Alison Treweek

I have been appointed to undertake and Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with DCCEEW - CPHR so any issues or focus areas that CPHR may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Saturday, November 15, 2025 12:55:14 AM
To: DPIE Water Assessments Mailbox <water.assessments@dpie.nsw.gov.au>
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Rob Brownbill

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with DPE Water so any issues or focus areas that DPE Water may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

Please consider the environment before printing this e-mail

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Friday, October 3, 2025 1:35:45 AM
To: Katrina O'Reilly <katrina.oreilly@planning.nsw.gov.au>
CC: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Subject: SSI 36656827 - Independent Environmental Audit - Hume Link East

Hi Katrina

As you are aware, I have been approved as the Independent Auditor of the Hume Link Project (SSI 36656827) . I will be conducting the site inspection Audit for the **Eastern Portion** of the project on the 2nd of December 2025. This is the section being constructed by the Acciona Genus Joint Venture (AGJV).

The purpose of this email is to initiate formal consultation with the Department to:

- Seek the Departments feedback regarding any specific issues or focus areas for the Audit
- Identify additional organisations to be consulted with in preparing the Audit

While the audit is not planned to formally commence for another 2 months, i seek your early advice regarding the above given the scale of the project. In this regard, I would be grateful for a response by 24 October.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Saturday, November 15, 2025 12:31:50 AM
To: info@cpa.nsw.gov.au
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Michael Waanders

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with EPA so any issues or focus areas that EPA may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Saturday, November 15, 2025 12:21:37 AM
To: council@wagga.nsw.gov.au
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Darryl Woods

Hi Darryl

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with Council so any issues or focus areas that Council may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Saturday, November 15, 2025 12:06:18 AM
To: council@yass.nsw.gov.au
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Chris Berry

Hi Chris

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with Council so any issues or focus areas that Council may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Friday, November 14, 2025 11:49:19 PM
To: council@goulburn.nsw.gov.au
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Scott Martin

Hi Scott,

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project with the site visit planned for February 2026. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with Council so any issues or focus areas that Council may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2026 would be greatly appreciated.

If you have any questions, please contact me as per my details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Friday, November 14, 2025 11:56:38 PM
To: info@svc.nsw.gov.au
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Steven Pinnuck

Hi Steven,

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with Council so any issues or focus areas that Council may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent on: Saturday, November 15, 2025 12:02:48 AM
To: council@upperlachlan.nsw.gov.au
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Attention: Simon Arkinstall

Hi Simon

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements | Planning](#).

The purpose of this email is to formally consult with Council so any issues or focus areas that Council may see relevant to the Audit may be considered by the Audit.

In this regard a response by 15 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775

From: Richard Peterson <richard.peterson-trigalana@outlook.com>

Sent on: Thursday, November 20, 2025 5:08:27 AM

To:

BCC: wagongalandsCouncil@gmail.com; blakneycreek@gmail.com; clive.freeman@y7mail.com; yurwang.gundanac.h.s@outlook.com; ngunawalhac@gmail.com; murrabidgeemullangari@yahoo.com.au; GulgunyaNHAC@hotmail.com; muragadi@yahoo.com.au; kevin.atkinson@ahvic.org.au; lillycarroll@y7mail.com; rlegg55@gmail.com; bobbo492@gmail.com; konanggo_consultancy@hotmail.com; corroboreecorp@bigpond.com; pd.ngunawalconsultancy@gmail.com; onerwal@gmail.com; pejarl@bigpond.com; thunderstonemg@gmail.com; burungunawal@gmail.com; yalmambirra@outlook.com; violetsheridan@hotmail.com; belindaevelynjean@outlook.com; ghal6522@bigpond.net.au; richie.allan@toac.com.au; didgengunawalclan@yahoo.com.au; onerwal@gmail.com; pejarl@bigpond.com

Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Registered Aboriginal Parties Consultation

Hi there

I have been appointed to undertake an Independent Environmental Audit of the Hume Link Project. Details of the project are here [HumeLink | Planning Portal - Department of Planning and Environment](#)

The Audit will commence in February 2026, and will be undertaken in accordance with the Department of Planning, Housing and Infrastructure - Post Approval Requirements [Independent Audit Post Approval Requirements Planning](#).

The purpose of this email is to formally consult with Registered Aboriginal Parties (RAPs) so any issues or focus areas you may see relevant to the Audit may be considered by the Audit.

In this regard a response by 20 December 2025 would be greatly appreciated.

If you have any questions, please contact me as per the details below.

Many thanks in advance



Richard Peterson | Director

Appendix E Photographs

Yass Accommodation Camp



Photo 1: Camp common areas



Photo 2: Camp facilities



Photo 3: Carpark



Photo 4: External bund and boundary fence



Photo 5: Stabilised batter and internal drain



Photo 6: Site drainage and rehabilitation



Photo 7: Stabilised batter



Photo 8: Internal drainage and stabilised batter



Photo 9: Sediment basin advisory sign



Photo 10: Water treatment system



Photo 11: Camp water treatment system



Photo 12: Fire water tank



Photo 13: Mobile fire fighting equipment



Photo 14: Fire fighting equipment test record



Photo 15: Fire extinguisher



Photo 16: Mobile fire fighting equipment

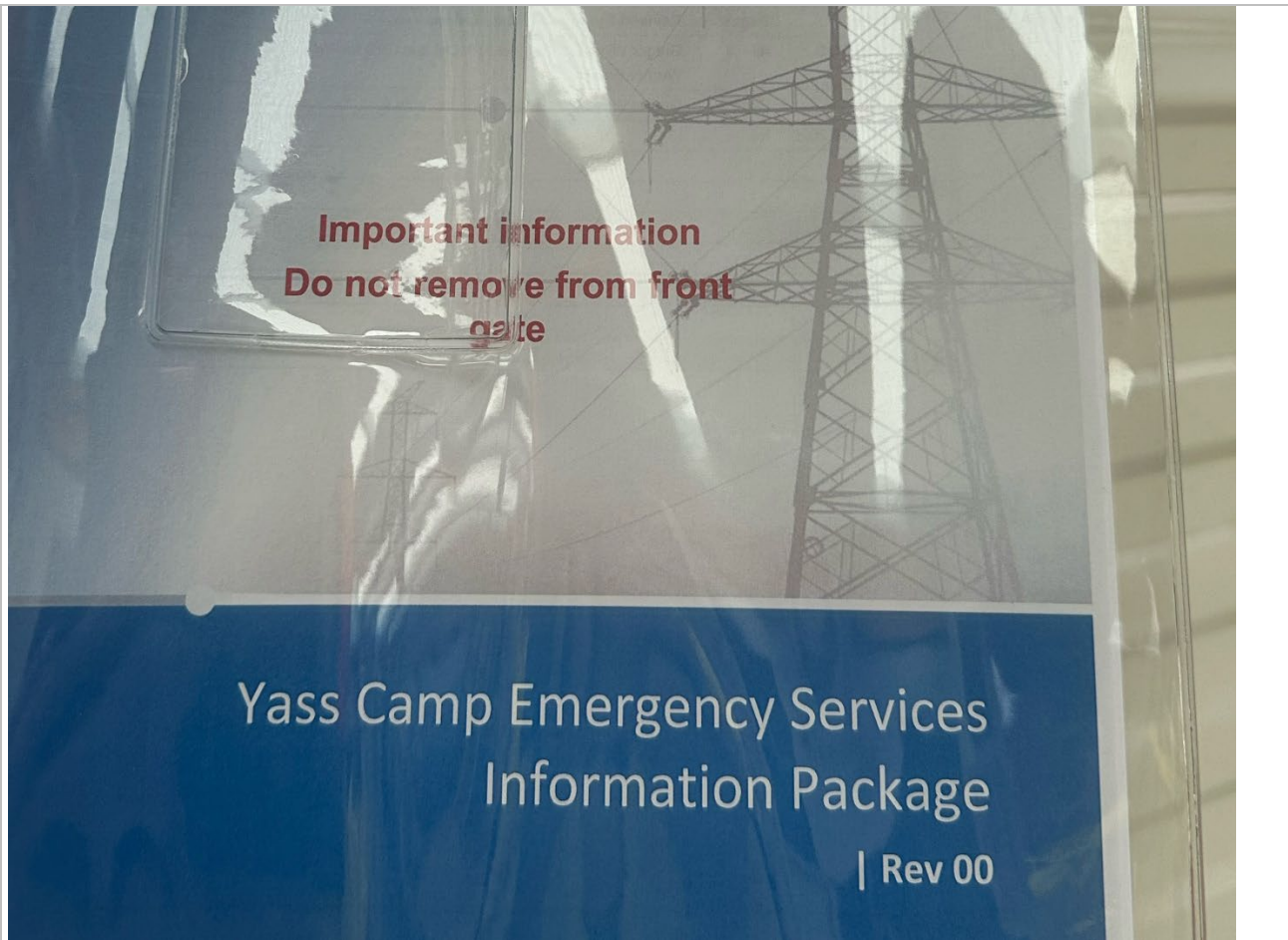


Photo 17: Emergency services information package

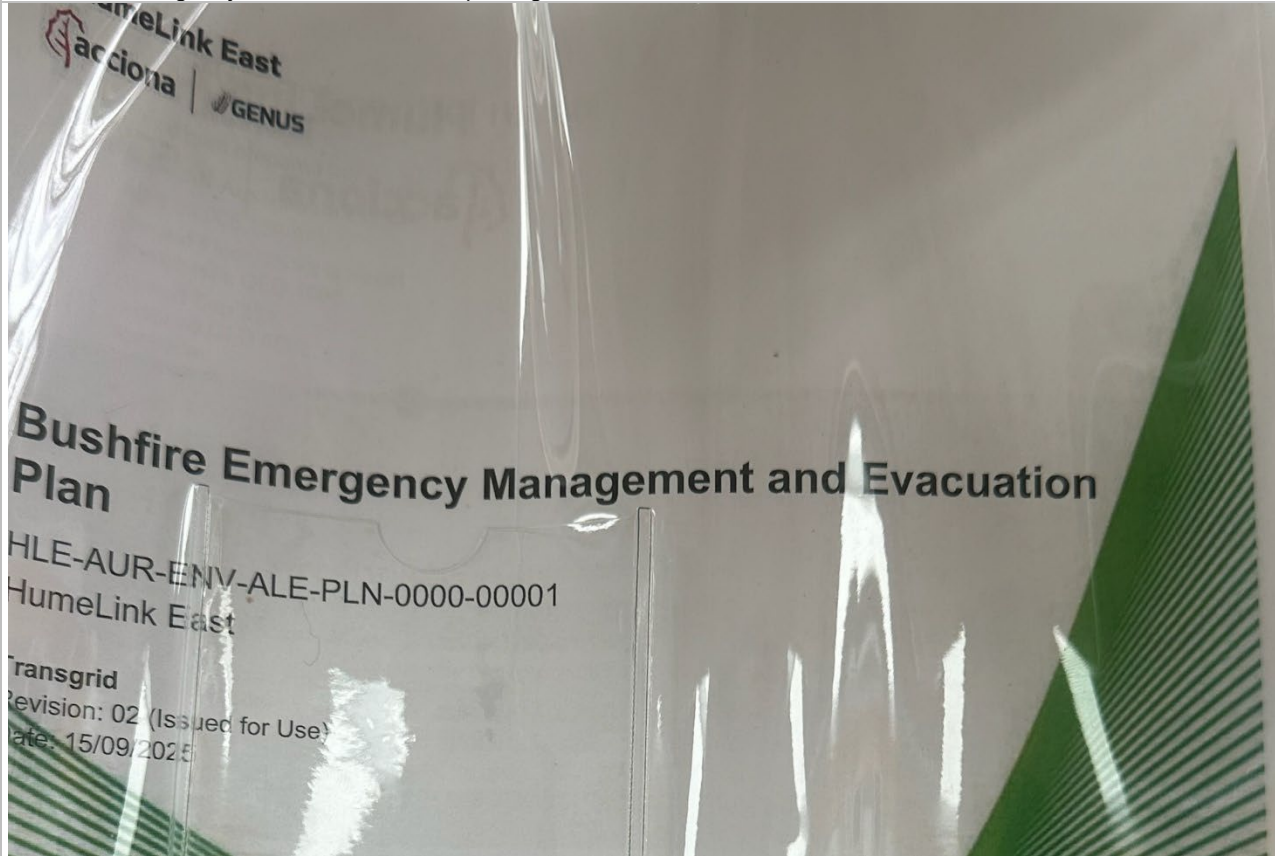


Photo 18: Bushfire and emergency plan



Photo 19: Pre-start site notice board



Photo 20: Spill kits



Photo 21: Bunded concrete washout area



Photo 22: Chemical containment bunding



Photo 23: Chemical storage – workshop



Photo 24: Chemicals stored in mobile bunding



Photo 25: Double skinned tank



Photo 26: Waste and recycling bins (domestic waste)



Photo 27: Waste and recycling bins (construction waste)



Photo 28: Low level security lighting



Photo 29: Nest box storage



Photo 30: Nest Box



Photo 31: Food dehydration unit



Photo 32: EV recharging station

Bannaby Substation



Photo 33: General construction



Photo 34: General Construction



Photo 35: General construction and embankment rehabilitation



Photo 36: Piling Activities



Photo 37: Internal access road and lockable gate



Photo 38: Site access road and traffic advisory signage



Photo 39 : Internal drainage and water cart



Photo 40: Sediment basin



Photo 41: Stockpile watering for dust suppression

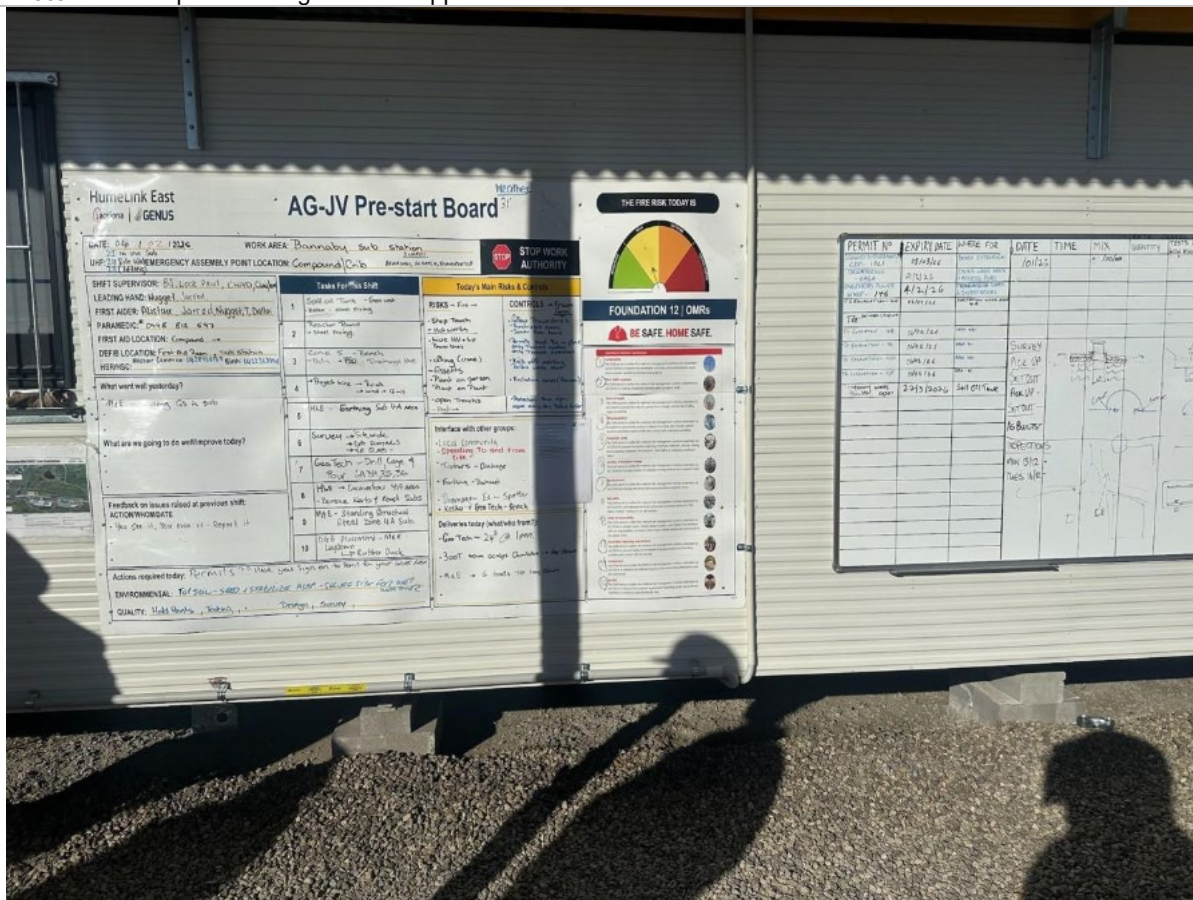


Photo 42: Prestart notice board



Photo 43: Trailer mounted fire fighting unit



Photo 44: Chemical storage container



Photo 45: Waste and recycling skip bins



Photo 46: Colour coded flagging system



Photo 47: Tree protection flagging and environmental protection (no go signage)

General Alignment



Photo 48: Access point signage



Photo 49: Access point and cattle grid



Photo 50: Graded access and topsoil preserved for rehabilitation



Photo 51: Stabilised construction PAD ready for piling contractor



Photo 52: Tower base installation



Photo 53: Traffic access signage and sealed intersection



Photo 54: Boundary marker



Photo 55: Rehabilitated batter



Photo 56: Rehabilitated construction PAD



Photo 57: Tower PAD excavation and rock sediment bunds



Photo 58: Rock sediment check bund



Photo 59: Truck mounted polymer spray



Photo 60: Culvert creek crossing



Photo 61: Nest box



Photo 62: Habitat tree and no go zone flagging



Photo 63: Vehicle hygiene signage



Photo 64: Vehicle hygiene washdown bay



Photo 65: Retained timber for habitat reuse and sediment control



Photo 66: Rock habitat feature



Photo 67: Trailer mounted fire fighting unit



Photo 68: Mobile spill kit

Appendix F Specialist Report - Biodiversity



HumeLink East

Independent Environmental Audit –
Biodiversity

Prepared for Transgrid

8 May 2026





Document overview

Transgrid

N250044|1

8 May 2026

| Version | Date | Prepared by | Reviewed by | Comments |
|---------|---------------|---------------|--|-----------------------------------|
| 1.0 | 28 April 2026 | Nathan Garvey | Richard Petersen (Trigalana Environment) | Initial draft for review |
| 2.0 | 8 May 2026 | Nathan Garvey | Richard Petersen (Trigalana Environment) | Updated to address comments |

Approved by

Nathan Garvey

Director | Principal Advisor

8 May 2026

This report has been prepared by Nature Positive Advisory Pty Ltd for the exclusive use of Transgrid and for the specific purpose stated in the report. The information, opinions, and recommendations presented are based on the scope of work, data, and methodologies outlined within the report and apply only to the project area and timeframe specified.

Nature Positive Advisory Pty Ltd has exercised due care and professional judgment in the preparation of this report, consistent with the relevant standards and current scientific and legislative frameworks applicable in Australia. However, no representation or warranty is made as to the accuracy, completeness, or suitability of the information provided for other projects, sites, or uses.

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Table of Contents

| | |
|---|-----------|
| Document overview | 2 |
| Abbreviations | 5 |
| Executive E. Executive Summary | 7 |
| 1 Project overview | 8 |
| 1.1 Project background | 8 |
| 1.2 Key project features | 8 |
| 1.3 Project approval..... | 10 |
| 1.4 Supplementary approvals and licences | 10 |
| 1.5 Auditor | 10 |
| 1.6 Audit objectives | 11 |
| 1.7 Audit scope and period..... | 11 |
| 2 Independent audit methodology | 18 |
| 2.1 Scope development | 18 |
| 2.2 Stakeholder consultation..... | 18 |
| 2.3 Summary of the audit process..... | 18 |
| 2.4 Opening meeting..... | 18 |
| 2.5 Site inspection | 19 |
| 2.6 Audit interview | 22 |
| 2.7 Document review..... | 22 |
| 2.8 Compliance descriptors | 23 |
| 2.9 Closing meeting..... | 23 |
| 3 Audit findings | 24 |
| 3.1 Compliance performance | 24 |
| 3.2 Summary of agency notices, orders, penalty notices and prosecutions | 31 |
| 3.3 Incidents | 31 |
| 3.4 Status of recommendations from previous Audits..... | 32 |
| 3.5 Stakeholder consultation outcomes | 32 |
| 3.6 Adequacy of Environmental Management Plans | 36 |
| 4 Actual versus predicted impacts | 37 |
| 4.1 Predictions made by the EIS | 37 |
| 4.2 Project boundary | 37 |
| 4.3 Biodiversity clearing limits..... | 38 |



| | | |
|-------------|--|----|
| 4.4 | Keystrengths | 39 |
| Appendix A. | Approval of Biodiversity Expert | 40 |
| Appendix B. | Photographs from the site inspection | 43 |
| Appendix C. | Consultation with CPHR | 55 |
| Appendix D. | Audit table..... | 68 |

Tables

| | | |
|------------|---|----|
| Table 1-1: | Auditor details | 11 |
| Table 1-2: | Independent Audit – Requirements | 12 |
| Table 1-3: | Biodiversity related conditions | 12 |
| Table 2-1: | Site inspection – key observations | 19 |
| Table 2-2: | Audit interview attendees | 22 |
| Table 2-3: | Compliance Descriptors | 23 |
| Table 2-4: | Closing meeting attendees | 23 |
| Table 3-1: | Biodiversity related conditions | 24 |
| Table 3-2: | Non compliances, observations, and recommendations..... | 25 |
| Table 3-3: | Key issues raised by CPHR and Auditor response | 33 |

Figures

| | | |
|-------------|--|----|
| Figure 1-1: | Humelink project – general alignment (source: Transgrid) | 9 |
| Figure 1-2: | Humelink East – key features and extent (source: Transgrid)..... | 10 |



Abbreviations

Commonly used acronyms in this Audit report are described below.

| Abbreviation | Description |
|---------------------|---|
| AAM | Additional and Appropriate Measures |
| AEMO | Australian Energy Market Operator |
| AGJV | Acciona and Genus Joint Venture |
| BAM | Biodiversity Assessment Method |
| BAVR | Biodiversity Assessment Verification Report |
| BMP | Biodiversity Management Plan |
| BOP | Biodiversity Offset Package |
| CEEC | critically endangered ecological community |
| CoA | Conditions Of Approval |
| Commonwealth DCCEEW | Commonwealth Department of Climate Change, Energy, the Environment and Water |
| CPESC | Certified Professional in Erosion and Sediment Control |
| CPHR | Conservation Programs and Heritage Regulation division |
| CSSI | Critical State Significant Infrastructure |
| DPHI | NSW Department of Planning, Housing and Infrastructure (|
| ECZ | Easement Clearing Zone |
| EIS | Environmental Impact Statement |
| EMS | Environmental Management Strategy |
| EPBC Act | Commonwealth <i>Environmental Protection and Biodiversity Conservation Act 1999</i> |
| FLP | Final Layout Plan |
| HLE | HumeLink East |
| HTZ | hazard tree zone |
| IAPARs | Independent Audit Post Approval Requirements |
| IEA | Independent Environmental Audit |
| km | kilometre |
| kV | kilovolt |
| LGA | local government area |
| NEM | National Electricity Market |
| NRAR | NSW Natural Resources Access Regulator |
| NSW | New South Wales |



| Abbreviation | Description |
|-------------------|---|
| NSW DCCEEW | NSW Department of Climate Change, Energy, the Environment and Water |
| REZ | Renewable Energy Zone |
| SAII | serious and irreversible impacts |
| SBS | Supplementary Biodiversity Strategy |
| TCZ | Total Clearing Zone |
| TEC | threatened ecological community |



Executive E. Executive Summary

Nature Positive Advisory Pty Ltd has been engaged to undertake an independent Audit of the HumeLink East (HLE) Project. The HLE Project involves the expansion of the existing Bannaby 500 kilovolt (kV) substation, along with the design and construction of a new 500 kV double circuit transmission line. This new transmission line will connect the Bannaby 500 kV substation at the Wondalga interface point with HumeLink West. Development Consent (SSI 36656827) covers both the construction and operational phases of the Project. The Project Proponent is NSW Electricity Networks Operations Pty Ltd (from here referred to as Transgrid). The construction contractor is the Acciona Genus Joint Venture (AGJV).

