

Independent Environmental Audit # 2

SSI 36656827 – Hume Link East

Trigalana Environment Pty Ltd

Audit Commencement Date: 28 July 2026

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SSI 36656827 – Hume Link East

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A	RP	9 September 2026	Initial draft for review
0	RP	25 September 2026	Final draft
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2	RP	16 October 2026	Final for submission to DPHI

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Executive Summary

Trigalana Environmental Pty Ltd has been engaged to undertake an independent Audit of the HumeLink East Project (HLE). Nature Positive Pty Ltd have been engaged to undertake the Biodiversity component of the Audit. 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 (March 2026) (IAPAR's).

The Audit covers construction activities for the period from the date of the previous Audit on 3 February 2026 to the date of the final Audit site inspection on 20 August 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 28 and 29 July 2026 by the Lead Auditor with an inspection undertaken by the Biodiversity Specialist on 19 and 20 August 2026. Members of AGJV and Transgrid teams were present for the inspection.

Key findings of the Audit are:

- Construction activities are advanced with all site establishment activities, accommodation camps, site offices and amenities complete and operational. Mainline clearing, tower pad construction and erection of towers is well underway with approximately 75% of tower pads constructed and 125 towers fully erected across the south and central regions. Cable stringing using drones and helicopters has recently commenced. Augmentation of the Bannaby substation is nearing completion.
- Some blasting has been undertaken for tower pad footings where geological conditions are suitable. No exceedances of noise or vibration limits for blasting have been recorded.
- No reportable environmental incidents occurred during the Audit period.
- A total of 89 complaints have been received during that period. An established process for recording and responding to complaints has been implemented which appears to be effective.
- Five non-compliance findings were identified during the audit period, resulting in breaches of seven conditions of consent. The non-compliances related to the use of incorrect travel routes, implementation of the OOH protocol, late submission of the BAVR and reporting complaints to the Environmental Representative. All non-compliances were self-reported to DPHI in accordance with Condition C11.
- One written warning was issued by DPHI for the OOH non-compliance (breach of conditions B1 and B16).
- Eighteen observations are made with associated recommendations for improvement. These relate to Biodiversity, Erosion and Sediment Control and Bushfire preparedness.
- Key strengths have been identified for training and awareness and sound management of biodiversity aspects.

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 non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance	Section 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
	• A completed Independent Audit Table with all relevant conditions of consent, identifying each requirement with compliance status assessed	Appendix C
	• Documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee	Appendix D
	• Completed and signed Independent Audit Declaration Form(s);	Appendix B
	• 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 Southwest 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 include:

- 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 HumeLink Project, Figure 2 shows the key features and extent of the HumeLink 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.

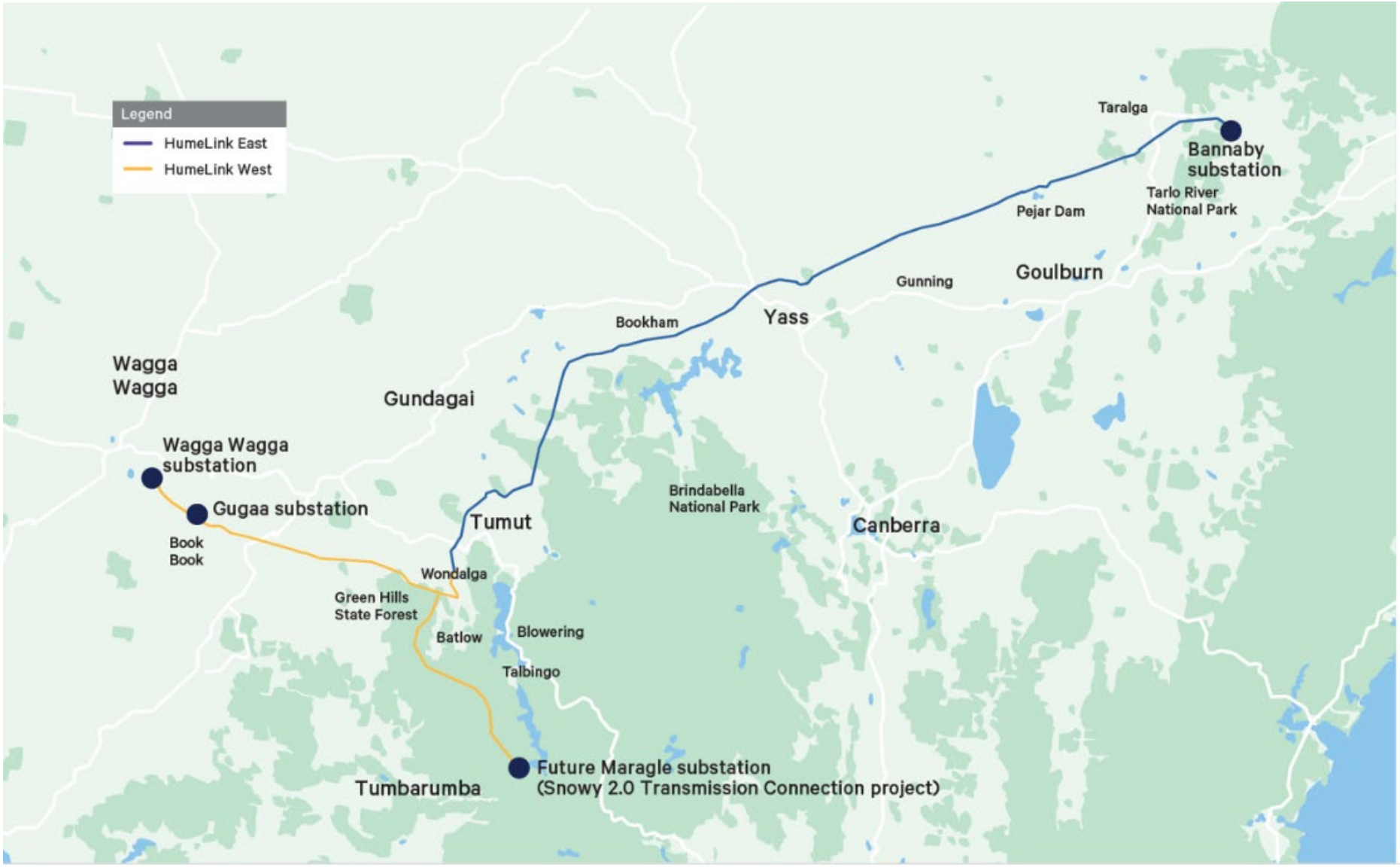


Figure 1: Humelink project – general alignment (source – Transgrid HumeLink East Project Website)

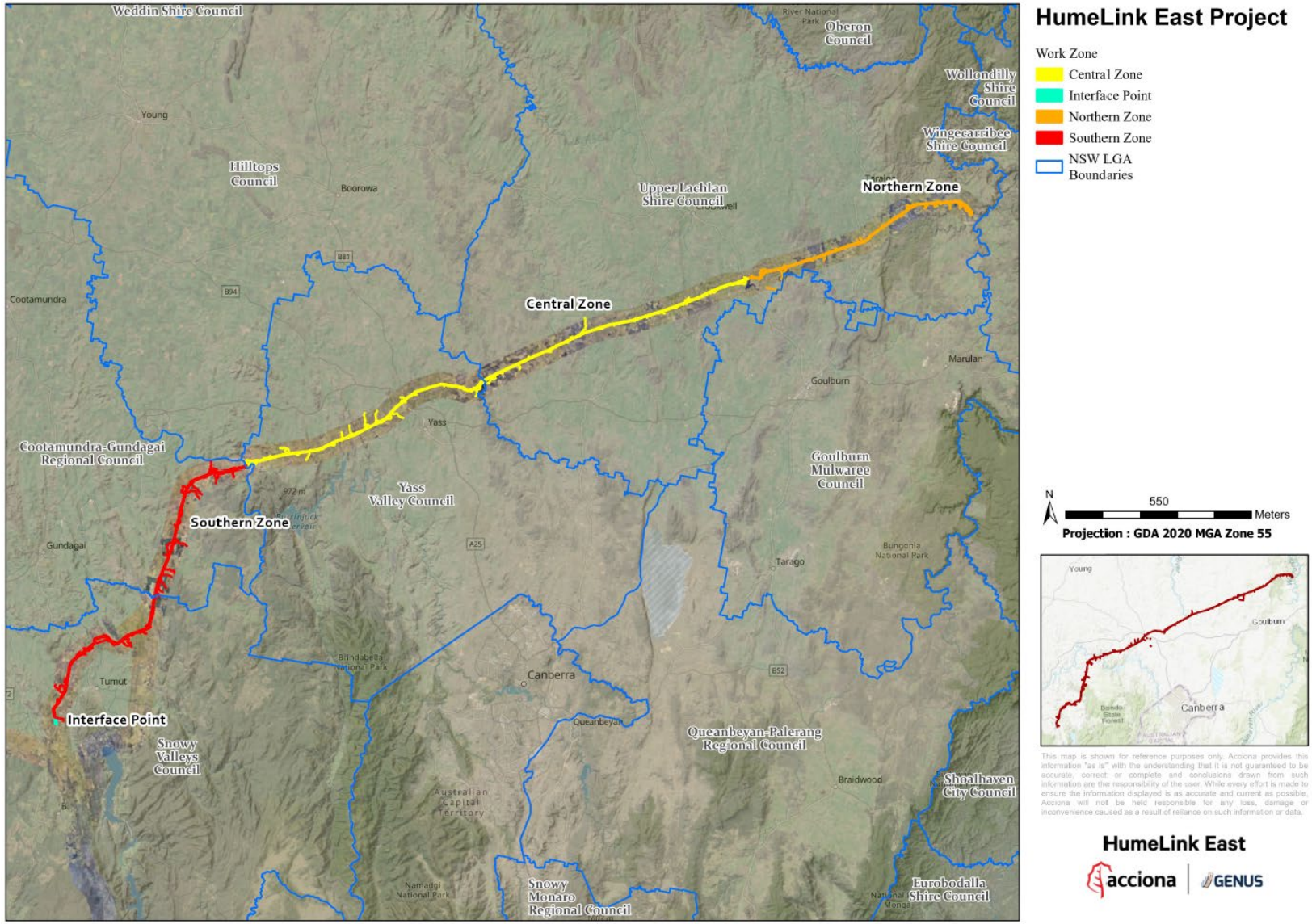


Figure 2: Humelink East – Key work zones

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. The DPHI letter of approval is provided in Appendix A.

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: • 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.
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: • 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 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 *Independent Audit Post Approval Requirements (2020)* or as updated from time to time and published on the Department's website.	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. During the Audit period, the IAPARs have been updated with the most recent version (March 2026) published on the DPHI website. This Audit has been undertaken to meet the requirements of both the 2020 and 2026 IAPARs. 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.

The Audit period is from the date of the previous Audit on 3 February 2026 to the date of the last day of the Audit site inspection (for the Biodiversity Specialist) on 20 August 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 #1	Initial Independent Environmental Audit, the previous Audit undertaken for the period from the commencement of work to 3rd February 2026,
IEA #2	The second Independental Environmental Audit (this Audit) for the period between the 3rd of February 2026 to the date of the site inspection by the biodiversity specialist on 20 August 2026
IAPAR	DPHI Independent Audit Post Approval Requirements, (as updated March 2026)
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
Non-compliance	An occurrence, set of circumstances or development that is a breach of this approval
Planning Secretary	The Planning Secretary under the EP&A Act or nominee
POEO Act	*Protection of the Environment Operations Act, 1997*
REZ	Renewable Energy Zone
RFS	Rural Fure 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 24th of July 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
Priya Murthy	Transgrid	Environmental Business Partner
Shani Walton	Transgrid	Senior Environmental Approvals Coordinator
Jon May	AGJV	Environment and Sustainability Manager
Huw Rabone	AGJV	Environment Manager, Central Zone
Cynthia Provoste	AGJV	Approvals Advisor

Name	Organisation	Role
Nathan Garvey	Nature Positive Advisory	Biodiversity Specialist

2.5 Site Inspection

The site inspection was undertaken as follows

- General inspection undertaken by the Lead Auditor on 28 and 29 July 2026.
- Targeted biodiversity inspection by the Biodiversity specialist, undertaken on 19 and 20 August 2026.

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

- Establishment and operation of accommodation camps at Yass and Adjungbilly.
- 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 trailer mounted mobile firefighting units.
- Construction of internal access roads on private property to tower PADs.
- Localised clearing for tower PAD establishment.
- Mainline clearing.
- Limited blasting of tower footings where geological conditions are suitable.
- Construction of footings and tower base, erection of towers.
- Cable stringing by helicopter with drones used for cable stringing and installation of other items such as bird diverters.

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
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.
Noise and vibration	The site is in an industrial setting with surrounding land use 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.
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. There were no observed dust emissions from the camps or construction areas observed during the site inspection.

Aspect	Observations
Water management	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. 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.
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 from the initial Audit to place highly visible sign on the fire water tank, so it is easily identified by emergency services in the event of a fire has been completed. 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.
Spill prevention and management, waste	A diesel fuel farm was established at the Yass Accommodation Camp site with a double skinned tank and spill containment sump and bund. 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. 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. 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.
Visual	As noted above, the site is 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.
Adjungbilly 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.
Noise and vibration	The site is in a rural setting with surrounding land use predominantly agriculture and approximately 5km to the Northwest of the township of Adjungbilly. There were no activities observed that would generate excessive noise or vibration that would result in annoyance.
Dust	Access roads, laydown areas, carparking and internal access routes were fully paved to prevent dust generation. Exposed batters were stabilised and rehabilitated. There were no observed dust emissions from the camps or construction areas observed during the site inspection.
Water management	Drainage, erosion and sediment controls were installed including stabilised batters, diversion bunds, internal drains and sediments basins. 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. Concrete washout trays and polymer was available for concrete wastes and erosion control.
Fire and Emergency	Equipment and resources available on site included fire water tank, fire extinguishers (including testing tag) and trailer mounter mobile water tanks. Emergency information pack was available at the site entrance.

Aspect	Observations
Spill prevention and management, waste	A diesel fuel farm was established with a double skinned tank and spill containment sump and bund. 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. 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. 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.
Visual	As noted above, the site is in a rural 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.
Bannaby Substation	
General	The site was fully established with construction compounds, sealed access roads, lockable gates with traffic advisory signage installed. Construction activities were advanced with substation transformers installed and operational basins underway. Rehabilitation of exposed embankments was observed. The site was well organised, housekeeping was a high standard with no litter or rubbish observed.
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.
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.
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.
Access tracks and tower pad construction sites	
General	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. There was no mud tracking observed onto connecting roads.
Soil and Water Management, Dust	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. High risk areas (steep slopes near waterways) were well managed with a high degree of stabilisation and ground cover to prevent erosion and properly constructed water management controls to provide scour protection. 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.
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.

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 Biodiversity
Huw Rabone	AGJV	Environment Manager - Central	General compliance
Jacques Coetzee	AGJV	Construction Manager	Transport and Logistics
Emma Hassett	AGJV	Operational Services Director	Community and Stakeholder
Mike Fitzgerald	AGJV	Interface Manager	Road Maintenance Council Interface Issues
Brett Lehmann	AGJV	Head of Digital Engineering	IVMS Implementation
Peter Scott	AGJV	Safety Manager	Bushfire and Emergency
Shani Walton	Transgrid	Senior Environmental Approvals Coordinator	General compliance Transgrid responsibilities
Derek Low	WolfPeak	Environmental Representative	Environmental Representative (ER)
Andrew Robertson[1]	AGJV	Environmental Manager, North	General compliance Biodiversity
Isaac Walsh[1]	AGJV	Environmental Coordinator, North	Biodiversity
Jack Brennan[1]	AGJV	Environmental Advisor, North	Biodiversity
Huw Rabone[1]	AGJV	Environmental Manager, Central	General compliance Biodiversity
Daniel O'Hearn[1]	AGJV	Senior Environmental Advisor, Central	Biodiversity
Andre Schmidt[1]	AGJV	Environmental Graduate, Central	Biodiversity
Mira Segaran[1]	AGJV	Environmental Coordinator, HumeLink East	Biodiversity
Michael Moroney[1]	Transgrid	Senior Environmental Business Partner | Major Projects	Biodiversity
Sam Hudson[1]	Transgrid	Biodiversity Business Partner | Major Projects	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 and 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 22 September 2026 where the Auditor provided a summary of audit findings, recommendations and outlined 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 on 24 September 2026 with further details 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
Priya Murthy	Transgrid	Environmental Business Partner
Jon May	AGJV	Environment and Sustainability Manager
Cynthia Provoste	AGJV	Senior Environmental Approvals Advisor
Amy Lee Conroy	AGJV	Environmental Manager, Southern Section
Andy Robertson	AGJV	Environmental Manager, North Section

Name	Organisation	Role
Karin Bedingfield	AGJV	Senior Environmental Approvals Advisor

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**	15	2	8
B	**67**	47	5	15
C	**15**	12	0	3
Total	**107**	**74**	**7**	**26**

Table 11 Non-compliances, observations, and recommendations

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
Non-Compliances - Lead Auditor				
HLE-NC-05	**A2**	The development must be carried out; a) In compliance with the conditions of this approval b) In accordance with all written directions of the of the Planning Secretary: c) Generally in accordance with the EIS; and Generally, in accordance with the Development Layout in Appendix 1.	During the Audit period, as noted in Condition C11, five non-compliances have been identified and reported to DPHI . Noting the reported non-compliances, the requirements of condition A2 a) have not been met in their entirety, therefore compliance with Condition A2 has not been achieved.	Details of each non-compliance is noted below with specific recommendations provided.
HLE-NC-06	**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)	On 17/5/26, Transgrid notified DPHI of a non-compliance with condition A14, noting the complaints register issued to the ER on 12/5/26 did not include a complaint that was received on 2/5/26. DPHI acknowledged receipt of the complaint on 22/5/26 noting the Department has decided to record the breach with no further enforcement action proposed.	This non-compliance appears to be an oversight and appears to have only occurred on one occasion. The ER confirmed that they have been provided with all information for them to perform their functions specified. No specific recommendations are made in addition to actions taken by the initial corrective actions taken by Transgrid.
HLE-NC-07	**B1**	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; a) 7am to 6pm Monday to Friday; b) 8am to 1pm Saturdays; and At no time on Sundays and NSW public holidays;	During the Audit period, a non-compliance was identified and reported to DPHI noting breach of conditions B1 and B16. The non-compliance was identified following a review of the permit register and active OOH works, 10 instances across four locations were identified to have undertaken construction works outside standard construction hours without a valid Out of Hours Works (OOHW) permit. The works resulted in six receivers being potentially noise affected, which constitutes non-compliance with Conditions B1 and B16. After the notification, an internal investigation was undertaken with corrective and preventative actions identified as follows: • Communications and all construction teams were reminded of the OOH process and the importance of compliance. • Stop works notice to be given to any construction team for any future OOH works unless the OOH works protocol is adhered to.	After the notification, an internal investigation was undertaken with corrective and preventative actions identified as follows: • Communications and all construction teams were reminded of the OOH process and the importance of compliance. • Stop works notice to be given to any construction team for any future OOH works unless the OOH works protocol is adhered to. • Targeted OOHW protocol training to specific construction teams has been undertaken. AGJV noted that toolbox talks held on 11th, 18th and 27th February included content on Noise and Vibration, OOHW and the OOHW protocol. The actions taken by AGJV in response to the non-compliance appear to be appropriate with no further recommendations made at this time. Should further non-compliances be recorded, a review of the effectiveness of existing controls should be undertaken with additional measures implemented as required.
HLE-NC-08	**B16**	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…….. Following the Planning Secretary's approval,		

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
		the Proponent must implement the Noise and Vibration Management Plan. *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.*	• Targeted OOHW protocol training to specific construction teams. On 18/6/26, DPHI issued a warning letter to AGJV for the breach noting non-compliance with Conditions B1 and B16	
HLE-NC-09	**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.	Non-compliance with Conditions B35 and B39 relating to the use of an unapproved route to the Bannaby Substation was reported to DPHI. Following investigation, AGJV identified the cause of the non-compliance was due to a breakdown in communication between the supplier and their HV operator. Actions taken to prevent recurrence included the immediate reinforcement of the requirement to comply with approved routes.	The actions taken by AGJV in response to the non-compliance appears to be appropriate with no further recommendations made at this time. Should further non-compliances be recorded, a review of the effectiveness of existing controls should be undertaken with additional measures implemented as required. **Auditor note:** The independent Environmental Representative has undertaken a project wide review of the TTMP at the request of DPHI, the review concluded that AGJV were implementing the TTMP actively and appropriately managing its traffic risks. The controls in place are robust and appropriate.
	B39	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……. Following the Planning Secretary's approval, the Proponent must implement the Traffic and Transport Management Plan		

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
Non-Compliances – Biodiversity Specialist				
HLE-NC-10	**B29**	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:…... 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.	The revised BAVR was due on 30 April 2026. Due to delays with finalising the FLPs and associated clearing, on 17 April 2026 Transgrid applied for an extension to the due date for the revised BAVR. This application was approved by DPHI on 12 June 2026. The application for an extension to the due date was submitted prior to the due date, but approval was not granted until after the due date. This represents an administrative non-compliance with Condition B29 of the Infrastructure Approval. This was reported by Transgrid as a non-compliance on 8 May 2026 in accordance with Condition C11 of the Infrastructure Approval.	A revised BAVR is required to be submitted by 20 November 2026.
Observations and recommendations – Lead Auditor				
HLE-Obs-015	**B19**	The Proponent must: a) Minimise erosion and control sediment generation; and b) Ensure all land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Best Practice Erosion and Sediment Control (IECA, 2008), Managing Urban Stormwater – Soils and Construction Volume 1 (Landcom, 2004), Managing Urban Stormwater – Soils and Construction Volume 2A Installation of Services (DECC, 2008) and Managing	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. Additional inspections are undertaken by the ER, Transgrid and the AGJV Environment team which includes pre and post rainfall inspections.	As observed during the Audit site inspection, construction of PADs and access roads is well advanced with disturbed surfaces being temporarily stabilised with polymer to reduce risk of erosion. It is recommended that the final rehabilitation of disturbed areas is completed as soon as practical with high-risk areas (steep slopes and sites near/adjacent to waterways) prioritised to provide permanent ground cover and effective erosion control and to effectively eliminate erosion hazard.