The Audit is required to assess compliance of the HLE Project with the biodiversity related conditions of approval (CoA) and the implementation of management plans as outlined in the CoA. The Audit has been undertaken in accordance with the Department of Planning, Housing and Infrastructure (DPHI) Post Approval Requirements (May 2020).

The Audit covers construction activities for the period from the date of commencement of the Project on 22 November 2024 to the Audit site inspection on 11 February 2026. The Audit consisted of a site inspection, interview with key project personnel and a review of biodiversity related management plans, project documents and management records.

A general site inspection was undertaken on by the Biodiversity Specialist on the 11 of February 2026. Members of AGJV and Transgrid teams were present for the inspection.

Key findings of the Audit are:

- The Project is in the early stages with clearing limited to clearing of the total clearing zone (TCZ) for the purposes of establishing accommodation camps, upgrade to the existing substation at Bannaby, construction of internal access roads, localised clearing for tower pads, construction of footings and erection of towers. No clearing of the easement clearing zone (ECZ) or hazard tree zone (HTZ) had commenced.
- Two non-compliances, related to clearing outside the project boundary, have had impacts on biodiversity values.
- One observation was made of erosion of the bund wall at Tower 55 during the site inspection, with deposition of sediment outside the total clearing zone due to ineffective sediment controls. This was investigated by AGJV and found not to meet the criteria of non-compliance/non-conformance or Incident as per the Project Environmental Management Strategy (EMS).
- Fourteen observations are made with associated recommendations for improvement.
- A number of key strengths are identified.

Overall, the HLE project is considered to be generally compliant with the Infrastructure Approval.



1 Project overview

1.1 Project background

The Australian energy landscape is transitioning to a greater mix of low-emission renewable energy sources, such as wind and solar. To support this transition, Transgrid has received approval to increase the energy network capacity in southern New South Wales (NSW) through the development of around 365 kilometres (km) of new 500 kilovolt (kV) high-voltage transmission lines and associated infrastructure between Wagga Wagga, Bannaby and Maragle. This project is collectively referred to as HumeLink. The Project is located across six Local Government Areas (LGAs) including Wagga Wagga City, Snowy Valleys, Cootamundra-Gundagai Regional, Upper Lachlan Shire, Yass Valley and Goulburn-Mulwaree.

HumeLink involves construction of a new substation east of Wagga Wagga as well as connection to existing substations at Wagga Wagga and Bannaby and a future substation at Maragle in the Snowy Mountains (referred to as the future Maragle 500 kV substation). The future Maragle 500 kV substation was subject to a separate major project assessment and approval (reference SSI-9717, EPBC 2018/836).

HumeLink is a priority project for the Australian Energy Market Operator (AEMO) and the Commonwealth and NSW governments and was declared as Critical State Significant Infrastructure (CSSI). The Project will deliver a cheaper, more reliable and more sustainable grid by increasing the amount of renewable energy that can be delivered across the national electricity grid, helping to transition Australia to a low carbon future. It will achieve this by supporting the transfer of energy from existing renewable generation as well as facilitate development of new renewable generation in the declared South West Renewable Energy Zone (REZ) and candidate Wagga Wagga and Tumut REZs. The Project will provide the required support for the network in southern NSW, allowing for the increase in transfer capacity between new renewable generation sources and the state's demand centres of Sydney, Newcastle and Wollongong. The Project will also improve the efficiency and reliability of the current energy transfer in this part of the network. Furthermore, HumeLink will form a key part of the transmission line infrastructure that supports the transfer of energy within the National Electricity Market (NEM) by connecting with other major interconnectors.

1.2 Key project features

The key components of the Project include:

- construction and operation of around 365 km of new double circuit 500 kV transmission lines and associated infrastructure between Wagga Wagga, Bannaby and Maragle,
- construction of a new 500/330 kV substation at Gregadoo (Gugaa 500 kV substation) approximately km south-east of the existing Wagga 330/132 kV substation (Wagga 330 kV substation),
- demolition and rebuild of a section of Line 51 (around 2 km in length) as a double circuit 330 kV transmission line connecting into the Wagga 330 kV substation,
- modification of the existing Wagga 330 kV substation and Bannaby 500/330 kV substation (Bannaby 500 kV substation) to accommodate the new transmission line connections,



- connection of transmission lines to the future Maragle 500/330 kV substation (Maragle 500 kV substation, approved under the Snowy 2.0 Transmission Connection Project (SSI-9717)),
- additional telecommunications connections to existing substations,
- establishment of new and/or upgraded temporary and permanent access tracks, and
- ancillary works required for construction of the Project such as construction compounds, worker accommodation facilities, utility connections and/or relocations, brake and winch sites, and helipad/helicopter support facilities.

Figure 1-1 shows the overall alignment of the HumeLink Project, Figure 1-2 shows the key features and extent of the HumeLink East (HLE) Project, the subject of this Audit.

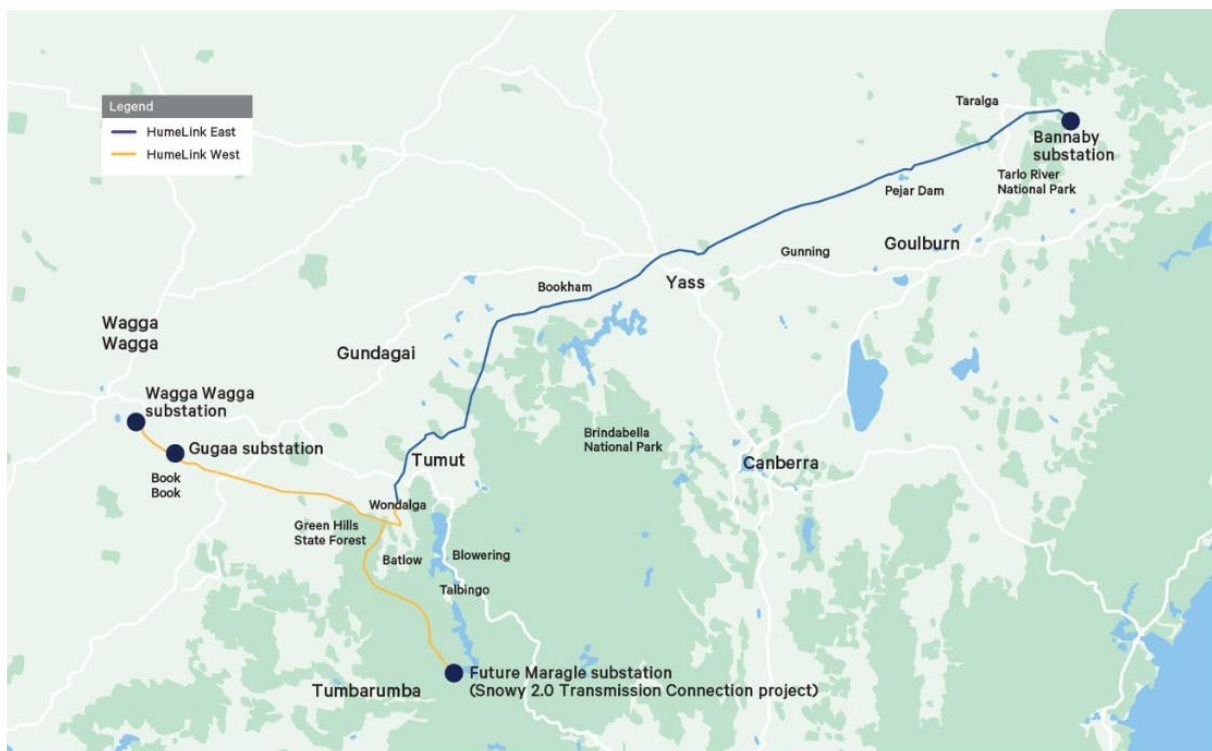


Figure 1-1: Humelink project – general alignment (source: Transgrid)

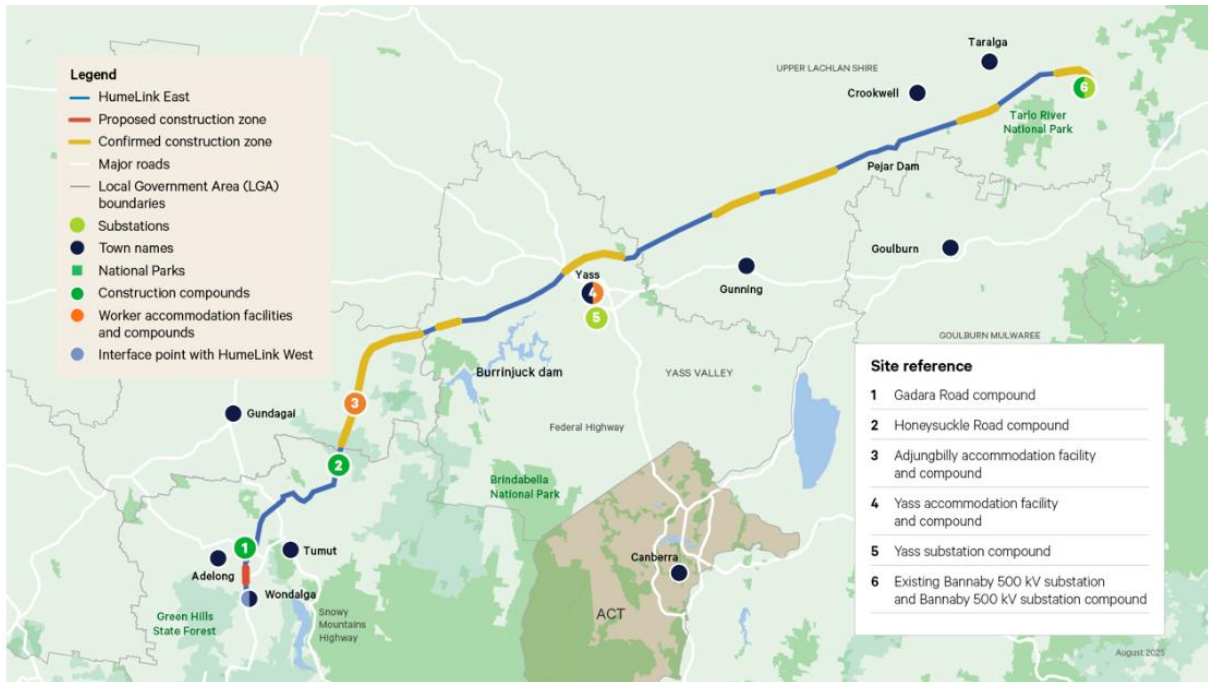


Figure 1-2: Humelink East – key features and extent (source: Transgrid)

1.3 Project approval

The Project is designated CSSI and was subject to an Environmental Impact Statement (EIS). The EIS, with accompanying documents were publicly displayed. Following public display, response to submissions and further studies, the EIS was approved by the NSW Minister for Planning. The Project instrument of approval (SSI 36656827) was issued on 13 November 2024 and documents conditions that are to be complied with during the construction and operational stages of the HumeLink Project.

1.4 Supplementary approvals and licences

In addition to the Planning Approval (SSI 36656827), approval under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) has been obtained. This approval (reference EPBC 2021/9121) was granted by the Australian Minister for the Environment on 18 December 2024.

The conditions of the EPBC Approval (EPBC 2021/9121) are not included in the scope of this Audit.

1.5 Auditor

Trigalana Environmental Pty Ltd has been appointed as the Lead Auditor to undertake the independent environmental audit (IEA).

The NSW Department of Planning, Housing and Infrastructure (DPHI) requested that a biodiversity/ecology expert, with Biodiversity Assessment Method (BAM) accreditation, be appointed for the IEA. Nathan Garvey of Nature Positive Advisory Pty Ltd (N+A) was nominated as the biodiversity/ecology expert. Nathan was endorsed by DPHI in accordance with Condition C13 of the Infrastructure Approval (Appendix A). Auditor details are provided in Table 1-1.



Table 1-1: Auditor details

| Name and Role | Qualifications | Key Experience |
|--|--|---|
| Nathan Garvey Biodiversity / ecology expert | BSc GradDip (BioSci) BAM Accredited Assessor (BAAS17037) CEnvP FEIANZ | Nathan is an experienced ecologist with over 25 years' practice in leading ecological assessments and approvals across eastern Australia. He is one of NSW's leading experts in biodiversity approvals and offsetting. Nathan is an accredited BAM assessor and a current serving member of both the Independent Expert Advisory Panel for Energy Assessment and Independent Expert Advisory Panel for Mining. Relevant project experience includes: <ul style="list-style-type: none"> • Mount Pleasant Operations independent environmental audit • Kooragang Island Waste Emplacement facility independent environmental audit • Independent Expert Advisory Panel for Mining: Metropolitan Mine Longwalls 312 to 316 Extraction Plan Review • Independent Expert Advisory Panel for Energy Assessment: Stratford Pumped Hydro • Springvale Colliery Independent Monitoring Panel – Biodiversity expert • Independent Expert Advisory Panel for Mining: Large Swamp Environmental Assessment Requirements for Extraction Plan for Metropolitan Mine Longwalls 311 to 316 • Independent Expert Advisory Panel for Mining: Dendrobium Coal Mine – Longwall 19A Subsidence Management Plan • Independent Expert Advisory Panel for Mining: Moolarben Coal Complex Stage 2 Modification 4 |

1.6 Audit objectives

The key objectives of the IEA are to assess compliance of the Project with the biodiversity related conditions of approval (CoA) and the implementation of management plans as outlined in the CoA. The Audit is to recognise good practices while providing practical and reasonable recommendations for improvement that can be implemented throughout the project as construction continues.

1.7 Audit scope and period

This Audit has been undertaken in accordance with Schedule 2 Condition C13 of the Infrastructure Approval. These conditions are outlined in Table 1-2 below.



Table 1-2: Independent Audit – Requirements

| Condition Reference | Condition | Comment |
|---------------------|--|--|
| C13 | Independent Audits of the SSI must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020) or as updated from time to time and published on the Department’s website. | The scope of the IEA was undertaken in accordance with the Independent Audit Post Approval Requirements (IAPARs) (2020). The scope of each Audit was defined in the Audit program and further developed in consultation with DPHI and other relevant stakeholders as requested by DPHI. Prior to the commencement of the Audit, the Audit team, including the Ecology/Biodiversity expert, were approved by DPHI (refer to Appendix A for DPHI letter of approval). |

The scope of the biodiversity/ecology expert was focused on relevant conditions of the Infrastructure Approval as set out in Table 1-3.

Table 1-3: Biodiversity related conditions

| Condition Reference | Condition |
|---------------------|---|
| A1 | OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT In meeting the specific performance measures and criteria in 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 pre-construction minor works, road upgrades, construction, operation, rehabilitation or decommissioning of the development. |
| B22 | Riparian Areas The Proponent must ensure all activities on waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (DPE 2022), 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 Water Group and DPIRD Fisheries agrees otherwise. |
| B25 | Restrictions on Clearing and Habitat Unless otherwise agreed with the Planning Secretary, the Proponent must: (a) ensure that the vegetation and habitat clearing limits specified in Table 2-1, Table 2-2 and Table 2-3 of Appendix 2 are not exceeded; and (b) minimise: (i) the impacts of the development on hollow-bearing trees; (ii) the impacts of the development on threatened species; and (iii) the clearing of native vegetation and key habitat; and (c) not undertake any works that result in ground disturbance within a minimum setback distance of 50 metres from PCT 637 – Alpine and sub-alpine peatlands, damp herbfields and fens, South Eastern Highlands Bioregion and Australian Alps Bioregion and 30 metres from known locations of <i>Prasophyllum bagoense</i> , <i>Prasophyllum kelttoni</i> and <i>Pterostylis oreophila</i> as mapped in the BDAR. |



| Condition Reference | Condition |
|---------------------|--|
| <p>B26</p> | <p>Biodiversity Offset Package</p> <p>Prior to carrying out any development that would impact on biodiversity values requiring offset or within 3 months of the date of the Project Approval whichever is sooner, the Proponent must update the Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT and to the satisfaction of the Planning 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, as determined in accordance with a BCF Charge Statement indexed on a monthly basis in accordance with the Biodiversity Offsets Payment Calculator Order 2022; (c) the timing and responsibilities for the implementation and delivery of the measures required in the Package; (d) a report to be provided every 6 months from the approval of the updated Package to the Planning Secretary, BCS and the BCT setting out the progress towards delivering each specific biodiversity offset measure; and (e) confirmation that the biodiversity offset measures will have been implemented and delivered no later than 13 November 2026, unless otherwise agreed with the Planning Secretary. <p>Following the Planning Secretary's approval, the Proponent must implement and deliver the Biodiversity Offset Package.</p> |
| <p>B27</p> | <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 \$502,332,107, in accordance with the Deed of Agreement with the Planning Secretary (or delegate) executed on 10 October 2024. The Proponent must comply with the terms of the Deed.</p> |



| Condition Reference | Condition |
|---------------------|---|
| B28 | <p data-bbox="352 439 775 465">Supplementary Biodiversity Strategy</p> <p data-bbox="352 477 1378 663">Prior to carrying out any development that would impact on the relevant biodiversity values (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Supplementary Biodiversity Strategy as committed to in the EIS, in consultation with BCS and to the satisfaction of the Planning Secretary. Unless otherwise agreed by the Planning Secretary, the Strategy must:</p> <p data-bbox="352 674 1331 763">(a) be peer reviewed by a suitably qualified, experienced and independent biodiversity consultant with Biodiversity Assessment Method (2020) (BAM) Accreditation whose appointment has been endorsed by the Planning Secretary;</p> <p data-bbox="352 775 1378 898">(b) detail survey methods for all entities to be targeted by the Strategy, in accordance with the Biodiversity Assessment Method (2020) and any other guidance document that is relevant and applicable at the time surveys were undertaken or the BDAR was prepared, including but not limited to:</p> <p data-bbox="352 909 1331 999">(i) surveys within unsurveyed areas of the development area identified in the EIS where a reduction in credit liability for the relevant biodiversity value assumed present is being sought;</p> <p data-bbox="352 1010 1166 1037">(ii) surveys for the following serious and irreversible impact (SAIL) entities:</p> <ul data-bbox="352 1048 884 1780" style="list-style-type: none">• <i>Prasophyllum bagoense</i>• <i>Grevillea iaspicula</i>• <i>Pterostylis oreophila</i>• <i>Pomaderris pallida</i>• <i>Caladenia concolor</i>• <i>Mixophyes balbus</i>• <i>Genoplesium superburn</i>• <i>Prasophyllum keltonii</i>• <i>Pomaderris delicatata</i>• <i>Bossiae fragrans</i>• <i>Litoria castanea</i>• <i>Eucalyptus robertsonii</i> subsp. <i>hemisphaerica</i>• <i>Prasophyllum innubum</i>• <i>Solanum armourense</i>• <i>Grevillea wilkinsonii</i>• <i>Calotis glandulosa</i>• <i>Chalinolobus dwyeri</i>• <i>Pseudomy fumeus</i>• <i>Tyto tenebricosa</i>• <i>Pimelea bracteata</i> |



| Condition Reference | Condition |
|---------------------|--|
| B29 | <p data-bbox="352 439 852 465">Biodiversity Assessment Verification Report</p> <p data-bbox="352 477 1394 689">Unless otherwise agreed by the Planning Secretary, prior to carrying out any development that would impact on the relevant biodiversity values subject to survey in the Supplementary Biodiversity Strategy in condition B28 (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Biodiversity Assessment Verification Report in consultation with BCS and to the satisfaction of the Planning Secretary. The Report must:</p> <ul data-bbox="352 701 1394 1305" style="list-style-type: none"><li data-bbox="352 701 1394 790">(a) be prepared by a suitably qualified, experienced and independent biodiversity consultant with Biodiversity Assessment Method (2020) (BAM) Accreditation whose appointment has been endorsed by the Planning Secretary;<li data-bbox="352 801 1394 891">(b) be prepared in accordance with the Biodiversity Assessment Method (2020) and any other guidance document that is relevant and applicable at the time surveys were undertaken or the BDAR was prepared;<li data-bbox="352 902 1394 992">(c) be prepared with regard to the final layout plans for the development required under condition C8, including the location of final access routes within each clearing zone and stockpile locations;<li data-bbox="352 1003 1394 1305">(d) include:<ul data-bbox="352 1037 1394 1216" style="list-style-type: none"><li data-bbox="352 1037 1394 1070">(i) detail of the outcomes of surveys undertaken in accordance with condition B28;<li data-bbox="352 1081 1394 1216">(ii) where species are found to be present following the surveys undertaken under condition B28 or that are assumed to be present, identify measures to avoid and / or mitigate the impact to those entities for inclusion in a revised version of the Biodiversity Management Plan required under condition B30;<li data-bbox="352 1227 1394 1305">(e) provide findings and recommendations relating to the matters in (d), including, but not limited to, reducing the relevant credit obligations and calculating credit obligations for unexpected finds. <p data-bbox="352 1317 1394 1496">Any required changes to biodiversity offset or mitigation measures arising from the Biodiversity Assessment Verification Report must be incorporated into an updated version of the Biodiversity Offset Package under condition B26 in consultation with BCS and BCT and addressed in a revised version of the Biodiversity Management Plan required under condition B30, in consultation with BCS and FCNSW, to the satisfaction of the Planning Secretary.</p> |

**B30****Biodiversity Management Plan**

Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:

- (a) be prepared by a suitably qualified and experienced biodiversity expert/s;
- (b) be prepared in consultation with BCS and FCNSW;
- (c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024);
- (d) include a description of the measures that would be implemented for:
 - (i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29;
 - (ii) minimising:
 - the amount of vegetation clearing on site;
 - the loss of key fauna habitat (including tree hollows);
 - the impacts of fauna on site, including undertaking pre-clearance surveys; and
 - potential indirect impacts on threatened flora and fauna species;
 - (iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;
 - (iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for:
 - all work in the associated location to stop to prevent further impact, and
 - notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and
 - relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work;
 - (v) connectivity strategy for the potentially impacted species identified in the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024) and a Supplementary Hollow and Nest Strategy;
 - (vi) protecting the conservation values of McPhersons Plain and avoiding impacts to *Prasophyllum bagoensis*, *Prasophyllum kelttoni* and *Pterostylis oreophila*;
 - (vii) rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable native species;
 - (viii) progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan;
 - (ix) 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 revegetation of the site;
 - (x) collecting and propagating seed (where relevant);
 - (xi) controlling erosion, weeds and feral pests;
 - (xii) bushfire management;
 - (xiii) minimising impacts on entities at risk of a serious and irreversible impact (SAIL), including for Box Gum Woodland, Rice Flower (*Pimelea bracteata*) and Sooty Owl (*Tyto tenebricosa*) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September



| Condition Reference | Condition |
|---------------------|---|
| | <p>2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); and</p> <p>(e) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p> <p>Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67."</p> |

DPHI also requested that the biodiversity/ecology expert review, in detail, the specific conditions of approval relevant to biodiversity as well as the implementation of the management plans.