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
		Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008), or their latest versions.	Reasonable and practical measures were observed to be implemented to minimise erosion and sediment generation by the project. Included: • 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.	
HLE-Obs-016	**B51**	The Proponent must: a) Minimise the fire risks of the development, including managing vegetation fuel loads on-site; …….. b) Ensure any fire trails on asset protection zones associated with the development are wholly contained within the approved disturbance area; c) Develop procedures to manage potential fires on site, in consultation with the RFS, FRNSW, FCNSW and NPWS; d) 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 Notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.	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 Equipment and resources available on site included fire water tank, fire extinguishers (including testing tag) and trailer mounter mobile water tanks. The Bushfire and Emergency Management Plan and emergency information package was available in a readily accessible location adjacent to the site compound. It was noted in the Audit interview that: • 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. • No fires have occurred during the Audit period. • Fire and Rescue have attended the site and provided advice regarding Dangerous Goods. • A monthly meeting is held with fire and emergency services, with regular contact made with the RFS. • Both RFS and Workcover have visited the site	Conduct an annual pre-bushfire season readiness review to ensure all obligations and commitments relating to Fire and Emergency are implemented and are compliant. This may include but not be limited to: • Onsite preparedness Activities. • Firefighting water supplies and equipment. • Access and egress for emergency vehicles. • Emergency Response. • Communication Protocols. Involve suitably qualified personnel in the review as required.

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
			• 20,000 L Water tanks were available at the Yass and Adjungbilly accommodation camps.	
Observations and recommendations – Biodiversity Specialist				
HLE-Obs-17	**B30**	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…. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan. *Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67*	Clearing was undertaken at BY-130-19 on a weekend without supervision by the Ecologist. Clearing included areas with habitat features identified. This occurred as the site foreman failed to re-review the Clearing and Land Disturbance Permit (CLDP). This was considered a non-conformance (non-reportable) by AGJV.	Reaffirm the requirement for site forepersons to review the CLDP prior to commencement of works. Ensure teams understand the constraints in the CLDP prior to signing. Reaffirm the requirement to have project Ecologists present during any clearing works
HLE-Obs-18			During clearing works at BY-026, a Wombat burrow was cleared without supervision of project Ecologists. This was considered a non-conformance (non-reportable) by AGJV.	Reaffirm the requirement for site forepersons to review the CLDP prior to commencement of works. Ensure teams understand the constraints in the CLDP prior to signing. Reaffirm the requirement to have project Ecologists present during any clearing works.
HLE-Obs-19			During clearing works within BY-069, a rock garden was cleared in BY-069 without supervision of project Ecologists. This was considered a non-conformance (non-reportable) by AGJV.	Reaffirm the requirement for site forepersons to review the CLDP prior to commencement of works. Ensure teams understand the constraints in the CLDP prior to signing. Reaffirm the requirement to have project Ecologists present during any clearing works
HLE-Obs-20			Clearing occurred outside the CLDP area due to the placement of felled trees. This was considered a non-conformance (non-reportable) by AGJV.	The HLE project should review where log stockpiles are placed during clearing. Where stockpiles are to be later mulched and/or removed they must be placed within TCZ clearing limits or be accounted for during CLDPs. Where timber is to be provided for re-use by landowners, storage of timber should not result in unintended impacts to biodiversity values. During Audit 2, AGJV identified opportunities for improvement in the landowner timber acceptance process, including identifying that landowner timber stockpiles are not placed in areas of biodiversity value.

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
HLE-Obs-21	**A1**	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.	Constraints mapped (Appendix J of the BMP) is used to define micrositing efforts and assess any design changes. Following changes to the FLPs for HLE and approval of revised clearing limits, updates to the BAVR are required. This will trigger updates to the BMP. This should include updates to constraints mapping.	Ensure updates to the BMP (required under Condition B29 of the Infrastructure Approval following updates to the BAVR) incorporate updated constraints mapping which reflects the FLPs and updated BAVR mapping. AGJV have advised that this action is captured within the planned BAVR and BMP update process.
HLE-Obs-22	**B22**	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 DPRID Fisheries agrees otherwise.	The site inspection identified that: • the culverts installed in the waterway crossing at Mantons Creek were perched at the downstream end, limiting fish passage during low flow conditions. • an aquatic assessment of Class 1 fish habitat was not undertaken at Melamalong Creek. • no culvert had been installed in a waterway crossing of a tributary of Melamalong Creek, impeding flow. • the bed level waterway crossings at Melamalong Creek were raised above bed level, impeding flow and resulting in ponding of water.	Ensure adequate aquatic assessment is undertaken for all Class 1 key fish habitat. Ensure waterway crossings are constructed to avoid becoming perched at the upstream or downstream end. Ensure bed level crossings are constructed at bed level on the upstream and downstream extents, allowing for unimpeded flows and that they do not result in ponding upstream of the crossing. Rectification works may be required at Melamalong Creek, including: • installation of a culvert in the first waterway crossing. • reconstruction of the second waterway crossing to ensure the crossing is at bed level. Other waterway crossings should be reviewed. Consider long-term inspection and maintenance requirements to ensure waterway crossings do not become obstructed.
HLE-Obs-23	**B25**	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	The Clearing Limits Tracking Dashboard provided during the audits does not separate full and partial clearing, as required by Condition B25 of the Infrastructure Approval for native vegetation. The Clearing Limits Tracking Dashboard does not predict future clearing required by the uncleared portions of the FLP, with potential for exceedances of clearing limits to inadvertently occur in future. Following approval of revised clearing limits, this dashboard will require updating to reflect revised clearing limits.	The Clearing Limits Tracking Dashboard is updated to allow tracking of full and partial clearing to ensure alignment with the revised clearing limits as approved by DPHI. This recommendation has been adopted, and the Clearing Limits Tracking Dashboard has been updated. The Clearing Limits Tracking Dashboard is updated to allow for future clearing to ensure potential exceedances are identified early, or an alternative process is put in place to ensure exceedances of clearing limits do not inadvertently occur.

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
		(iii) The clearing of native vegetation and key habitat; and 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 *Prasophyllum bagoense, Prasophyllum keltonni and Pterostylis oreophila* as mapped in the BDAR.		
HLE-Obs-24	**B26**	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; 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	Transgrid has flagged their intent to enter into a Strategic Offset Delivery Agreement (SODA) after all other measures have been exhausted and is currently finalising negotiations with DCCEEW. A modification to the Infrastructure Approval is required to enable a SODA between Transgrid and NSW DCCEEW.	Include the intent to enter into a SODA in the updated BOP.

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
		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. Following the Planning Secretary's approval, the Proponent must implement and deliver the Biodiversity Offset Package.		
HLE-Obs-25	**B29**	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 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: ……. 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.	Audit 1 found that the recommendations in Section 9 of the BAVR do not include targeted measures for avoidance based on the findings of the BAVR, as required by Condition B29 (d(ii)) of the Infrastructure Approval. Some species have been recorded during the SBS outside species polygons identified in the Revised BDAR (Niche, 2024). These species, such as the Squirrel Glider, were not reported in the BAVR as they were not targeted species. Pre-clearing surveys can identify species outside the species polygon but within the known range of the species. Transgrid has advised AGJV that these are not unexpected finds. It is unclear how these species are to be treated with regard to updates to the BAVR, clearing limits and offset requirements.	Section 9 of the revised BAVR, due on 20 November 2026, should include targeted measures for avoidance based on the findings of the BAVR, as required by Condition B29 (d(ii)) of the Infrastructure Approval. Ensure the BAVR incorporates all results of the SBS, particularly where species were recorded outside of species polygons in the Revised BDAR. Confirm how records of threatened species outside the species polygon but which are not defined as unexpected finds are to be treated as part of the updates to the BAVR.
HLE-Obs-26	**B30**	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	The initial BMP was prepared by suitably qualified and experienced persons. However, updates to the BMP have been undertaken by members of the Environment team at AGJV. It is unclear whether these amendments fulfil the requirement under Condition B30(a) of the Infrastructure Approval.	Ensure amendments to the BMP, other than routine administrative and implementation updates, are prepared by or reviewed and endorsed by suitably qualified and experienced biodiversity experts, as required by Condition B30(a) of the Infrastructure Approval. Updates to the HLE BMP following submission of the revised BAVR should incorporate the specific measures to minimise impacts on entities at risk of SAII, as required by Condition B30 (d(xiii)) of the Infrastructure Approval.

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
		must…. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan. *Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67*	Condition B30 (d(xiii)) of the Infrastructure Approval requires identification of specific measures to minimise impacts on entities at risk of SAII. The HLE BMP states this is included in Sections 7.3 and 7.6; however, these mitigation measures are general in nature and are considered insufficient to address the requirements of the condition.	
HLE-Obs-27	**B30**		The site inspection and review of documentation in this audit identified that not all records of unexpected finds of the Yass Daisy at YG-020 were buffered by 30 m in the Pre-clearing Report. The site inspection also identified that fencing of exclusion zones had occurred across a wider area of ~50 m than was required for construction of the access track. There is an opportunity to minimise impacts to threatened species by reviewing requirements for construction and ensuring fencing is brought into the smallest possible area.	Ensure appropriate buffers are applied to all records of unexpected finds and mitigation measures are implemented accordingly. Where feasible, to help manage unexpected finds or species requiring specific mitigation measures, reduce the width of the construction corridor and ensure exclusion fencing is installed along this reduced area. This recommendation has been adopted and implemented for YG-020.
HLE-Obs-28	**B30**		During the site inspection, numerous areas of erosion were observed across the project area following recent heavy rains, with minor impacts to biodiversity values. An example is provided in Table 2-1 for Towers 74 and 75. Erosion controls were observed to be inconsistently applied across the project. Where applied, use of coarse woody debris at the base of batter slopes was found to be most effective at controlling erosion following rainfall. In some areas this was not installed, and sediment fencing was used. In other areas, no sediment control measures were installed. Slope stabilisation had not occurred in a number of areas due to a breakdown of the polymer spraying unit.	Review need to stabilise batter slopes with polymer as soon as possible following construction. Given the effectiveness of the use of coarse woody debris as a part of erosion and sediment controls, review potential for broader use of this technique across all clearing works. Following the audit, slope stabilisation works have been completed at Tower 75.
HLE-Obs-29	**B30**	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	Review of pre-clearing reports, where species requiring implementation of specific mitigation measures outlined in Section 2.4 and 2.5 of the Vegetation Clearing Procedure (Appendix B of the BMP) had been identified, did not make clear recommendations on how these mitigation measures should be implemented. There is potential for project teams to fail to implement these measures if they are not clearly outlined.	Ensure mitigation measures required by the BMP, such as hand-clearing, are clearly outlined in the pre-clearing reports. Review colours used in the Environmental Control Maps to ensure adequate contrast to avoid confusion between controls. Ensure all plant operators have access to the clearing limits loaded into survey-grade GPS to ensure inadvertent clearing outside limits does not occur.

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
		satisfaction of the Planning Secretary. This plan must…. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan. *Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67*	Review of the Environmental Control Maps identified that similar colours are used in the legend of these maps, with potential for confusion by project teams in how the maps should be implemented. During Audit 1, the auditor was advised that plant operators had the clearing limits loaded into survey grade GPS to ensure inadvertent clearing outside the clearing limits did not occur. This was also a recommendation of Audit 1 (see HLE-NC-01). During the site inspection, a plant operator was found not to have access to the clearing limits due to a lack of data access. Further, the plant operator was relying on a mobile device with non-survey grade accuracy. This is somewhat mitigated by clear definition of clearing boundaries using bunting and signage, but the lack of redundant controls diminishes the effectiveness of the Swiss cheese model of risk mitigation discussed during the site inspection.	
HLE-Obs-30	**B30**		During clearing works, logs and coarse woody debris are stockpiled for: • use by the landowner (where requested), or • for mulching at a later stage. Where logs are to be used by the landowner, the location of log stockpiles is identified in consultation with the landowner via a Timber Acceptance Form, with the location for stockpiles identified in this agreement. The location of log stockpiles has the potential to result in inadvertent impacts on biodiversity values (see HLE-Obs-20, Lucidity ID 48197 above). Further, in some instances stockpiling of material is occurring outside the clearing limits.	Ensure clearing limits are clearly flagged and all impacts, including stockpiling of material and deposition of coarse woody debris, are retained within clearing limits. Review how log stockpile locations are identified in the Timber Acceptance Form and ensure PCT mapping is included in the agreement, and that log stockpiles are placed in areas of PCT 0 to ensure inadvertent and unintended impacts to biodiversity values are not occurring. Review the procedure for removal of log piles to ensure inadvertent impacts do not occur.

Unique ID	REF	Details of Condition	Auditor Observations	Recommendation
			This stockpiling of material can also create secondary habitat with animals recolonising this habitat post the initial clearing event. Later disturbance of these stockpiles could result in inadvertent impacts to animals if they have relocated into these stockpiles. The Environment team advised that the disturbance of these stockpiles required supervision of the project Ecologists, but the process for ensuring this occurs is not clear.	
HLE-Obs-31	**B30**	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…. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan. *Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67*	AGJV have undertaken further analysis of partial clearing area in the ECZ using LiDAR and input from project Arborists, to reduce clearing in the ECZ. This is commendable and demonstrates minimisation of harm to the environment in accordance with Condition A1 of the Infrastructure Approval. However, some BAM plots are located within areas which will no longer be cleared. There is potential that the location of these plots will misrepresent the outcomes which are achieved by partial clearing with regards to future vegetation integrity scores.	Review the location of BAM monitoring plots to ensure they are representative of partial clearing.
HLE-Obs-32	**B30**		During the site inspection, it was identified that the use of washdown bays as required by the Biosecurity Management Plan (Appendix D of the BMP) and Property Management Plans cannot be reviewed to ensure compliance. No usage log or auditable mechanism is in place to ensure usage.	Ensure controls are implemented to identify who is using washdown bays and the frequency of use to ensure project personnel are implementing biosecurity controls in accordance with the Biosecurity Management Plan (Appendix D of the BMP) and Property Management Plans. This recommendation has been adopted and implemented with evidence provided following the audit.

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

During the Audit period, one Warning Letter was issued by DPHI. The warning letter was issued on 18/6/26 and related to breaches of Conditions B1 and B16. The non-compliance was identified following a review of the permit register and active OOH works, 10 instances across four locations were identified to have undertaken construction works outside standard construction hours without a valid Out of Hours Works (OOHW) permit. The works resulted in six receivers being potentially noise affected, which constitutes non-compliance with Conditions B1 and B16.

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 ten minor incidents occurred (e.g. oil spills) which were classified as minor and non-reportable with minimal impact. There were no incidents reported to DPHI during the Audit period.

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 89 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 -18.
- Dust – 17.
- Road condition, traffic management – 12.
- Property impacts including unauthorised access, gates left open – 10.
- Out of hours works – 6.
- Consultation and communication – 7.
- Livestock impacts – 3.
- Parking issues – 3.
- Noise – 1.
- Construction impacts, tower location, access track, heritage pits, vibration monitors - 8.

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 second independent Audit. Recommendations and actions arising from the previous Audit have been considered as part of this report with details provided in Table 12.

Table 12 Status of non compliances and recommendations from the previous Audit (IEA #1)

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
Non-Compliances				
HLE-NC-01	**A2/B30**	**Lead Auditor Observations (HLE-NC-01)**	**Lead Auditor Recommendations (HLE-NC-01)**	**Lead Auditor Comments (HLE-NC-01)**
		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. Following the identification and reporting of the non-compliance, a number of preventative actions were undertaken as noted below: **Procedural Controls** • 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. **Boundary Communication** • Provide physical signage and fencing to delineate boundaries. • Reinforce boundary rules at toolbox/pre-start, with site crews. **Organisational / Resource Allocation:** • Ensure sufficient resources for survey team to delineate project boundaries for future works. • Ensure that all machine controls are uploaded and ready for use.	The Auditor reviewed the actions taken in response to the non-compliance and considers them to be appropriate. 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 relevant protocols are undertaken and revised with the objective of identifying and eliminating any systemic weaknesses to prevent further non-compliance.	As noted in IEA#1, the actions taken in response to the non-compliance are considered appropriate. AGJV confirmed that the actions have been completed. There have been no further breaches of the project boundary during This Audit period. **STATUS - CLOSED**

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
		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).		
		Biodiversity Specialist Observations (HLE-NC-01)	**Biodiversity Specialist Recommendations (HLE-NC-01)**	**Biodiversity Specialist Comments (HLE-NC-01)**
		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. 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. 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 *(Delma impar)*, Yass Daisy *(Ammobium craspedioides)*, Hoary Sunray *(Leucochrysum albicans subsp. tricolor)* and Austral Toadflax *(Thesium australe)* noting none were observed during pre-clearing surveys.	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. 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. AGJV should review use of flagging to determine whether this is appropriate and easily observed by all. 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. The impacts should be incorporated into the updates to condition B25 currently being sought by Transgrid.	The site inspection for Audit 2 found this recommendation was not being consistently implemented: • A plant operator undertaking partial clearing within the ECZ at BY-109 did not have the clearing limits loaded. into a device and was using a mobile device with non-survey grade accuracy. However, flagging of clearing limits was found to be significantly improved, with use of bunting across the majority of the project clearly delineating clearing limits. **STATUS - OPEN**

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
		The BAVR identifies AT 299 in in YG-027A as habitat for Southern Myotis *(Myotis macropus)*, Yass Daisy *(Ammobium craspedioides)*, Hoary Sunray *(Leucochrysum albicans subsp. tricolor)* and Austral Toadflax *(Thesium australe)* noting none were observed during pre-clearing surveys. No threatened species habitat is mapped in MA-051. This incident has resulted in unintended impacts to biodiversity values.		
HLE-NC-02	**B64**	**Lead Auditor Observations (HLE-NC-02)**	**Lead Auditor Recommendations (HLE-NC-02)**	**Lead Auditor Comments (HLE-NC-02)**
		On 10/9/25 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. 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: **Immediate Actions** • 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. **Short Term Actions** • 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	The Auditor reviewed the actions taken in response to the non-compliance and considers them to be appropriate. 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 relevant protocols are undertaken and revised with the objective of identifying and eliminating any systemic weaknesses to prevent further non-compliance.	As noted in IEA#1, the actions taken in response to the non-compliance are considered appropriate. AGJV confirmed that the actions have been completed. There have been no further breaches of the project boundary during This Audit period. **STATUS - CLOSED**

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
		• Improved base station deployment planning to avoid future delays. **Medium Term Actions** • 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. At the time of the Audit, the recommended actions were noted as complete.		
		Biodiversity Specialist Observations (HLE-NC-02)	**Biodiversity Specialist Recommendations (HLE-NC-02)**	**Biodiversity Specialist Comments (HLE-NC-02)**
		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.	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. 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. AGJV should review use of flagging to determine whether this is appropriate and easily observed by all. 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.	The site inspection for Audit 2 found this recommendation was not being consistently implemented: A plant operator undertaking partial clearing within the ECZ at BY-109 did not have the clearing limits loaded into a device and was using a mobile device with non-survey grade accuracy. However, flagging of clearing limits was found to be significantly improved, with use of bunting across the majority of the project clearly delineating clearing limits. **STATUS - OPEN**

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
		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. 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 (Keyacris scurra), Yass Daisy (Ammobium craspedioides), Small Purple-pea (Swainsona recta), Silky Swainson-pea (Swainsona sericea) and Striped Legless Lizard (Delma impar) 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.	The impacts should be incorporated into the updates to condition B25 currently being sought by Transgrid.	
HLE-NC-03	**B65**	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). Corrective actions noted included: • Checking controls to be implemented for enabling works • Targeted retraining on enabling works approvals and controls • Revision to geofencing configuration.	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. The enabling works have now been completed, and the relevant obligations incorporated into the construction environmental management plans. A general recommendation is to ensure all authorisations and signoffs are obtained prior to the commencement of any new activity.	As noted in IEA#1, the actions taken in response to the non-compliance are considered appropriate. AGJV confirmed that the actions have been completed. However, a non-compliance has been reported during this Audit period for undertaking works outside the approved working hours without the signed OOH permits in place. Refer to Table 11 with details of the non-compliance as well as recommended actions to prevent recurrence. **STATUS – CLOSED**

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
		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.		**Note**: Actions are closed in relation to this recommendation as it relates to the EWMP. Further actions have been identified in relation to non-compliance with conditions B1 and B16 for OOH works during construction as noted in Table 11.
HLE-NC-04	**C11**	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). 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.	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.	During the Audit period, a total of four non-compliances were reported to DPHI in accordance with Condition C11. The Auditor reviewed the Audit reports issued to DPHI and compared the dates that the non-compliance was identified to the date the non-compliance was reported. No breaches of this timing requirement were identified by the review. **STATUS - CLOSED**
Observations and recommendations – Lead Auditor				
HLE-Obs-01	**A19**	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. 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.	It is recommended the register is reviewed and updated to include this information.	The incident register now includes this information. **STATUS - CLOSED**
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.	As observed during the Audit site inspection, appropriate signage has been installed. **STATUS CLOSED**

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
HLE-Obs-03	**B30**	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. 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	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: • Visual signage (e.g. Bannaby Substation) • Site inductions • EWMS/ECMS and Workpacks.	The site wide review has been completed with corrective actions implemented at Bannaby. There were some isolated instances where colour coding for fencing was inconsistent with the coding system. It is therefore recommended that the implementation is continually checked through routine site inspections. **STATUS – OPEN and ONGOING**
HLE-Obs-04	**B51**	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. 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.	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.	As observed during the Audit site inspection, appropriate signage has been installed to alert emergency services to the location of the water tank. **STATUS CLOSED**
HLE-Obs-05	**B55/B56**	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. On 10/10/25 DPHI wrote to Transgrid acknowledging the potential non-compliance noting that no further action would be taken. 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:	The Auditor has reviewed the information provided by Transgrid as noted and agrees with the findings of the Transgrid investigation and interpretation of compliance. 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.	This was a positive observation with no recommended actions. **STATUS CLOSED**

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
		• 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**	Revised constraints mapping, updated following completion of the Biodiversity Assessment Verification Report (BAVR), is not included in the current version of the BMP. 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.	The BMP is updated to include revised constraints mapping.	This is yet to be implemented. AGJV have advised that this be included in the updates to the BMP required by Condition B29 of the Infrastructure Approval following revisions to the BAVR. **STATUS - OPEN**
HLE-Obs-07	**B30**	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, 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.	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.	AGJV advised that the Unexpected Finds Procedure was updated in the latest revision of the BMP (Rev 02.2) to include a process for reporting when an unexpected find is confirmed during pre-clearing surveys or any other survey. Whilst these changes make responsibilities clearer, the recommendation related to a potential unexpected find of the Striped Legless Lizard during pre-clearing surveys, which was recorded on a daily ecologist checklist, but no clear record of resolution of this was documented. The amendments to the BMP will not resolve this issue. It is recommended that a system be established requiring the project Ecologists to report potential unexpected finds to the Environment team, flagging these for resolution within a certain timeframe (e.g. 24 hours). This issue is partially resolved.