The Audit period is from the commencement of work on 22 November 2024 to the date of the Audit site inspection on the 11 February 2026.



2 Independent audit methodology

2.1 Scope development

The Audit scope was developed in consideration of:

- the IAPARs,
- HumeLink Conditions of Approval (SSI 36656827) dated 13 November 2024, and
- stakeholder feedback from the Conservation Programs and Heritage Regulation division (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW).

The scope of the Audit did not include an assessment of compliance with any supplementary approvals or licences or verification of design aspects of the project.

Further details on scope are provided in the Lead Auditors report.

2.2 Stakeholder consultation

Stakeholder feedback was sought from the CPHR. This included:

- an initial request for consultation issued by the Lead Auditor on 15 November 2025 with a request for feedback by the 15 December 2025,
- a follow up email issued by the Lead Auditor on 19 January 2026 requesting feedback,
- a meeting with representatives from CPHR held on 21 January 2026.

Additional information was provided by CPHR on 30 January 2026 via email expanding on issues raised during the consultation meeting. Consultation is attached at Appendix C. Key issues raised by CPHR are summarised in Section 3.5.

The NSW Natural Resources Access Regulator (NRAR) and Commonwealth Department of Climate Change, Energy, the Environment and Water (Commonwealth DCCEEW) were contacted regarding providing feedback on the HumeLink project. Commonwealth DCCEEW declined to comment and referred the auditors to CPHR. NRAR referred the Auditor to NSW DCCEEW (Water).

2.3 Summary of the audit process

The audit process involved the following steps

- Opening meeting
- Site inspection, noting environmental practices and controls
- Audit Interviews
- Review of documents and records
- Closing meeting.

2.4 Opening meeting

Refer to the main audit report.



2.5 Site inspection

A site inspection was undertaken by Nathan Garvey on 11 February 2026 with representatives of Acciona and Genus Joint Venture (AGJV) and Transgrid. The site inspection included:

- inspection of property BY-030 where:
 - an access track had been constructed, with measures put in place during construction to protect the Hoary Sunray (*Leucochrysum albicans* subsp. *tricolor*),
 - waterway crossing of an unnamed third-order tributary of Cowpers Creek in BY-030,
 - tower pad for Tower 55 in BY-030, and
- inspection of property BY-040 where:
 - pre-clearing surveys had been undertaken,
 - the clearing permit process for the total clearing zone (TCZ) had been completed,
 - an additional waterway crossing of an unnamed second-order stream was being constructed,
 - general features such as habitat trees and weeds were observed,
 - an environmental exclusion zone had been established due to presence of a connectivity corridor, and
 - nest boxes were being installed.

At the time of the site inspection no clearing was being undertaken, so active clearing procedures could not be inspected. In addition, AGJV is in the process of updating the final layout plan (FLP), with only the TCZ finalised. As a result, works on HLE to date have included clearing of the TCZ, with partial clearing of the easement clearing zone (ECZ) and hazard tree zone (HTZ) yet to commence and no areas of partial clearing were inspected.

Key observations made during those inspections are summarised in Table 2-1 below with site inspection photographs provided in Appendix B.

Table 2-1: Site inspection – key observations

| Aspect | Observations | Photo reference (Appendix B) |
|--------------------------|---|------------------------------|
| BY-030 | | |
| Waterway crossing | <p>The waterway crossing was well established with four corrugated pipe culverts under the access track and pools at both the upstream and downstream extents. The upstream pool was dry, but water was observed in the downstream pool. During the site inspection there was minimal to no flow along the stream with the pipe culverts dry at the downstream and upstream extents.</p> <p>At the downstream extent, the pipe culverts sit slightly above bed level but would be likely to provide flow during even minimal flow conditions.</p> | Photo 1 to Photo 4 |



| Aspect | Observations | Photo reference (Appendix B) |
|--|---|------------------------------|
| Hoary Sunray protection fencing | At the time of the site inspection, the construction of the access road had been completed, and mitigation measures had been removed. Photographic evidence was provided by Transgrid showing protection fencing and "no-go" signage installed adjacent to the access track during construction. The site inspection indicated there was no damage to species habitat evident post construction. | - |
| Tower 55 | <p>Vegetation clearing and earthworks had been completed and the tower pad had been fully installed. The pad was constructed on a slope and had been levelled with cuts at the upslope extent and fill at the downslope extent. A bund wall was established around the pad to direct drainage, with a drop structure installed in the middle of the pad. Coarse woody debris was stockpiled around the outer edge of the pad as a sediment control measure. There were some gaps in the extent of this debris (see below).</p> <p>During the site inspection failure of the bund wall was observed. Over 30 millimetres (mm) of rain had fallen between 8-10 February 2026¹, resulting in the bund wall at the south-eastern extent of the pad failing and sediment being deposited downslope of the pad and outside of the TCZ and into areas of derived grassland, largely due to a gap in sediment control measures. The deposition of sediment was observed to be relatively minor but had spread downslope towards an unnamed third-order tributary of Cowpers Creek.</p> | Photo 5 to Photo 10 |
| BY-040 | | |
| Permitting process | <p>Copies of both pre-clearing reports and clearing permits were available on-site, along with relevant daily checklists. A good process for approval of clearing permits was evident, and it was positive to see copies readily available and easily accessed.</p> <p>Review of the daily ecology checklist from the 10 February 2026 noted "<i>Legless Lizard relocated into existing hole</i>". Given this note, it was unclear whether this was a potential unexpected find of the Striped Legless Lizard (<i>Delma impar</i>), which would be a significant range extension, or the Pink-tailed Legless Lizard (<i>Aprasia parapulchella</i>), which is known to occur nearby. No documentation was available indicating whether this had been resolved. The Project Manager from East Coast Ecology advised that the animal had self-relocated into a hollow. Tracking of documentation determined that this was the non-threatened <i>Delma inornata</i>.</p> <p>During the site inspection at BY-040 a difference in the data layers between the Project Ecologists (East Coast Ecology) and AGJV was observed. Following pre-clearing surveys, the access track had been modified, with potential for discrepancies to arise between areas assessed as a part of the pre-clearing process and subsequent clearing works.</p> | Photo 11 |

¹ Goulburn Airport weather station (<https://www.bom.gov.au/climate/dwo/202602/html/IDCJDW2049.202602.shtml>)



| Aspect | Observations | Photo reference (Appendix B) |
|------------------------------|---|------------------------------|
| Waterway crossing | <p>The waterway crossing was under construction at the time of the site inspection, with two pipe culverts being laid and the access track being established. The waterway was dry at the time of the site inspection.</p> <p>As for the previous waterway crossing, the pipe culverts sit slightly above bed level at the downstream extent noting that construction had not been finalised.</p> | Photo 12 to Photo 13 |
| General features | <p>Two habitat trees, identified during pre-clearing surveys, were scheduled to be retained due to changes in the alignment of the access road and the ECZ, demonstrating avoidance of biodiversity values during design.</p> <p>Discussion was held with the Project Ecologists on requirements for mapping of weeds during the pre-clearing process. The Biodiversity Management Plan (BMP) appears to contain two methods for documenting weed species:</p> <ul style="list-style-type: none"> • The Vegetation Clearing Procedure² requires that pre-clearing surveys count (or estimate if over 10 individuals) priority weed species. • The Biosecurity Management Plan³ requires baseline data collection, as a part of pre-clearing surveys, including identifying priority weeds and assigning a cover estimate category (Low [<5%], Moderate [<15%], or High [>15%]) for each priority weed species. <p>These methods are inconsistent and, as a result, appear not to have been comprehensively surveyed at some properties. The pre-clearing report for BY-040 documents a single occurrence of Serrated Tussock (<i>Nassella trichotoma</i>) within property BY-040. This compares to the site inspection where the species was noted to occur in low densities across open areas of the eastern portion of the property.</p> | Photo 14 to Photo 15 |
| Connectivity corridor | <p>Property BY-040 supports a connectivity corridor (CRO_3_21) which is modelled to provide connectivity for 'Other species' including Eastern Pygmy-possum (<i>Cercartetus nanus</i>) and Koala (<i>Phascolarctos cinereus</i>). During the site inspection the connectivity corridor was fenced off and identified as an environmental exclusion zone.</p> | Photo 16 to Photo 18 |

² See Section 3.1 of Appendix B: Vegetation Clearing Procedures (Rev 01.7) of the HumeLink East BMP.

³ See Section 4 of Appendix D: Biosecurity Management Plan (Rev 01.4) of the HumeLink East BMP.



| Aspect | Observations | Photo reference (Appendix B) |
|------------------------------|---|------------------------------|
| Nest box installation | <p>At the time of the site inspection, a team was on-site at BY-040 undertaking installation of nest boxes within the connectivity corridor (outside of the ECZ). The team included arborists undertaking tree climbing to install nest boxes under direction of Project Ecologists from East Coast Ecology and the Environmental Advisor from AGJV. A variety of nest boxes were being installed, including large nest boxes for owls, as well as smaller nest boxes for other species such as parrots, gliders and microbats.</p> <p>The site inspection included viewing of previously installed nest boxes as well as a hollow carved into a Eucalypt using the Hollow Hog.</p> <p>An overview of the nest box installation process and outcomes to date was provided by Nea Pilgrim (Environmental Advisor, AGJV) who is overseeing the nest box strategy.</p> | Photo 19 to Photo 24 |

2.6 Audit interview

Audit interviews were held throughout the site inspection with a formal interview process at the end of the site visit on 11 February 2026. Attendance is noted in Table 2-2.

Table 2-2: Audit interview attendees

| Name | Organisation | Role |
|------------------------|--------------------|--|
| Jon May | AGJV | Environment & Sustainability Manager, HumeLink East |
| Colm Kennedy | AGJV | Environment Manager, HumeLink East |
| Ciara Moriarty | AGJV | Environmental Approvals Advisor, HumeLink East |
| Ellis Lloyd | AGJV | Environmental Coordinator, HumeLink East |
| Mira Segaran | AGJV | Environmental Coordinator, HumeLink East |
| Michael Moroney | Transgrid | Senior Environmental Business Partner Major Projects |
| Peter Monsted | Transgrid | Senior Biodiversity Business Partner Major Projects |
| Chris Keogh | East Coast Ecology | Project Manager Senior Ecologist |
| Dom Wagner | East Coast Ecology | Project Ecologist |

An additional and separate audit interview was held with Peter Monsted (Transgrid) on 24 February 2026 to discuss aspects of the audit specific to Transgrid.

2.7 Document review

In undertaking the Audit, a broad range of documents were reviewed or referred to, including:

- HumeLink Infrastructure Approval condition (SSI 36656827)



- HumeLink Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024)
- HumeLink Biodiversity Offset Package (Version 5, dated 19 May 2025)
- HumeLink Supplementary Biodiversity Strategy (Version 13.2 dated 5 June 2025)
- HumeLink Biodiversity Assessment Verification Report (Revision 5.1, dated 29 August 2025)
- HumeLink East Biodiversity Management Sub-plan (Revision 01.7, dated 2 September 2025).

2.8 Compliance descriptors

The compliance status of each condition was determined using the relevant descriptors in and as described in the DPE (now DPHI) 2020 Auditing Post Approval Requirement and summarised in Table 2-3.

Table 2-3: Compliance Descriptors

| Status | Description |
|----------------------------|--|
| Compliant (C) | Sufficient verifiable evidence to demonstrate that all elements of the requirement have been completed. |
| Non- Compliant (NC) | One or more specific elements of the conditions or requirements have not been complied with within the scope of the Audit. |
| Not Triggered (NT) | A requirement has an activation or timing trigger that has not been met at the time when the Audit was undertaken. |

2.9 Closing meeting

Refer to the main audit report. A closing meeting was held on 6 May 2026 where the Auditor provided a summary of audit findings, recommendations and outlines the next steps for completion of the audit report. The closing meeting was attended by representatives of AGJV and Transgrid as detailed in Table 2-4.

Table 2-4: Closing meeting attendees

| Name | Organisation | Role |
|-------------------------|-----------------------|---|
| Jon May | AGJV | Environment & Sustainability Manager, HumeLink East |
| Colm Kennedy | AGJV | Environment Manager, HumeLink East |
| Ciara Moriarty | AGJV | Environmental Approvals Advisor, HumeLink East |
| Sam Pathammavong | Transgrid | Environment and Sustainability Manager Major Projects |
| Michael Moroney | Transgrid | Senior Environmental Business Partner Major Projects |
| Peter Monsted | Transgrid | Senior Biodiversity Business Partner Major Projects |
| Shani Walton | Transgrid | Senior Environmental Approvals Coordinator Major Projects |
| Richard Peterson | Trigalana Environment | Lead Auditor |



3 Audit findings

3.1 Compliance performance

A summary of compliance performance is provided in Table 3-1. During this audit period there were two non-compliances in relation to condition B30 and ten recommendations have been made. Both the non-compliances and recommendations are detailed in Table 3-2.

Table 3-1: Biodiversity related conditions

| Condition Reference | Condition | Compliance status |
|---------------------|--|---------------------|
| A1 | Obligation To Minimise Harm to the Environment | Compliant (C) |
| B22 | Riparian Areas | Compliant (C) |
| B25 | Restrictions on Clearing and Habitat | Compliant (C) |
| B26 | Biodiversity Offset Package | Compliant (C) |
| B27 | Biodiversity Offset Package Bank guarantee | Compliant (C) |
| B28 | Supplementary Biodiversity Strategy | Compliant (C) |
| B29 | Biodiversity Assessment Verification Report | Compliant (C) |
| B30 | Biodiversity Management Plan | Non - Compliant (C) |

Non-compliances, observations and recommendations are provided in Table 3-2.



Table 3-2: Non compliances, observations, and recommendations

| Unique ID | Condition(s) | Auditor observations | Recommendation |
|------------------------|--------------|---|--|
| Non Compliances | | | |
| HLE-NC-01 | A2(d)/B30 | <p>On 28 November 2025 DPHI were notified of four instances where access track construction resulted in impacts outside the project boundary (Lucidity ID 47487). The access tracks identified include AT 299 and AT 301 within property YG-027A, as well as AT 446-448 and AT 451 within property MA-051. This was considered a potential for non compliance with Conditions A2 (d) and B30.</p> <p>This incident arose due to boundary flagging being in the wrong position as well as the spacing between flagging being insufficient. For one site (AT446-448 in MA-051) insufficient sediment controls were in place and sediment spread outside the clearing boundary and development of a boghole led to construction of an alternate access for the landowner outside the project boundary.</p> <ul style="list-style-type: none"> Clearing in MA-051 and YG-027A occurred in areas mapped as PCT 316 and PCT 1330⁴. PCT 1330 is considered with White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland critically endangered ecological community (CEEC)⁵. The BAVR identifies AT 301 in YG-027A as habitat for the Striped Legless Lizard (<i>Delma impar</i>), Yass Daisy (<i>Ammobium craspedioides</i>), Hoary Sunray (<i>Leucochrysum albicans</i> subsp. <i>tricolor</i>) and Austral Toadflax (<i>Thesium australe</i>) noting none were observed during pre-clearing surveys⁶. The BAVR identifies AT 299 in in YG-027A as habitat for Southern Myotis (<i>Myotis macropus</i>), Yass Daisy (<i>Ammobium craspedioides</i>), Hoary Sunray (<i>Leucochrysum albicans</i> subsp. <i>tricolor</i>) and Austral Toadflax (<i>Thesium australe</i>) noting none were observed during pre-clearing surveys⁷. | <p>Ensure survey grade equipment is used to delineate clearing boundaries. GPS devices with less accurate positioning (e.g. mobile devices supporting FieldMaps) should not be used to delineate boundaries.</p> <p>Ensure flagging is at appropriate intervals to clearly delineate clearing boundaries, Intervals should be adapted to the alignment, with a lower interval on curves for example, and more flagging on steep terrain.</p> <p>AGJV should review use of flagging to determine whether this is appropriate and easily observed by all</p> <p>As advised by AGJV during the site inspection, large plant used during clearing works should be equipped with survey grade GPS with the clearing boundaries loaded to ensure clearing does not extend outside approved limits.</p> |

⁴ Incident Investigation Report - Environmental Event YG-027A, MA-051

⁵ Table 6-10 of Niche (2024). Humelink Technical Report 1 - Revised Biodiversity Development Assessment Report. Revision 0 (dated 21 June 2024).

⁶ Incident Investigation Report - Environmental Event YG-027A, MA-051

⁷ Incident Investigation Report - Environmental Event YG-027A, MA-051



| Unique ID | Condition(s) | Auditor observations | Recommendation |
|-----------|--------------|--|--|
| HLE-NC-02 | | <ul style="list-style-type: none"> No threatened species habitat is mapped in MA-051⁸. <p>This incident has resulted in unintended impacts to biodiversity values.</p> | <p>The impacts should be incorporated into the updates to condition B25 currently being sought by Transgrid.</p> |
| | B64 | <p>On 4 September 2025 Transgrid Notified DPHI of a potential non compliance with Condition B64 (Lucidity ID 47912). The post construction review of as built drone imagery identified two areas of an access track within property MA-099 breaching the project boundary by a maximum of 6.5 m. The works were undertaken as a part of Enabling Works and were associated with Minor Impact Checklist (MIC) # 15, which was approved by the Environmental Representative.</p> <p>This incident arose due to the use of ArcGIS FieldMaps to delineate the clearing boundary with accuracy of >5 m. Further, spacing between was insufficient due to alignment of the track and terrain.</p> <p>The Response to Request for Information⁹ identified that although the project boundary was exceeded, the total disturbance was less than the approved disturbance (13,272 m² vs 23,587 m²). This document also states that a review by the Project Ecologist indicated the area was low conservation value grassland and “<i>would have resulted on a negligible impact to biodiversity</i>” (p.2). This conclusion does not draw on the data from the BDAR or BAVR¹⁰.</p> <ul style="list-style-type: none"> Clearing occurred in areas mapped as a mix of PCT 280 and PCT 277¹¹. PCT 277 is considered with White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland critically endangered ecological community (CEEC)¹². Land adjacent is mapped as Category 1 Land¹³. The BDAR identifies these areas as habitat for a variety of threatened fauna species Key's Matchstick Grasshopper (<i>Keyacris scurra</i>)¹⁴, Yass Daisy (<i>Ammobium</i> | |

⁸ Incident Investigation Report – Environmental Event YG-027A, MA-051

⁹ Response to Request for Information, HumeLink East – CoA B64 - SSI-36656827-PA-116 – Request for Additional Information, Transgrid

¹⁰ Email from Alex Graham (East Coast Ecology) to Jon May (AGJV) titled RE: HLE | MA-099 Biodiversity, dated 23 September 2025

¹¹ Figure 4-1 of Niche (2024). HumeLink Technical Report 1 – Revised Biodiversity Development Assessment Report. Revision 0 (dated 21 June 2024).

¹² Table 6-10 map reference 65 of Niche (2024).

¹³ Figure 4-3 map reference 65 of Niche (2024).

¹⁴ Figure 13-5 map reference 65 of Niche (2024).



| Unique ID | Condition(s) | Auditor observations | Recommendation |
|---|---|--|---|
| | | <p><i>craspedioides</i>), Small Purple-pea (<i>Swainsona recta</i>), Silky Swainson-pea (<i>Swainsona sericea</i>)¹⁵ and Striped Legless Lizard (<i>Delma impar</i>)¹⁶.</p> <p>Given the total disturbance was less than the approved disturbance, and occurred in areas contiguous with the approved disturbance boundary, it is considered likely that impacts to biodiversity are consistent with or even less than the predicted impacts.</p> | |
| Observations and Recommendations | | | |
| HLE-Obs-06 | A1 | <p>Revised constraints mapping, updated following completion of the Biodiversity Assessment Verification Report (BAVR), is not included in the current version of the BMP.</p> <p>Despite not being included in the current version of the BMP, mapping derived from BAVR (vegetation mapping and species polygons) has been used by AGJV in the revised constraints mapping. This constraints mapping is used to microsite development, when assessing impacts during consistency assessments, and in the clearing and permitting process and assessment of clearing.</p> | The BMP is updated to include revised constraints mapping. |
| HLE-Obs-07 | B30 / Unexpected Finds Protocol | <p>During the site inspection, a daily ecology checklist from the 10 February 2026 potential unexpected find (see Table 2-1). This had not been reported through to project personnel,</p> <p>No clear process for reporting and resolving potential unexpected finds was evident. To ensure compliance with the requirements of the BMP a clear process is required.</p> | AGJV and their Project Ecologist develop a process to report, track and resolve potential unexpected finds and that this procedure be incorporated into an updated Unexpected Finds Protocol. |
| HLE-Obs-08 | B30 / Vegetation Clearing Procedures | <p>During the site inspection a difference in the data layers being used by the Project Ecologists (East Coast Ecology) and AGJV was observed (see Table 2-1).</p> <p>A lack of consistency in data layers being used may lead to discrepancies between areas assessed as a part of the pre-clearing process and subsequent clearing works.</p> | AGJV explore improved data sharing processes with their Project Ecologists to ensure consistent datasets are used. |

¹⁵ Figure 13-8 map reference 65 of Niche (2024).