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
				STATUS - OPEN
HLE-Obs-08	**B30**	During the site inspection a difference in the data layers being used by the Project Ecologists (East Coast Ecology) and AGJV was observed (see Appendix F Table 2-1). 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.	AGJV explore improved data sharing processes with their Project Ecologists to ensure consistent datasets are used.	AGJV advised that they now provide the ecologists with all data layers for pre-clearing surveys and reporting, ensuring both Ecologists and AGJV are using the same, correct design footprint. As a fail-safe, the pre-clearing survey area is checked against the permitted area to identify any possible discrepancies. **STATUS - CLOSED**
HLE-Obs-09	**B30 /**	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. 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. 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.	AGJV engage with CPHR with a view to simplifying baseline data collection for weed species. This could include: • noting priority weeds occurring at low densities which teams need to be aware of. • undertaking detailed mapping of weed infestations which will need to be managed during construction. This information should be spatial in nature.	AGJV advised that the process for documenting weeds was amended in the latest revision of the BMP (Rev 02.2). A revised process for documenting weed species in pre-clearing reports for baseline monitoring was also included to ensure consistency between the Vegetation Clearing Procedure and the Biosecurity Management Plan. Review of this process indicates a more simplified process, but there is still a lack of nexus between weeds occurring at low densities, which project teams need to just be aware of, and those occurring at higher densities, which will need to be managed during construction. Further amendments are recommended. This issue is partially resolved. **STATUS - OPEN**
HLE-Obs-10	**B30 / C8**	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. 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.	AGJV should assess the extent of any damage to determine whether the event is classified as an incident or non-compliance as defined by the consent. 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.	AGJV advised that an investigation was undertaken into the observation made at Tower 55 during Audit 1. This investigation identified a post-rainfall ERSED maintenance action and determined it did not meet the criteria for non-compliance or an incident under the Project EMS, and confirmed it would be managed under the HLE SWMP, with no material harm identified. **STATUS - CLOSED**

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
HLE-Obs-11	**B25**	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. 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. 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. 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.	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. • allow for future clearing to ensure potential exceedances are identified early so that appropriate actions can be implemented to prevent non-compliance. • allow delineation of clearing permits that have been applied for (but not approved), approved and completed.	Following Audit 2 this process has been revised with inclusion of partial and total clearing in the Clearing Tracking Dashboard. **STATUS - CLOSED**
HLE-Obs-12	**B26**	The current BOP does not provide evidence of consultation with CPHR and the BCT, as required by condition B26.	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.	Evidence of consultation with NSW Planning, Offsets, Threatened Species and Ecosystems (POTSE) and CPHR was provided after the submission of the previous audit report. **STATUS - CLOSED**

Unique ID	Condition (s)	Auditor Observations	Recommendation	Actions taken and status
HLE-Obs-13	**B30**	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. Condition B30 requires that the BMP includes a description of the measures which would be implemented to minimise impacts to entities at risk of SAII. 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.	Updates to the HLE BMP should include evidence of the date and timing for consultation with CPHR and the FCNSW. Include specific mitigation measures to be implemented for entities at risk of SAII.	A detailed consultation report has been provided indicating extensive consultation with both FCNSW and CPHR and an updated version of this consultation report was provided during Audit 2. **STATUS - CLOSED**
HLE-Obs-14	**B30**	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).	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: • Visual signage • Site inductions • EWMS/ECMS and Workpacks	The site inspection undertaken for Audit 2 identified consistent use of bunting to demarcate clearing limits with consistent signage used to indicate environmental protection zones, hand clearing areas and monitoring locations. **STATUS - CLOSED**

3.6 Adequacy of Environmental Management Plans and Strategies

Management plans and strategies relevant to this audit are summarised in Table 13.

Table 13: 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

- AGJV have developed a training and awareness programme focussing on key environmental risks. Key elements included standardised toolbox talks, poster awareness campaign and a collaborative “away day” with the environment team to promote awareness of key risks, issues, best practice and to facilitate collaboration across all aspects of the project.

- AGJV continues to have good on-site controls and induction processes. Permits were readily available, with documentation of site inductions occurring. Impressively, during the inspection of the unexpected find of the Pink-tailed Legless-lizard at YG-031, the plant operator advised that he had been inducted the previous day and the presence of a lizard was highlighted and controls clearly explained.
- Marking of clearing limits had significantly improved. Clearing limits are clearly marked with bunting and signage, and appropriate controls are in place. This was highlighted during the site inspection of partial clearing at Tower 214 in BY-130-19 where clearing controls had been well established prior to commencement of clearing the next day.
- Project access is well managed, with areas not open to project personnel well marked, removing potential for inadvertent access and impacts to occur.
- Measures to minimise impacts are ongoing on the project. This was evidenced during the inspection of partial clearing at BY-130-09 where clearing of the overstorey/canopy layer had been reduced based on additional analysis of clearing distances to conductors using LiDAR and on-site assessment by an Arborist, resulting in a smaller area of partial clearing than predicted.
- Nest box installation continues to be well advanced. To date, the HLE team has installed 1,605 nest boxes or artificial hollows. This compares to 112 occupied hollows recorded during clearing works. The HLE project has currently installed more nest boxes than required based on identification of occupied hollows.

3.8 Stakeholder Consultation Outcomes

Issues raised by project stakeholders that were consulted with prior to undertaking the Audit are summarised in Table 14 with the Auditor's response to each issue.

Table 14: Key stakeholder issues and Auditor response

Organisation	Key Issues/Comments	Auditor Response
Government Agencies		
Department of Planning, Housing and Infrastructure (DPHI)	Department has received a recent complaint in regards to activities such as truck movements, truck speeds and convoying, vibration and impacts to house from truck movements and dust associated with the Humelink East Project in particular around Woodhouselee Road. The Department requests that you also include in the upcoming audit a focus on the below:	Noted. Refer to the Auditors response below in relation to specific issues raised by the Department.
	Review whether monitoring of Traffic Noise and vibration is being undertaken along transport/construction routes to ensure no exceedances of criteria to nearby residents and whether mitigation measures are appropriate or additional actions are required.	The Auditor reviewed the requirements for Traffic Noise and Vibration monitoring in both the Construction Noise and Vibration Management Plan and the Traffic Management Plan. Neither of these plans require noise and vibration monitoring of traffic. At the time of the Audit, AGJV had not undertaken noise or vibration monitoring specifically of traffic impacts.
	Management of vehicle movements along transport/construction routes is being undertaken to minimise convoy lengths or platoons	As noted below, the In Vehicle Management System (IVMS) system has been implemented to manage the scheduling of haulage vehicle movements and record vehicle movements in accordance with the TTMP. The Driver Code of Conduct included in Appendix B includes a commitment for all drivers to “Not drive in platoons or convoys”. During the Audit site inspection, there were no convoys nor platoons of vehicles observed.
	Review procedures and mechanisms for the distribution of information and consultation with the community is being undertaken as per the Community Communication Strategy. Specifically in relation to traffic related impacts, timing and management, where there may be an increase in the number of movements for activities such as steel deliveries.	The Auditor reviewed the community notifications distributed during the Audit period as follows: • Oversize deliveries to Crookwell – August 2026 • Traffic disruptions at Black Range Road – July 2026 • Road Closures on Adjungbilly Road – June 2026 • Steel Deliveries – April 2026 • Hurdle Deliveries – April 2026 Notifications appear to be appropriate for the activities planned to be undertaken. Further information is available on the HLE project website HumeLink East | Transgrid

Organisation	Key Issues/Comments	Auditor Response
	Review transport movements along Woodhouselee to determine whether there are any issues with dust impacts on nearby residents and whether mitigation measures are appropriate or additional actions are required.	The Auditor undertook a visual surveillance of Woodhouselee road using satellite imagery and notes the road is sealed for a substantial section on either side of the complainant's property. Additional measures to control dust at this location are therefore not warranted.
	How any complaints received in regard to activities along Woodhouselee Road have been addressed by the AGJV in accordance with the requirements under the relevant management plans such as: • Traffic and Transport Management Plan (TTMP) - Traffic Noise & Vibration is to be addressed in the Noise and Vibration Management Plan (NVMP). • NVMP - Complaint based monitoring - Where complaints are received, noise and/or vibration monitoring may be undertaken at sensitive receivers to determine if the actual construction noise generated exceeds the predicted 'worst case' construction noise levels identified in this plan or to confirm predicted vibration levels.	At the time of the Audit, AGJV noted that they received the complaint on 19th of July 2026 and acknowledged and issued an initial response to the complainants concerns on the 20th July with an offer to meet the complainant at their property or at another location on 24th or 30th of July. The complainant declined the request for a meeting. At the time of the Audit the complainant did not request noise and /or vibration monitoring to be undertaken.
	TTMP - Convoy - scheduling the haulage vehicle movements to minimise convoy length or platoons; Section 6.1, Section 6.6 and Appendix B.	As noted below, the IVMS system has been implemented to manage the scheduling of haulage vehicle movements and record vehicle movements in accordance with the TTMP. The Driver Code of Conduct included in Appendix B includes a commitment for all drivers to "Not drive in platoons or convoys". During the Audit site inspection, there were no convoys nor platoons of vehicles observed.
	LinkedSite is a web-based program designed to virtually track, analyse, and manage vehicle movements in and around projects. AGJV will deploy LinkedSite on AGJV vehicles to track vehicle movements and to assist with scheduling.	As noted in the Auditors response to B37, an IVMS has been implemented across the project to track vehicle movements and to assist with scheduling. The Auditor was provided with a demonstration of the system which includes: • 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.

Organisation	Key Issues/Comments	Auditor Response
		• All subcontractors are registered on the system and are required to do a pre-start prior to commencing their activities. • 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.
	Consult with the following organisations: • 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.	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.
Conservation, Programs, Heritage and Regulation, within the NSW Department of Climate Change, Energy, the Environment and Water (CPHR)	No response received.	N/A.
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

Organisation	Key Issues/Comments	Auditor Response
	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	No response received.	N/A
NSW Rural Fire Service	No response received.	N/A
NSW DCCEEW Water Group	Key Issues raised by the DCCEEW Water Group for consideration by the Audit area as follows: • implementation of effective erosion and sediment controls • suitable groundcover/stabilisation maintained across the project area • suitable management/storage/use of chemicals and fuels etc • appropriate installation/management of any waterway crossings, including appropriate approvals • any roads constructed and maintained to reduce risks to water quality • appropriate management and disposal of onsite wastewater from construction compounds • analysis of water quality monitoring results • assessment of the effectiveness of the soil and water management plan • implementation of consent conditions, including an analysis on what has worked and what hasn't worked.	The Audit has included an assessment of these issues with no non-compliances identified. Further information is provided in Appendix C (Audit Schedule). Overall, compliance with consent conditions relating to soil and water management has been achieved with existing systems and processes deemed to be effective. One recommendation has been made to complete the final rehabilitation of disturbed areas as soon as practical with high-risk areas (steep slopes and sites near/adjacent to waterways) prioritised to provide permanent ground cover and effective erosion control.
Natural Resources Access Regulator (NRAR).	No response received.	N/A.

Organisation	Key Issues/Comments	Auditor Response
Heritage NSW	No response received.	N/A.
Transport for NSW	No response received.	N/A.
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 response received.	N/A.
Goulburn Mulwaree Council (GMC)	Within the Summary of Mitigation/Management Strategy section of the Social Impact Management Plan there were some items within the Monitoring and Reporting Frequency that had not been addressed or not actioned within the specified timeframe. There was a requirement of a Monthly Contractor report + pulse checks in active work zones, these have not been received.	Noted. Social impact monitoring reporting has now commenced with quarterly reports provided on the Project website. Reports include the following information: • Progress in meeting SIMP targets, including Key Achievements, summary of progress and key indicators, assessment against targets and adaptive measures implemented • Community engagement undertaken, stakeholder feedback and planned engagement for the next quarter • Complaints received and responses, trend analysis.
	There was a requirement to demonstrate Evidence of proactive event planning trough dynamic scheduling measures in collaboration with local tourism operators or services; and Quarterly engagement with Destination Networks and local councils to discuss emerging tourism issues... This had not taken place prior to a meeting with Council on 25/6/2026	Noted. Councils' concerns have been forwarded to AGJV for their consideration.

Organisation	Key Issues/Comments	Auditor Response
	There are ongoing concerns regarding the impact of Hume Link on accommodation occupancy in Goulburn, given it did not proceed with the originally proposed accommodation camp in Upper Lachlan. This has resulted in Goulburn being the key location for workers on the Upper Lachlan section of the project. Following a 25/06/26 Teams meeting with Hume Link, we understand they are using a mix of 17 hotel/motel/caravan park properties currently, alongside a further two Airbnb properties and several rental properties.	Noted. Councils' concerns have been forwarded to AGJV for their consideration.
	Whilst at the moment the impact is minimal due to the lower staff numbers currently on the project, when the project reaches its peak (which is now delayed), it will see accommodation in Goulburn at maximum capacity between February and April 2027 - this period, and other periods of high staff numbers cause us great concern for accommodation availability for major events, multiple-event weekends, and for Goulburn generally. This is a peak period for Goulburn regardless, where accommodation is hard to find anyway, reputationally this has the capacity to be very damaging for Goulburn as visitors will be unable to source accommodation.	Noted. Councils' concerns have been forwarded to AGJV for their consideration.
	At the 25/06/26 Teams meeting, it was agreed that a monthly stakeholder meeting would occur to discuss these issues, flag key event periods, and for Hume Link to use their Travel Manager to assist with logistics to move workers in/out as required, which has not occurred. A meeting is scheduled with Hume Link next week to focus specifically on events and identifying periods of concern	Noted. Councils' concerns have been forwarded to AGJV for their consideration.
	Council has concerns about the impact on rental accommodation availability and subsequent rental pricing and impacts on the local community. Council has raised concerns around the significant increase in the rental prices (all houses) (long term) during the construction period. The weekly rent has risen 10.7% from $500.79 to $553.88 in the 10-month period from June 2025 - May 2026.	Noted. Councils' concerns have been forwarded to AGJV for their consideration.

Organisation	Key Issues/Comments	Auditor Response
	An ongoing issue raised during the meeting on 25/6/2026, is project vehicle parking within the Goulburn CBD taking up parking for community visiting council and other nearby facilities. The number of vehicles is excessive, and multiple complaints have been received by patrons of the Goulburn Region Art Gallery, Goulburn Regional Library and the private businesses who occupy the same building at HumeLink.	The Auditor discussed this issue with AGJV who noted that several actions have been implemented to minimise car parking impacts. These include: • Directing personnel visiting the office to the Ellesmere Street carpark. • Placement of advisory signage within the office requesting personnel to respect the parking time limits and advising personnel of “no go” parking zones. • Warning staff of potential fines for not complying with the above. The Actions taken by AGJV appear to be appropriate in response to Councils concerns.
	The proponents’ contractors do not appear to be complying with the Transport Management Plan (TMP). We are aware that they have been applying for permits to travel on roads not listed in the TMP. The additional roads are showing significant damage and do not appear to have had dilapidation reports. The expectation around permits and timeframes (typically lodged at the last minute) isn’t acceptable.	The Audit has included an assessment of compliance with the Traffic and Transport Management Plan and related conditions (refer to Appendix C). Sufficient evidence was provided to the Auditor to demonstrate the overall implementation of the Plan, however during the Audit period, Non-compliance with Conditions B35 and B39 relating to the use of an unapproved route to the Bannaby Substation was reported to DPHI. Following investigation, AGJV identified the cause of the non-compliance was due to a breakdown in communication between the supplier and their HV operator. Actions taken to prevent recurrence included the immediate reinforcement of the requirement to comply with approved routes. AGJV has acknowledged Councils concerns regarding applications for permits to Council for routes not included in the TTMP and noted the applications these applications are being made incorrectly by the haulage company. AGJV has requested these permits are refused by Council and has reinforced the correct routes and processes to respective haulage companies. AGJV noted that the roads are not proposed to be used and therefore dilapidation surveys are not required to be undertaken. In addition, the independent Audit findings, the independent Environmental Representative has undertaken a project wide review of the TTMP at the request of DPHI, the review concluded that AGJV were implementing the TTMP actively and appropriately managing its traffic risks. The controls in place are robust and appropriate.
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.

Organisation	Key Issues/Comments	Auditor Response
Yass Council (YC)	The primary issue Yass Valley Council is having with this project is the deterioration of our unsealed road network due to the additional volume of light and heavy vehicles Of particular concern are Black Range Road and Coolalie Road	The issue of Black Range Road and Coolalie Road was discussed with the relevant members of the AGJV project team who acknowledged Councils concerns and have noted that repair works have been initiated and that AGJV will continue to work with Council to resolve any further issues.
Cootamundra Gundagai Regional Council (CGRC)	No response received.	N/A.

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 and Adjungbilly Accommodation Camps, 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.
- There have been no reported instances where exceedances of the project boundary have occurred and reported to DPHI.

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:

"revised clearing limits have recently been approved based on revised FLPs. The HumeLink project will now be reviewed against these revised clearing limits. At the time of Audit 2, clearing under these revised limits had only just been recommended and clearing limits for HLE had not been updated.

These revised clearing limits have triggered updates to the BAVR, with a requirement for amendments to the BMPs for both HLE and HumeLink West. This will include revisions to the clearing limits for both projects and updates to the Clearing Limits Tracking Dashboard.

The next audit should continue to review progress against these revised 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.

- 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 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	16 October 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	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.	**Lead Auditor** • Site Inspection,28th and 29th of August 2026 • Audit Interview 30 August 2026 • Documents reviewed as part of the audit and noted below • Environmental Audit Report, from CK Environmental dated 05/07/26 • Traffic Management Audit, from Acciona, dated 29/05/26 **Biodiversity Specialist** • HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Rev 02.1 (dated 22 May 2026) • Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026) • Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228)	**Lead Auditor** 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. During the Audit period, two separate internal Audits were undertaken, which included an audit of traffic management measures and compliance with the CTTMP. **Biodiversity Specialist** Measures to avoid and minimise impacts to biodiversity values are outlined in the letter from Transgrid to DPHI seeking approval to exceed the clearing limits set in Condition B25 of the Infrastructure Approval. This letter outlines that amendments to the design, along with reductions in assumed presence, have resulted in: • a reduction in clearing of native vegetation by around 47 ha (from 926.60 hectares to 879.18 hectares), • a reduction in impacts to TECs listed under the EPBC Act by around 8.75 hectares (from 130.58 ha to 121.83 ha), • a reduction in impacts to TECs listed under the BC Act by around 23.88 ha (from 490.38 ha to 466.50 ha), • a reduction in impacts to all SAII entities except for Delicate Pomaderris (*Pomaderris delicata*) and Pale Pomaderris (*Pomaderris pallida*), including: – 21.27 ha for Box Gum Woodland (from 477.04 ha to 455.77 ha),	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			– 2.99 ha for Sooty Owl (*Tyto tenebricosa*) (from 68.81 ha to 65.82 ha), – 0.10 ha for Rice Flower (*Pimelea bracteata*) (from 4.76 ha to 4.66 ha), and These three species required specific measures to minimise impacts in accordance with Condition B30 (d)(xii) of the Infrastructure Approval. As outlined in Audit 1, data collected as 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 micrositing efforts and assess any design changes. Also as noted during Audit 1, this information was not included in the BMP reviewed as a part of that Audit. It is unclear whether updates to the BMP (Rev 02.1) include revised constraints mapping. Based on approval of changes to clearing limits under Condition B25 and approval of the final layout plans (FLPs), further amendments to these constraints maps will likely be required to reflect the results of the BAVR and these finalised FLPs. This should be included in the updates to the BMP required by Condition B29 of the Infrastructure Approval. Efforts to minimise harm were observed during the site visit to BY-040 during Audit 1. Evidence of reductions in impacts was also observed during the site inspection for Audit 2, as noted in partial clearing areas at Pull20 in BY130-09. Clearing of the overstorey/canopy layer had been reduced based on additional analysis of clearing distances to conductors using LiDAR and on-site assessment by an Arborist, resulting in a smaller area of partial clearing than predicted. **Recommendations:** Ensure updates to the BMP (required under Condition B29 of the Infrastructure Approval following updates to the BAVR) incorporate updated constraints mapping which reflects the FLPs and updated BAVR mapping.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
TERMS OF APPROVAL				
A2	The development must be carried out; a) In compliance with the conditions of this approval b) In accordance with all written directions of the of the Planning Secretary: c) Generally in accordance with the EIS; and d) Generally in accordance with the Development Layout in Appendix 1.	• Site Inspection,28th and 29th of August 2026 • Audit Interview, 30 August 2026 • HLE Obligations Register • Transgrid site inspection records (various) • AGJV site inspection records (various) • Skip bin Photos, (various) • Waste Management inspection report, from Acciona, dated 12/02/26 • On ground heritage controls review, from Acciona, dated 17/06/26 • Photo of heritage site, various • Letter from SEEC, titled "Independent Inspection of Erosion and Sediment Controls: Humelink East Project (Tumut and Adjungbilly Area), 26 February 2026" dated 26/02/26 • HumeLink east Environment & Sustainability Inspection Checklist, from Acciona, dated 16/02/26 • Environment and Sustainability Inspection Checklist (v1), from Acciona, dated 24/02/26 • Conditions of consent, from Wolfpeak, titled "Construction Works" (undated) • Excel spreadsheet, titled "HLE Obligations Register" (undated) • Environmental Inspection Actions, from Acciona, dated 18/06/26 • 20260318 TG HLE Environmental Inspection • 20260409 TG HLE Bannaby Substation • 20260429 TG HLE Environmental Inspection • 20260507 TG HLE -YG-026 • 2026070-8 TG HLE -MA-059-10 BW 71	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. 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. In addition to the day-to-day monitoring and inspections, further detailed and risk based inspections and reviews have been undertaken including pre-and post rainfall inspections, technical erosion and sediment control inspections (by the project CPESC), and waste management inspections (undertaken at Yass and Adjungbilly camps). An on-ground heritage controls review was undertaken as a preventative measure to avoid a heritage related incident. Two internal audits were undertaken, which included the implementation of the TTMP. On 16 March 2026 the Department requested the ER conduct a review of traffic management and implementation of the TTMP. A copy of the review was appended to the Monthly ER report. During the Audit period, as noted in Condition C11, five Non-compliances have been identified and reported to DPHI. The requirements of condition A2 a) have not been met in their entirety, therefore compliance with Condition A2 has not been achieved.	Non-Compliant
A3	The Proponent must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: a) Any strategies, plans, or correspondence that are submitted in accordance with this approval; b) Any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and c) The implementation of any actions or measures contained in these documents.	• Audit Interview 30 August 2026 • Documents reviewed as part of the audit and noted below • Letter from DPHI, titled "HumeLink – HumeLink East Soil and Water Management Plan" dated 11/02/26 • Letter from DPHI, titled "HumeLink – HumeLink East Air Quality Management Plan" dated 06/03/26 • Letter from DPHI, titled "HumeLink – HumeLink East Bushfire Emergency Management and Evacuation Plan" dated 11/02/26	During the Audit period, the following documents were reviewed by DPHI: • Soil and Water Management Plan • Air Quality Management Plan • Biodiversity Management Plan • Bushfire Emergency Management and Evacuation Plan • Traffic and Transport Management Plan. There were no specific requirements or directions issued by DPHI in their letters of approval other than the requirement to ensure the latest	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		• Letter from DPHI, titled "HumeLink – HumeLink East Biodiversity Management Plan" dated 09/06/26 • Letter from DPHI, titled "HumeLink – HumeLink East Soil and Water Management Plan" dated 12/06/26 • Letter from DPHI, titled "HumeLink – HumeLink East Traffic and Transport Management Plan" dated 14/04/26	version of the document is available on the project website.	
A4	The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c), or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	• Excel Spreadsheet, titled "CA Tracking Register" (undated) • "Consistency Assessment Report" dated 06/05/26 (various examples) • Minor Consistency Assessment Checklist, from Acciona dated 30/06/26	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 ensure consistency with project approvals (and documents listed). A register of consistency assessments is utilised to track project changes with an up to date version provided to the Auditor. All consistency assessments undertaken during the Audit period were provided to the Auditor.	Compliant
A5	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.	• 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 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 • Letter from DPHI to Transgrid titled "HumeLink – Extension Request for the revised Biodiversity Assessment Verification Report" dated 16/6/25 • Letter from Transgrid to DPHI titled "HumeLink – Request to Amend the Timeframe for Updating BVAR- SSI-36656827 Condition B29" dated 17/4/26 • Letter from DPHI to Transgrid titled "HumeLink-	During the IA #1 Audit period, amended or extended timeframes were granted by DPHI for the following: • 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 with a separate extension of time for the submission of the Audit report (including the Biodiversity component) • Timing amendment for the updated Biodiversity Assessment Verification Report • Extension of time for the Biodiversity Offset Package. During the IEA# 2 Audit period, two extension requests were approved by DPHI as follows: • Extension of time for the revised Biodiversity Assessment Verification Report • Extension of time for the submission of the Independent Audit report (for IEA#1).	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		Extension Request- to submit – Biodiversity Expert Report Component of Independent Environmental Audit 2026" dated 2/4/26		
LAPSE OF APPROVAL				
A6	This approval will lapse if the Proponent does not physically commence the development within 5 years of the date on which it is granted.	• 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 24/9/2/5 • Letter from Transgrid to DPHI titled "HumeLink – Notification of the Commencement of Construction – Stage 3A (ii) HumeLink East Condition C7" dated 24/9/25	The commencement of construction of HumeLink East was 29/9/25 and within 5 years of the date of consent (13/11/24).	Compliant
LIMITS OF APPROVAL				
A7	This approval does not authorise the development of any quarry operation, including: a) Coffee Pot Quarry; and b) Three Mile Quarry *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.*	• Audit Interview 30 August 2026 • Site Inspection,28th and 29th of August 2026	It was noted that these quarry operations are not within the HLE project and are not being utilised by the HLE project team.	Not triggered
EVIDENCE OF CONSULTATION				
A8	Where conditions of this approval require consultation with an identified party, the Proponent must; a) Consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and b) Provide details of the consultation undertaken including; (i) The outcome of that consultation, matters resolved and unresolved; and (ii) Details of any disagreement remaining between the party consulted and the	• A8 Consultation Report, Accommodation Camp Management Plan, June 2025" Revision B, • A8 Consultation Report, Yass Accommodation Camp Management Plan, September 2025" Revision C, • "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,	Consultation reports have been prepared in accordance with this condition. Reports are comprehensive and includes the following information: • 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	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Proponent and how the Proponent has addressed the matters not resolved.	• "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 • A8 Consultation report, Biodiversity Management Plan, Acciona" dated 29/05/26 • A8 Consultation Report, Traffic and Transport Management Plan" dated 2/4/26	• Issue status (resolved/unresolved) and details of any disagreements • Evidence of consultation with stakeholder. Examples of A8 consultation reports were provided to the Auditor for the Biodiversity Management Plan and the Traffic Management Plan.	
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.	• Audit Interview 30 August 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.	• 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 Environmental Representative" dated 05/02/25 • Letter from DPHI to Transgrid, titled	DPHI approved a lead Environmental Representative (ER) and an additional alternate ER on 15/11/24. 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.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		• 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.	• 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 *Environmental Representative Protocol* (Department of Planning and Environment, October 2018).	• 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 • Letter from Transgrid to DPHI titled "HumeLink – Nomination of Environmental Representative for the	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
		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	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; 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; (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 (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); b) As may be required by the Planning Secretary, assisting the Department in the resolution of community complaints; 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; d) Overseeing the implementation of all construction environmental management plans and monitoring programs required under this approval, and advise the Proponent upon the achievement of these plans/ programs;	• ER Audit Interview 17 August 2026 • General Correspondence from WolfPeak, titled "Management Plan updates" dated 09/02/26 • Excel spreadsheet titled "Blast MP Comments Register Template" from Transgrid, (undated) • General Correspondence from Wolfpeak, titled "BMP Rev 02.1 – Conductor Line Marker Plan Update" dated 23/05/26 • Letter from Wolfpeak, titled "ER Review of Emergency Plan I HumeLink East (SSI-36656827)" dated 09/02/26 • Letter from Wolfpeak, titled "ER Review of update to Soil and Water Management Plan I HumeLink East (SSI-36656827)" dated 09/02/26 • Letter from Wolfpeak, titled "ER Review of update to Soil and Water Management Plan I HumeLink East (SSI-36656827)" dated 20/05/26 • Letter from Wolfpeak, titled "ER Review of Update to Traffic and Transport Management Plan I HumeLink East (SSI-36656827)" dated 02/04/26 • General Correspondence, from Wolfpeak, titled "Management Plan Update", dated 09/02/26 • Excel Spreadsheet, titled "Asbestos Management Plan" dated 19/03/26 • General Correspondence from Wolfpeak, titled "Revised SWMP and AMP – Minor Amendments" dated 15/04/26 • Excel Spreadsheet, titled "GEN-R-TG-GEN-004254.02-TTMP OSOM Comments Register" dated 17/03/26 • Excel Spreadsheet, titled "GEN-R-TG-GEN-004254.02-TTMP OSOM_GMC Comments Register" dated 26/06/25 • General correspondence, from Transgrid, titled "TTMP A8 Consultation Report" dated 31/03/26 • General Correspondence, from Acciona, dated Stage 3A(v)-TTMP" dated 27/03/26 • General Correspondence, from Wolfpeak, titled "HLE TTMP OSOM Update" dated 02/04/26	Substantial evidence of the ER's involvement in the Project during the Audit period was provided to the Auditor included the following: • 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. The ER noted that they have not • 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
	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 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.	• Email from Humelink East, titled "HLE – Complaints Register – 10 July 2026" dated 10/06/26		
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)	• ER Audit Interview 17 August 2026 • Letter from Transgrid to DPHI titled "HumeLInk – Notification of Non-compliance – Condition C11" dated 18/5/267 • Email from DPHI to Transgrid titled "HumeLink Post Approval Document Received – (SSI- 3665627-PA 201" dated 18/5/26 • Letter from DPHI to Transgrid titled "HumeLink Notification – Non-compliance A14-4 May 2026 – failure to notify ER within timeframe" dated 22/5/26	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. On 17/5/26, Transgrid notified DPHI of a Non-compliance with condition A14, noting the complaints register issued to the ER on 12/5/26 did not include a complaint that was received on 2/5/26. DPHI acknowledged receipt of the complaint on 22/5/26 noting the Department has decided to record the breach with no further enforcement action proposed.	Non-compliant
PROTECTION OF PUBLIC INFRASTRUCTURE				
A15	Unless the Proponent and the applicable authority agree otherwise, the Proponent must; a) Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and b) Relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. *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.*	• Audit Interview 30 August 2026 • Site Inspection, 28th and 29th of August of 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

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
DEMOLITION				
A16	The Proponent must ensure that all demolition work on site is carried out in accordance with *AS 2601-2001: The Demolition of Structures* (Standards Australia, 2011), or its latest version.	• Site Inspection, 28th and 29th of August 2026 • Audit Interview 30 August 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
STRUCTURAL ADEQUACY				
A17	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. *Notes:* • *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.*	• Audit Interview 30 August 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	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. There was no evidence of alterations or additions to existing buildings or structures observed during the Site Inspection.	Not triggered
COMPLIANCE				
A18	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.	• Audit Interview 30 August 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	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. Specific environmental issues are communicated through the delivery of site toolbox talks. Several examples of toolbox talks were provided for specialist issues including: • Erosion and sediment control • Clearing and land disturbance permitting process • Threatened flora • Environmental controls during the Christmas shutdown process. Subcontracts mandate compliance with the CEMP and management plans which incorporate the requirements of the Development Consent.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Site notice boards provide information and environmental management documents relevant to the works being undertaken. **Observation (Key Strength)** AGJV have developed a training and awareness programme focussing on key environmental risk. Key elements included standardised toolbox talks, poster awareness campaign and a collaborative "away day" with the environment team to promote awareness of key risks, issues, best practice and to facilitate collaboration across all aspects of the project	
A19	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; 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.	• Audit Interview 30 August 2026 • Excel spreadsheet, from Acciona titled "Env Incident & NCR Register" dated 03/10/25	The Auditor was provided with a copy of the Incident and NCR register for the Audit period. During the Audit period, a total of 10 minor incidents occurred (e.g. oil spills) which were classified as minor and non-reportable with minimal impact. There were no incidents triggered the requirement for reporting to DPHI in accordance with this condition As noted in the previous Audit, the incident register does not include a description of the actions taken to remedy the incident or any additional measures to prevent further incident. A recommendation was made to review and updated to include this information. The incident register has now been updated to include corrective and preventative measures. This recommendation is now closed.	Not triggered
A20	The Applicant must provide the Department with a subsequent incident report in accordance with Appendix 5 (Incident Notification and Reporting Requirements).	• Audit Interview 30 August 2026 Excel spreadsheet, from Acciona titled "Env Incident & NCR Register"	As noted above, there were no incidents during the Audit period that would trigger the requirement for reporting in accordance with this condition.	Not triggered
OPERATION OF PLANT AND EQUIPMENT				
A21	All plant and equipment used on site, or in connection with the development must be: a) Maintained in proper and efficient condition; b) Operated in a proper and efficient manner.	• Site Inspection,28th and 29th of August 2026 • Document titled "Plant Prestart – Mobile" from Acciona, dated 21/07/26 • Service History Listing, from Coates Hire, dated 02/03/26 • Excel spreadsheet, titled "Plant Prestart" dated 23/04/26 • Equipment Maintenance record, from Coates Hire (undated) • Excel Spreadsheet, titled "Hygiene Check – Mobile	All plant and equipment were observed to be operating in a proper and efficient manner with no excessive noise or exhaust emissions observed. 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.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		Plant" dated 06/07/26 • Excel Spreadsheet, titled "Hygiene Check – Utility Vehicle" dated 06/02/26 • Appendix C – Hygiene check from Transgrid, dated 13/05/26		
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.	• 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.	• Audit Interview 30 August 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.	• Audit Interview 30 August 2026 • "Community Communication Strategy" AGJV dated 25/05/25	The Community Communication Strategy (CCS) was prepared in November 2024, prior to commencing the development and updated in May 2025. The CCS is comprehensive and meets the requirements of Condition A25 as noted below. It was noted during the Audit interview that the CCS is currently under revision for extended helicopter hours.	Compliant
A25	The Community Communication Strategy must; a) Identify landowners and potentially impacted receivers; b) Ensure that the landowners identified in (a) are consulted during Enabling Works and construction; c) Set out procedures and mechanisms for the regular distribution of information; d) Establish a public liaison officer(s) to engage with the local community; and e) Set out procedures and mechanisms (i) Through which the community can discuss or provide feedback to the	• Audit Interview 30 August 2026 • "Community Communication Strategy" AGJV dated 25/05/25 • Community News Articles (various) • HumeLink East Construction Notice August 2026 • HumeLink East Construction Notice July 2026 • HumeLink East Construction Notice May 2026 • HumeLink East Construction Notice April 2026 • February 2026 • Works Notification July 2026 – Traffic Disruptions and Black Range Road • Works Notification June 2026 – Road Closures on	The CCS is comprehensive and meets the requirements of this condition as follows: • Section 5.1 identifies landowners and potentially impacted receivers; • 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	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Proponent; (ii) Through which the Proponent will respond to enquiries or feedback from the community; and (iii) To resolve any issues and mediate any disputes that may arise in relation to Enabling Works and construction of the development. The Proponent must implement the Community Communication Strategy for the duration of Enabling works and construction.	Adjungbilly Road • Works Notification May 2026 – Hurdle Deliveries, General Notice • Works Notification April 2026 –Stringing Works to begin for Humelink East (General Notification) • HumeLink East, Quarterly Newsletter June 2026 • HumeLink East Quarterly Newsletter March 2026 • HumeLink East Project Update • 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_Compressed 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	• Section 2, and 6.1-6.3 set out procedures and mechanisms o Through which the community can discuss or provide feedback to the Proponent; o Through which the Proponent will respond to enquiries or feedback from the community; and o To resolve any issues and mediate any disputes that may arise in relation to Enabling Works and construction of the development. AGJV have appointed an experienced stakeholder management and community engagement team to oversee the implementation of the CCS. Evidence of implementation of the Community Communications Strategy included: • Project website (refer to condition C15 below) • Project contact form and details • Works notifications • Complaints register online • 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	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; a) 7am to 6pm Monday to Friday; b) 8am to 1pm Saturdays; and c) At no time on Sundays and NSW public holidays;	• 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 30 August 2026 • R "Work Pack 01" dated 18/06/24 • Work Pack 21, rev02" dated 04/06/26 • Report from Acciona, titled "Work Pack 27, rev01" dated 04/11/25 • Report from Acciona titled "HLE-AGJ-CN-ALE-WP-0000-00001" dated 21/02/25 • Report from Acciona, titled "HLE-AGJ-CN-ALE-WP-0000-00011" dated 06/08/25 • Access Tracks Supervisor Pack (undated) • Work Pack 11 – Review and Approve, dated 27/10/26 • Work Pack 11 – Submission for approval, dated 17/11/26 • HLE Environmental Non-compliance Report, from Acciona, dated 07/02/26 • Response to Request for Information, from Transgrid, 27/03/26 • Letter from DPHI, titled "Warning Letter – Breach of Section 5.14 of the Environmental Planning and assessment act 1979" dated 18/07/26 • Out of hours work permits, (undated, various)	Section 6.1.1 of the Noise and Vibration Management Plan describes the standard construction hours as consistent with this condition. Section 14.4 of work packs communicates the standard working hours. Further communication of the approved working hours is provided in the site induction. Works outside the approved hours have been undertaken, mostly on weekends on a case by case basis in consultation with the Property Owner and where the Property Management Plan dictates. Examples of Out of Hours permits were provided to the Auditor. During the Audit period, a Non-compliance was identified and reported to DPHI noting breach of conditions B1 and B16. The Non-compliance was identified following a review of the permit register and active OOH works, and 10 instances across four locations were identified to have undertaken construction works outside standard construction hours without a valid Out of Hours Works (OOHW) permit. The works resulted in six receivers being potentially noise affected, which constitutes non-compliance with Conditions B1 and B16. Subsequent to the notification, an internal investigation was undertaken with corrective and preventative actions identified as follows: • Communications and all construction teams were reminded of the OOH process and the importance of compliance • Stop works notice to be given to any construction team for any future OOH works unless the OOH works protocol is adhered to • Targeted OOHW protocol training to specific construction teams has been undertaken. AGJV noted that toolbox talks held on 11th, 18th and 27th February included content on Noise and Vibration, OOHW and the OOHW protocol. On 18/6/26, DPHI issued a warning letter to AGJV for the breach noting Non-compliance with Conditions B1 and B16.	Non-compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Recommendations The actions taken by AGJV in response to the Non-compliance appear to be appropriate with no further recommendations made at this time. Should further Non-compliances be recorded, a review of the effectiveness of existing controls should be undertaken with additional measures implemented as required.	
EXCEPTIONS TO CONSTRUCTION HOURS				
B2	The following activities may be carried outside the hours specified in condition B1 above; • 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 *Interim Construction Noise Guidelines* (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 construction hours; • 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.	• Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 • Feedback form from Transgrid, titled "Humelink East Work Notice – Earthworks – Access Points, access tracks and pad construction" (undated) • Feedback form, from Transgrid, titled "Humelink East Work Notice – Piling – tower ad foundations" (undated)	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: • 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. The Auditor reviewed the OOH applicant forms and noted the majority were for works on private property in agreement with the property owner and in accordance with the Property Management Plan, oversize deliveries and where the works have been assessed to be compliant with the noise management levels specified in the CNVMP and the Construction Noise Guidelines. Examples of signed community agreement forms were provided to the Auditor.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
MEMORIAL AVENUE CONSTRUCTION COMPOUND				
B3	The following activities must not be carried out at the Memorial Avenue Construction Compound: 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) Anu other noise generating activity that would result in noise levels at sensitive receivers or sensitive land uses exceeding the construction 'highly noise affected' noise management level criteria established using the *Interim Construction Noise Guideline* (DECC, 2009).	• Audit Interview 30 August 2026	Not applicable to the HLE project, the Memorial Avenue Compound is located in the Hume Link West section of the Project.	Not triggered
HELICOPTER ACTIVITIES				
B4	Helicopter use associated with the development may only be carried out: 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; Unless different hours are permitted or required under an EPL in force in respect of the CSSI or the Planning Secretary agrees otherwise.	• Audit Interview 30 August 2026 • Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25	Section 6.11 of the CNVMP states the following *"Helicopter use associated with development may only be carried out between 9 am and 5 pm Monday to Friday and between 9 am to 1 pm on Saturday. No helicopter use is allowed on Sundays or public holidays. This would only not apply if different hours are permitted or required under an EPL in force in respect of the CSSI or the Planning Secretary agrees otherwise, consistent with CoA B4"* Helicopter use commenced on 15th of June 2026 for stringing purposes. There have been no reported breaches of these prescribed hours during the Audit period. No variations to the approved hours have been requested during the Audit period.	Compliant
CONSTRUCTION AND DECOMMISSIONING				
B5	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.	• Audit Interview 30 August 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	Reasonable and feasible steps and measures observed during the Audit site inspection and discussed in the Audit interview included the following: • Locating the Yass accommodation camp in an industrial area and the Adjungbilly camp in a rural setting and away from residential receivers	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		• 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) • Noise Monitoring Field Sheet, from Acciona, (undated) (various) • Toolbox talk, from Transgrid, dated 01/04/26 • Powerpoint titled "Toolbox talk" from Transgrid, dated 15/04/26 • Sitehive report, dated 15/04/26	• 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).	
B6	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 *Interim Construction Noise Guidelines* (DECC, 2009) (or its latest version).	• Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25	The Construction Noise and Vibration Management Plan incorporates the requirements of the ICNG with evidence of implemented noted in condition B5 as above.	Compliant
B7	The Proponent must implement mitigation measures with the aim of achieving the road traffic noise assessment criteria for uses from *NSW Road Noise Policy* (DECCW, 2011).	• 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	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.	Compliant
B8	The Proponent must comply with the following vibration limits at any residence or sensitive receiver; a) Vibration criteria established using the *Assessing vibration: a technical guideline* (DEC, 2006) (for human exposure); b) *BS 7385 Part 2 – 1993 "Evaluation and measurement for vibration in buildings Part 2"* as they are "applicable to Australian conditions"; and c) Vibration limits set out in the *German Standard DIN 4150-3: Structural Vibration – effects of vibration on structures (for structural damage).*	• Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 • Noise and Vibration monitoring register, (undated) • Excel Spreadsheet, titled "Noise and Vibration Monitoring Report" dated 27/11/25 • Site Hive report, dated 15/04/26	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.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			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. 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. Vibration monitoring undertaken confirms compliance with the vibration limits.	
B9	Where a sensitive receiver is identified as potentially exceeding the construction 'noise affected' noise management level or sleep disturbance criteria established using the *Interim Construction Noise Guideline* (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 construction noise below the relevant criteria at each relevant sensitive receiver. 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. *Note: Mitigation measures may include path barrier controls, at-property treatment, or a combination of path controls and at-property treatment.*	• 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 assessment, Acciona, dated 18/02/26 • OOH Works Permit 008 for Faulder Avenue Compound, dated 10/7/25 • Landholder Engagement Statement, from Acciona, dated 26/02/26 • Sitehive report, dated 15/04/26 • Work notification from Transgrid. Titled "Hurdle Deliveries for HumeLink East" dated May 2026	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. The assessments have confirmed noise levels do not exceed the sleep disturbance criteria for any sensitive receivers. 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.	Compliant
B10	Where a sensitive receiver is identified as potentially exceeding the 'highly noise affected' noise management level established using the *Interim Construction Noise Guideline (DECC, 2009),* 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. Activities that would exceed the 'highly noise affected' noise	• Acciona and Genus Plus Joint Venture HumeLink East 500kv transmission line Construction noise and vibration impact statement, Hutchison Weller, dated 19/11/25 • Report from Hutchison Weller, titled "HumeLink west 500kv transmission line – Helicopter Operations" dated 22/07/26 • Document titled "Noise Contours" (undated)	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. The assessments have confirmed noise levels do not exceed the sleep disturbance criteria for any sensitive receivers.	Not Triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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. *Note: Mitigation measures may include path barrier controls, at-property treatment, or a combination of path controls and at-property treatment.*	• Document titled "Noise model inputs" (undated)		
BLASTING				
B11	Blasting may only be carried out on the site: a) Between 9am to 5pm Monday to Friday; b) Between 9am to 1pm on Saturday; and c) No blasting is allowed on Sunday or NSW public holidays.	• Audit Interview 30 August 2026 • Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 • Report from Osterman, titled "Blast Management Plan rev 00" dated 16/03/26 • Excel spreadsheet, titled "Copy of Blasting register" dated 30/03/26 • Blast report, from Precision Drill and Blast, dated 31/03/26 • Blast Report, from Precision Drill and Blast, dated 01/04/26 • Blast Report, from Precision Drill and Blast, dated 01/04/26	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"* Blasting has now commenced for piling and cut/fill locations and tower PAD site where geological conditions are suitable. A blast specialist has been appointed to oversee the process and provide technical support as required. Blasting reports prepared by Precision Drill and Blast confirm blasts have been undertaken within the approved hours as prescribed by this condition.	Compliant
B12	The Proponent must ensure that any blasting carried out on site does not exceed the criteria in Table 2.	• Noise and Vibration Management Plan, HumeLink East, Transgrid, Rev 03 dated 14/10/25 • Blast report, from Precision Drill and Blast, dated 31/03/26 • Blast Report, from Precision Drill and Blast, dated 01/04/26 • Blast Report, from Precision Drill and Blast, dated 01/04/26 • Excel spreadsheet, titled "Copy of Blasting register" dated 30/03/26	The Auditor reviewed the blast monitoring results for the Audit period. There were no exceedances with the blast criteria identified in Table 2 recorded.	Complaint