¹⁶ Figure 13-10 map reference 65 of Niche (2024).



| Unique ID | Condition(s) | Auditor observations | Recommendation |
|------------|---|--|--|
| HLE-Obs-09 | B30 / Vegetation Clearing Procedure / Biosecurity Management Plan | <p>Two different procedures are provided in the Vegetation Clearing Procedure and Biosecurity Management Plan regarding documenting weed species within a property. The pre-clearing report for BY-040 did not adequately document occurrence and distribution of priority weed species to allow management to occur.</p> <p>There is a lack of consistency between the two procedures, along with very onerous requirements in the Vegetation Clearing Procedure. It is likely that this is leading to inadequate mapping of weed species as a part of the pre-clearing surveys.</p> <p>The intent of weed mapping should be focused on understanding baseline conditions and control of priority weeds during construction, to prevent spread and ensure compliance is achieved.</p> | <p>AGJV engage with CPHR with a view to simplifying baseline data collection for weed species. This could include:</p> <ul style="list-style-type: none"> noting priority weeds occurring at low densities which teams need to be aware of, and undertaking detailed mapping of weed infestations which will need to be managed during construction. This information should be spatial in nature. |
| HLE-Obs-10 | B30 / C8 | <p>During the site inspection, a potential incident was observed where a bund wall around a tower pad had collapsed, and sediment had been deposited outside the TCZ.</p> <p>This potential incident occurred due to a gap in sediment control measures around the tower pad. It is the auditor's opinion that had sediment control measures been installed this event would not have extended beyond the TCZ.</p> | <p>AGJV should assess the extent of any damage to determine whether or not the event is classified as an incident or non-compliance as defined by the consent.</p> <p>For all areas of earthworks at future construction locations, ensure sediment control measures are installed around the entire extent of any earthworks and are suitable to ensure sediment is retained within clearing limits.</p> |
| HLE-Obs-11 | B25 | <p>The clearing limits set out in condition B25 and Table 2-1 include distinction between full and partial clearing. Partial clearing is likely to have a lower level of impact on biodiversity values than full clearing and has resulted in a reduced offset liability for the HumeLink project.</p> <p>The Clearing Limits Dashboard used by AGJV does not include separate tracking of full and partial clearing, meaning compliance with clearing limits set out in Table 2-1 cannot be assessed in future.</p> | <p>The Clearing Limits Tracking Dashboard is updated to:</p> <ul style="list-style-type: none"> allow tracking of full and partial clearing to ensure alignment with condition B25 and Table 2-1, allow for future clearing to ensure potential exceedances are identified early so that appropriate actions can |



| Unique ID | Condition(s) | Auditor observations | Recommendation |
|------------|--------------|---|---|
| | | <p>The Clearing Limits Dashboard does not account for future clearing arising from elements of the project yet to be cleared, despite this being assessed in the permitting process. The tracking of this during the permitting process provides a proactive step for ensuring compliance with the clearing limits set in condition B25. This proactive step should be incorporated into the Dashboard.</p> <p>The initial review of the Clearing Limits Dashboard appeared to identify that HLE has exceeded the allocated clearing limits for two PCTs and one fauna species. However, feedback provided by AGJV identified that this was a result of the inclusion of clearing permits which had not been approved, and that this is used to flag potential exceedances early. This process, of including clearing associated with unapproved clearing permits, could lead to confusion over whether the clearing limits set in Condition B25, and the allocation to HLE, had been exceeded.</p> | <p>be implemented to prevent non compliance, and</p> <ul style="list-style-type: none"> allow delineation of clearing permits that have been applied for (but not approved), approved and completed. |
| HLE-Obs-12 | B26 | <p>The current BOP does not provide evidence of consultation with CPHR and the BCT, as required by condition B26.</p> | <p>Updates to the BOP, as required by condition B26(d), should include evidence of the date and timing for consultation with CPHR and the BCT.</p> |
| HLE-Obs-13 | B30 | <p>Condition B30 requires that the BMP is prepared in consultation with these agencies. The BMP does not provide evidence of consultation with CPHR or FCNSW, other than in the document control tab.</p> <p>Condition B30 requires that the BMP includes a description of the measures which would be implemented to minimise impacts to entities at risk of SAll. Specific measures were not identified in the BAVR and the general measures outlined in the BMP do not provide specific mitigation measures for these entities.</p> | <p>Updates to the HLE BMP should include evidence of the date and timing for consultation with CPHR and the FCNSW.</p> <p>Include specific mitigation measures to be implemented for entities at risk of SAll.</p> |
| HLE-Obs-14 | B30 | <p>A system is in place for marking of the project boundary. However, during the site inspection the marking was difficult to identify in some areas There is a risk that these clearing limits are not sufficient to prevent incidents occurring, and this is consistent with the findings of the incident investigation for HLE-NC-01 (see above).</p> | <p>Review the colour coding system for the identification and delineation of environmental protection fencing across the project. The review should also include mechanisms for communicating colour</p> |



| Unique ID | Condition(s) | Auditor observations | Recommendation |
|-----------|--------------|----------------------|--|
| | | | coding systems to ensure consistency including: <ul style="list-style-type: none">• Visual signage• Site inductions• EWMS/ECMS and Workpacks |



3.2 Summary of agency notices, orders, penalty notices and prosecutions

No agency notices, warning letters, orders, penalty notices or prosecutions have been issued to the project to date.

3.3 Incidents

The Lead Auditors report outlines several non-compliances and observations which are unrelated to biodiversity¹⁷.

Two potential incidents were reported to DPHI which are related to biodiversity (see Table 3-2).

During the site inspection, one observation was made. This is detailed below.

3.3.1 Observation – Tower 55

During the site inspection, the collapse of a bund wall at Tower 55 was observed following >30 mm of rainfall in the three days prior to the site inspection (Photo 5 and Photo 6). Water had not been directed to the drop structure installed during construction (Photo 10). Due to a gap in the sediment control measures, sediment had been deposited outside the TCZ for the tower pad and into areas of derived grassland spreading towards an unnamed third-order tributary of Cowpers Creek (Photo 7).

These areas are not mapped as a threatened ecological community (TEC)¹⁸, but provide habitat for threatened species, including Gang-gang Cockatoo (*Callocephalon fimbriatum*)¹⁹, Glossy Black-Cockatoo (*Calyptorhynchus lathami lathami*)³, Pink-tailed Legless Lizard (*Aprasia parapulchella*)²⁰, Koala (*Phascolarctos cinereus*)²¹, Eastern Pygmy-possum (*Cercartetus nanus*)⁵, *Diuris aequalis*²², Spotted-tailed Quoll (*Dasyurus maculatus*)²³, Yellow-bellied Glider (*Petaurus australis*)⁷ and Grey-headed Flying-fox (*Pteropus poliocephalus*)⁷, Regent Honeyeater (*Anthochaera phrygia*)²⁴ and Painted Honeyeater (*Grantiella picta*)⁸. Impacts to arboreal and avian species from this incident would be negligible, with potential for impacts restricted to terrestrial species.

Sediment control measures at this location appeared to be ineffective and resulted in the deposition of sediment beyond the TCZ. The use of coarse woody debris in other sections appeared to be effective as a sediment control measure (Photo 8 and Photo 9).

Following the observation made during the audit, AGJV investigated the event and have identified that this did not meet the criteria of non-compliance/non-conformance or Incident as per the Project Environmental Management Strategy (EMS). Additional sediment control measures were installed by AGJV and inspected by a Certified Professional in Erosion and

¹⁷ Table 11 of Independent Environmental Audit SSI 36656827 – Hume Link East, Trigalana Environment Pty Ltd, dated 15 March 2026

¹⁸ Figure 6-1 map reference 108 of Niche (2024). HumeLink Technical Report 1 - Revised Biodiversity Development Assessment Report. Revision 0 (dated 21 June 2024).

¹⁹ Figure 13-7 map reference 108 of Niche (2024).

²⁰ Figure 13-10 map reference 108 of Niche (2024) - downslope of the ECZ.

²¹ Figure 13-12 map reference 108 of Niche (2024).

²² Figure 13-13 map reference 108 of Niche (2024).

²³ Figure 13-17 map reference 108 of Niche (2024).

²⁴ Figure 13-17 map reference 108 of Niche (2024).



Sediment Control (CPESC) on 27 February 2026²⁵. This inspection identified a number of positive feedback items, along with making a number of recommendations for minor improvement. Notably, many of the recommendations made in an earlier draft version of this audit report had already been undertaken.

Please refer to the main Audit report for further observations by the lead Auditor regarding erosion and sediment control across the project for all areas of earthworks at future construction locations, ensure sediment control measures are installed around the entire extent of any earthworks in accordance with existing protocols

3.4 Status of recommendations from previous Audits

This is the first IEA for the HumeLink project and there are no recommendations from previous Audits.

3.5 Stakeholder consultation outcomes

Issues raised by CPHR are summarised in Table 3-3 with the Auditor's response to each issue.

²⁵ SEEC (206), Independent Inspection of Erosion and Sediment Controls: Humelink East Project (Bannaby and BY30), 27 February 2026, letter from Strategic Environmental and Engineering Solutions to AGJV, dated 27 February 2026.



Table 3-3: Key issues raised by CPHR and Auditor response

| Key issues/comments | Auditor response |
|--|--|
| <p>Inconsistencies between species recorded during pre-clearing reports and the species polygons in the BAVR. Two examples were cited:</p> <ul style="list-style-type: none"> Recording of substantially more hollow-bearing trees during pre-clearing surveys than reflected in the Revised BDAR or BAVR, with obvious implications for threatened species such as the Gang-gang Cockatoo (<i>Callocephalon fimbriatus</i>). | <p>In their response to the RFI, AGJV advised that there have been instances of threatened species observations during pre-clearing survey, outside of their mapped species polygons. However, as per Appendix A of the BMP (Unexpected Threatened Species Finds Procedure) this does not meet the definition of an unexpected find as the species observed were assessed in the BDAR and are within the known range.</p> <p>Appendix A defines an unexpected find as <i>"An unexpected find is a species/entity that has not been assessed in the Biodiversity Development Assessment Report (BDAR) or has been assessed but is found outside the known range in the BDAR."</i>²⁶</p> <p>It is the auditor's opinion that the examples provided by CPHR do not meet the definition of an unexpected find as per Appendix A based on current information available. Both species were assessed in the BDAR and the areas identified are within the range of the species as outlined in the BDAR.</p> <p>Clearing limits are set in condition B25 and Tables 2-1, 2-2 and 2-3 of the Infrastructure Approval. Condition B25 requires the proponent to ensure that these limits are not exceeded. Section 7.6 of the BMP outlines how AGJV assess compliance against these limits. Although not stated in the BMP, AGJV advised during the site inspection, interview and response to the RFI that clearing is assessed against the vegetation mapping and species from the BAVR. In light of this, it is unlikely that this would be considered a non-compliance with B25.</p> <p>However, it is likely that if impacts to habitat for these species occur in areas not mapped in the BAVR then impacts arising from the HumeLink project could be greater than estimated in the EIS and BDAR.</p> |
| <p>Potential clearing outside the FLPs.</p> | <p>The BDAR assesses impacts on the basis of an <i>"indicative disturbance area"</i>²⁷, but notes that updates to this indicative disturbance area are anticipated during detailed design. The BDAR states that while updates may occur, the updated disturbance area would not move outside of the nominated amended project footprint. Detailed design was intended to try and avoid identified biodiversity values <i>"to the greatest extent practicable"</i>²⁸.</p> <p>This intent has been partially carried through to Infrastructure Approval:</p> <ul style="list-style-type: none"> Condition B25 sets clearing limits. |

²⁶ Page 1 of AGJV (2025). Unexpected Threatened Species Finds Procedure HLE-AGJ-ENV-ALE-PRD-0000-00004. Revision 02 (dated 15 September 2025).

²⁷ Page 498 of Niche (2024). HumeLink Technical Report 1 - Revised Biodiversity Development Assessment Report. Revision 0 (dated 21 June 2024).

²⁸ Page 673 of Niche (2024). HumeLink Technical Report 1 - Revised Biodiversity Development Assessment Report. Revision 0 (dated 21 June 2024).



| Key issues/comments | Auditor response |
|---|---|
| | <ul style="list-style-type: none"> Condition C8 requires the proponent to submit detailed plans of the FLP prior to construction commencing and that the project is constructed in accordance with the FLPs. <p>Transgrid has sought to stage the FLPs and that has been granted by DPHI (see C8 of the Audit Table in Appendix D). Based on the above, it is the Auditor's opinion that clearing outside the FLP is permissible provided:</p> <ul style="list-style-type: none"> clearing does not occur outside the project footprint shown in Appendix 1 of the Infrastructure Approval, and clearing does not result in exceedances of the clearing limits specified in Tables 2-1, Table 2-2 and Table 2-3 of Appendix 2 of the Infrastructure Approval (as amended). <p>As outlined in Section 3.1 and 3.3, clearing has occurred outside the project boundary during construction of access tracks and these incidents have resulted in impacts to biodiversity values.</p> |
| <p>No FLPs have been provided to CPHR.</p> | <p>The FLPs are currently being finalised and Transgrid will be submitting the FLPs to DPHI imminently. Further details are provided in Section 4.3.</p> |
| <p>Project Ecologists not following the requirements of the pre-clearing process. Examples cited include:</p> <ul style="list-style-type: none"> not undertaking stag watching, not using Songmeters, not undertaking visual inspection of accessible hollows, <p>In other instances, pre-clearing reports state surveys were undertaken for target fauna but do not describe the methods used.</p> | <p>The pre-clearing reports provided as a part of the RFI were found to provide little information on what surveys, if any, were undertaken to support conclusions around presence or absence of threatened species. However, it is noted that the BMP does not provide commitments to undertake targeted surveys such as stag watching or use of Songmeters as a part of standard pre-clearing surveys and is only triggered if certain habitat features and/or species are identified.</p> <p>The Vegetation Clearing Procedure²⁹ does make a commitment to <i>“Survey hollow bearing trees within the survey area, and confirm hollows are unoccupied by conducting a visual inspection of each identified accessible hollow, either by climbing the tree (with a ladder or rope access) or from the ground with an extendable endoscope.”</i> The pre-clearing reports reviewed did not provide any information on whether these surveys are occurring.</p> |
| <p>CPHR noted pre-clearing reports relate to areas previously assessed</p> | <p>During the IEA the consistency assessment for the Yass Camp was provided to the auditor. The consistency assessment outlines that as the footprint for the Yass Camp was not assessed as a part of the Revised BDAR for the HumeLink project a</p> |

²⁹ See page 25 of Appendix B: Vegetation Clearing Procedures (Rev 01.7) of the HumeLink East BMP



| Key issues/comments | Auditor response |
|--|---|
| <p>via a consistency assessment. CPHR do not have visibility of these assessments, so are unable to verify the assumptions underpinning or accuracy of these assessments.</p> | <p>BDAR was prepared by the Project Ecologists (East Coast Ecology) in accordance with the Streamlined Assessment Module - Small Area of the BAM and used to inform the consistency assessment. This BDAR documents impacts to 0.19 ha of PCT 3376 in degraded condition. This vegetation is aligned with the White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland CEEC.</p> <p>The consistency assessment compares the clearing arising from the project to the clearing required by the original site for the Yass Camp (Faulder Avenue) and concluded that impacts could be managed in accordance with the existing conditions of approval and biodiversity impacts were consistent with the clearing limits outlined in Infrastructure Approval and that no further offsets would be required.</p> |
| <p>Questions were raised around where Enabling Works had been undertaken in areas of native vegetation.</p> | <p>Condition B64 permits construction of enabling works to occur subject to preparation of an Enabling Works Management Plan. The definitions in the Infrastructure Approval require construction of enabling works in areas of low risk. For the purposes on biodiversity, low risk is defined in accordance with the definitions in Table 5-4 of the Enabling Works Management Plan³⁰. Low risk areas include areas of native vegetation, including non-woody TECs and very low condition TECs. Thus, the Enabling Works Management Plan permits clearing of native vegetation.</p> |

³⁰ Transgrid (2024). HumeLink Enabling Works Management Plan, Version 4 (dated 12 December 2024).



3.6 Adequacy of Environmental Management Plans

The BMP prepared for the HLE project has been prepared by suitably qualified personnel, endorsed by the independent Environmental Representative, and approved by DPHI following consultation with relevant stakeholders. The plans meet the conditions of approval and other relevant legislative requirements. The management plans are adequate for the current scope of work and were observed to be implemented effectively in the field.

A number of recommendations are made in this report to improve the BMP.

The implementation of the BMP is assessed in the audit table at Appendix D.



4 Actual versus predicted impacts

4.1 Predictions made by the EIS

A high-level review of the BDAR and BAVR was conducted to determine consistency of the actual and predicted impacts with the current impacts of the HLE Project.

Given only clearing of the TCZ has occurred on HLE, current overall impacts are well below those predicted in the EIS.

As identified above, clearing has occurred outside of the project boundary (see Table 3-2). This clearing has resulted in impacts to areas not predicted to be impacted by the EIS, including impacts to CEECs and habitat for threatened species.

The Revised BDAR included assumed presence for a number of threatened species due to land access issues. The BAVR, which included refinement to species polygons, has identified reductions in impacts to 37 flora species and 22 fauna species and increases in impacts to 2 flora species and 5 fauna species, based on the footprint used in the Revised BDAR. The final impact arising from HumeLink is to be determined following finalisation of the FLP.

4.2 Project boundary

The Vegetation Clearing Procedure³¹ requires the following with regards to boundary marking:

The Supervisor is to ensure the clearing extent, and any exclusion and protection zones are delineated in accordance with the requirements before clearing works commence. In areas that are not adjacent to exclusion zones (refer below), the clearing limits will be delineated using regularly placed pegs or identification markers at a maximum distance of 3 metres apart. In locations adjacent to exclusion zones or where pegs and identification markers will not be suitably visible (for example, if obscured by existing vegetation), highly visible barrier or star pickets with tape such as colour-coded UV-stabilised rope, bunting, nightline, or other similarly robust and durable materials will be used ensuring a clear marking line.

No active works were underway at the time of the site inspection, other than the waterway crossing at BY-040, making inspection of any boundary marking difficult. In assessing compliance with the project boundary, the Auditor undertook a high level review of boundary marking and clearing at Tower 55 and on BY-040.

At Tower 55 works had been completed and boundary marking removed. The edge of clearing was delineated by windrows of coarse woody debris used as a sediment control measure. It is unclear whether windrowed coarse woody debris was situated with the TCZ, as per the FLP, or was located outside. Certainly, coarse woody debris was windrowed outside of areas subject to clearing and grubbing works (see Photo 8 and Photo 9). No other evidence of impacts outside the clearing limits (e.g. tyre tracks, stockpiled materials, etc.) was evident.

On BY-040 boundary marking for the access track was in place, consisting of metal stakes with a pink flag (see background of Photo 12). These boundaries markers extended along the access track into the connectivity corridor. The Auditor found boundary marking difficult to identify,

³¹ See Section 3 of Appendix B: Vegetation Clearing Procedures (Rev 01.7) of the HumeLink East BMP.



particularly in areas of remnant native vegetation (as occurs within the connectivity corridor). There is a risk that these clearing limits are not sufficient to prevent incidents occurring, and this is consistent with the findings of the incident investigation for HLE-NC-01 (see Table 3-2) where it was found clearing outside the project boundary had occurred due to boundary marking being insufficient.

This risk is somewhat mitigated by the methods of clearing. During the site inspection, AGJV outlined that equipment and construction vehicles undertaking clearing works are fitted with a GPS system with the FLP loaded to ensure they stay within the approved clearing limits. However, in the opinion of the Auditor, this system does not mitigate the risk that inadvertent impacts, such as stockpiling materials outside the clearing limits or accidental access, could occur. It is also unclear whether this system was in place for the incidents outlined in Table 3-2.

4.3 Biodiversity clearing limits

Condition B25 of the conditions of Infrastructure Approval requires the Proponent to ensure that the vegetation and habitat clearing limits specified in Table 2-1, Table 2-2 and Table 2-3 of Appendix 2 of the Infrastructure Approval are not exceeded.

It is noted that HLE is in the process of finalising the FLP for the ECZ and HTZ (the FLP for Humelink West (HLW) has been finalised). Once complete, Transgrid is intending to submit an application to DPHI to modify condition B25 on the basis of these FLPs. During the audit interviews, Transgrid advised that this application has been drafted, and meetings with stakeholders such as CPHR and DPHI are scheduled. This is likely to result in modifications to the clearing limits set in Table 2-1, Table 2-2 and Table 2-3 of Appendix 2 of the Infrastructure Approval.

Section 7.6 of the HLE BMP outlines a process for tracking of clearing. The Environmental and Sustainability Manager is responsible for progressive tracking of clearing, with tracking both prior to clearing (through the permitting process) and post-clearing works. Transgrid collects aerial imagery via drone surveys every 6 weeks and this is provided to both joint venture partners to aid in verifying the extent of clearing.

During the site audit and associated interviews, AGJV outlined that current tracking uses:

- the TCZ as shown in the FLP,
- projected future clearing based on the plant community type (PCT) mapping and threatened species polygons in the BAVR,
- clearing limits as set out in the Infrastructure Approval.

Once Condition B25 is modified, revised clearing limits will be used.

To ensure clearing is within the limits set out in the FLP, the clearing permits set out the clearing for all PCTs and threatened species habitat based on species polygons provided by Transgrid. This data is then checked against clearing limits to ensure they are within the allocation for that property. If they exceed the allocation for that property, the permit requires additional approvals. This process is considered robust, with both a pre- and post-clearing check to ensure clearing it is within clearing limits (noting anticipated changes to clearing limits).



The process outlined above has identified some potential exceedances based on current clearing limits; however, it is expected that these be rectified by the proposed modification to Condition B25. During the audit interviews, Transgrid advised that the ECZ for HLE has expanded significantly (Peter Monsted, pers. comm., 24 Feb 2026).

At this stage of the project, minimal clearing has been undertaken, with clearing limited to the TCZ only. It is highly unlikely that clearing limits have been exceeded. However, future clearing is not currently accounted for due to the proposed modification of Condition B25.

Further assessment will need to be undertaken in future Audits to confirm compliance with (or otherwise) of the project clearing limits.