<table>
<tr><th>ID</th><th>Requirement</th><th>Evidence Collected</th><th>Independent Audit Findings & Recommendations</th><th>Compliance Status</th></tr>
<tr><td></td><td colspan="3">Table 2: Blasting Criteria
<table>
<tr><th>Location</th><th>Airblast Overpressure (dB (Lin Peak)</th><th>Ground Vibration (mm/s)</th><th>Allowable exceedance</th></tr>
<tr><td rowspan="2">Any residential receiver</td><td>120</td><td>10</td><td>0%</td></tr>
<tr><td>115</td><td>5</td><td>5% of the total number of blasts or events over a rolling period of 12 months</td></tr>
</table></td><td></td></tr>
<tr><td colspan="5">OPERATION</td></tr>
<tr><td>B13</td><td>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 Noise Policy for Industry (NPfI), at the reasonably most affected point of the residence, at any residential receiver.</td><td>• Substation Noise Study rev D, Acciona, dated 02/07/25
• Noise and Vibration Management Plan Rev 03, Acciona, dated 14/10/25</td><td>A noise assessment undertaken for the substation concludes “Based on the worst case operational scenarios considered, noise emissions predicted compliance with all Project Noise Trigger Levels (PTNL’s), suggesting noise levels are unlikely to cause adverse emissions.”
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
Therefore this condition is not triggered at this stage.</td><td>Not triggered</td></tr>
<tr><td>B14</td><td>The Proponent must:
a) Take all reasonable and feasible steps to minimise corona discharge noise during operation of the project;
b) Identify residences predicted to experience corona discharge noise levels above the PNTL at the reasonably most affected point of the residence, determined in accordance with the NPfI, and how often corona noise is expected to be above this level per year;
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
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.</td><td>• Corona and Radio Noise Report Rev D, Acciona, 02/07/25
• Substation Noise Study Rev D, Acciona, dated 02/07/25</td><td>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.
It is noted that full compliance with this condition will be assessed following operation, therefore this condition is not triggered at this stage.</td><td>Not triggered</td></tr>
</table>