4.4 Key strengths

The IEA has identified a number of key strengths for the HLE project:

- AGJV have developed a strong permitting process which will assist in identifying both current and future compliance against condition B25 of the Infrastructure Approval. The permitting process includes an assessment of actual clearing for each permit against predicted clearing, flagging if clearing is predicted to exceed approved limits for each individual permit and requiring additional approvals. This process allows AGJV to proactively manage clearing against clearing limits set by condition B25, reducing the likelihood of a non-compliance in the future.
- During the site inspection the visit to BY-040 indicated that AGJV had permits and induction materials stored at entry to the property and these were readily provided to the auditor. This ease of access provides confidence that personnel coming to each property have ready access to the material required to ensure the HLE project minimises harm to the environment.
- The Project Ecologists, East Coast Ecology, were present during the site inspection. During the course of the site inspection, it was very clear that the Project Ecologist team had a comprehensive understanding of the project, the values present and were actively advising AGJV.
- The nest box installation program on HLE was a key positive observed during the site inspection. The installation team were well organised, had clear goals and were well led by Nea Pilgrim (Environmental Advisor, AGJV). To date, the HLE team has installed 1,575 nest boxes or artificial hollows. Given that only TCZ clearing has occurred and ECZ and HTZ clearing is yet to commence, this level of installation is impressive and well exceeds the commitment to install 30% of required nest boxes prior to clearing.



Appendix A. Approval of Biodiversity Expert

Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-36656827-PA-157
Mr Jeremy Roberts
Major Project Delivery Director (HumeLink)
NSW Electricity Networks Operations Pty Limited
17/12/2025

Subject: HumeLink – Independent Environment Audit (IEA) Team - Biodiversity Expert Endorsement Request

Dear Mr Roberts

I refer to your request for the Planning Secretary's approval of a suitably qualified, experienced, and independent Biodiversity Expert to assist in the Independent Environmental Audit (IEA) of the HumeLink (East and West), SSI-36656827 as modified (the approval), submitted to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 5 December 2025.

NSW Planning has reviewed the independent 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 Part C Condition C13 of the approval and the NSW Planning, Independent Audit Post Approval Requirements (2020), as nominee of the Planning Secretary, I endorse Nathan Garvey of Nature Positive Advisory as the Biodiversity Expert.

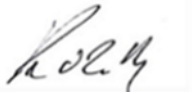
Please note:

- This correspondence must be appended to the Independent Audit Report.
- Nathan Garvey is approved for the duration of construction and the initial operational audit of the development. However, NSW Planning reserves the right to request an alternate auditor or audit team at any time.
- Nathan Garvey must attend site (unless otherwise agreed by the Secretary) and the IEA report must include specific sections (and/or an appended report) prepared by Nathan Garvey which addresses his assessment of compliance (and recommendations for improvements) in respect to the conditions, BDAR, EIS, management plans and any other matters considered relevant for his area of expertise.

Department of Planning, Housing and Infrastructure

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

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly".

Katrina O'Reilly
Team Leader – Compliance
Department Of Planning Housing and Infrastructure
As nominee of the Planning Secretary



Appendix B. Photographs from the site inspection



Photo 1: Broad view of the waterway crossing of an unnamed tributary of Cowpers Creek in BY-030



Photo 2: Upstream view of the waterway crossing of an unnamed tributary of Cowpers Creek in BY-030



Photo 3: Downstream view of the waterway crossing of an unnamed tributary of Cowpers Creek in BY-030



Photo 4: Downstream view of the waterway crossing of an unnamed tributary of Cowpers Creek in BY-030, showing Cowpers Creek crossing of Taralga Road



Photo 5: Wall of tower pad at Tower 55 on BY-030 showing erosion of the wall



Photo 6: Wall of tower pad at Tower 55 on BY-030 showing erosion of the wall below the tower pad



Photo 7: Sediment dispersal from erosion of the wall below the tower pad at Tower 55 on BY-030



Photo 8: Coarse woody debris used to control sediment dispersal below the tower pad at Tower 55 on BY-030, showing sediment reaching the control point



Photo 9: Coarse woody debris used to control sediment dispersal below the tower pad at Tower 55 on BY-030, showing sediment not extending beyond the control measure



Photo 10: Drop structure constructed in the wall of tower pad at Tower 55 on BY-030 to control water flow from the tower pad

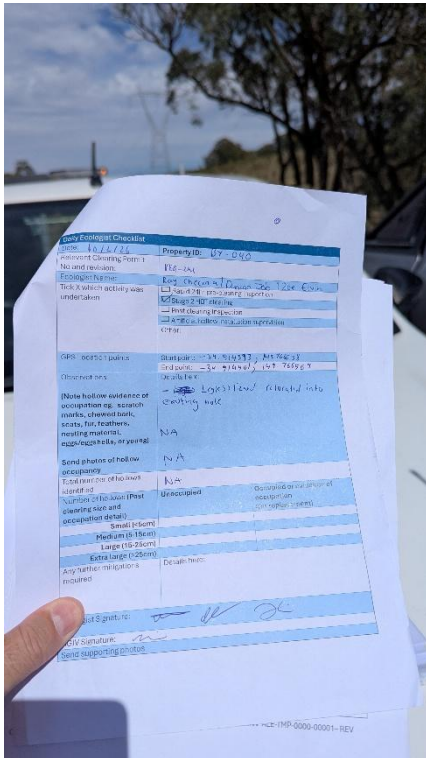


Photo 11: Daily ecology checklist for BY-040



Photo 12: Upstream extent of the waterway crossing of an unnamed second-order stream in BY-040



Photo 13: Downstream extent of the waterway crossing of an unnamed second-order stream in BY-040



Photo 14: Habitat tree identified during pre-clearing surveys in BY-040



Photo 15: Habitat tree identified during pre-clearing surveys in BY-040



Photo 16: Broad view of flagging of connectivity corridor in BY-040



Photo 17: Close up view of flagging of connectivity corridor in BY-040 showing signage



Photo 18: Habitat in the connectivity corridor in BY-040



Photo 19: Arborist climbing a tree within the connectivity corridor in preparation for installation of a nest box in the connectivity corridor in BY-040



Photo 20: Installation of a Owl nest box in the connectivity corridor in BY-040



Photo 21: Entrance to a hollow constructed using a Hollow Hog in the connectivity corridor in BY-040



Photo 22: Ply wood nest box suitable for Parrots installed in the connectivity corridor in BY-040



Photo 23: Ply wood nest box suitable for microbats installed in the connectivity corridor in BY-040



Photo 24: Ply wood nest box suitable for microbats installed in the connectivity corridor in BY-040



Appendix C. Consultation with CPHR

Nathan Garvey

From: Nat O'Rourke <Nat.ORourke@dcceew.nsw.gov.au>
Sent: Friday, 30 January 2026 4:15 PM
To: Nathan Garvey; richard.peterson-trigalana@outlook.com
Cc: Allie Cash; Evan Creek; ROG South East Region Mailbox
Subject: RE: Draft info for Nathan G.
Attachments: HL Pre-clearing Spreadsheet.xlsx

You don't often get email from nat.orourke@dcceew.nsw.gov.au. [Learn why this is important](#)

Hi Nathan and Richard,

Please find attached a summary of observations arising from our reviews of pre-clearing reports to date. We appreciate receiving these reports from the Humelink delivery partners as they provide visibility over the implementation of key on-site avoidance and mitigation measures, as well as clearing progress, which will inform our review of the Biodiversity Assessment Verification Report (BAVR) due in the coming months.

A running issues spreadsheet is also attached, which we use to capture issue/comments/concerns identified during our reviews. Happy to make some time to discuss or clarify any of the points below or contained within the attached spreadsheet.

General observations

• Hollow bearing trees (HBTs)

HBTs are being identified during pre-clearing surveys in areas previously excluded as suitable habitat for hollow-dependent species (for example Gang-gang Cockatoo) in the BDAR/BAVR. In a number of locations, pre-clearing surveys are recording substantially more HBTs than reflected in the BAVR/BDAR dataset. While some variation is expected, differences raise concerns that habitat values may have been underestimated, with a risk that avoidance and mitigation measures are not being applied where they may be warranted / of most benefit.

• Survey effort and methods not clearly documented

There is uncertainty regarding the survey effort undertaken for some pre-clearing surveys. HumeLink East (HLE) pre-clearing reports lack detail on survey methods and effort. For example, Appendix B of the BMP (Vegetation Clearing Procedure) states that pre-clearing surveys should include a visual inspection of accessible hollows using a ladder or rope access, or an extendable endoscope from the ground. The HLE reports reviewed do not document whether these procedures were undertaken or what specifically was undertaken in their place.

Similarly, some reports state that surveys were undertaken for target fauna (for example gliders) without specifying the survey techniques used (such as spotlighting, stag watching or other targeted methods). HumeLink West (HLW) surveys conducted by NGH do not consistently describe survey intensity or

methods. HLW reports prepared by ENSPEC include ecologist track maps which, although difficult to interpret, provide a higher level of transparency regarding survey coverage.

- **Consistency reports**

Some HLW pre-clearing reports relate to areas previously assessed under consistency reports. As CPHR is not routinely provided with those consistency reports, we are unable to verify whether the ecological data and assumptions informing those areas remain accurate.

Matters raised in your previous email:

- **Differences between BAVR and pre-clearing findings**

We are observing cases where species have been identified during pre-clearing surveys in locations inconsistent with BAVR species polygons. Examples are below. For mapping context, CPHR generally uses Planet imagery (3 m resolution) under a user agreement. This imagery is suitable for general context but not for fine-scale positional accuracy.

5C3/5C1-082

Pop-up

▲ a8758_flora_spp_poly_gda2020z55_20250813 (1)

Survey reduction

a8758_flora_spp_poly_gda2020z55_20250813 - Survey redu...

| | |
|-----------------|---|
| OBJECTID | 380632 |
| Project number | 8758 |
| result_BDAR | Survey reduction |
| Result BAVR1 | N/A |
| result_Combined | Survey reduction |
| Species | Pimelea_bracteata |
| NVR_Type | Not_Cat1_Land |
| pct_id | 285 |
| condition | High |
| formation | Dry Sclerophyll Forests (Shrub/grass sub-formation) |
| Credits | Species |
| Kingdom | Plantae |
| Family | Thymelaeaceae |

◀ 1 of 1 ▶ 55H 604537 6058315

5C3/5C1-081



5C3/5C1-080

Figure 1. Screen shot of *Pimelea bracteata* survey reduction polygon between towers 80 and 81 Humelink west line 1, surveyed during the BDAR/BAVR and recorded as not present. During pre-clearing surveys ENSPEC found 14 individual plants and 16 patches. We have no spatial data supplied for these finds as of 29/01/26 however details and maps showing their locations are contained in the Line 1 from Bullongra Road (T78) to Bago Forest Way (T86) HumeLink West pre-clearing report.

Pop-up

▲ a8758_flora_spp_poly_gda2020z55_20250813 (1)

Survey reduction

a8758_flora_spp_poly_gda2020z55_20250813 - Survey redu...

| | |
|-----------------|---|
| OBJECTID | 425390 |
| Project number | 8758 |
| result_BDAR | Survey reduction |
| Result BAVR1 | N/A |
| result_Combined | Survey reduction |
| Species | Pultenaea_humilis |
| NVR_Type | Not_Cat1_Land |
| pct_id | 343 |
| condition | Moderate |
| formation | Dry Sclerophyll Forests (Shrubby sub-formation) |
| Credits | Species |
| Kingdom | Plantae |
| Family | Fabaceae_Faboideae |

◀ 1 of 1 ▶

55H 553839 6092855



Figure 2. *Pultenaea humilis* record (awaiting confirmation from herbarium but NGH appear to be confident) found next to a polygon excluded by Niche and surrounded by areas of assumed presence. Located between towers 115 and 116 Humelink west line 2.

- **Clearing outside approved layout zones**

We are aware of instances of clearing occurring outside the Total Clearing Zone (TCZ) provided to CPHR. This appears more frequent on the West lines but has also occurred on East. Transgrid has acknowledged this issue to a degree in recent discussions. Given the relevance to Conditions of Approval and BMP controls, this may warrant consideration as part of the audit.



5C3/5C1-012

5C3/5C1-011

5C3/5C1-010

5C3/5C1-009

Figure 3. Clearing outside of TCZ between towers 9-12 line 1 HLW. Red is Total Clearing Zone (TCZ) yellow is combined Easement Clearing Zone (ECZ) and Hazard Tree Zone (HTZ)



Figure 4. Clearing outside of TCZ towers 48-50 line 2 HLW

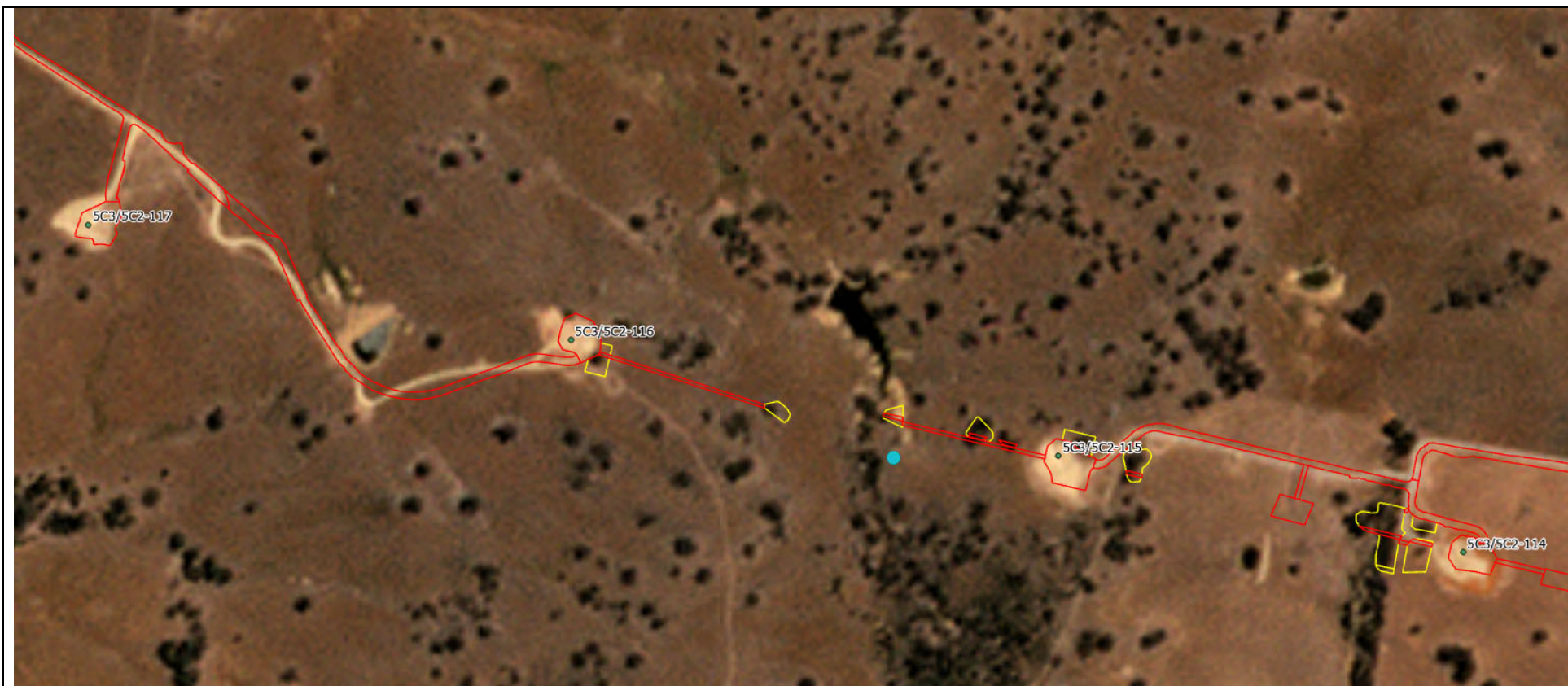


Figure 5. Clearing outside of TCZ towers 114-116 line 2 HLW



Figure 6. Clearing outside of TCZ tower 10 HLW



Figure 7. Clearing outside of TCZ towers 153-156 HLE.

• **Alignment of pre-clearing surveys with BMP requirements**

The attached spreadsheet includes examples where pre-clearing surveys appear inconsistent with the processes outlined in the BMP. These include:

- species listed as present or assumed present in BAVR polygons not being surveyed for
- song meter surveys not undertaken where expected
- stag watching not completed
- uncertainty as to whether no-go zones are being delineated during pre-clearing surveys
- lack of clarity on whether nest boxes are being installed prior to clearing in accordance with BMP requirements.

• **Additional comments**

CPHR also notes broader themes relevant to the audit, including data transparency and provision of spatial layers, consistency of survey and reporting standards across contractors and project sections, evidence of adaptive management where pre-clearing findings exceed assessment assumptions, and the effectiveness of on-ground demarcation and fauna risk controls. These aspects influence whether the approved BMP and BAVR framework is operating as intended.

Again, more than happy to discuss the contents of this email. Appreciate there are a lot of moving parts here. We will also continue to keep a log in our version of the attached spreadsheet following reviews of subsequent pre-clearing reports and other management plans.

Cheers

Nat

Nat O'Rourke
Team Leader Planning



Appendix D. Audit table



Table D.1 HumeLink East Audit Table

| CoA | Requirement | Evidence collected | Audit finding and recommendations | Compliance status |
|-----|---|---|--|-------------------|
| A1 | <p>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</p> <p>In meeting the specific performance measures and criteria in 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 pre-construction minor works, road upgrades, construction, operation, rehabilitation or decommissioning of the development.</p> | <ul style="list-style-type: none"> Site visit to BY-040 Audit interview on 11 February 2026 Additional information provided by HLE on 13 March 2026 | <p>Data collected as a part of the BAVR has been utilised to update the constraints layers referred to in Section 7.7 and shown in Appendix J of the BMP. This constraints layer is used to define micro-siting efforts and assess any design changes.</p> <p>It is noted that this information is not included in the BMP review as a part of this audit. It is recommended that the BMP is updated to include revised constraints mapping. Efforts to minimise harm were observed during the site visit to BY-040</p> | Compliant (C) |
| B22 | <p>Riparian Areas</p> <p>The Proponent must ensure all activities on waterfront land are constructed in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i> (DPE 2022), <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 Water Group and DPIRD Fisheries agrees otherwise.</p> | <ul style="list-style-type: none"> Site visit to waterway crossing in BY-30 Waterway Crossing Methodology Rev 01 dated 22 April 2025 Waterway crossing memo consultation dated 16 April 2025 Email from SEEC to HLE, dated 17 January 2025 endorsing the Waterway Crossing ERSED Plan Environmental Work Method Statement (EWMS) – Earthworks, Stockpile Management and Fencing (EWMS06), Acciona, dated 10 December 2025 Environmental Work Method Statement (EWMS) – Working near Sensitive Areas and Fencing (EWMS04), Acciona, dated 12 February 2025 Pre-construction Aquatic Habitat Survey Reports prepared by East Coast Ecology | <p>AGJV have prepared a Waterway Crossing Methodology (Rev 01 dated 22 April 2025) outlining the proposed approach for waterway crossings and construction methodology. This plan has been developed in consultation with NSW DCCEEW Water Group.</p> <p>The construction of waterway crossings are informed by detailed Pre-construction Aquatic Habitat Survey Reports prepared by the project ecologists (East Coast Ecology)</p> <p>To date, only one waterway crossing has been constructed on HLE, a waterway crossing of an unnamed third-order tributary of Cowpers Creek in BY-030. The waterway crossing has been constructed consistent with guidance documents and provides unimpeded fish passage.</p> | Compliant (C) |
| B25 | <p>Restrictions on Clearing and Habitat</p> <p>Unless otherwise agreed with the Planning Secretary, the Proponent must:</p> <p>(a) ensure that the vegetation and habitat clearing limits specified in Table 2-1, Table 2-2 and Table 2-3 of Appendix 2 are not exceeded; and</p> <p>(b) minimise:</p> <p>(i) the impacts of the development on hollow-bearing trees;</p> <p>(ii) the impacts of the development on threatened species; and</p> <p>(iii) the clearing of native vegetation and key habitat; and</p> <p>(c) not undertake any works that result in ground disturbance within a minimum setback distance of 50 metres from PCT 637 – Alpine and sub-alpine peatlands, damp herbfields and fens, South Eastern Highlands Bioregion and Australian Alps Bioregion and 30 metres from known locations of <i>Prasophyllum bagoense</i>, <i>Prasophyllum keltonni</i> and <i>Pterostylis oreophila</i> as mapped in the BDAR.</p> | <ul style="list-style-type: none"> Clearing permit for BY-103 (Permit no. VEG-160) Clearing Limits Tracking Dashboard | <p>The clearing limits outlined in Condition B25 and set out in Tables 2-1, 2-2 and 2-3 of the Infrastructure Approval have been apportioned to HLE and HLW by Transgrid. During the site visit and audit interviews evidence was presented demonstrating a robust process for tracking clearing against the clearing limits:</p> <ul style="list-style-type: none"> Prior to clearing: as a part of the permitting process, AGJV undertakes a check against the clearing limits for each permit to ensure clearing proposed is within allocation for that permit area. If an exceedance is identified additional approvals are required. Post clearing: Transgrid captures detailed imagery via drone survey every 6 weeks. Actual clearing is then verified using this imagery, with both total (TCZ) and partial (ECZ and HTZ) clearing tracked. Data is compiled by HLE and input into the Clearing Limits Tracking Dashboard with updates provided to Transgrid every 3 months. The Clearing Limits Tracking Dashboard for HLE does not apportion clearing to full impact or partial impact, as per condition B25 and Table 2-1. <p>Transgrid is responsible for compiling data across both HLE and HLW.</p> <p>At the time of the audit, only the FLP for the TCZ had been finalised (with FLP for the ECZ and HTZ yet to be finalised). As a result, tracking of clearing limits is restricted to the TCZ. The Clearing Limits Tracking Dashboard provided by HLE indicates that allocated clearing limits for two PCTs (306 and 1256) and one threatened fauna species (Little Eagle) have been exceeded. It is noted that the clearing for HLE does not exceed the limits set out in Tables 2-1 or 2-3 of the Infrastructure Approval, only the allocation for HLE. However, this could lead to a non-compliance in future if HLW</p> | Compliant (C) |



| CoA Requirement | Evidence collected | Audit finding and recommendations | Compliance status |
|---|---|---|----------------------|
| | | <p>uses their full allocation. It is anticipated this will be rectified via an update to the clearing limits set out in condition B25 (see below).</p> <p>A key gap identified is the allowance for future clearing. The Clearing Limits Tracking Dashboard not currently accounted for future clearing. Whilst HLE has a process for ensuring exceedances do not occur during the pre-clearing process, this does not flow through to the post-clearing tracking and means that exceedance of clearing limits could inadvertently occur in future.</p> <p>It is noted that Transgrid has prepared and submitted a draft application for revised clearing limits to DPHI. This is a complex process that needs to account for issues such as polygon smoothing, single use access tracks (to areas of partial clearing in the ECZ), assumes ECZ clearing along 4 m centreline, etc. This is being done by HLE and HLW and reviewed by Transgrid. The ECZ and HTZ has now been provided by HLE. It is understood that the ECZ has been expanded significantly.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> The Clearing Limits Tracking Dashboard is updated to allow tracking of full and partial clearing to ensure alignment with condition B25 and Table 2-1. The Clearing Limits Tracking Dashboard is updated to allow for future clearing to ensure potential exceedances are identified early. Transgrid assess clearing for PCTs 306 and 1256 and the Little Eagle to ensure non-compliance with condition B25 has not occurred. | |
| <p>B26 Biodiversity Offset Package</p> <p>Prior to carrying out any development that would impact on biodiversity values requiring offset or within 3 months of the date of the Project Approval whichever is sooner, the Proponent must update the Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT and to the satisfaction of the Planning 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, as determined in accordance with a BCF Charge Statement indexed on a monthly basis in accordance with the Biodiversity Offsets Payment Calculator Order 2022;</p> <p>(c) the timing and responsibilities for the implementation and delivery of the measures required in the Package;</p> <p>(d) a report to be provided every 6 months from the approval of the updated Package to the Planning Secretary, BCS and the BCT setting out the progress towards delivering each specific biodiversity offset measure; and</p> <p>(e) confirmation that the biodiversity offset measures will have been implemented and delivered no later than 13 November 2026, unless otherwise agreed with the Planning Secretary.</p> <p>Following the Planning Secretary's approval, the Proponent must implement and deliver the Biodiversity Offset Package.</p> | <ul style="list-style-type: none"> HumeLink Biodiversity Offset Package, Version 4 (dated 19 December 2024) HumeLink Biodiversity Offset Package, Version 5 (dated 19 May 2025) HumeLink Biodiversity Offset Package (letter from DPHI to Transgrid dated 21 May 2025, reference SSI-36656827-PA-76) HumeLink Biodiversity Offset Package, Version 6 (dated 20 November 2025) Six-Monthly Update Report – HumeLink Biodiversity Offset Package (letter from Transgrid to DPHI, dated 20 November 2025) | <p>Condition B26 requires the preparation of the BOP "Prior to carrying out any development that would impact on biodiversity values requiring offset or within 3 months of the date of the Project Approval whichever is sooner...". The Infrastructure Approval was dated 13 November 2024. Development commenced on 25 September 2025. Under condition B26, the update to the BOP was required by 13 March 2025.</p> <p>An initial BOP was prepared by Niche (Version 4, dated 19 December 2024) with conditional approval received on 20 December 2024, subject to further consultation with CPHR. The BOP was amended and a revised version (Version 5, dated 19 May 2025) submitted. The BOP was approved by DPHI (letter dated 21 May 2025).</p> <p>The BOP does not provide clear evidence of consultation with BCS (now CPHR) or the BCT.</p> <p>Section 4 of the BOP outlines the offset measures to be implemented:</p> <ul style="list-style-type: none"> future surveys to reduce the offset liability, establishment of BSAs, purchase of existing credits via both the like-for-like and variation rules (once all options to secure like-for-like credits been exhausted, and subject to an application to DPHI), payment into the BCF for residual offsets. <p>Section 5.1 outlines the projected cost of payment into the BCF (\$502,332,107) noting that the offset liability will be reduced through further survey and offset will be secured via other means prior to payment into the BCF.</p> <p>Section 6 outlines timing and responsibilities for the implementation and delivery of the BOP.</p> <p>Condition B26 requires a report to be provided to the Planning Secretary, BCS (now CPHR) and the BCT every 6 months from the approval of the updated BOP setting</p> | <p>Compliant (C)</p> |



| CoA Requirement | Evidence collected | Audit finding and recommendations | Compliance status | |
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| | | <p>out the progress towards delivering each specific biodiversity offset measure with the BOP committing to 6-monthly updates (Section 5.4). The BOP was approved in May 2025 and an update was due to November 2025. An update was submitted to DPHI (dated 20 November 2025) with a response received from DPHI (dated 24 November 2025).</p> <p>The BOP has been updated with the results of the BAVR (Version 6, dated 20 November 2025) with a reduction in species credits from 232,233 to 152,406 and reduction in associated cost of payment into the BCF from \$410,851,830 (total inclusive of ecosystem credits of \$502,332,107) to \$261,018,440.74 (total inclusive of ecosystem credits of \$352,498,718). There has been no change in ecosystem credits required by the project as a result of the BAVR (15,128).</p> <p>The BOP and offset liability will be updated following finalisation of the FLPs, expected in early 2026.</p> <p>Implementation of the BOP is ongoing. As of 20 November 2025, Transgrid had delivered the following:</p> <ul style="list-style-type: none"> • 13,273 ecosystem credits met via credits held by Transgrid, generated by BSAs undertaken by Transgrid or credits purchased from the market. • 1,401 species credits met via credits held by Transgrid or credits purchased from the market (<1%). <p>Transgrid is due to implement the measures outlined in the BOP by 13 November 2026. Strong progress has been made against the ecosystem credit liability with 88% delivered to date; based on this, it is likely that the residual paid into the BCF will be minor. However, given the extent of assumed presence for species credits a large species credit liability remains (99%) and the residual payment into the BCF is estimated at \$259M.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Updates to the BOP, as required by condition B26(d), should include evidence of the date and timing for consultation with CPHR and the BCT. | | |
| B27 | <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 \$502,332,107, in accordance with the Deed of Agreement with the Planning Secretary (or delegate) executed on 10 October 2024. The Proponent must comply with the terms of the Deed.</p> | <ul style="list-style-type: none"> • Transgrid Bank Guarantees (letter from Transgrid to DPHI, dated 20 December 2024) | <p>The bank guarantee was lodged by Transgrid on 20 December 2024.</p> | Compliant (C) |
| B28 | <p>Supplementary Biodiversity Strategy</p> <p>Prior to carrying out any development that would impact on the relevant biodiversity values (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Supplementary Biodiversity Strategy as committed to in the EIS, in consultation with BCS and to the satisfaction of the Planning Secretary. Unless otherwise agreed by the Planning Secretary, the Strategy must:</p> <p>(a) be peer reviewed by a suitably qualified, experienced and independent biodiversity consultant with Biodiversity Assessment Method (2020) (BAM) Accreditation whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) detail survey methods for all entities to be targeted by the Strategy, in accordance with the Biodiversity Assessment Method (2020) and any other</p> | <ul style="list-style-type: none"> • HumeLink Supplementary Biodiversity Strategy, Version 13.2 (dated 5 June 2025) • HumeLink – Supplementary Biodiversity Strategy (letter from DPHI to Transgrid, dated 6 June 2025, reference SSI-36656827-PA-67) • HumeLink – Supplementary Biodiversity Strategy – Peer Review (letter from DPHI to NSW Electricity Network Operations Pty Ltd, dated 20 November 2024, reference SSI-36656827-PA-2) | <p>Condition B28 requires Transgrid to prepare the SBS to the satisfaction of the Planning Secretary "Prior to carrying out development that would impact on the relevant biodiversity values...".</p> <p>The SBS was prepared and submitted to DPHI on 5 June 2025 (V13.2). Development commenced on 25 September 2025. The SBS was approved by DPHI (letter dated 6 June 2025).</p> <p>Evidence of consultation with BCS (now CPHR) is provided in the Document Control, with four reviews by CPHR (V9, V10, V12 and V13) and dates of consultation are outlined in Section 1.11.</p> <p>The SBS was peer reviewed by Adam Cavallaro. Mr Cavallaro was endorsed by DPHI as a suitably qualified, independent and experienced (letter dated 20 November 2024). Evidence of the peer review is provided in the Document Control table, with Mr Cavallaro reviewing version V8, and outlined in Section 1.10 with finding of the peer</p> | Compliant (C) |



| CoA Requirement | Evidence collected | Audit finding and recommendations | Compliance status |
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| <p>guidance document that is relevant and applicable at the time surveys were undertaken or the BDAR was prepared, including but not limited to:</p> <p>(i) surveys within unsurveyed areas of the development area identified in the EIS where a reduction in credit liability for the relevant biodiversity value assumed present is being sought;</p> <p>(ii) surveys for the following serious and irreversible impact (SRI) entities:</p> <ul style="list-style-type: none"> • Prasophyllum bagoense • Grevillea iaspicula • Pterostylis oreophila • Pomaderris pallida • Caladenia concolor • Mixophyes balbus • Genoplesium superburn • Prasophyllum keltonii • Pomaderris delicatata • Bossiaea fragrans • Litoria castanea • Eucalyptus robertsonii subsp. hemisphaerica • Prasophyllum innubum • Solanum armourense • Grevillea wilkinsonii • Calotis glandulosa • Chalinolobus dwyeri • Pseudomyza fumeus • Tyto tenebricosa • Pimelea bracteata | | <p>review provided in Appendix C. Transgrid's response to these recommendations provided in Attachments A and B of Appendix C.</p> <p>Survey methods for entities targeted by the SBS are described in Section 3 and Appendix F. Section 4 outlines a process for quantifying the results of supplementary surveys and any revised offset liabilities.</p> | |
| <p>B29 Biodiversity Assessment Verification Report</p> <p>Unless otherwise agreed by the Planning Secretary, prior to carrying out any development that would impact on the relevant biodiversity values subject to survey in the Supplementary Biodiversity Strategy in condition B28 (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Biodiversity Assessment Verification Report in consultation with BCS and to the satisfaction of the Planning Secretary. The Report must:</p> <p>(a) be prepared by a suitably qualified, experienced and independent biodiversity consultant with Biodiversity Assessment Method (2020) (BAM) Accreditation whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) be prepared in accordance with the Biodiversity Assessment Method (2020) and any other guidance document that is relevant and applicable at the time surveys were undertaken or the BDAR was prepared;</p> <p>(c) be prepared with regard to the final layout plans for the development required under condition C8, including the location of final access routes within each clearing zone and stockpile locations;</p> <p>(d) include:</p> | <ul style="list-style-type: none"> • HumeLink Biodiversity Assessment Verification Report, Version R5.1 (dated 29 August 2025) • HumeLink Biodiversity Assessment Verification Report (letter from DPPI to NSW Electricity Network Operations Pty Ltd dated 5 September 2025, reference SSI-36656827-PA-107) • Timing Amendment for the updated Biodiversity Assessment Verification Report (letter from DPPI to NSW Electricity Network Operations Pty Ltd dated 5 December 2025, reference SSI-36656827-PA-155) | <p>Condition B29 requires Transgrid to prepare the BAVR to the satisfaction of the Planning Secretary "Prior to carrying out development that would impact on the relevant biodiversity values . . .".</p> <p>The BAVR was prepared by Niche and submitted to DPPI on 29 August 2025 (Version R5.1). Development commenced on 25 September 2025.</p> <p>The BAVR was approved by DPPI (letter dated 6 June 2025). This approval is subject to a number of items:</p> <ol style="list-style-type: none"> 1. unless otherwise agreed by the Planning Secretary, a revised BAVR addressing the requirements of points 2 and 3 of this letter must be provided to the Department for the approval of the Planning Secretary within 3 months of the date of this letter; 2. revisions to the BAVR must have regard to the final layout plans as required by Condition B29(c) including an analysis of the approved BAVR (Rev 5.1) and any new information reported in future versions of the BAVR against the final layout plans, including the location of final access routes within each clearing zone and stockpile locations; 3. revisions to the BAVR must be submitted in accordance with Section 1.4 of BAVR Rev 5.1; | <p>Compliant (C)</p> |



| CoA Requirement | Evidence collected | Audit finding and recommendations | Compliance status |
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| <p>(i) detail of the outcomes of surveys undertaken in accordance with condition B28;</p> <p>(ii) where species are found to be present following the surveys undertaken under condition B28 or that are assumed to be present, identify measures to avoid and / or mitigate the impact to those entities for inclusion in a revised version of the Biodiversity Management Plan required under condition B30;</p> <p>(e) provide findings and recommendations relating to the matters in (d), including, but not limited to, reducing the relevant credit obligations and calculating credit obligations for unexpected finds.</p> <p>Any required changes to biodiversity offset or mitigation measures arising from the Biodiversity Assessment Verification Report must be incorporated into an updated version of the Biodiversity Offset Package under condition B26 in consultation with BCS and BCT and addressed in a revised version of the Biodiversity Management Plan required under condition B30, in consultation with BCS and FCNSW, to the satisfaction of the Planning Secretary.</p> | | <p>4. Transgrid must supply the Department with a list of lot and DPs that were not accessed for survey, either entirely or for certain times of the day prior to the lodgement of a revised BAVR.</p> <p>Transgrid sought and an extension to the due date for the revised BAVR of 5 December 2025 due to the FLPs for HLE being ongoing. This extension was granted with a revised due date of 30 April 2026 (letter from DPHI dated 5 December 2025). Evidence of consultation with BCS (now CPHR) is provided in the Document Control, with four reviews by CPHR (RO, R1, R2 and R3) and dates of consultation outlined in Section 1.6.</p> <p>Table 3 of the BAVR addresses the requirements of condition B29.</p> <ul style="list-style-type: none"> The BAVR has been prepared by Thea Kane and reviewed by Chani Wheeler of Niche. The BAVR has been independently peer reviewed by Adam Cavallaro, as approved by DPHI. The BAVR has been prepared in accordance with the BAM and relevant guidance documents, unless otherwise stated and agreed with CPHR. Table 5 of the BAVR addresses compliance with Section 5.2 of the BAM. The BAVR has been prepared based on the approved project footprint (i.e. not the FLP). This deviation has been approved by DPHI (see above). Results of the supplementary surveys are outlined in Section 4 and measures to avoid and/or mitigate impacts are provided in Section 9.1 and Annex 12 for inclusion in the BMP. Recommendations regarding the revised offset liability are outlined in Section 9. <p>The IEA found that the recommendations in Section 9 of the BAVR do not targeted measures for avoidance based on the findings of the BAVR, as required by B29 (d(ii)). The BAVR surveys have resulted in significant reductions in predicted impacts for some species when compared to the clearing limits set in the Infrastructure Approval, including reductions to nil impacts for:</p> <ul style="list-style-type: none"> Flockton Wattle (<i>Acacia flocktoniae</i>) Blue-tongued Greenhood (<i>Pterostylis oreophila</i>) - SAll species Alpine Sun-orchid (<i>Thelymitra alpicola</i>) Mauve Burr-Daisy (<i>Calotis glandulosa</i>) Smoky Mouse (<i>Pseudomys fumeus</i>) Large-eared Pied Bat (<i>Chalinolobus dwyeri</i>) - SAll species <p>Overall, 37 flora species and 22 fauna species had a reduction in impacts when compared to clearing limits sets under condition B25. This may change as the FLPs are finalised and impact calculations are updated.</p> <p>As outlined above, Transgrid have prepared a revised BOP and have submitted a draft application for revised clearing limits set in condition B25 to DPHI. Updates to the BMP arising from the BAVR are discussed below, under condition B30.</p> <p>The Squirrel Glider (<i>Petaurus norfolcensis</i>) was recorded during surveys undertaken for the SBS in areas where a reduction in offset liability was sought as part of Revised BDAR. These were not reported in the BAVR as the Squirrel Glider was not a target species for the BAVR. This is being rectified through updates to the BAVR following finalisation of FLPs (anticipated to occur in April 2026).</p> | |



| CoA Requirement | Evidence collected | Audit finding and recommendations | Compliance status |
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| <p>B30 Biodiversity Management Plan</p> <p>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s;</p> <p>(b) be prepared in consultation with BCS and FCNSW;</p> <p>(c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024);</p> <p>(d) include a description of the measures that would be implemented for:</p> <p>(i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29;</p> <p>(ii) minimising:</p> <ul style="list-style-type: none"> • the amount of vegetation clearing on site; • the loss of key fauna habitat (including tree hollows); • the impacts of fauna on site, including undertaking pre-clearance surveys; and • potential indirect impacts on threatened flora and fauna species; <p>(iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;</p> <p>(iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for:</p> <ul style="list-style-type: none"> • all work in the associated location to stop to prevent further impact, and • notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; <p>(v) connectivity strategy for the potentially impacted species identified in the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024) and a Supplementary Hollow and Nest Strategy;</p> <p>(vi) protecting the conservation values of McPhersons Plain and avoiding impacts to <i>Prasophyllum bagoensis</i>, <i>Prasophyllum keltonni</i> and <i>Pterostylis oreophila</i>;</p> <p>(vii) rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable native species;</p> <p>(viii) progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan;</p> <p>(ix) 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 revegetation of the site;</p> <p>(x) collecting and propagating seed (where relevant);</p> <p>(xi) controlling erosion, weeds and feral pests;</p> <p>(xii) bushfire management;</p> | <ul style="list-style-type: none"> • HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 Revision 02 (dated 15 September 2025) • HumeLink – HumeLink East Biodiversity Management Plan (letter from DPHI to NSW Electricity Network Operations Pty Ltd dated 9 September 2025, reference SSI-36656827-PA-3) • A8 Consultation Report Biodiversity Management Plan Revision B (dated 15 August 2025) • HumeLink Connectivity Corridor BMP Review (letter from Transgrid to NSW DCCEEW, dated 29 July 2025) • Conductor Line-Marking Plan (email from Niche to Transgrid, dated 30 January 2026) • Transgrid's proposals for additional and appropriate measures to compensate the likely serious and irreversible impacts arising from HumeLink (letter from Transgrid to NSW DCCEEW, dated 2 September 2024) • LAMP Workshop Minutes (dated 10 March 2025) • Transgrid - DCCEEW - Yass Area Network Landcare, Box Gum Woodland Local Area Management Programme, Terms of Reference (undated) • BGW LAMP Advisory Group – Meeting minutes (dated 17 December 2025) • BGW LAMP Advisory Group – Project Area Mapping Workshop / Quarterly Meeting Minutes (dated 25 February 2026) • Proposal to guide conservation of <i>Pimelea bracteata</i> (Rice Flower) through genomically diverse seed collection strategies (Botanic Gardens of Sydney) • Quarterly meeting - <i>Pimelea bracteata</i> - A&AM for HumeLink (email from Transgrid dated 16 December 2025) • RE: Landholder access request - <i>Pimelia</i> sampling (email from Transgrid dated 6 January 2026) • Sooty Owl - meeting notes 17/2/26 (email from Transgrid to NSW DCCEEW and DPHI, dated 4 March 2026) | <p>Condition B30 requires Transgrid to prepare the BMP to the satisfaction of the Planning Secretary "Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting . . .".</p> <p>The HLE BMP (Revision 0.1.7) was prepared and submitted to DPHI on 2 September 2025. This version of the HLE BMP was approved by DPHI (letter dated 9 September 2025). Development commenced on 25 September 2025.</p> <p>An updated version of HLE BMP (Revision 02) was provided as a part of the IEA and this document was reviewed. The document control indicates no changes to the version approved by DPHI, stating that Revision 02 was "Issued for Use".</p> <p>The HLE BMP has been prepared by Alex Graham and Dr Jack Tattler who are Principal Ecologists at East Coast Ecology. Both are considered suitably qualified and experienced persons. The BMP has been prepared in accordance with the Revised BDAR.</p> <p>Section 4.1 of the BMP states that the document "will be prepared in consultation with Biodiversity, Conservation and Science of the Environment and Heritage Group of NSW DCCEEW (BCS) and FCNSW." The document control tab indicates that revisions have occurred in response to CPHR comments. A detailed consultation report has been provided indicating extensive consultation with both FCNSW and CPHR.</p> <p>The BMP incorporates measures to meet the mitigation measures outlined in condition sB25 and B29 (see Sections 7.15 and Table 4) and to minimise clearing of native vegetation and fauna habitat as well as indirect impacts.</p> <p>A pre-clearing process is included to ensure clearing does not occur outside the disturbance footprint (noting proposed amendments to the FLPs - see above).</p> <p>An Unexpected Finds Protocol is outlined in Appendix A.</p> <p>Transgrid prepared a Connectivity Corridor BMP Review to identify and recommend priority actions to support fauna movement and habitat connectivity. The Connectivity Strategy provided at Appendix F of the HLE BMP builds on this.</p> <p>A draft HumeLink Conductor Line Marking Plan has been developed by Niche (dated 30 January 2026) and submitted to Transgrid for review. The plan sets out areas where there is a collision risk and provides recommendations for mitigating this risk (flappers, spirals etc). The review has found that initial modelling parameters were not sufficiently specific and did not adequately differentiate areas of higher collision risk from other areas. The plan is to be updated prior to finalisation.</p> <p>A Supplementary Hollow and Nest Strategy is provided at Appendix E.</p> <p>HLE does not interact with the biodiversity values of McPhersons Plain so measures to protect conservation values of the Plain are not required.</p> <p>Measures to rehabilitate temporary disturbance are outlined in Section 7.12 of the HLE BMP.</p> <p>A process for monitoring clearing is outlined above, with further information incorporated into the HLE BMP (see Appendix B: Vegetation Clearing Procedure). Partial clearing is yet to commence on HLE, so no verification report has been triggered at the time of the audit. Regardless, recommendations are provided above to improve tracking of partial clearing.</p> <p>Measures to salvage habitat resources are outlined in Section 3.3 of the HLE BMP.</p> | <p>Not compliant (NC)</p> |



| CoA Requirement | Evidence collected | Audit finding and recommendations | Compliance status |
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| <p>(xiii) minimising impacts on entities at risk of a serious and irreversible impact (SAll), including for Box Gum Woodland, Rice Flower (<i>Pimelea bracteata</i>) and Sooty Owl (<i>Tyto tenebricosa</i>) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September 2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); and</p> <p>(e) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p> <p>Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</p> | | <p>Minimal measures are incorporated for the collection and propagation of seed, excluding as a part of additional and appropriate measures (AAMs) for <i>Pimelea bracteata</i>.</p> <p>Table 3 of the HLE BMP states that measures to minimise impacts on entities at risk of SAll are outlined in Sections 7.3 and 7.6. Section 7.3 discusses the BAVR process, while Section 7.6 discusses clearing limits. As outlined above, specific mitigation measures are not provided in the BAVR and none have been incorporated into the HLE BMP. The general mitigation measures and clearing limits are considered insufficient to address the requirements of the condition B30 (d(xiii)).</p> <p>Transgrid has outlined AAMs for Box Gum Woodland, Sooty Owl and <i>Pimelea bracteata</i> in a letter to NSW DCCEE in September 2025. In their RFI response, Transgrid provided an update to the implementation of AAMs:</p> <ul style="list-style-type: none"> • Transgrid has established the Box Gum Woodland Local Area Management Programme (LAMP) in collaboration with DCCEE and Yass Area Network Landcare. • Transgrid has entered into a contract with the Royal Botanic Gardens to undertake genomically diverse seed collection. To date, three field trips have been undertaken to collect genetic material and place bags over seed heads. <p>A review by Transgrid and CPHR has determined that the Project will not impact caves within Sooty Owl habitat. Accordingly, the project will not result in SAll for this species and AAMs are no longer required.</p> <p>A flora and fauna monitoring program is outlined in Appendix H.</p> <p>Two non-compliances in relation to condition B30. These are discussed in Section 3.1 and Table 3-2.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Updates to the HLE BMP should include evidence of the date and timing for consultation with CPHR and the FCNSW. • Updates to monitoring of partial clearing (see recommendations under condition B25). • Include specific mitigation measures to be implemented for entities at risk of SAll. • Implement recommendations in Table 3-2 to avoid further instances of clearing outside project boundaries. | |
| <p>C8 Prior to commencing construction, the Proponent must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including:</p> <p>(a) details on siting of transmission towers and ancillary infrastructure and / or ancillary facilities; and</p> <p>(b) showing comparison to the approved layout and approved vegetation clearing.</p> <p>The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans.</p> | <ul style="list-style-type: none"> • HumeLink – Final Layout Plans staging request (letter from DPPI to Transgrid, dated 22 August 2025, reference SSI-36656827-PA-109) • HumeLink – HumeLink East Final Layout Plans staging request letter from DPPI to Transgrid, dated 11 September 2025, reference SSI-36656827-PA-111) | <p>Transgrid has requested approval to stage the FLPs for the HumeLink project, including HLE. These requests have been approved by DPPI.</p> <p>As outlined above, Transgrid is in the process of finalising the FLPs for both HLE and HLW.</p> | Compliant (C) |