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
OPERATIONAL NOISE COMPLIANCE VERIFICATION				
B15	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; 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; b) A comparison of the actual noise performance of the development against PNTLs established in accordance with the NPfI; 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. 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.	• N/A	• Operational requirement – not triggered	Not triggered
NOISE AND VIBRATION MANAGEMENT PLAN				
B16	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: a) Include measures and process to ensure the requirements in conditions B1 and B14 are complied with; b) Include a description of the reasonable and feasible measures that would be implemented to minimise noise and vibration impacts of the development;	• Letter from DPHI 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 • Report from Hutchison Weller, titled "Construction	DPHI approved the HumeLink East Construction Noise and Vibration Management Plan on 17/4/25 noting the HumeLink East Construction Noise and Vibration Management Plan: • 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.	Non-Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	c) 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; d) Include a detailed description of the noise and vibration management system for the development; e) Include a protocol for the identification, notification and management of works that exceed the noise management levels f) 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; g) 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 h) 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; i) 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; (i) Be prepared in consultation with the relevant Council; (ii) Identify low risk activities that can be undertaken without the approval of the Planning Secretary; (iii) Identify high risk activities that must be approved by the Planning Secretary (iv) Identify the Department, Council and community notification arrangements for approved out of hours work. Following the Planning Secretary's approval, the Proponent must implement the Noise and Vibration Management Plan. *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.*	and Vibration Impact Statement" dated 22/07/26 • Document titled "Noise Contours" (undated) • Document titled "Noise Model Inputs" (undated) • Noise Monitoring Field Sheet, from Acciona, dated 15/06/26 • Report from Transgrid, titled "Noise and Vibration Management Plan rev03" dated 14/10/25 • • HLE Environmental Non-compliance Report, from Acciona, dated 07/02/26 • Response to Request for Information, from Transgrid, 27/03/26 • Letter from DPHI, titled "Warning Letter – Breach of Section 5.14 of the Environmental Planning and assessment act 1979" dated 18/07/26 • Out of hours work permits, (undated, various)	• 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. Evidence of implementation of the Noise and Vibration Management Plan included the following: • 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. During the Audit period, a Non-compliance was identified and reported to DPHI noting breach of conditions B1 and B16. The Non-compliance was identified following a review of the permit register and active OOH works, and 10 instances across four locations were identified to have undertaken construction works outside standard construction hours without a valid Out of Hours Works (OOHW) permit. The works resulted in six receivers being potentially noise affected, which constitutes non-compliance with Conditions B1 and B16. Subsequent to the notification, an internal investigation was undertaken with corrective and preventative actions identified as follows: • Communications and all construction teams were reminded of the OOH process and the importance of compliance • Stop works notice to be given to any construction team for any future OOH works unless the OOH works protocol is adhered to • Targeted OOHW protocol training to specific construction teams has been undertaken. AGJV noted that toolbox talks held on 11th, 18th and 27th February included content on Noise and Vibration, OOHW and the OOHW protocol. On 18/6/26, DPHI issued a warning letter to AGJV for the breach noting Non-compliance with Conditions B1 and B16.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Recommendations The actions taken by AGJV in response to the Non-compliance appear to be appropriate with no further recommendations made at this time. Should further Non-compliances be recorded, a review of the effectiveness of existing controls should be undertaken with additional measures implemented as required.	
AIR QUALITY				
B17	In addition to the performance outcomes, commitments and mitigation measures specified in the EIS, the Proponent must take all reasonable steps to: a) Minimise the off-site dust, fume, blast emissions and other air pollutants of the development; and b) Minimise the surface disturbance of the site.	• Audit Interview 30 August 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 • Site photos (various) (undated) • Report from SiteHive, titled "Monitoring Devices" dated 27/05/26	Reasonable and practical measures observed during the site inspection to minimise the generation of dust included: • 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	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. *Note: Under the Water Act 1912 and/ or the Water 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*	• Audit Interview 30 August 2026 • Agreement for Supply of water, Commercial Customer Agreement, Snowy Valleys Council, dated 05/06/25 • WAL approval register, dated 28/01/26 • Excel Spreadsheet, titled "HLE Water Tracker for Audit" (undated)	Key management plans prepared relating to water management include the following: • Soil and Water Management Plan prepared in accordance with Condition B24 • Accommodation Camp Management Plan, prepared in	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	(unless an exemption applies).		accordance with Condition B59. The management plans describes the control measures to be implemented for: • 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. 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.	
EROSION AND SEDIMENTATION				
B19	The Proponent must: a) Minimise erosion and control sediment generation; and b) Ensure all land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with *Best Practice Erosion and Sediment Control* (IECA, 2008), *Managing Urban Stormwater – Soils and Construction Volume 1* (Landcom, 2004), *Managing Urban Stormwater – Soils and Construction Volume 2A Installation of Services* (DECC, 2008) and *Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads* (DECC, 2008), or their latest versions.	• Audit Interview 30 August 2026 • Report from Acciona, titled "Progressive Erosion and Sediment Control Plan (PESCP)" dated 21/04/26 (various) • Progressive Erosion and Sediment Control Plan: For Pilling, dated 09/04/26 • Progressive ESCP 421 Tower Pad Sheet 1 of 3, from SEEC, dated 24/04/26 • Progressive ESCP 420 Tower Pad Sheet 1 of 3, from SEEC, dated 24/04/26 • Progressive ESCP 419 Tower Pad Sheet 1 of 3, from SEEC, dated 26/04/26 • Progressive ESCP 418 Tower Pad Sheet 1 of 3, from SEEC, dated 28/04/26 • Progressive ESCP 417 Tower Pad Sheet 1 of 3, from SEEC, dated 04/05/26 • Progressive ESCP 416 Tower Pad Sheet 1 of 3, from SEEC, dated 04/05/26 • Progressive ESCP 415 Tower Pad Sheet 1 of 3, from SEEC, dated 04/05/26 • Progressive ESCP Brake and Winch 69 PAD Sheet 1 of 3, from SEEC, dated 04/05/26 • Progressive ESCP Brake and Winch 68 PAD Sheet 1 of 3, from SEEC, dated 04/05/26 • Progressive ESCP – Lucas Properties Access	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. Additional inspections are undertaken by the ER, Transgrid 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: • 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. 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.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		Track Sheet 1 of 17, from SEEC, dated 15/05/26 • Progressive ESCP Brake and Winch 66 PAD Sheet 1 of 3, from SEEC, dated 10/06/26 • Progressive Tower Pad 400 Sheet 1 of 3, from SEEC, dated 12/06/26 • Progressive ESCP Tower Pad 399 Sheet 1 of 3, from SEEC, dated 15/06/26 • Progressive ESCP – MA – 088 Properties Access Track Sheet 1 of 7, from SEEC, dated 17/06/26 • Environmental Work Method Statement (EWMS) – Blasting (EWMS13), from Acciona, dated 30/03/26 (various) • Letter from SEEC, titled "Independent Inspection of Erosion and Sediment Controls: HumeLink East Project (Tumut and Adjungbilly Area), 26 February 2026" dated 26/02/26 • Letter from SEEC, titled "Independent Inspection of Erosion and Sediment Controls: HumeLink East Project (Bannaby and BY30), 27 February 2026" dated 27/02/26 • Letter from SEEC, titled "Independent Inspection of Erosion and Sediment Controls: HumeLink East Project; 9 April 2026" dated 10/04/26 • Letter from SEEC, titled "Independent Inspection of Erosion and Sediment Controls: HumeLink East Project (BY26), 21 April 2026" dated 21/04/26 • Letter from SEEC, titled "Independent Inspection of Erosion and Sediment Controls: HumeLink East Project; 22 April 2026" dated 24/04/26 • Letter from SEEC, titled "Independent Inspection of Erosion and Sediment Controls: HumeLink East Project (Tumut Area). 24 June 2026" dated 24/06/26 • Letter from SEEC, titled "Independent Inspection of Erosion and Sediment Controls: HumeLink East Project (Adjungbilly Area), 25 June 2026" dated 25/06/26 • Letter from SEEC, titled "Independent Inspection of Erosion and Sediment Controls: HumeLink East Project BY103 and BY096, 17 July 2026" dated 17/06/26 • Excel Spreadsheet, titled "Lucidity Site Inspections" dated 12/06/26 • Site photos (various) • Excel Spreadsheet, titled "HLE Training Register"	**Recommendation** As observed during the Audit site inspection, construction of PADs and access roads is well advanced with disturbed surfaces being temporarily stabilised with polymer to reduce risk of erosion. It is recommended that the final rehabilitation of disturbed areas is completed as soon as practical with high risk areas (steep slopes and sites near/adjacent to waterways) prioritised to provide permanent ground cover and effective erosion control.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		from Acciona, dated 29/04/26 • Certificate of Completion from Centre for Environmental Training, dated 20/05/26 • Certificate of Completion from Centre for Environmental Training, dated 19/05/26		
POLLUTION OF WATERS				
B20	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.	• Site inspection 3,4 February 2026 • HumeLink East Incidents and NCR Register, Acciona	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. Properly constructed facilities were provided for vehicle refuelling and concrete washout were provided. 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. The Auditor was provided with a copy of the Incident and NCR register for the Audit period. During the Audit period, a total of 10 minor incidents occurred (e.g oil spills) which were classified as minor and with no offsite impacts. Further details are provided in Section 2.5 with photographic evidence provided in Appendix E.	Compliant
B21	The Proponent must: a) Design, construct and maintain an appropriate water management system at all substations, concrete batching plants, construction compounds and accommodation camps to prevent pollution; 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 c) Minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.	• HumeLink East Adjungbilly Camp, SEEC, dated 19/12/24 • 23000436_PO2_ESCP_REV00, SEEC, dated 19/12/24 • 23000436_PO2_ESCP_REVA, SEEC, dated 19/12/24 • 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	As observed during the Audit site inspection, appropriate water management systems were provided and installed for construction activities . These included: • Water treatment plant to treat sewage and greywater • 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. At the time of the site inspection, the Bannaby Substation was still under construction and liquid waste/spill containment systems for the operational phase have not been completed.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		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 • Environment Protection Licence, EPL 1742 (Goulburn STP) dated 01 May • Environment Protection Licence (EPL 3110), (Gunning STP) dated 20 June • Environment Protection Licence, f(EPL 210) (YASS STP), dated 01 June • Environment Protection Licence, from EPA, dated 01 May • Excel Spreadsheet titled "Conwaste Septic Waste Volume Totals" dated 15/07/26 • Email from Conwaste, titled "Caravan Septic pump out" dated 14/07/26 • Email from Level Plumbing, titled "Sewer Removal" dated 22/07/26 • Waste Register, dated 13/04/26	Appropriate records were provided to the Auditor demonstrating waste water from the Accommodation camps have been disposed to council sewage treatment facilities that are licenced to receive the waste. Copies of Environmental Protection Licences for Goulburn, Gunning, Tumut and Yass were provided Refer to the Auditors response to Condition B20 relating to spill prevention and response. Refer to Appendix E for photographic evidence of construction phase water management systems.	
RIPARIAN AREAS				
B22	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 DPRID Fisheries agrees otherwise.	**Lead Auditor** • 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	**Lead Auditor** As noted in IEA #1, 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: • Progressive Erosion and Sediment Control Plan (PESCP) for waterway crossings – general design • Environmental Work Method Statements prepared for sensitive areas. Erosion and sediment control plans were reviewed and endorsed by the CPESC. Waterway crossings observed during the IEA#1 site inspection appeared to be constructed in a manner consistent with these plans.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		Biodiversity Specialist • Site visit to waterway crossing at Mantons Creek and Melamalong Creek (Audit 2) • 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	**Biodiversity Specialist** 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. The construction of waterway crossings are informed by detailed Pre-construction Aquatic Habitat Survey Reports prepared by the project ecologists (East Coast Ecology). In Audit 1, only one waterway crossing had been constructed on HLE; a waterway crossing of an unnamed 3rd-order tributary of Cowpers Creek in BY-030. The waterway crossing has been constructed consistent with guidance documents and provided unimpeded fish passage. During Audit 2, two additional waterway crossing were inspected: • crossing of a 2nd-order section of Mantons Creek, and • crossing of a 4th-order section of Melamalong Creek and associated 2nd-order tributaries. At Mantons Creek, the lower culverts were perched above the bed of the waterway (Photo 26) impeding fish passage. Further, due to higher than expected flows, the pipe culverts were partially obstructed (Photo 25) and may become blocked long term. At Melamalong Creek, constructed bed level crossings on the second-order tributaries were constructed above natural bed levels (Photo 103, Photo 104, Photo 107, Photo 108, Photo 109). The crossing of the fourth-order section of Melamalong Creek was constructed at or near bed level with evidence of flow over the top of the crossing (Photo 110-Photo 112). **Recommendations:** • Ensure waterway crossings are constructed to avoid becoming perched at the upstream or downstream end. • Ensure bed level crossings follow the natural bed levels and avoid . • Consider long-term inspection and maintenance requirements to ensure waterway crossings do not become obstructed.	
FLOODING				
B23	Except for the Gugaa Substation, the Proponent must ensure that the development does not materially alter the flood	• Design Compliance Matrix V38 report, Aurecon, dated 17/03/25	The Auditor reviewed a range of technical documents as discussed below:	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	storage capacity, flows or characteristics in the development area or off-site.	• 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	• EIS technical Report 11 – Hydrology and Flooding • Hydrology and Flooding Impact Assessment Addendum Technical Report 11 EIS Technical Report 11 identified generally minor adverse impacts on flood behaviour as a result of the development. The addendum technical report agreed with this conclusion. 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. A design compliance matrix has been prepared and is updated by AGJV. The matrix notes the following "*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.*"	
SOIL AND WATER MANAGEMENT PLAN				
B24	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; a) Be prepared in consultation with the relevant Council, BCS and Water Group; b) Ensuring the requirements in conditions B18 to B23 are met; c) Managing flood risk during construction and operation; d) Investigating, assessing and managing contaminated land, soils, groundwater and blasting in the development area; e) Investigating, assessing and managing the potential	• 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) • Dewatering permit, dated 28/04/26 • Dewatering permit, dated 25/05/26 • Dewatering permit, dated 10/06/26 • Dewatering permit, dated 02/07/26 • Dewatering Permit, dated 16/07/26 • Excel Spreadsheet, titled "Lucidity Site Inspections" (undated)Excel Spreadsheet, titled	DPHI approved the Soil and Water Management Plan on 4/7/25 noting the HumeLink East Soil and Water Management Plan: • 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 During the Audit period, the Soil and Water Management Plan was updated, endorsed by the ER and approved by DPHI on 11/2/26.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	for asbestos and other hazardous materials in the development area; f) Managing any unexpected and/ or suspected contaminated land, asbestos and unexploded ordinance excavated, disturbed or otherwise discovered during construction; and g) A program to monitor and report on the impacts and environmental performance of the development. Following the Planning Secretary's approval, the Proponent must implement the Soil and Water Management Plan. *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.*	"Surface Water Register" dated 30/03/26 • Letter from DPHI titled "HumeLink – HumeLink East Soil and Water Management Plan" dated 11/02/26 • Letter from Wolfpeak, titled "Er Review of update to Soil and Water Management Plan I HumeLink East (SSI-36656827)" dated 09/02/26 • Report from Transgrid, titled "Soil and Water Management Plan" dated 06/02/26 • Letter from DPHI, titled "HumeLink – HumeLink East Soil and Water Management Plan" dated 12/06/26 • Letter from WolfPeak, titled "ER Review of update to Soil and Water Management Plan I HumeLink East (SSI-36656827)" dated 20/05/26 • Report from Transgrid, titled "Soil and Water Management Plan" dated 14/05/26 • Certificate of Approval from Robson Environmental, titled "Stockpile SP01 Waste Classification Assessment" dated 29/04/26 • Certificate of Analysis, from Envirolab, dated 30/04/26 • General Correspondence, from Acciona, titled "Incident 48690- Manage" dated 01/05/26 • Yass Camp Water Testing Results, excel spreadsheet, (undated)	Sufficient evidence was provided to the Auditor to demonstrate the effective implementation of the Soil and Water Management Plan including dewatering permits, water monitoring records, soil and waste classification records. Asbestos awareness and unexpected contamination finds training has also been undertaken, as noted in IEA#1. Refer to the Auditors response to Conditions B19 – B23 for further information with photographic evidence provided in Appendix E regarding implementation of the Soil and Water Management Plan in the field. As noted in IEA#1, the Sediment Basin at the Yass Accommodation Camp has had a sign installed that ensures relevant personnel understand the requirements of the "Permit to Pump" to minimise the risk of an unauthorised discharge incident. As recommended, similar signage has also been placed at other sediment basins to minimise the risk of unauthorised discharge of water to the environment.	
BIODIVERISTY				
RESTRICTIONS ON CLEARING AND HABITAT				
B25	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	• Clearing permit for BY-103 (Permit no. VEG-160) • Clearing Limits Tracking Dashboard • Markup of construction area, (undated) (various) • Environmental Control Map ECM, from Acciona, dated 14/11/25 (various) • Clearing and Land Disturbance Permit – Vegetation and Topsoil, from Acciona, dated 18/12/25 (various) • Environment and Sustainability Inspection Checklist (V1), from Acciona, dated 11/02/26 • Email from HumeLink East, titled "BY-103 Heritage	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 for Audit 1, evidence was presented demonstrating a robust process for tracking clearing against the clearing limits: • Prior to clearing: as a part of the permitting process, AGJV undertakes a check against the clearing limits for each permit to	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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 *Prasophyllum bagoense, Prasophyllum keltonni and Pterostylis oreophila* as mapped in the BDAR.	Clearance" dated 14/11/25 • Pre-clearing Survey report from East coast ecology, dated 05/11/26 • Images of work site (various) • Clearing Permit, Fauna, from Acciona, (undated) (various) • Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026) • Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228) • Clearing Limits Tracking Dashboard	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 of the Infrastructure Approval. Transgrid is responsible for compiling data across both HLE and HLW. Audit 1 identified a key gap in the allowance for future clearing. The Clearing Limits Tracking Dashboard did not account 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. This appears not have been addressed. Transgrid prepared and submitted an application for revised clearing limits to DPHI on 4 August 2026. This was subsequently approved by DPHI on 12 August 2026. These clearing limits now replace the clearing limits set out in Condition B25 and Table 2-1, Table 2-2 and Table 2-3 of Appendix 2 of the Infrastructure Approval. Updates to the BOP and BAVR are required (see below). **Recommendations** • The Clearing Limits Tracking Dashboard is updated to allow tracking of full and partial clearing to ensure alignment with the revised clearing limits as approved by DPHI or an alternative process is put in place to ensure exceedances of clearing limits do not inadvertently occur. • The Clearing Limits Tracking Dashboard is updated to allow for future clearing to ensure potential exceedances are identified early.	
BIODIVERSITY OFFSET PACKAGE				
B26	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	• HumeLink Biodiversity Offset Package, Version 4 (dated 19 December 2024) • HumeLink Biodiversity Offset Package, Version 5	Condition B26 requires the preparation of the BOP *"Prior to carrying out any development that would impact on biodiversity values requiring offset*	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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; 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. Following the Planning Secretary's approval, the Proponent must implement and deliver the Biodiversity Offset Package.	(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) • Consultation Report – HumeLink, Conditional Approval – Biodiversity Offset Package (CoA B26) HumeLink Infrastructure Approval (SSI 36656827) (dated May 2025) • Six-Monthly Update Report – HumeLink Biodiversity Offset Package (letter from Transgrid to DPHI, dated 20 November 2025) • Re: Quarterly Update – HumeLink Biodiversity Offset Package (letter from Transgrid to DPHI, dated 20 February 2026) • Re: Six-Monthly Update – HumeLink Biodiversity Offset Package letter from Transgrid to DPHI, dated 18 May 2026) • Re: Quarterly Update – HumeLink Biodiversity Offset Package (letter from Transgrid to DPHI, dated 20 August 2026) • Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026) • Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228)	*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. 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). Audit 1 noted a lack of evidence of consultation with BCS (now CPHR) or the BCT. Evidence of consultation with NSW Planning, Offsets, Threatened Species and Ecosystems (POTSE) and CPHR was provided after the submission of the previous audit report. This is considered resolved. Section 4 of the BOP outlines the offset measures to be implemented: • 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. 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. Section 6 outlines timing and responsibilities for the implementation and delivery of the BOP. 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. Six-monthly updates have been submitted to DPHI in November 2025 and May 2026, with a response	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			received from DPHI in the same periods. Two quarterly updates have also been provided in February and August 2026. As noted in Audit 1, 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). Following approval of the revised clearing limits by DPHI on 12 August 2026, and finalisation of the FLPs, updates to the BAVR will be required. Under Condition B29 of the Infrastructure Approval, and as noted in the approval from DPHI, updates to the BOP are required to reflect these changes. In their application for revised clearing limits, Transgrid notes that they expect the *"overall biodiversity offset liability for the project has been reduced due to the reductions in the magnitude of clearing predicted for native vegetation and the total impacts on threatened flora and fauna species"*. Implementation of the BOP is ongoing. As of 20 August 2026, Transgrid had delivered the following: • 12,890 ecosystem credits met via credits held by Transgrid, generated by BSAs undertaken by Transgrid or credits purchased from the market. • 58,169 species credits met via credits held by Transgrid or credits purchased from the market, representing 38% of the species credit liability for the project. 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 85% delivered to date. Since Audit 1, significant progress has been made against the species credit liability, with an increase from 1% met to 38% met.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Transgrid has signalled its intent to enter into a Strategic Offset Delivery Agreement (SODA) after all other measures have been exhausted and is currently finalising negotiations with DCCEEW. It is noted that an administrative modification to the Infrastructure is required to enable a SODA between Transgrid and NSW DCCEEW. **Recommendations:** • Include the intent to enter into a SODA in the updated BOP.	
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.	• Transgrid Bank Guarantees (letter from Transgrid to DPHI, dated 20 December 2024) • Letter from Wolfpeak, titled "ER Review of updated biodiversity Management Plan Humelink east (SSI – 36656827)" dated 22/05/26	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; 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; 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; (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	• 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) • Report from Transgrid, titled "HumeLink Supplementary Biodiversity Strategy" dated 05/06/25	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 . . ."*. 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). 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. 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.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	present is being sought; (ii) Surveys for the following serious and irreversible impact (SAII) entities: • Prasophyllum bagoense • Pterostylis oreophila • Caladenia concolor • Genoplesium superburn • Pomaderris delicatat • Litoria castanea • Parasophyllum innubum • Solanum armourense • Calotis gladulosa • Pseudomy fumeus • Pimelea bracteate • Grevillea iaspicula • Pomaderris pallida • Mixophyes balbus • Prasophyllum keltonii • Bossiae fragrans • Eucaluptus robertsonii subsp, hemisphaerica • Grevillea wikinsonii • Chalinolobus dwyeri • Tyto tenebriscosa		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.	
BIODIVERSITY ASSESSMENT VERIFICATION REPORT				
B29	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 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: 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	• HumeLink Biodiversity Assessment Verification Report, Version R5.1 (dated 29 August 2025) • 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) • Re: HumeLink – Request to Amend the Timeframe for Updating the BAVR – SSI-36656827 Condition B29 (letter from Transgrid to DPHI, dated 17 April 2026) • Subject: HumeLink - Revised Biodiversity	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 . . .*" . 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: *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;*	Non-compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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: (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. 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.	Assessment Verification Report extension request (letter from DPHI to Transgrid, dated 24 April 2026, reference SSI-36656827-PA-187) • Response to Request for Information, HumeLink – Revised BAVR Extension Request (undated) • Re: HumeLink – Notification of Non-Compliance – Condition C11 (letter from Transgrid to DPHI, dated 8 May 2026) • HumeLink - Notification non-compliance - B29 (letter from DPHI to Transgrid, dated 19 May 2026, reference: SSI-36656827-PA-199) • Subject: HumeLink - Revised Biodiversity Assessment Verification Report extension request (letter from DPHI to Transgrid, dated 15 May 2026, reference SSI-36656827-PA-187) • Response to Request for Information, HumeLink – Revised BAVR Extension Request (undated) • Subject: HumeLink - Extension request for the revised Biodiversity Assessment Verification Report (letter from DPHI to Transgrid, dated 12 June 2026, reference SSI-36656827-PA-187) • Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026) • Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228)	*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.* Transgrid sought 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). Transgrid sought an additional extension to the due date for the revised BAVR with an application submitted on 17 April 2025 (prior to the due date for the BAVR). Following two RFIs from DPHI to confirm specific details, approval was granted for an extension to the timing for the BAVR with a revised due date of 20 November 2026. Transgrid has committed to preparing a revised BAVR which will capture the results of the SBS and the finalised FLPs. Transgrid is to provide this revised BAVR by 20 November 2026, as per the extension granted by DPHI. This application for an extension was submitted prior to the due date of 30 April 2026, but approval was not granted until after the due date . This represents an administrative non-compliance with Condition B29 of the Infrastructure Approval. This was reported by Transgrid as a non-compliance on 8 May 2026 in accordance with Condition C11 of the Infrastructure Approval. Under Condition B29 of the Infrastructure Approval, updates to the BMP and BOP are required following finalisation of the revised BAVR (see above and below).	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			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. Table 3 of the BAVR addresses the requirements of condition B29. • 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. The IEA found that the recommendations in Section 9 of the BAVR do not include targeted measures for avoidance based on the findings of the BAVR, as required by Condition B29 (d(ii)) of the Infrastructure Approval. 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: • Flockton Wattle (*Acacia flocktoniae*) • Blue-tongued Greenhood (*Pterostylis oreophila*) - SAII species • Alpine Sun-orchid (*Thelymitra alpicola*) • Mauve Burr-Daisy (*Calotis glandulosa*) • Smoky Mouse (*Pseudomys fumeus*) • Large-eared Pied Bat (Chalinolobus dwyeri) - SAII species Overall, 37 flora species and 22 fauna species had a reduction in impacts when compared to clearing limits sets under condition B25.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Updates to these changes are likely as a result of the revised BAVR currently under preparation. The Squirrel Glider (*Petaurus norfolcensis*) 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. **Recommendations:** Section 9 of the revised BAVR, due on 20 November 2026, should include targeted measures for avoidance based on the findings of the BAVR, as required by Condition B29 (d(ii)) of the Infrastructure Approval. • Ensure the BAVR incorporates all results of the SBS, particularly where species were recorded outside of species polygons in the Revised BDAR.	
BIODIVERSITY MANAGEMENT PLAN				
B30	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	• HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Rev 02.2 (dated 28 May 2026) • HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Rev 02.1 (dated 22 May 2026) • HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Revision 02 (dated 15 September 2025) • HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Rev 02.1 (dated 22 May 2026) • Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Rev 02.2 (dated 28 May 2026	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 . . .*" . 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. An updated version of HLE BMP (Revision 02) was provided as a part of Audit 1 and this document was reviewed during Audit 1. The document control indicates no changes to the version approved by DPHI, stating that Revision 02 was "Issued for Use". AGJV advised that because the Planning Secretary endorsed Rev 01.07, CPHR requested that the BMP	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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 disturbance footprint including the requirements for; • 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; (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 keltonni and Pterostylis oreophilla; (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	• 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) • A8 Consultation Report Biodiversity Management Plan Revision D (dated 29 May 2026) • RE: Proposed changes to BMP Connectivity Strategy relating to CLMP (email from CPHR to Transgrid, dated 22 May 2026) • HumeLink – HumeLink East Biodiversity Management Plan (letter from DPHI to Transgrid, dated 9 June 2026, reference SSI-36656827-PA-207) • Identification of Pink tailed legless lizard (general correspondence from AGJV to Transgrid, dated 5 June 2026, Reference No.: AGJV-GEN-001205.00) • Pink-tailed Legless Lizard Relocation Plan HumeLink East – YG-031 (report prepared for AGJV by East Coast Ecology, dated 2 September 2026) • Re: HLE - Pink Tailed Legless Lizard Relocation Plan for review (email from Transgrid to CPHR, dated 1 September 2026) • 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	and appendices be reverted to Rev 01.07 to align with the revision submitted to and endorsed by the Planning Secretary. 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. An updated versions of the HLE BMP (Rev 02.1) was provided as a part of Audit 2 and this document was reviewed during Audit 2. This revised BMP was endorsed by CPHR on 22 May 2026 and this updated version was acknowledged by DPHI on 9 June 2026. A further updated versions of the HLE BMP (Rev 02.2) was also provided as a part of Audit 2. Rev 02.2 was drafted and is being consulted on with CPHR and FCNSW. AGJV have advised that Rev 02.3 is being prepared to address comments from CPHR and previous audit recommendations. It is noted that updates have been undertaken by personnel from AGJV. It is unclear whether these personnel are considered suitably qualified and experienced biodiversity experts in accordance with Condition B30(a) of the Infrastructure Approval or whether changes have been reviewed and endorsed by the suitably qualified and experienced persons identified in Section 1.5 of the HLE BMP (Alex Graham and Jack Tattler). 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 and an updated version of this consultation report was provided during Audit 2. The BMP incorporates measures to meet the mitigation measures outlined in conditions B25 and B29 (see Sections 7.15 and Table 4) and to minimise clearing of native vegetation and fauna habitat as well as indirect impacts.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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 (*Pimelea bracteata*) and Sooty Owl (*Tyto tenebricosa*) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Reort 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. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan. *Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.*	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 *Pimelea bracteata* (Rice Flower) through genomically diverse seed collection strategies (Botanic Gardens of Sydney) • Quarterly meeting - Pimelea bracteata - A&AM for HumeLink (email from Transgrid dated 16 December 2025) • RE: Landholder access request - Pimelia 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) • Glider Connectivity Corridor Validation Report for HumeLink East – Rev F (report prepared by WSP Australia Pty Ltd for AGJV, dated 25 August 2026) • RE: HLE CCVR CPHR Comments Response Sheet (email from NSW DCCEEW to Transgrid, dated 25 August 2026) • Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026)	A pre-clearing process in included to ensure clearing does not occur outside the disturbance footprint (noting proposed amendments to the FLPs - see above). The audit found clearing controls are generally well implemented, with clearing limits clearly marked using bunting. However, plant operators were found not to always have clearing limits loaded into survey grade GPS or did not always have access to data due to signal issue, with potential for inadvertent impacts to biodiversity. Log stockpiles have been placed outside the clearing limits identified in the CLDPs (see Table 3-2) and placement of log stockpiles under Timber Acceptance Forms with landowners may have resulted in impacts to biodiversity; a recommendation is made to improve this process. An Unexpected Finds Protocol is outlined in Appendix A. This has been subject to minor updates in Rev 02.1 and Rev 02.2 to clarify responsibilities. These are minor. During the audit period for Audit 2, two unexpected finds were recorded: • Pink-tailed Legless-lizard at YG-031. • Striped Legless Lizard at MA-054. The site inspection included the area where the Pink-tailed Legless-lizard was identified at YG-031. As identified in Table 2-1, the site inspection identified that the unexpected finds protocol has been implemented well with suitable controls identified and measures put in place to manage this unexpected find. A relocation plan was developed by the project Ecologists and provided to CPHR. This plan was endorsed by CPHR. 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. 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	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		• Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228) • Threatened Flora Baseline Monitoring Report Humelink East (report prepared for AGJV by East Coast Ecology, dated 3 September 2026) • Threatened Flora Baseline Monitoring Report (general correspondence from AGJV to Transgrid, dated 13 January 2026, Reference No.: AGJV-GEN-000859.00) • Threatened Frog Monitoring Report (Baseline), Humelink East (report prepared for AGJV by East Coast Ecology, dated 16 March 2026) • Threatened Frog Baseline Report (general correspondence from AGJV to Transgrid, dated 16 March 2026, Reference No.: AGJV-GEN-000944.00)	specific and did not adequately differentiate areas of higher collision risk from other areas. As noted above, updates to the Bird Deterrent Measures in Section 7 of the Connectivity Strategy were included in Rev 02.1 of the BMP. A Glider Connectivity Corridor Validation Report has been prepared for HLE outlining the final location for glider connectivity corridors and the exact mitigation measures that will be installed at each glider corridor. This was endorsed by CPHR on 25 August 2026, and installation of glider corridors on HLE can commence. A Supplementary Hollow and Nest Strategy is provided at Appendix E. This strategy requires that any hollow with evidence of occupancy is replaced, with installation of 30% of required hollows installed prior to clearing. Review of information provided as a part of Audit 1 and 2 indicates that HLE is significantly exceeding this 30% target, and likely already exceeding the total number of occupied hollows required to be installed. This is largely due to hollows being identified during pre-clearing surveys that do not exhibit signs of occupation when removed during clearing works. No hollows have been salvaged for re-use. 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. AGJV advised during Audit 2 that no rehabilitation works occurred on the project to date. A process for monitoring clearing is outlined above, with further information incorporated into the HLE BMP (see Appendix B: Vegetation Clearing Procedure). Partial clearing had not commenced during Audit 1 but had commenced prior to Audit 2. Requirements for verification of partial clearing limits is outlined in the HLE BMP (see Appendix H: Flora and Fauna Monitoring Program) with monitoring to be conducted within 3 months of the completion of partial clearing, and a Partial Clearing Validation Report(PCVR) will be provided within 6 weeks of completion of the monitoring. During Audit 2, it was identified that monitoring of partial clearing was yet to commence. This should be reviewed during the next audit.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Measures to salvage habitat resources are outlined in Section 3.3 of the HLE BMP. No hollows have been salvaged for re-use. As noted during Audit 1, minimal measures are incorporated for the collection and propagation of seed, excluding as a part of additional and appropriate measures (AAMs) for *Pimelea bracteata*. As noted during Audit 1, Table 3 of the HLE BMP states that measures to minimise impacts on entities at risk of SAII 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)). Transgrid has outlined AAMs for Box Gum Woodland, Sooty Owl and *Pimelea bracteata* in a letter to NSW DCCEEW in September 2025. In their RFI response, Transgrid provided an update to the implementation of AAMs: • 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. 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 SAII for this species and AAMs are no longer required. A flora and fauna monitoring program is outlined in Appendix H of the HLE BMP. • As outlined above, monitoring of partial clearing is yet to commence due to partial clearing only recently commencing. This should be reviewed during the next audit as the first monitoring report will be due.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			• AGJV have advised that specific monitoring for weeds, pathogens and pests has not started. • As outlined above, rehabilitation works have not yet commenced, so rehabilitation monitoring has not started. • Baseline monitoring of threatened flora was required to be collected prior to commencement of vegetation clearing, with a Threatened Flora Baseline Monitoring Report due to be submitted within three months of the completion of baseline monitoring works. Threatened flora monitoring is required biannually during spring and autumn, with a report due within 3 months of completion of monitoring. The initial revision of the baseline flora monitoring report was completed in January 2026 and provided to Transgrid on 13 January 2026. • baseline flora monitoring report has been provided. This is a non-compliance with the requirements of the HLE BMP (see Section 6 of Appendix H: Flora and Fauna Monitoring Program). • Baseline monitoring of threatened frogs was required to be collected prior to collected prior to commencement of construction, with a Threatened Frog Baseline Monitoring Report due to be submitted within three months of the completion of baseline monitoring works. Threatened frog monitoring is required biannually in July to August and November to December, with a report due within 3 months of completion of monitoring. The initial revision of the baseline frog monitoring report was completed in March 2026 and provided to Transgrid on 16 March 2026. Monitoring of artificial hollows and nest boxes is required biannually during construction, in spring and autumn. During the audit interview, AGJV advised that the first round of monitoring has occurred and has identified 8-10% occupancy. The monitoring report is yet to be completed. • As outlined above, HLE has recently received approval to commence installation of glider poles. As such, monitoring is yet to commence. In accordance with Condition B29 of the Infrastructure Approval, the BMP will require updating following the submission of the BAVR in November 2026.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Recommendations: • Updates to monitoring of partial clearing (see recommendations under condition B25). • Include PCT mapping in Timber Agreement Forms with landowners and ensure log stockpiles are placed in areas of PCT 0 to ensure inadvertent impacts to biodiversity do not occur. • Ensure amendments to the BMP, other than routine administrative and implementation updates, are prepared by or reviewed and endorsed by suitably qualified and experienced biodiversity experts, as required by Condition B30(a) of the Infrastructure Approval. • Updates to the HLE BMP following submission of the revised BAVR should incorporate the specific measures to minimise impacts on entities at risk of SAII, as required by Condition B30 (d(xiii)) of the Infrastructure Approval.	
HERITAGE				
UNSURVEYED AREAS				
B31	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: a) Include details of consultation with the Aboriginal stakeholders; b) Describe the additional Aboriginal heritage surveys that were undertaken, including test excavations of PADs; c) Describe any potential additional impacts to heritage items; d) Identify further mitigation measures, including avoidance or salvage; e) Include detailed justification where the final	• 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 DPHI to Transgrid titled "Humelink East – Addendum Aboriginal Cultural Heritage Assessment Report" dated 5/12/25	The Addendum Cultural Heritage Assessment Report (Addendum ACHAR) was prepared by Kelleher Nightingale and approved by DPHI on 5/12/25. In their letter of approval, DPHI noted the AACHAR: • *Contains the information required by Condition B31* • *Has been prepared in consultation with Registered Aboriginal Parties and Heritage NSW* • *Has been reviewed by Transgrid and no issues have been raised with the Department* In their letter of approval DPHI issued a requirement under condition A3 as follows:	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	transmission line alignment is not able to avoid impacts to heritage items; and f) Provide an updated and consolidated list of sites that would be protected and remain in-situ throughout construction and sites that would be salvaged and relocated to suitable alternative locations.		1. *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)* Accordingly the Heritage Management Plan was updated and endorsed by the ER on the 18/12/25 noting " *the HMP is consistent with the terms of the Approval and that the update is in line with the Departments 5 December 2025 Direction".* DPHI approved the revised HMP om 16/1/26. There were no further changes to the AACHAR during the IEA#2 Audit period.	
PROTECTION OF HERITAGE ITEMS				
B32	The Proponent must: 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.	• Email from KNC, titled "Heritage Clearance MA-059-10" dated 31/03/26 • Clearing and Land Disturbance Permit – Vegetation and Topsoil, from Acciona, dated 29/05/26 (various) • Email from KNC, titled "Heritage Clearance MA-087-01" dated 03/03/26 • Email from KNC, titled "AT-320 YG-035 Heritage Clearance" dated 28/04/26 • HumeLink (SSI-36656827): HumeLink East – ECZ Clearing Pre-works assessment, from Acciona, (undated) • ECM 1 MA-092 RedHill , from Acciona, (undated) • Site Photos, various • Environmental Control Map (ECM) Project, from Acciona, dated 12/06/26 • Email from KNC, titled "heritage Consultants update" dated 06/05/26 • Email from KNC, titled "heritage Consultants update" dated 14/05/26 • On ground heritage controls review, from Acciona, dated 17/06/26	AGJV have appointed experienced heritage consultant Kelleher Nightingale (KNC) 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: • 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 • Environmental Control Maps with • 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. • Heritage clearance confirmation by the Heritage Consultant During the Audit period review of the on ground heritage controls was undertaken to minimise the risk of harm to an item of aboriginal heritage significance. The review included the following: • Exclusion Zones and physical controls	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			• Assessment of field activities such as containment of works withing the project footprint, access tracks and signs of disturbance outside the approved project boundary • Workforce awareness • Permits and Approvals No damage to heritage items have been reported during the Audit period.	
HERITAGE MANAGEMENT PLAN				
B33	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; 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 *Code of practice for archaeological investigation of Aboriginal objects in NSW* (DECCW, 2010); d) Include a description of the measures that would be implemented for: (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;	• 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	The HumeLink East Heritage Management Plan was approved by DPHI on the 2nd of July 2025 noting the HMP: • 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. Refer to the Auditors response to B33 as above regarding implementation of the plan. There have been no changes to the HMP during the Audit period.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	(v) A strategy for the management of any salvaged Aboriginal objects; (vi) A contingency plan and reporting procedure if: • 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 thee inductions; and (viii) Ongoing consultation with Aboriginal Stakeholders during the implementation of the plan; and e) Include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan. *Note: The Heritage Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.*			
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.	• Audit Interview 30 August 2026 • A&D Mooney OSOM Permit Checklist, Acciona, dated 08/01/26 • Heavy Vehicle Driver Code of Conduct, Acciona, (undated) • Letter from DPHI, titled "HumeLink – Humelink • Letter from DPHI, titled "HumeLink – Humelink East Request for Additional OSOM Construction route" dated 13/04/26 • Letter from Transgrid, titled "Humelink east – request for use of Sydney Road, Goulburn for	During the IEA#1 Audit interview, AGJV provided a demonstration of the digital In Vehicle Management System (IVMS) and mechanisms to ensure compliance with the requirements. AGJV confirmed in the IEA#2 Audit interview the continued implementation of this system This included: • 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	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		OSOM delivery to Bannaby Substation – SSI-36656827 Condition B34" dated 31/03/26 • Letter from DPHI to Transgrid titled "HumeLink East Request for additional OSOM construction route" dated 1/4/26 • Letter titled "HumeLink – Response to RFI for HumeLink East request for additional OSOM construction route – SSI – 36656827 Condition B34" dated 9/04/26 • DPHI Post approval form_20260331074126 • Traffic complaints (undated)	• 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. During the Audit period, DPHI approved and additional OSOM vehicle routes from Port Kembla to Bannaby Substation. Following DPHI approval, the TTMP was updated to include the Oversize, Overmass delivery of reactors to Bannaby 500kV substation (stage 3A (v), DPHI approved the revised TTMP on 14/4/26.	
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.	• 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 • Letter from DPHI to Transgrid titled "Warning Letter- Breach of Section 5.14 of the Environmental Planning and Assessment Act, 1979" dated 18/6/26	During the IEA#1 Audit period, submissions made to the Planning Secretary in accordance with this condition are as follows: • 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). During the IEA#2 Non-compliance with Conditions B35 and B39 relating to the use of an unapproved route to the Bannaby Substation was reported to DPHI. Following investigation, AGJV identified the cause of the Non-compliance was due to a breakdown in communication between the supplier and their HV operator. Actions taken to prevent recurrence included the immediate reinforcement of the requirement to comply with approved routes. **Recommendation** No additional recommendations are made over and above the actions taken by AGJV.	Non-compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
TRANSPORT STRATEGY				
B36	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; 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 *Austroads Guide to Road Design* (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.	• 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	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.	Not triggered
ROAD UPGRADES				
B37	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. 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.	• 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	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. 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.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
ROAD MAINTENANCE				
B38	The Proponent must: a) Undertake an independent dilapidation survey: (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 (ii) Assessing the condition of all local roads on the transport route (including local road crossing); • Within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe 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; 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. (i) As soon as possible after the damage is identified but within 7 days at the latest if it could endanger road safety; and (ii) Within 2 months of the completion of the survey; (iii) Unless the relevant roads authority agrees otherwise; c) Prepare a report in consultation with the relevant roads authority 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.	• 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, dated11/02/26	Road dilapidation reports were undertaken with evidence provide demonstrating they were submitted to Councils. As noted, maintenance and repair works are being undertaken by Snowy 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. There have been no disputes with any local authority about the road maintenance works or implementation of these works to date.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
TRAFFIC AND REPORT MANAGEMENT PLAN				
B39	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: 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; (i) Minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including; • 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	• 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 • Letter from WolfPeak, titled "ER Review of update to Traffic and Transport Management Plan Humelink east (SSI- 36656827)" dated 02/04/26 • Letter from DPHI. Titled "HumeLink – HumeLink East Traffic and Transport Management Plan" dated 14/04/26 • Report from Acciona, titled "Periodic Traffic Report" dated 17/06/26 • Letter from DPHI, titled "HumeLink – Humelink East Traffic and Transport Management Plan" dated 14/04/26 • Letter from DPHI, titled "HumeLink – Humelink East Request for Additional OSOM Construction	DPHI approved the HumeLink East Traffic and Transport Management Plan on 7/8/25 noting the TTMP: • 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. During the Audit period, the TTMP was updated to include the Oversize, Overmass delivery of reactors to Bannaby 500kV substation (stage 3A (v), DPHI approved the revised TTMP on 14/4/26. Evidence of implementation of the TMP included the following: • 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	Non-compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	development-related traffic at key intersections (not applicable to Hume Highway); • 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	route" dated 13/04/26 • Letter from Transgrid, titled "Humelink east – request for use of Sydney Road, Goulburn for OSOM delivery to Bannaby Substation – SSI-36656827 Condition B34" dated 31/03/26 • Letter titled "HumeLink – Response to RFI for HumeLink East request for additional OSOM construction route – SSI – 36656827 Condition B34" dated 9/04/26 • Traffic complaints (undated)	• Driver code of conduct • 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. During the IEA#2 period, non-compliance with Conditions B35 and B39 relating to the use of an unapproved route to the Bannaby Substation was reported to DPHI. Following investigation, AGJV identified the cause of the Non-compliance was due to a breakdown in communication between the supplier and their HV operator. Actions taken to prevent recurrence included the immediate reinforcement of the requirement to comply with approved routes. **Recommendation** No additional recommendations are made over and above the actions taken by AGJV.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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 ; (ii) Minimise the impacts of the road and intersection upgrades of the development; (iii) Minimises parking on the public road network; (iv) Maintain all roads and water related infrastructure on site in a safe and serviceable condition; (v) Minimise the traffic noise impacts of the development; e) Include a drivers code of conduct that addresses; (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
	and report on the effectiveness of these measures and the code of conduct. f) Include a program to; (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 (ii) Monitor and publicly report on the effectiveness of these measures. g) A flood response plan detailing procedures and options for safe access to and from the site in the event of flooding. Following the Planning Secretary's approval, the Proponent must implement the Traffic and Transport Management Plan. *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.*			
AVIATION				
AERIAL ACTIVITIES				
B40	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. Following approval by the Planning Secretary, the Proponent must implement these measures.	• N/A	This condition relates to HLW	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
VISUAL AMENTIY				
VISUAL IMPACT MITIGATION				
B41	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). 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. 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. 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.	• 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	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. As this condition relates to the operational phase, it is therefore not triggered at this stage.	Not triggered
B42	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. Following approval by the Planning Secretary, the Proponent	• 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	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. DPHI also noted that:	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	must implement these measures.	• 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	*"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."* The Final Layout Plans have been submitted to DPHI progressively. Refer to the Auditors response to C8 for further information.	
B43	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. Following approval by the Planning Secretary, the Proponent must implement these measures.	• 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	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. The Final Layout Plans have been submitted to DPHI. Refer to the Auditors response to C8 for further information.	Compliant
VISUAL APPEARANCE				
B44	The Proponent must: a) Take reasonable steps to minimise the visual impacts of the development; and b) Not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	• Site inspection 28,29 July 2026	As observed during the site inspection, the Yass Accommodation Camp is located in an industrial area and away from any sensitive receivers. Similarly the Adjungbilly camp is located in a rural setting with no immediate neighbours that would be visually impacted by the camp. 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. There were no advertising signs or logos observed on site other than traffic or safety signage.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Refer to Appendix E for photographic evidence.	
LIGHTING				
B45	The Proponent must; a) Take all the reasonable steps to minimise the off-site visual impacts of the development; and b) Ensure that any external lighting associated with the development; (i) Is installed as low intensity lighting (except where required for safety or emergency purposes); (ii) Does not shine above the horizontal; and (iii) Complies with *Australian/ New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting.*	• Site inspection 28,29 July 2026	As observed during the site inspection, the Yass Accommodation Camp is located in an industrial area and away from any sensitive receivers. Similarly the Adjungbilly camp is located in a rural setting with no immediate neighbours that would be visually impacted by the camp. Lighting is limited to low level safety and amenity lighting for the accommodation camp with low level directional lighting for the carpark. Refer to Appendix E for photographic evidence.	Compliant
RADIOCOMMUNICATIONS				
B46	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.	• HumeLink East HLE-136 Radio Interreference Assessment (Addendum) Review of Amendments to Tower Locations, Acciona, dated 27/02/25 • Meeting Minutes Humelink Project – NSW Police Link Review Meeting, dated 2/1/2/25 • 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) – 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	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: • Optus Site – Telstra Site, Telegraph Hill o Tower #: 5C1/5C2-451 (PI Point) • Police Site, Talmo – Commsite Lerida o Tower #: 5C1/5C2-292 • NSW FRS Site, St Mary Water Reservoir Gunning o Tower #: 5C1/5C2-150 (PI point) • NSW FRS Site, St Mary- Pacific Power Site, Mt Spring o Tower #: 5C1/5C2-150 (PI point) • Transgrid, Gullen Range, Transgrid Site Crookwell o Tower #:5C1/5C2-103 The assessments conclude the following	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		titled "Pole Locations 51-226-L (Left), 51-226 – M (Middle), 51-226- R (Right), dated 22/10/25 • Audit Interview 11 February 2026	*"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.* *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*." 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. Evidence of consultation with the NSW Telecommunications Authority was provided to the Auditor including: • 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 The Final Layout Plans have been submitted to DPHI. Refer to the Auditors response to C8 for further information.	
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.	• As above	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.	• N/A	Operational requirement – not triggered	Not triggered