Independent Environmental Audit – SSI 36656827 HumeLink East

Proponent Response to Audit Findings – 14 May 2026

Non-compliances

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action/ Response | Due Date |
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| HLE-NC-01 | A2 | <p>The development must be carried out:</p> <ul style="list-style-type: none"> (a) in compliance with the conditions of this approval; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in Appendix 1. | <p>Lead Auditor Observations (HLE-NC-01)</p> <p>On 28/11/25 DPHI were notified of four instances where access track construction resulted in impacts outside the project boundary and potential for non-compliances with Conditions A2 (d) and B30.</p> <p>Following the identification of the identification and reporting of the non-compliance, a number of preventative actions are to be undertaken as follows:</p> <p>Procedural Controls</p> <ul style="list-style-type: none"> • Implement controls that have since been developed and documented in the Biodiversity Management Plan (BMP), specifically BD6, BD11 and BD16. • Flagging intervals to be reviewed based on terrain and track alignment and amended accordingly. • Re-brief all site staff on boundaries and the process to follow for delineating the boundary. <p>Boundary Communication</p> <ul style="list-style-type: none"> • Provide physical signage and fencing to delineate boundaries. • Reinforce boundary rules at toolbox/pre-start, with site crews. <p>Organisational / Resource Allocation:</p> <ul style="list-style-type: none"> • Ensure sufficient resources for survey team to delineate project boundaries for future works. • Ensure that all machine controls are uploaded and ready for use. | <p>Lead Auditor Recommendations (HLE-NC-01)</p> <p>The Auditor reviewed the actions taken in response to the non-compliance and considers them to be appropriate.</p> <p>However, should any breaches of the boundary disturbance protocols, or further boundary exceedances (or near misses) occur, a detailed review of the effectiveness of the implementation of the recommendations and processes are reviewed and revised accordingly with the objective of identifying and eliminating any systemic weaknesses to prevent further non-compliance.</p> <p>Please also refer to the specialist biodiversity report (Appendix F) and to HLE-Obs-03 below regarding boundary flagging.</p> | <p>Actions in response to the non-compliance reported on 28/11/2026 were complete, as reviewed during the audit.</p> <p>No further action is proposed.</p> | N/A |
| | B30 | <p>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced biodiversity expert/s; (b) be prepared in consultation with BCS and FCNSW; (c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024); (d) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> (i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29; (ii) minimising: <ul style="list-style-type: none"> • the amount of vegetation clearing on site; • the loss of key fauna habitat (including tree hollows); • the impacts of fauna on site, including undertaking pre-clearance surveys; and • potential indirect impacts on threatened flora and fauna species; | | | | |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action/ Response | Due Date |
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| | | <p>(iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;</p> <p>(iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for:</p> <ul style="list-style-type: none"> • all work in the associated location to stop to prevent further impact, and • notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; <p>(v) connectivity strategy for the potentially impacted species identified in the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024) and a Supplementary Hollow and Nest Strategy;</p> <p>(vi) protecting the conservation values of McPhersons Plain and avoiding impacts to <i>Prasophyllum bagoensis</i>, <i>Prasophyllum keltonni</i> and <i>Pterostylis oreophila</i>;</p> <p>(vii) rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable native species;</p> <p>(viii) progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan;</p> <p>(ix) 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 revegetation of the site;</p> <p>(x) collecting and propagating seed (where relevant);</p> <p>(xi) controlling erosion, weeds and feral pests;</p> <p>(xii) bushfire management;</p> <p>(xiii) minimising impacts on entities at risk of a serious and irreversible impact (SAIL), including for Box Gum Woodland, Rice Flower (<i>Pimelea bracteata</i>) and Sooty Owl (<i>Tyto tenebricosa</i>) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September 2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); and</p> <p>(e) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p> <p>Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</p> | <p>Biodiversity Specialist Observations (HLE-NC-01)</p> <p>On 28 November 2025 DPHI were notified of four instances where access track construction resulted in impacts outside the project boundary (Lucidity ID 47487). The access tracks identified include AT 299 and AT 301 within property YG-027A, as well as AT 446-448 and AT 451 within property MA-051. This was considered a potential for non-compliance with Conditions A2 (d) and B30.</p> <p>This incident arose due to boundary flagging being in the wrong position as well as the spacing between flagging being insufficient. For one site (AT446-448 in MA-051) insufficient sediment controls were in place and sediment spread outside the clearing boundary and development of a boghole led to construction of an alternate access for the landowner outside the project boundary.</p> <ul style="list-style-type: none"> • Clearing in MA-051 and YG-027A occurred in areas mapped as PCT 316 and PCT 1330. PCT 1330 is considered with White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland critically endangered ecological community (CEEC). • The BAVR identifies AT 301 in YG-027A as habitat for the Striped Legless Lizard (<i>Delma impar</i>), Yass Daisy (<i>Ammobium craspedioides</i>), Hoary Sunray (<i>Leucochrysum albicans</i> subsp. <i>tricolor</i>) and Austral Toadflax (<i>Thesium australe</i>) noting none were observed during pre-clearing surveys. • The BAVR identifies AT 299 in in YG-027A as habitat for Southern Myotis (<i>Myotis macropus</i>), Yass Daisy (<i>Ammobium craspedioides</i>), Hoary Sunray (<i>Leucochrysum albicans</i> subsp. <i>tricolor</i>) and Austral Toadflax (<i>Thesium australe</i>) noting none were observed during pre-clearing surveys. • No threatened species habitat is mapped in MA-051. <p>This incident has resulted in unintended impacts to biodiversity values.</p> | <p>Biodiversity Specialist Recommendations (HLE-NC-01)</p> <p>Ensure survey grade equipment is used to delineate clearing boundaries. GPS devices with less accurate positioning (e.g. mobile devices supporting FieldMaps) should not be used to delineate boundaries.</p> <p>Ensure flagging is at appropriate intervals to clearly delineate clearing boundaries, Intervals should be adapted to the alignment, with a lower interval on curves for example, and more flagging on steep terrain.</p> <p>AGJV should review use of flagging to determine whether this is appropriate and easily observed by all</p> <p>As advised by AGJV during the site inspection, large plant used during clearing works should be equipped with survey grade GPS with the clearing boundaries loaded to ensure clearing does not extend outside approved limits.</p> | <p>The HLE Survey Team are the only personnel who set out clearing boundaries and have a dedicated section in the Permit for sign off, therefore only survey-grade equipment is used for setting out flagging.</p> <p>Flagging intervals will be updated in the next revision of the BMP.</p> <p>Flagging is being audited as per HLE-Obs-14 below. As advised during site inspection, AGJV confirm that large plant used during clearing works are be equipped with survey grade GPS with the clearing boundaries loaded to ensure clearing does not extend outside approved limits.</p> | <p>15/05/2026</p> <p>15/05/2026</p> |
| HLE-NC-02 | B64 | <p>Prior to commencing Enabling Works, an Enabling Works Management Plan must be prepared which outlines the environmental management practices and procedures to be implemented. The Enabling Works Management Plan must be prepared in consultation with the relevant council(s) and government agencies. The Enabling Works Management Plan must include:</p> <p>(a) a description of activities to be undertaken during Enabling Works (including scheduling and duration of work to be undertaken at the site) focussing on low risk activities;</p> <p>(b) risk assessment for types of activities to be undertaken under the plan;</p> <p>(c) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s);</p> | <p>Lead Auditor Observations (HLE-NC-02)</p> <p>On 10/9/25 Transgrid Notified DPHI of a potential non-compliance with Condition B64.</p> <p>The post construction review of as-built drone imagery identified two areas of an access track within property MA-099 breaching the project boundary by a maximum of 6.5m. The works were associated with Minor Impact Checklist (MIC) # 15, which was approved by the ER.</p> <p>Following the identification and reporting of the non-compliance, an internal investigation was undertaken which recommended a number of actions to be undertaken as follows:</p> | <p>Lead Auditor Recommendations (HLE-NC-02)</p> <p>The Auditor reviewed the actions taken in response to the non-compliance and considers them to be appropriate.</p> | <p>Action in response to the non-compliance reported on 10/09/2025 were complete, as reviewed during the audit.</p> <p>No further action is proposed.</p> | N/A |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action/ Response | Due Date |
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| | | <p>(d) a program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken prior to the commencement of site establishment work;</p> <p>(e) details of how the activities described in subsection (a) of this condition will be carried out to:</p> <p>(i) meet the performance outcomes stated in the documents listed in Condition A1;</p> <p>(ii) ensure the accommodation camps comply with conditions B23 and B51;</p> <p>(iii) manage the risks identified in the risk analysis undertaken in subsection (b) of this condition; and</p> <p>(f) a program for monitoring the performance outcomes, including a program for construction noise monitoring.</p> | <p>Immediate Actions</p> <ul style="list-style-type: none"> Review of all current project boundaries with survey/foreman kits. Site-wide re-briefing on boundary rules and delineation requirements. Requirement that machine controls are confirmed as being operational prior to works commencement. <p>Short Term Actions</p> <ul style="list-style-type: none"> Targeted re-training for all delivery teams on appropriate use of GIS vs GPS tools. Toolbox talks rolled out to reinforce correct boundary delineation processes. Action status: Completed. Improved base station deployment planning to avoid future delays. <p>Medium Term Actions</p> <ul style="list-style-type: none"> Additional survey resources allocated to boundary Survey team to sign off all Clearing and Land Disturbance Permits as an additional control. Risk-based requirement for survey delineation of all access track works outside 200m corridor or near environmental constraints. <p>At the time of the Audit, the recommended actions were noted as complete.</p> | <p>However, should any breaches of the boundary disturbance protocols, or further boundary exceedances (or near misses) occur, a detailed review of the effectiveness of the implementation of the recommendations and processes are reviewed and revised accordingly with the objective of identifying and eliminating any systemic weaknesses to prevent further non-compliance.</p> <p>Please also refer to the specialist biodiversity report (Appendix F) and to HLE-Obs-03 below regarding boundary flagging.</p> | | |
| | | | <p>Biodiversity Specialist Observations (HLE-NC-02)</p> <p>On 4 September 2025 Transgrid Notified DPHI of a potential non-compliance with Condition B64 (Lucidity ID 47912). The post construction review of as-built drone imagery identified two areas of an access track within property MA-099 breaching the project boundary by a maximum of 6.5 m. The works were undertaken as a part of Enabling Works and were associated with Minor Impact Checklist (MIC) # 15, which was approved by the Environmental Representative.</p> <p>This incident arose due to the use of ArcGIS FieldMaps to delineate the clearing boundary with accuracy of >5 m. Further, spacing between was insufficient due to alignment of the track and terrain.</p> <p>The Response to Request for Information identified that although the project boundary was exceeded, the total disturbance was less than the approved disturbance (13,272 m² vs 23,587 m²). This document also states that a review by the Project Ecologist indicated the area was low conservation value grassland and "would have resulted on a negligible impact to biodiversity" (p.2). This conclusion does not draw on the data from the BDAR or BAVR.</p> | <p>Biodiversity Specialist Recommendations (HLE-NC-02)</p> <p>The impacts should be incorporated into the updates to condition B25 currently being sought by Transgrid.</p> | <p>An updated Final Layout Plan was provided to Transgrid on 07/05/2026 with this specific area in as-built state to be incorporated. This submission was supported by the provision of vegetation, threatened flora and threatened fauna polygons for the impacted area.</p> | <p>N/A</p> |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action/ Response | Due Date |
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| | | | <p>Clearing occurred in areas mapped as a mix of PCT 280 and PCT 277. PCT 277 is considered with White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland critically endangered ecological community (CEEC). Land adjacent is mapped as Category 1 Land.</p> <p>The BDAR identifies these areas as habitat for a variety of threatened fauna species Key's Matchstick Grasshopper (<i>Keyacris scurra</i>), Yass Daisy (<i>Ammobium craspedioides</i>), Small Purple-pea (<i>Swainsona recta</i>), Silky Swainson-pea (<i>Swainsona sericea</i>) and Striped Legless Lizard (<i>Delma impar</i>).</p> <p>Given the total disturbance was less than the approved disturbance and occurred in areas contiguous with the approved disturbance boundary, it is considered likely that impacts to biodiversity are consistent with or even less than the predicted impacts.</p> | | The FLPs and supporting vegetation and species polygons will be used to inform the B29 Biodiversity Assessment Verification Report (BAVR) Final Layout Plan Revision, which is currently in development. The revised BAVR will, in turn, inform an application to update the clearing limits under Condition B25. | |
| HLE-NC-03 | B65 | Following the Planning Secretary's approval, the Proponent must implement the Enabling Works Management Plan for the duration of the Enabling Works. | <p>On 29/05/25, Transgrid notified DPHI of a non-compliance with Condition B65 relating related to works commencing at access Point T180 prior to the ER signoff of the minor impacts checklist (A5) (checklist No 39).</p> <p>Corrective actions noted included:</p> <ul style="list-style-type: none"> • Checking controls to be implemented for enabling works • Targeted retraining on enabling works approvals and controls • Revision to geofencing configuration. <p>A response was received by DPHI dated 30/09/2025 acknowledging the corrective actions implemented. The Actions noted above are deemed to be appropriate and were confirmed by Transgrid and AGJV to have been completed.</p> | <p>The non-compliance is in regard to a timing issue and relates to the enabling works. The relevant approvals were subsequently obtained from the ER.</p> <p>The enabling works have now been completed, and the relevant obligations incorporated into the construction environmental management plans.</p> <p>A general recommendation is to ensure all authorisations and signoffs are obtained prior to the commencement of any new activity.</p> | <p>This non-compliance was related to enabling works.</p> <p>AGJV processes have matured to ensure all authorisations and signoffs are communicated to the Construction Teams.</p> | N/A |
| HLE-NC-04 | C11 | <p>Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing and must be submitted via the NSW planning portal (Major Projects). The notification must identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply, the reasons for the non-compliance (if known), and what actions have been undertaken, or will be undertaken, and when, to address the non-compliance.</p> <p>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p> | <p>Non-compliance with Condition C11 relating to late notification of a non-compliance. The notification related to works commencing prior to the ER signoff of the minor impacts checklist (A5)</p> <p>In relation to the non-compliance with Condition C11, the formal notification was made to DPHI on 08/09/2025, more than 7 days following the identification on the non-compliance on 29/05/2025. Accordingly, the notification timeframes have not been met. DPHI confirmed the non-compliance on 01/10/2025.</p> | <p>A general recommendation is to review the internal communication and notification processes and amend as required to ensure any non-compliance is reported to DPHI within the required timeframes.</p> | <p>Project wide training was rolled out during a "soft start" to the new year in January 2026, with a large focus on compliance and responsibilities.</p> <p>A review of the internal communication and notification processes will be undertaken to ensure those with reporting responsibilities are aware of the required timeframes.</p> | <p>Complete</p> <p>23/04/2026</p> |

Observations and Opportunities for Improvement

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action / Response | Due Date |
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| Lead Auditor Observations and Recommendations | | | | | | |
| HLE-Obs-01 | A19 | <p>The Applicant must notify the Department within 24 hours of becoming aware of an incident. The notification must be made via the NSW planning portal (Major Projects) and address details of the incident including:</p> <p>(a) date, time and location;</p> <p>(b) a brief description of what occurred and why it has been classified as an incident;</p> <p>(c) a description of what immediate steps were taken in relation to the incident; and</p> <p>(d) identifying a contact person for further communication regarding the incident.</p> | <p>The Auditor was provided with a copy of the Incident and NCR register for the Audit period. During the Audit period, a total of 7 minor incidents occurred (e.g. oil spills) which were classified as minor and non-reportable with minimal impact.</p> <p>The incident register does not include a description of the actions taken to remedy the incident or any additional measures to prevent further incident and this information would be beneficial in demonstrating due diligence in the event of a major spill.</p> | <p>It is recommended the register is reviewed and updated to include this information.</p> | <p>Incident and NCR Register will be reviewed and updated to align with close out actions to be recorded.</p> | 16/04/2026 |
| HLE-Obs-02 | B24 | <p>Prior to the commencement of construction (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Applicant must prepare a Soil and Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared in consultation with the relevant Council, BCS and Water Group;</p> <p>(b) ensuring the requirements in conditions B18 to B23 are met;</p> <p>(c) managing flood risk during construction and operation;</p> <p>(d) investigating, assessing and managing contaminated land, soils, groundwater and blasting in the development area;</p> <p>(e) investigating, assessing and managing the potential for asbestos and other hazardous materials in the development area;</p> <p>(f) managing any unexpected and / or suspected contaminated land, asbestos and unexploded ordnance excavated, disturbed or otherwise discovered during construction; and</p> <p>(g) a program to monitor and report on the impacts and environmental performance of the development.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Soil and Water Management Plan.</p> <p>Note: The Soil and Water Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</p> | <p>The Sediment Basin at the Yass Accommodation Camp has a sign installed that ensures relevant personnel understand the requirements of the "Permit to Pump" to minimise the risk of an unauthorised discharge incident.</p> | <p>Place similar signage at all sediment basins where there is a risk of unauthorised discharge of potentially contaminated water to the environment.</p> | <p>Sediment basin signage will be reviewed and implemented in line with the recommendation.</p> | 16/04/2026 |
| HLE-Obs-03 | B30 | <p>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s;</p> <p>(b) be prepared in consultation with BCS and FCNSW;</p> <p>(c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024);</p> <p>(d) include a description of the measures that would be implemented for:</p> <p>(i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29;</p> <p>(ii) minimising:</p> <ul style="list-style-type: none"> • the amount of vegetation clearing on site; • the loss of key fauna habitat (including tree hollows); • the impacts of fauna on site, including undertaking pre-clearance surveys; and | <p>A colour coding system for boundary flagging and the delineation of project boundary and environmentally sensitive areas has been implemented at the Bannaby substation site.</p> <p>The colour of the flagging is inconsistent with the advisory signage at the site compound and it appears that a similar system has not been implemented on other parts of the project</p> | <p>Review the colour coding system for the identification and delineation of environmental protection fencing across the project. The review should also include mechanisms for communicating colour coding systems to ensure consistency including:</p> <ul style="list-style-type: none"> • Visual signage (e.g. Bannaby Substation) • Site inductions • EWMS/ECMS and Workpacks | <p>A review of the fencing and signage protocol will be undertaken.</p> <p>Associated EWMS and Workpacks will be reviewed to ensure consistency of fencing and signage protocols.</p> <p>Current implementation of signage and fencing will undergo an internal audit.</p> | <p>16/04/2026</p> <p>23/04/2026</p> <p>30/04/2026</p> |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action / Response | Due Date |
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| | | <ul style="list-style-type: none"> • potential indirect impacts on threatened flora and fauna species; (iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint; (iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for: <ul style="list-style-type: none"> • all work in the associated location to stop to prevent further impact, and • notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; (v) connectivity strategy for the potentially impacted species identified in the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024) and a Supplementary Hollow and Nest Strategy; (vi) protecting the conservation values of McPhersons Plain and avoiding impacts to <i>Prasophyllum bagoensis</i>, <i>Prasophyllum kelttoni</i> and <i>Pterostylis oreophila</i>; (vii) rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable native species; (viii) progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan; (ix) 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 revegetation of the site; (x) collecting and propagating seed (where relevant); (xi) controlling erosion, weeds and feral pests; (xii) bushfire management; (xiii) minimising impacts on entities at risk of a serious and irreversible impact (SAII), including for Box Gum Woodland, Rice Flower (<i>Pimelea bracteata</i>) and Sooty Owl (<i>Tyto tenebricosa</i>) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September 2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); and (e) include a program to monitor, evaluate and publicly report on the effectiveness of these measures. <p>Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p> <p>Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</p> | | | | |
| HLE-Obs-04 | B51 | <p>The Proponent must:</p> <ul style="list-style-type: none"> (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; (b) ensure that the development; <ul style="list-style-type: none"> (i) complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; (ii) is suitably equipped to respond to any fire 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; | <p>Condition B51 requires the 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.</p> <p>Water supply tanks have been installed as required by this condition. 20,000 L Water tanks were available at the Yass Accommodation Camp and the Bannaby substation sites, however it was not clear to the Auditor that the tank was a dedicated fire water tank which may lead to confusion and loss of response time in the event of a bushfire emergency.</p> | <p>Install highly visible signage on water supply tanks at all locations so emergency services can quickly identify the water supply tank in the event of an emergency.</p> | <p>Review of signage requirements at water supply tanks will be undertaken and appropriate signage will be installed.</p> | 23/04/2026 |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action / Response | Due Date |
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| | | <p>(iii) incorporates the recommendations of a fire risk assessment as per the network operator's design standards;</p> <p>(c) ensures that buildings within the compounds comply with Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS's Planning for Bushfire Protection 2019;</p> <p>(d) ensure any fire trails or asset protection zones associated with the development are wholly contained within the approved disturbance area;</p> <p>(e) develop procedures to manage potential fires on site, in consultation with the RFS, FRNSW, FCNSW and NPWS;</p> <p>(f) assist the RFS, FRNSW, FCNSW, NPWS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(g) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.</p> | | | | |
| HLE-Obs-05 | B55 | 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>On 25/08/2025, DPHI were notified of a potential non-compliance with conditions B55 and B56 relating to site won material from the Faulder Ave compound to property number BY-150. The potential non-compliance notification noted that an approved notice under Section 143 of the Environment Operations Act 1997 did not accompany the material to the receiving location.</p> <p>On 10/10/2025 DPHI wrote to Transgrid acknowledging the potential non-compliance noting that no further action would be taken.</p> <p>The Auditor notes that the notification to DPHI was initially made as a precaution, with further investigations undertaken to further assess compliance status. In their response to a request for information issued by DPHI Transgrid noted that:</p> <ul style="list-style-type: none"> Following further sampling and analysis of the material, the test results confirmed the material classification to be Excavated Natural Material (ENM) The material was placed with the approved EIS project boundary and not exported off site. The material was beneficially re-used in line with the Early Works Management Plan. | <p>The Auditor has reviewed the information provided by Transgrid as noted and agrees with the findings of the Transgrid investigation and interpretation of compliance.</p> <p>The Auditor acknowledges the transparent approach in reporting the potential non-compliance to DPHI and makes no recommendations in relation to this condition at this time.</p> | Noted, no further action is proposed. | N/A |
| | B56 | 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. | | | | |
| Biodiversity Specialist Observations and Recommendations | | | | | | |
| HLE-Obs-06 | A1 | In meeting the specific performance measures and criteria in 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 pre-construction minor works, road upgrades, construction, operation, rehabilitation or decommissioning of the development | <p>Revised constraints mapping, updated following completion of the Biodiversity Assessment Verification Report (BAVR), is not included in the current version of the BMP.</p> <p>Despite not being included in the current version of the BMP, mapping derived from BAVR (vegetation mapping and species polygons) has been used by AGJV in the revised constraints mapping. This constraints mapping is used to microsite development, when assessing impacts during consistency assessments, and in the clearing and permitting process and assessment of clearing.</p> | The BMP is updated to include revised constraints mapping | The BMP will be updated with the BAVR constraints layer once the BAVR revision has been finalised. | Pending BAVR revision |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action / Response | Due Date |
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| HLE-Obs-07 | B30 | <p>Unexpected Finds Protocol</p> <p>iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for:</p> <ul style="list-style-type: none"> • all work in the associated location to stop to prevent further impact, and • notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; | <p>During the site inspection, a daily ecology checklist from the 10 February 2026 potential unexpected find (see Error! Reference source not found.). This had not been reported through to project personnel,</p> <p>No clear process for reporting and resolving potential unexpected finds was evident. To ensure compliance with the requirements of the BMP a clear process is required.</p> | <p>AGJV and their Project Ecologist develop a process to report, track and resolve potential unexpected finds and that this procedure be incorporated into an updated Unexpected Finds Protocol.</p> | <p>If an ecologist confirms an unexpected find, AGJV would be immediately notified.</p> <p>The process will be clarified in the Unexpected Finds Procedure, in the next revision of the BMP.</p> <p>There have been no unexpected finds to date. During the audit site inspection it was confirmed that the potential unexpected find of legless lizard was not confirmed and not present.</p> | <p>N/A</p> <p>15/05/2026</p> <p>N/A</p> |
| HLE-Obs-08 | B30 | <p>Vegetation Clearing Procedures</p> <p>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s;</p> <p>(b) be prepared in consultation with BCS and FCNSW;</p> <p>(c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024);</p> <p>(d) include a description of the measures that would be implemented for:</p> <p>(i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29;</p> <p>(ii) minimising:</p> <ul style="list-style-type: none"> • the amount of vegetation clearing on site; • the loss of key fauna habitat (including tree hollows); • the impacts of fauna on site, including undertaking pre-clearance surveys; and • potential indirect impacts on threatened flora and fauna species; <p>(iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;</p> <p>(iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for:</p> <ul style="list-style-type: none"> • all work in the associated location to stop to prevent further impact, and • notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; <p>(v) connectivity strategy for the potentially impacted species identified in the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024) and a Supplementary Hollow and Nest Strategy;</p> <p>(vi) protecting the conservation values of McPhersons Plain and avoiding impacts to <i>Prasophyllum bagoensis</i>, <i>Prasophyllum keltonni</i> and <i>Pterostylis oreophila</i>;</p> <p>(vii) rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable native species;</p> <p>(viii) progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan;</p> | <p>During the site inspection a difference in the data layers being used by the Project Ecologists (East Coast Ecology) and AGJV was observed (see Error! Reference source not found.).</p> <p>A lack of consistency in data layers being used may lead to discrepancies between areas assessed as a part of the pre-clearing process and subsequent clearing works.</p> | <p>AGJV explore improved data sharing processes with their Project Ecologists to ensure consistent datasets are used.</p> | <p>AGJV provide the ecologists with all data layers for pre-clearing surveys and reporting. The Project ecologists have been provided an updated shapefile layer to ensure and confirm both ecologists and AGJV are using the same and correct design footprint.</p> <p>24/04/2026</p> <p>Regarding pre-clearing survey areas, as a fail-safe, the pre-clearing survey area is specifically checked against the permitted area to identify if there are any possible discrepancies, prior to Permit approval.</p> <p>No further action proposed.</p> | <p>N/A</p> |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action / Response | Due Date |
|------------|-----|--|--|---|---|---|
| | | <p>(ix) 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 revegetation of the site;</p> <p>(x) collecting and propagating seed (where relevant);</p> <p>(xi) controlling erosion, weeds and feral pests;</p> <p>(xii) bushfire management;</p> <p>(xiii) minimising impacts on entities at risk of a serious and irreversible impact (SAIL), including for Box Gum Woodland, Rice Flower (<i>Pimelea bracteata</i>) and Sooty Owl (<i>Tyto tenebricosa</i>) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September 2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); and</p> <p>(e) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p> <p>Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</p> | | | | |
| HLE-Obs-09 | B30 | <p>Vegetation Clearing Procedure / Biosecurity Management Plan</p> <p>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s;</p> <p>(b) be prepared in consultation with BCS and FCNSW;</p> <p>(c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024);</p> <p>(d) include a description of the measures that would be implemented for:</p> <p>(i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29;</p> <p>(ii) minimising:</p> <ul style="list-style-type: none"> • the amount of vegetation clearing on site; • the loss of key fauna habitat (including tree hollows); • the impacts of fauna on site, including undertaking pre-clearance surveys; and • potential indirect impacts on threatened flora and fauna species; <p>(iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;</p> <p>(iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for:</p> <ul style="list-style-type: none"> • all work in the associated location to stop to prevent further impact, and • notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; <p>(v) connectivity strategy for the potentially impacted species identified in the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024) and a Supplementary Hollow and Nest Strategy;</p> <p>(vi) protecting the conservation values of McPhersons Plain and avoiding impacts to <i>Prasophyllum bagoensis</i>, <i>Prasophyllum keltonni</i> and <i>Pterostylis oreophila</i>;</p> <p>(vii) rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable</p> | <p>Two different procedures are provided in the Vegetation Clearing Procedure and Biosecurity Management Plan regarding documenting weed species within a property.</p> <p>The pre-clearing report for BY-040 did not adequately document occurrence and distribution of priority weed species to allow management to occur.</p> <p>There is a lack of consistency between the two procedures, along with very onerous requirements in the Vegetation Clearing Procedure. It is likely that this is leading to inadequate mapping of weed species as a part of the pre-clearing surveys.</p> <p>The intent of weed mapping should be focused on understanding baseline conditions and control of priority weeds during construction, to prevent spread and ensure compliance is achieved</p> | <p>AGJV engage with CPHR with a view to simplifying baseline data collection for weed species. This could include:</p> <p>noting priority weeds occurring at low densities which teams need to be aware of, and</p> <p>undertaking detailed mapping of weed infestations which will need to be managed during construction. This information should be spatial in nature.</p> | <p>AGJV notes that, as there is no conflict between the requirements of the VCP and Biodiversity Management Plan, all weed collection measures can be and are being implemented. Therefore, it is not necessary to engage with CPHR to simplify the data collection process. Instead, the action is to update the BMP to ensure consistency between the VCP and Biodiversity MP.</p> <p>Any inconsistencies within the BMP will be updated in the next revision of the BMP.</p> <p>The HLE Project Ecologist reviewed the Pre-Clearing Report (BY-040), to address the auditor's comments, and determined compliance with the requirements of the BMP, as follows:</p> <ul style="list-style-type: none"> - The Vegetation Clearing Procedure asks for species identification, counts or count estimates, and the NSW property lot for each species. All covered in Table 6 and Figures 4–6. - The Biosecurity Management Plan asks for species identification and a cover estimate category. Both are provided in Table 6. <p>Section 4.1.1 of the Flora and</p> | <p>N/A</p> <p>15/05/2026</p> <p>N/A</p> |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action / Response | Due Date |
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| | | <p>native species;</p> <p>(viii) progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan;</p> <p>(ix) 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 revegetation of the site;</p> <p>(x) collecting and propagating seed (where relevant);</p> <p>(xi) controlling erosion, weeds and feral pests;</p> <p>(xii) bushfire management;</p> <p>(xiii) minimising impacts on entities at risk of a serious and irreversible impact (SAIL), including for Box Gum Woodland, Rice Flower (<i>Pimelea bracteata</i>) and Sooty Owl (<i>Tyto tenebricosa</i>) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September 2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); and</p> <p>(e) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p> <p>Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</p> | | | <p>Fauna Monitoring Plan asks for weed identification, locations, and presence/absence maps by property. All included in Table 6 and Figures 4–6.</p> <p>- Weed species and distribution is depicted spatially in Figures 4–6 and in Table 6.</p> | |
| HLE-Obs-10 | B30 /C8 | <p>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s;</p> <p>(b) be prepared in consultation with BCS and FCNSW;</p> <p>(c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024);</p> <p>(d) include a description of the measures that would be implemented for:</p> <p>(i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29;</p> <p>(ii) minimising:</p> <ul style="list-style-type: none"> • the amount of vegetation clearing on site; • the loss of key fauna habitat (including tree hollows); • the impacts of fauna on site, including undertaking pre-clearance surveys; and • potential indirect impacts on threatened flora and fauna species; <p>(iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;</p> <p>(iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for:</p> <ul style="list-style-type: none"> • all work in the associated location to stop to prevent further impact, and • notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; | <p>During the site inspection, a potential incident was observed where a bund wall around a tower pad had collapsed, and sediment had been deposited outside the TCZ.</p> <p>This potential incident occurred due to a gap in sediment control measures around the tower pad. It is the auditor's opinion that had sediment control measures been installed this event would not have extended beyond the TCZ.</p> | <p>AGJV should assess the extent of any damage to determine whether or not the event is classified as an incident or non-compliance as defined by the consent.</p> <p>For all areas of earthworks at future construction locations, ensure sediment control measures are installed around the entire extent of any earthworks and are suitable to ensure sediment is retained within clearing limits.</p> | <p>An Audit observation at Tower 55 identified a post -rainfall ERSED maintenance action.</p> <p>AGJV investigated the event and determined it did not meet the criteria of non-compliance or Incident as per the Project EMS and would be managed under the HLE SWMP and confirmed there was no material harm.</p> <p>No further action is proposed.</p> | N/A |

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| | | <p>(v) connectivity strategy for the potentially impacted species identified in the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024) and a Supplementary Hollow and Nest Strategy;</p> <p>(vi) protecting the conservation values of McPhersons Plain and avoiding impacts to <i>Prasophyllum bagoense</i>, <i>Prasophyllum keltonni</i> and <i>Pterostylis oreophila</i>;</p> <p>(vii) rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable native species;</p> <p>(viii) progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan;</p> <p>(ix) 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 revegetation of the site;</p> <p>(x) collecting and propagating seed (where relevant);</p> <p>(xi) controlling erosion, weeds and feral pests;</p> <p>(xii) bushfire management;</p> <p>(xiii) minimising impacts on entities at risk of a serious and irreversible impact (SAIL), including for Box Gum Woodland, Rice Flower (<i>Pimelea bracteata</i>) and Sooty Owl (<i>Tyto tenebricosa</i>) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September 2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); and</p> <p>(e) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p> <p>Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</p> | | | <p>After the Audit site inspection at BY-030 which highlighted the controls requiring maintenance (11/02), the controls were maintained with batter chute controls and additional energy dissipation, undertaken in consultation with the Project CPESC. Controls were installed as early as the 24/02/2026, which was confirmed by the Project CPESC during an inspection undertaken on 27/02/2026. This process of ESC maintenance was undertaken in accordance with the Erosion and Sediment Control Strategy (Appendix D of the SWMP).</p> | |
| HLE-Obs-11 | B25 | <p>Restrictions on Clearing and Habitat</p> <p>Unless otherwise agreed with the Planning Secretary, the Proponent must:</p> <p>(a) ensure that the vegetation and habitat clearing limits specified in Table 2-1, Table 2-2 and Table 2-3 of Appendix 2 are not exceeded; and</p> <p>(b) minimise:</p> <p>(i) the impacts of the development on hollow-bearing trees;</p> <p>(ii) the impacts of the development on threatened species; and</p> <p>(iii) the clearing of native vegetation and key habitat; and</p> <p>(c) not undertake any works that result in ground disturbance within a minimum setback distance of 50 metres from PCT 637 – Alpine and sub-alpine peatlands, damp herbfields and fens, South Eastern Highlands Bioregion and Australian Alps Bioregion and 30 metres from known locations of <i>Prasophyllum bagoense</i>, <i>Prasophyllum keltonni</i> and <i>Pterostylis oreophila</i> as mapped in the BDAR.</p> | <p>The clearing limits set out in condition B25 and Table 2-1 include distinction between full and partial clearing. Partial clearing is likely to have a lower level of impact on biodiversity values than full clearing and has resulted in a reduced offset liability for the Humelink project.</p> <p>The Clearing Limits Dashboard used by AGJV does not include separate tracking of full and partial clearing, meaning compliance with clearing limits set out in Table 2-1 cannot be assessed in future.</p> <p>The Clearing Limits Dashboard does not account for future clearing arising from elements of the project yet to be cleared, despite this being assessed in the permitting process. The tracking of this during the permitting process provides a proactive step for ensuring compliance with the clearing limits set in condition B25. This proactive step should be incorporated into the Dashboard.</p> | <p>The Clearing Limits Tracking Dashboard is updated to:</p> <ul style="list-style-type: none"> allow tracking of full and partial clearing to ensure alignment with condition B25 and Table 2-1, allow for future clearing to ensure potential exceedances are identified early so that appropriate actions can be implemented to prevent non-compliance, and allow delineation of clearing permits that have been applied for (but not approved), approved and completed. | <p>No easement clearing was undertaken during the audit period and the dashboard will be updated with partial clearing tracking capacity prior to easement clearing.</p> <p>Forecasting of required clearing limits is not incorporated into the dashboard as it is tracked separately in a specific forecast calculation spreadsheet connected to GIS.</p> <p>Review of the dashboard is underway for continuous improvement and feasibility of this recommendation will be investigated and implemented if achievable.</p> | <p>N/A</p> <p>12/06/2026</p> |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action / Response | Due Date |
|------------|-----|---|---|--|---|----------|
| | | | <p>The initial review of the Clearing Limits Dashboard appeared to identify that HLE has exceeded the allocated clearing limits for two PCTs and one fauna species. However, feedback provided by AGJV identified that this was a result of the inclusion of clearing permits which had not been approved, and that this is used to flag potential exceedances early. This process, of including clearing associated with unapproved clearing permits, could lead to confusion over whether the clearing limits set in Condition B25, and the allocation to HLE, had been exceeded.</p> | | | |
| HLE-Obs-12 | B26 | <p>Biodiversity Offset Package</p> <p>Prior to carrying out any development that would impact on biodiversity values requiring offset or within 3 months of the date of the Project Approval whichever is sooner, the Proponent must update the Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT and to the satisfaction of the Planning 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, as determined in accordance with a BCF Charge Statement indexed on a monthly basis in accordance with the Biodiversity Offsets Payment Calculator Order 2022;</p> <p>(c) the timing and responsibilities for the implementation and delivery of the measures required in the Package;</p> <p>(d) a report to be provided every 6 months from the approval of the updated Package to the Planning Secretary, BCS and the BCT setting out the progress towards delivering each specific biodiversity offset measure; and</p> <p>(e) confirmation that the biodiversity offset measures will have been implemented and delivered no later than 13 November 2026, unless otherwise agreed with the Planning Secretary.</p> <p>Following the Planning Secretary's approval, the Proponent must implement and deliver the Biodiversity Offset Package.</p> | <p>The current BOP does not provide evidence of consultation with CPHR and the BCT, as required by condition B26.</p> | <p>Updates to the BOP, as required by condition B26(d), should include evidence of the date and timing for consultation with CPHR and the BCT.</p> | <p>The current approved revision of the BOP (Ver.5 dated 19/05/2025) available on the major project website was accompanied by a Consultation Report (May 2025) that was not published on the website. This report was provided to the auditor on 12/05/2026.</p> <p>An equivalent report has also been prepared BOP Rev 6 which has been consulted and pending approval.</p> <p>No further actions are proposed.</p> | N/A |
| HLE-Obs-13 | B30 | <p>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s;</p> <p>(b) be prepared in consultation with BCS and FCNSW;</p> <p>(c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024);</p> <p>(d) include a description of the measures that would be implemented for:</p> <p>(i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29;</p> <p>(ii) minimising:</p> <ul style="list-style-type: none"> • the amount of vegetation clearing on site; • the loss of key fauna habitat (including tree hollows); • the impacts of fauna on site, including undertaking pre-clearance surveys; and • potential indirect impacts on threatened flora and fauna species; <p>(iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;</p> <p>(iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for:</p> <ul style="list-style-type: none"> • all work in the associated location to stop to prevent further impact, and | <p>Condition B30 requires that the BMP is prepared in consultation with these agencies. The BMP does not provide evidence of consultation with CPHR or FCNSW, other than in the document control tab.</p> <p>Condition B30 requires that the BMP includes a description of the measures which would be implemented to minimise impacts to entities at risk of SAIL. Specific measures were not identified in the BAVR and the general measures outlined in the BMP do not provide specific mitigation measures for these entities.</p> | <p>Updates to the HLE BMP should include evidence of the date and timing for consultation with CPHR and the FCNSW.</p> <p>Include specific mitigation measures to be implemented for entities at risk of SAIL.</p> | <p>A separate consultation report was prepared for the BMP, to meet CoA A8. This report was provided to the Auditor on 08/05/2026.</p> <p>No further actions are proposed.</p> <p>SAIL are managed in accordance with existing mitigations within the BMP and no further specific mitigations were identified during the initial consultation and review process of the approved BMP.</p> | N/A |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action / Response | Due Date |
|------------|-----|---|---|---|--|---|
| | | <ul style="list-style-type: none"> notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; <p>(v) connectivity strategy for the potentially impacted species identified in the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024) and a Supplementary Hollow and Nest Strategy;</p> <p>(vi) protecting the conservation values of McPhersons Plain and avoiding impacts to <i>Prasophyllum bagoensis</i>, <i>Prasophyllum kelttoni</i> and <i>Pterostylis oreophila</i>;</p> <p>(vii) rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable native species;</p> <p>(viii) progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan;</p> <p>(ix) 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 revegetation of the site;</p> <p>(x) collecting and propagating seed (where relevant);</p> <p>(xi) controlling erosion, weeds and feral pests;</p> <p>(xii) bushfire management;</p> <p>(xiii) minimising impacts on entities at risk of a serious and irreversible impact (SAIL), including for Box Gum Woodland, Rice Flower (<i>Pimelea bracteata</i>) and Sooty Owl (<i>Tyto tenebricosa</i>) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September 2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); and</p> <p>(e) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p> <p>Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</p> | | | | |
| HLE-Obs-14 | B30 | <p>Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s;</p> <p>(b) be prepared in consultation with BCS and FCNSW;</p> <p>(c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024);</p> <p>(d) include a description of the measures that would be implemented for:</p> <p>(i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29;</p> <p>(ii) minimising:</p> <ul style="list-style-type: none"> the amount of vegetation clearing on site; the loss of key fauna habitat (including tree hollows); the impacts of fauna on site, including undertaking pre-clearance surveys; and potential indirect impacts on threatened flora and fauna species; <p>(iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;</p> | <p>A system is in place for marking of the project boundary. However, during the site inspection the marking was difficult to identify in some areas. There is a risk that these clearing limits are not sufficient to prevent incidents occurring, and this is consistent with the findings of the incident investigation for HLE-NC-01 (see above).</p> | <p>Review the colour coding system for the identification and delineation of environmental protection fencing across the project. The review should also include mechanisms for communicating colour coding systems to ensure consistency including:</p> <ul style="list-style-type: none"> Visual signage Site inductions EWMS/ECMS and Workpacks | <p>A review of the fencing and signage protocol was undertaken on 16/04/2026</p> <p>Associated EWMS and Workpacks have been reviewed to ensure consistency of fencing and signage protocols. 23/04/2026</p> <p>Current implementation of signage and fencing will undergo an internal audit.</p> | <p>N/A</p> <p>N/A</p> <p>19/06/2026</p> |

| Audit ID | CoA | Compliance Requirement | Auditor Observations | Recommendation | Proponent's Proposed Action / Response | Due Date |
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| | | <p>(iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for:</p> <ul style="list-style-type: none"> • all work in the associated location to stop to prevent further impact, and • notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; <p>(v) connectivity strategy for the potentially impacted species identified in the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024) and a Supplementary Hollow and Nest Strategy;</p> <p>(vi) protecting the conservation values of McPhersons Plain and avoiding impacts to <i>Prasophyllum bagoensis</i>, <i>Prasophyllum kelttoni</i> and <i>Pterostylis oreophila</i>;</p> <p>(vii) rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable native species;</p> <p>(viii) progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan;</p> <p>(ix) 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 revegetation of the site;</p> <p>(x) collecting and propagating seed (where relevant);</p> <p>(xi) controlling erosion, weeds and feral pests;</p> <p>(xii) bushfire management;</p> <p>(xiii) minimising impacts on entities at risk of a serious and irreversible impact (SAIL), including for Box Gum Woodland, Rice Flower (<i>Pimelea bracteata</i>) and Sooty Owl (<i>Tyto tenebricosa</i>) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September 2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); and</p> <p>(e) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p> <p>Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.</p> | | | | |