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
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 *The storage and handling of flammable and combustible liquids* and AS/NZS 1596:2014 *The storage and handling of LP Gas, the Dangerous Goods Code,* and the EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Manual.*	• 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	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."* As observed during the site inspection, a diesel fuel farms were established at the both the Yass and Adjungbilly accommodation camp sites with a double skinned tank and spill containment sump and bund. 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. Refer to Appendix E for photographic evidence.	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 *Internal Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to time varying electric and magnetic fields (1Hz – 100kHz)* (ICNIRP, 2010).	• Electric and Magnetic Fields Assessment Report rev 0, Acciona, dated 08/12/25 • EMF Study Report rev D, Acciona, dated 03/07/25	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. Both of these studies provide a technical assessment of compliance tithe the ICNIRP with further design recommendations to be implemented to ensure compliance with these technical guidelines. 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). There were no construction activities observed during the Audit site inspection that are likely to generate EMF. 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.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
BUSHFIRE SAFETY				
OPERATING CONDITIONS				
B51	The Proponent must: a) Minimise the fire risks of the development, including managing vegetation fuel loads on-site; b) Ensure that the development; (i) Complies with the relevant asset protection requirements in the RFS's *Planning for Bushfire Protection 2019* (or equivalent) and Standards for Asset protection Zones; (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 *Construction of buildings in bushfire prone areas* (or equivalent) and RFS's *Planning for Bushfire Protection 2019;* 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.	• 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 • Emergency Response Drill Debrief, from Australian Camp Services, dated 12/04/26 • Photo of water tank (various) • Work Pack 27 – Emergency Response, from Acciona, (undated) • Email from HumeLink East, titled "Impromptu AGJV Yass Office Evacuation Drill" dated 22/07/26	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. Equipment and resources available on site included fire water tank, fire extinguishers (including testing tag) and trailer mounter mobile water tanks. The Bushfire and Emergency Management Plan and emergency information package was available in a readily accessible location adjacent to the site compound. It was noted in the Audit interview that: • 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 • No fires have occurred during the Audit period • Fire and Rescue have attended the site and provided advice regarding Dangerous Goods. • A monthly meeting is held with fire and emergency services, with regular contact made with the RFS • Both RFS and Workcover have visited the site. 20,000 L Water tanks were available at the Yass and Adjungbilly accommodations camps. As recommended by IEA #1, a visible sign on the fire water tank at both the Yass and Adjungbilly accommodation camps have been installed so the Water Tanks can be identified by the RFS in the event of a fire **Recommendation** Conduct an annual pre-bushfire season readiness review to ensure all obligations and commitments relating to Fire and Emergency are implemented and are compliant. This may include but not be limited to: • Onsite preparedness Activities • Firefighting water supplies and equipment	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			• Access and egress for emergency vehicles • Emergency Response • Communication Protocols • Involve suitably qualified personnel in the review as required.	
EMERGENCY PLAN				
B52	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: a) Be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1 '*Emergency Planning'* and RFS's *Planning for Bushfire Protection 2019* (or equivalent); b) Be consistent with the NSW RFS document: *A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan;* 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: (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	• 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, Emergency Response Drill Debrief, from Australian Camp Services, dated 12/04/26 • Photo of water tank (various) • Work Pack 27 – Emergency Response, from Acciona, (undated) • Email from HumeLink East, titled "Impromptu AGJV Yass Office Evacuation Drill" dated 22/07/26	The Auditor reviewed the Bushfire, Emergency and Evacuation Plan and notes the following: Table 0-1 of the Plan notes the relevant legislation and guidelines that have been incorporated into the plan including: • "*Planning for Bush Fire Protection: A guide for councils, planners, fire authorities and developers (NSW RFS, 2019)"* • *Development Planning: A guide to developing a bush fire emergency management and evacuation plan NSW Rural Fire Service (NSW RFS) (2014).* • 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 o Asset protection zones o Construction standards and building requirements o 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. There have been no changes to the emergency plan during the Audit period.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	procedures that would be implemented in the event that: • There is a fire on-site or in the vicinity of the site; • There are any activities on site that would have the potential to ignite surrounding vegetation; or • There are any proposed activities to be carried out during a bushfire danger period; and (vi) Detail specific response measures in the case of flood to ensure site safety; (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 carriageway); and (viii) Include the Emergency Services Information Package in accordance with *Emergency Services information and tactical fire plan* (FRNSW, 2019) to the satisfaction of FRNSW and RFS; (ix) Operational procedures in the event of bushfires to minimise interference with aerial firefighting operations; and (x) Include details of how live transmission infrastructure can be safely isolated in an emergency. *Notes: The Emergency Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.*			
WASTE				
B53	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: 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 passible,	• 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 • Excel spreadsheet, titled "HL Waste and Spoil Register rev1" dated 08/07/26 • Letter from Epic, titled "Excavated Natural Material Assessment – Tower Pad 327, 328 and 329" dated	As noted in B57, a Waste Management Plan has been prepared. 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.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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.	20/04/26	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. Waste generation is recorded and a register is kept up to date.	
B54	The importation of waste and storage, treatment, processing, reprocessing or disposal of such waste must comply with the *Protection of the Environment Operations (Waste) Regulation 2014*, and orders or exemptions under the regulation.	• Audit Interview 5 February • Site Inspection,28th and 29th of August 2026 • Environment Protection Licence, EPL 21583 EPA NSW, dated 21/03/25 • Practising Certificate, NSW Government, dated 01/08/24 • Delivery Docket, dated 20/02/26 • Delivery Docket, Dated 29/04/26	No waste had been imported to the project a during the IEA #2 audit period. Quarry materials are imported from EPA Licenced facilities (Wyangle Quarry – EPL 21583).	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 *Environment Operations (Waste) Regulation 2014, or any other place that can lawfully accept such waste.*	• 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 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 • 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 • Smallmon Brothers invoices June, (various undated) • Smallmon Brothers invoices May, (various undated) • Adjungbilly Village Dockets, (various) (undated) • Yass Camp Dockets, (various) (undated)	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.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
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.	• 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	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. Appropriate waste records (tip dockets) were provided to the Auditor as evidence. As observed during the site inspection, waste recycling facilities have been provided and a food recycling facility established at the Yass Accommodation Camp. Appropriate waste and recycling facilities were also observed at the Adjungbilly camp for construction and domestic /office waste. Waste and recycling volumes are monitored for diversion away from landfill.	Complaint
B57	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: 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. *Note: The Waste Management Plan must incorporate all*	• 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 • Report from Transgrid, titled "Waste Management Plan" dated 01/09/25	The most recent version of the Waste Management Plan (WMP) is dated 19/2/25. Construction commenced on 24/9/25. The WMP addresses the requirements of these conditions as follows: • 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.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.		On 17/3/25 DPHI acknowledged receipt of the WMP noting they had no comments on the plan at that time. There were no changes to the WMP during the IEA#2 Audit period.	
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.	• 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	At the time of the Audit site inspection, the Yass and AAdjungbilly Camps had been constructed and were operational. Both camps were inspected during the IEA#2 Audit and appeared to be operating in accordance with this condition with no issues identified or recommendations made. 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. 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.	Compliant
B59	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; 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; b) Ensure the accommodation camps comply with conditions B23 and B51; c) Ensure any treated wastewater from the accommodation camps used for dust suppression during construction: (i) Complies with the Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ)	• 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 • Certificate of Analysis, from ALS, dated 01/07/26 • Certificate of Analysis, from ALS, dated 04/03/26 • Certificate of Analysis, from ALS, dated 26/05/26 •	Accommodation Camp Management Plans have been prepared for the Yass Valley and Adjungbilly Accommodation Camps. 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: • 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. The Auditor reviewed the site layout of the Yass Valley and Adjungbilly Accommodation Camps and noted that the "as built" layout is generally consistent with the layout depicted in the plan. Key environmental controls at the Accommodation Camps are described in Section 2.5 of the Audit report with photographic evidence provided in Appendix E. Water quality testing results were provided to the Auditor to demonstrate compliance with the requirements of part c of this condition. Both camps were inspected during the Audit site inspection with no issues identified or recommendations made.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	(2000) *Guidelines for irrigation water quality;* (ii) Meets the requirements for the Public Health Act 2010; d) Include measures for dust suppression within the accommodation camp; 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; f) Provide the site layout including building locations, vehicle access and movement, site servicing utilities infrastructure; 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; h) Include measures to support local suppliers in servicing the camp where possible; and i) Include measures to facilitate worker cohesion, safety, health and wellbeing and provision of on-site medical services. The Proponent must implement the Accommodation Camp Management Plan. *Note: The Accommodation Camp Management Plan must incorporate all relevant aspects of the development, including Enabling Works, consistent with the requirements of condition B67.*			
LOCAL BUSINESS AND EMPLOYMENT STRATEGY				
B60	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: a) Consider the cumulative impacts associated with other State significant projects in the area; and b) Investigate options for prioritising the employment of local and Aboriginal workforce and suppliers for the construction of the development, where feasible. The Proponent must implement the Local Business and	• Audit Interview 30 August 2026 • Paper to Steering Committee, Acciona, dated 21/11/25 • Local Business and Employment Strategy Rev 02, Transgrid, dated 15/09/25 • Report from Acciona, titled "Community Investment and Benefits Program" dated 15/07/26	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. • 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
	Employment Strategy. *Note: The Local Business and Employment Strategy must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.*		A copy of the Community Investment and benefits program progress report was provided to the Auditor with details of evidence of implementation including key achievements and a high level update of each initiative.	
SOCIAL				
SOCIAL IMPACT MANAGEMENT PLAN				
B61	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: a) Be prepared by suitably qualified and experienced person's; b) Be prepared having regard to the EIS commitments for the preparation of the Social Impact Management Plan; c) Be developed in consultation with Councils and relevant affected stakeholders; d) Include a summary of the social baseline and assessment of social impacts and risks, including the social impact ratings; e) Refer to and be consistent with the strategy in condition A22; f) Describe the measures that would be implemented to enhance positive social impacts from the development; g) Describe the measures that would be implemented to manage and mitigate negative (and cumulative) social impacts, including: (i) Impacts to near neighbours and the broader community; (ii) Impacts to community cohesion, safety, health and wellbeing; (iii) Access to social infrastructure and services; (iv) Impacts to housing availability and	• Social Impact Management Plan, HumeLink East, Transgrid, rev 05 dated 22/10/25 • Letter from DPHI to Transgrid titled "HumeLink East Social Impact Management Plan" dated 5/8/25 • Community Investment and Benefit Program (CIBP) Rollout Overview, Acciona, (undated) • Report from Acciona, titled "Social Impact Monitoring Report" dated 31/03/26	DPHI approved the Social Impact Management Plan on 8/8/25 noting the Plan: • 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". There have been no changes to the SIMP during the IEA#2 Audit period. 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. Social Impact Monitoring Reporting has now commenced with quarterly reports provided on the Project website. Reports include the following information: • Progress in meeting SIMP targets, including Key Achievements,	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	affordability; (v) Impacts to tourism; (vi) Labour draw and impacts to local businesses and services; (vii) Cumulative social impacts associated with other State significant development projects in the area h) Include a program to monitor, evaluate and publicly report on the effectiveness of these measures and any social impacts of the development, including; (i) Identifying performance indicators, incorporating trigger action response plan; (ii) A yearly independent survey of the attitudes of the community about the development; (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; (iv) Recording community engagement and complaints as they relate to social issues; (v) Adaptive management measures implemented or proposed; and (vi) Preparing a quarterly monitoring report, to be publicly available on the project website; and i) Include details of who would be responsible for monitoring, reviewing and implementing the plan. Following the Planning Secretary's approval, the Proponent must implement the Social Impact Management Plan for the duration of construction. *Note: The Social Impact Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.*		summary of progress and key indicators, assessment against targets and adaptive measures implemented • Community engagement undertaken, stakeholder feedback and planned engagement for the next quarter • Complaints received and responses, trend analysis. .	
REHABILITATION				
B62	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	• Audit Site Inspection,28th and 29th of August 2026	At the time of the Audit Site Inspection, construction activities were underway. The requirements of this condition are to be fulfilled within 6 months following the completion of construction.	Not triggered

<table>
<tr><th>ID</th><th>Requirement</th><th>Evidence Collected</th><th>Independent Audit Findings & Recommendations</th><th>Compliance Status</th></tr>
<tr><td></td><td>Table 3.</td><td></td><td></td><td></td></tr>
<tr><td></td><td colspan="3">Table 3 Rehabilitation Objectives
<table>
<tr><th>Feature</th><th>Objective</th></tr>
<tr><td>Accommodation Camp</td><td>• 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>
</table></td><td></td></tr>
<tr><td>B63</td><td>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.</td><td>• Audit Site Inspection, 28th and 29th of August 2026</td><td>At the time of the Audit Site Inspection construction activities were underway. The requirements of this condition are to be fulfilled within 6 months following the completion of construction.</td><td rowspan="2">Not triggered</td></tr>
<tr><td></td><td colspan="3">Table 4 Rehabilitation Objectives
<table>
<tr><th>Feature</th><th>Objective</th></tr>
<tr><td>Ancillary Facilities</td><td>• 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>Land Use</td><td>• Restore or maintain land capability to pre-existing use</td></tr>
<tr><td>Community</td><td>• Ensure public safety</td></tr>
</table></td></tr>
<tr><td colspan="5">ENABLING WORKS MANAGEMENT PLAN</td></tr>
<tr><td>B64</td><td>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:
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 low risk activities;</td><td>• 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
• Letter from Transgrid titled “HumeLink – Request</td><td>DPHI approved the initial Enabling Works Management Plan on 13/12/24 noting the Plan:
• 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.</td><td>Not triggered</td></tr>
</table>

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	b) Risk assessment for types of activities to be undertaken under the plan; c) Figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s); 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; e) Details of how the activities described in subsection (a) of this condition will be carried out to: (i) Meet the performance outcomes stated in the documents listed in Condition A1; (ii) Ensure the accommodation camps comply with conditions B23 and B51; (iii) Manage the risks identified in the risk analysis undertaken in subsection (b) of this condition; and f) A program for monitoring the performance outcomes, including a program for construction noise monitoring.	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	At the time of IEA#2, all enabling works have been completed and the Enabling Works Management Plan has been retired. This condition is therefore not triggered for IEA#2.	
B65	Following the Planning Secretary's approval, the Proponent must implement the Enabling Works Management Plan for the duration of the Enabling Works.	• As above	As above	Not Triggered
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.	• As above	As above	Not Triggered
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.	• 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	As noted in IEA #1, Construction environmental management plans noted elsewhere in this Audit report have been updated to incorporate the requirements of the EWMP.	Compliant

PART C – ENVIRONMENTAL MANAGEMENT, AUDITING AND REPORTING

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT STRATEGY				
C1	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: 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; (i) Keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) Receive, handle, respond to and record complaints; (iii) Resolve any disputes that may arise; (iv) Respond to any non-compliance; (v) Respond to emergencies; and e) Include; (i) References to any strategies, plans and programs approved under the conditions of this 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. The Proponent must not commence construction until the Environmental Management Strategy is approved by the Planning Secretary.	• 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 I HumeLink (SSI-36656827)" dated 05/05/25 • Letter from WolfPeak, titled "ER Review of Environmental Management Strategy I 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	An environmental management strategy (EMS) has been prepared and is comprehensive. The EMS provides a strategic framework for the environmental management of the development and includes the following information: • 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 DPHI approved the EMS on 20/6/25 noting the EMS: • 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. There have been no changes to the EMS during the IEA#2 Audit period.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Following the Planning Secretary's approval, the Proponent must implement the Environmental Management Strategy.			
REVISION OF STRATEGIES, PLANS AND PROGRAMS				
C2	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: a) The submission of an incident report under condition C10; b) The submission of an Independent Audit under condition C14; c) Any modification of the conditions of this approval; or d) The issue of a direction of the Planning Secretary under condition A3 which requires a review.	• HL Reviews of Strategies, Plans, Programs, dated 30/6/26 • Letter from DPHI, titled "HumeLink – HumeLink East Soil and Water Management Plan" dated 11/02/26 • Letter from DPHI, titled "HumeLink – HumeLink East Air Quality Management Plan" dated 06/03/26 • Letter from DPHI, titled "HumeLink – HumeLink East Bushfire Emergency Management and Evacuation Plan" dated 11/02/26 • Letter from DPHI, titled "HumeLink – HumeLink East Biodiversity Management Plan" dated 09/06/26 • Letter from DPHI, titled "HumeLink – HumeLink East Soil and Water Management Plan" dated 12/06/26 • Letter from DPHI, titled "HumeLink – HumeLink East Traffic and Transport Management Plan" dated 14/04/26	There have been no specific requirements to amend the management plans and strategies in accordance with this condition during the IEA #2 Audit period. Specifically, • There have been no incidents reported to DPHI in accordance with condition C10 • The Initial Independent Environmental Audit (IEA#1) did not recommend any updates to any management plans or strategies • There have been no modifications to the project or directions issued by the Planning Secretary that would require an update to the Management Plans and/or strategies. Where required due to project changes, management plans have been updated, endorsed by the ER and approved by DPHI. Transgrid have prepared and implement an overarching program to review and updated management plans periodically to ensure they are up to date.	Compliant
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS				
C3	With the approval of the Planning Secretary, the Proponent may; a) Prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any further stages and the trigger for updating the strategy, plan or program); 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	• 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,	On 22/8/25 DPHI approved a request to stage the Final Layout Plans required under Condition C8 for both HumeLink East and HumeLink 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. Transgrid noted that TTMPs have also been staged for OSOM and cable stringing over State Roads and FLP's have been staged for total clearing and partial clearing.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	proposed to be combined); and 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).	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 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 • Letter from DPHI, titled "HumeLink – HumeLink East Soil and Water Management Plan" dated 11/02/26 • Letter from DPHI, titled "HumeLink – HumeLink East Air Quality Management Plan" dated 06/03/26	There have been no additional requests for project staging during the IEA #2 Audit period in accordance with this condition.	

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		• Letter from DPHI, titled "HumeLink – HumeLink East Bushfire Emergency Management and Evacuation Plan" dated 11/02/26 • Letter from DPHI, titled "HumeLink – HumeLink East Biodiversity Management Plan" dated 09/06/26 • Letter from DPHI, titled "HumeLink – HumeLink East Soil and Water Management Plan" dated 12/06/26 • Letter from DPHI, titled "HumeLink – HumeLink East Traffic and Transport Management Plan" dated 14/04/26		
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.	• 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.	• 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.	• 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 • 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,	On 22/8/25 DPHI approved a request to stage the Final Layout Plans required under Condition C8 for both HumeLink East and HumeLink 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. Transgrid noted that TTMPs have also been staged for OSOM and cable stringing over State Roads and FLP's have been staged for total clearing and partial clearing. There have been no additional requests made to DPHI during the IEA #2 Audit period in accordance with this condition.	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		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		
NOTIFICATIONS				
NOTIFICATION OF DEPARTMENT				
C7	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. If any of these phases of the development are to be	• Infrastructure Approval SSI 36656827, dated 13/11/24 • 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 HumeLink titled "HumeLink Commencement of Construction Stage 3A(ii) HumeLink East" dated 24/9/2/5 • Letter from Transgrid to DPHI titled "HumeLink – Notification of the	As noted in the IEA #1 Audit period, DPHI were notified of the commencement of: • The development (consisting of pre-construction minor works) on the 22/11/24 • Enabling works on 06/01/25	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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.	Commencement of Construction – Stage 3A (ii) HumeLink East Condition C7" dated 24/9/25 • Letter from Transgrid to DPHI titled "HumeLink – Notification of the Commencement of Enabling Works – Stage 2 SSI36656827 Condition C7" dated 06/01/25Letter from Transgrid to DPHI titled "HumeLink – Notification of the Commencement of Construction – Stage 3A (v) HumeLink East SSI-36656827 Condition C7" dated 1/5/26 • Letter from DPHI, titled "HumeLink – Notification Commencement construction – Stage 3A(v) HumeLink East – Condition C7 – 7 May 2026" dated 13/05/26 • Email from DPHI to Transgrid titled "Post Approval Form_20265010554953" dated 1/5/26	• Construction on 24/9/25. Details of staging are provided within each letter. During the IEA#2 Audit period, DPHI were notified of the commencement of Stage 3A (v) on 1 May 2026. The notification related to the transportation of high risk OSOM deliveries to the Bannaby Substation. DPHI acknowledged the notification on 13/5/26.	
FINAL LAYOUT PLANS				
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. a) Details on siting of transmission towers and ancillary infrastructure and/ or ancillary facilities; and b) Showing comparison to the approved layout and approved vegetation clearing. The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans.	• 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 DPHI to Transgrid titled "HumeLink Final Layout Plans Staging Request" dated 22/8/25 • Letter from WolfPeak to Transgrid titled "ER Review of Final Layout Plans, Humelink East (various) • Letter from DPHI, titled "HumeLink – HumeLink East Final Layout Plans" dated 13/05/26 • Letter from DPHI, titled "HumeLink – HumeLink East Final Layout Plans Stage A Total Clearing" dated 23/02/26 • Letter from DPHI, titled "HumeLink – HumeLink East Final	On 22/8/25 DPHI 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. DPHI approval included several conditions that are noted in Condition A 3. The detailed layout plans are available on the Proponent's website in accordance with Condition C15. The ER endorsed the final layout plans prior to submission to DPHI. Final layout plans have been submitted to DPHI progressively with letters of acknowledgement received from DPHI). Evidence of submission and DPHI acknowledgement of FLP's issued during the IEA# 2 period were provided and reviewed by the Auditor. Transgrid have applied for revised clearing limits under Condition B25 of the Infrastructure Approval (see above).	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		Layout Plans" dated 21/05/26 • Letter from DPHI, titled "HumeLink – HumeLink East Final Layout Plans Stage A Total Clearing Zone" dated 27/02/26 • Letter from DPHI, titled "HumeLink – HumeLink East Final Layout Plans" dated 03/06/26 • Letter from DPHI, titled "HumeLink – HumeLink East Final Layout Plans Stage A Total Clearing Zone Rev 2" dated 26/03/26 • Letter from DPHI, titled "HumeLink – HumeLink East Final Layout Plans" dated 02/06/26 • Letter from DPHI, titled "HumeLink – HumeLink East Final Layout Plans" dated 16/07/26 • Letter from DPHI, titled "HumeLink – HumeLink East Final Layout Plans Stage A Total Clearing" dated 13/05/26		
WORKS AS EXCUTED 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.	• 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.	• Excel spreadsheet, from Acciona titled "Env Incident & NCR Register" dated 03/10/25	The Auditor was provided with a copy of the Incident and NCR register for the Audit period. During the Audit period, a total of 10 minor incidents occurred (e.g oil spills) which were classified as minor and non-reportable with minimal impact.	Not triggered
NON-COMPLIANCE NOTIFICATION				
C11	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	• Letter from DPHI, titled "HumeLink – Notification of Non-Compliance Condition C11" dated 09/3/26 • Letter from Transgrid to DPHI, titled "HumeLink – Notification	During the Audit period, four non-compliances were reported to DPHI in accordance with this condition. This included:	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	(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. *Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.*	of Non-Compliance – Condition C11" dated 26/3/26 • Letter from Transgrid to DPHI, titled "Non-compliance Notification – Delivery of electrical cabling by heavy vehicle (HV) to Bannaby Substation via Brayton Road (Marulan Brayton) • DPHI Post Approval Form_20260326061659 • Letter from DPHI to Transgrid titled "HumeLink-Notification – HV use Unauthorised Route" dated 1/4/26 • Department of Planning, Housing and Infrastructure (DPHI) Non-compliance notification dated 20/6/26 • Transgrid Response to DPHI Request for Information • DPHI Post Approval Form_2026032706434 • DPHI Post Approval Form_20260501051823 • Email from DPHI to Transgrid titled "HumeLink East – Failure to Comply with Part B Conditions B1 and B16-OOHW Feb-Mar 26, dated 30/3/26 • Letter from DPHI to Transgrid titled "HumeLink Notification-Non-compliance- Conditions B1 and B16 – tower piling work OOH" dated 31/3/26 • Letter from DPHI to Transgrid titled "Warning Letter- Breach of Section 5.14 of the Environmental Planning and Assessment Act, 1979" dated 18/6/26 • Letter from Transgrid to DPHI titled "HumeLink – Notification of Non-compliance – Condition C11" dated 18/5/267 • Email from DPHI to Transgrid titled "HumeLink Post Approval Document Received – (SSI- 3665627-PA 201" dated 18/5/26 • Letter from DPHI to Transgrid titled "HumeLink Notification – Non-compliance A14-4 May 2026 – failure to notify ER within timeframe" dated 22/5/26 • C11 Notification BAVR timing _01052026 • Email from DPHI to Transgrid titled "Humelink Post Approval Document Received (SSI-3665627-PA-199) dated 8/5/26 • Letter from DPHI to Transgrid titled "HumeLink – Notification of Non-compliance – B29" dated 19/5/26	• Non-compliance with Conditions B35 and B39 relating to the use of an unapproved route to the Bannaby Substation (via Brayton Road – A route that is not approved as part of the EIS) (NC identified on 20/3/26 and reported to DPHI on 26/3/26) • Non-compliance with Conditions B1 and B16 relating to instances across four locations where construction was undertaken out of hours without a valid OOH permit (NC identified on 20/3/26 and reported to DPHI on 26/3/26) • Non-compliance with Condition B29 regarding the late submission of the Biodiversity Assessment Verification Report (BVAR) (NC identified on 1/5/26 and reported to DPHI on 8/5/26) • Non-compliance with Condition A14 regarding the provision of the complaints register to the ER on the day of the complaint (NC identified on 12/5/26 and reported to DPHI on 18/5/26) Transgrid have developed a standard template for reporting Non-compliances which includes all the necessary information required by this condition. Non-compliance notifications were made to DPHI within 7 days of TransGrid becoming aware of the Non-compliance.	
NOTIFICATION OF LANDOWNERS				
C12	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.	• 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 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	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		• 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 "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				

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
C13	Independent Audits of the development must be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements (2020)* or as updated from time to time and published on the Department's website.	• This Audit report • DPHI Independent Audit Post Approval Requirements (2020) • DPHI Independent Audit Post Approval Requirements (2020 • Letter from DPHI to Transgrid, titled "Subject: HumeLink – Independent Environmental Audit (IEA) Team – Biodiversity Expert Endorsement Request" dated 10/12/25 • Letter from DPHI to Transgrid, titled "Subject: HumeLink – East – Revised Independent Environmental Audit (IEA) report [and Response to Audit Recommendations (RAR)]1 Construction 22 November 2024 to 3 February 2026" dated 20/5/26 • Letter from DPHI to Transgrid titled "HumeLink – East IEA # 1 Construction 22 November2024 to 3 February 2026" dated 18/5/26 • Email from DPHI to Transgrid titled "HumeLink Post Approval Document Received – (SSI-36656827-PA 183) dated 2/4/26	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. During the Audit period, the IAPARs have been updated with the most recent version (March 2026) published on the DPHI website. This Audit has been undertaken to meet the requirements of both the 2020 and 2026 IAPARs. The Initial Audit IEA#1 report was accepted by DPHI on 20/5/26,	Compliant
C14	Make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary.	• HumeLink East | Transgrid	A copy of the previous Audit report was provided on the Project website, along with the proponents response to the Audit findings	Compliant
ACCESS TO INFORMATION				
C15	The Proponent must: a) Make the following information and documents publicly available on its website as relevant to the stage of the development; (i) The EIS; (ii) The final layout plans for the development; (iii) Current statutory approvals for the development; (iv) Approved strategies, plans or programs required under the conditions of this approval; (v) The proposed staging plans for the development if the construction, operation and/ or decommissioning of the development is to be staged; (vi) A comprehensive summary of the monitoring results of the development, which have been reported in accordance with the	• HumeLink East | Transgrid	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: • Environmental Impact Statement and technical reports • Environmental Audit Report and Proponents response to the Audit findings • 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	Compliant

ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	various plans and programs approved under the conditions of this approval; (vii) How complaints about the development can be made; (viii) A record of complaints, which is to be updated on a monthly basis; (ix) Any independent environmental audit, and the Proponent's response to the recommendations in any audit; and (x) Any other matter required by the Planning Secretary; and b) Keep such information up to date.		• 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. As noted in Condition C14, a copy of the Proponents response in to the recommendations made in the previous Audit were provided on the Proponents website.	

Appendix D Stakeholder Consultation Records

richard.peterson-trigalana@outlook.com

From: Katrina O'Reilly <Katrina.OReilly@dphi.nsw.gov.au>
Sent: Friday, 24 July 2026 8:46 AM
To: Richard Peterson
Cc: Jennifer Rowe
Subject: HumeLink East IEA

Good morning Richard,

Further to my message yesterday on your phone. The Department has received a recent complaint in regards to activities such as truck movements, truck speeds and convoying, vibration and impacts to house from truck movements and dust associated with the Humelink East Project in particular around Woodhouselee Road. The Department requests that you also include in the upcoming audit a focus on the below:

- Review whether monitoring of Traffic Noise and vibration is being undertaken along transport/construction routes to ensure no exceedances of criteria to nearby residents and whether mitigation measures are appropriate or additional actions are required.
- Management of vehicle movements along transport/construction routes is being undertaken to minimise convoy lengths or platoons
- Review procedures and mechanisms for the distribution of information and consultation with the community is being undertaken as per the Community Communication Strategy. Specifically in relation to traffic related impacts, timing and management, where there may be an increase in the number of movements for activities such as steel deliveries.
- Review transport movements along Woodhouselee to determine whether there are any issues with dust impacts on nearby residents and whether mitigation measures are appropriate or additional actions are required.
- How any complaints received in regard to activities along Woodhouselee Road have been addressed by the AGJV in accordance with the requirements under the relevant management plans such as:
    - Traffic and Transport Management Plan (TTMP) - Traffic Noise & Vibration is to be addressed in the Noise and Vibration Management Plan (NVMP)
    - NVMP - Complaint based monitoring - Where complaints are received, noise and/or vibration monitoring may be undertaken at sensitive receivers to determine if the actual construction noise generated exceeds the predicted ‘worst case’ construction noise levels identified in this plan or to confirm predicted vibration levels.
    - TTMP - Convoy - scheduling the haulage vehicle movements to minimise convoy length or platoons; Section 6.1, Section 6.6 and Appendix B
    - LinkedSite is a web-based program designed to virtually track, analyse, and manage vehicle movements in and around projects. AGJV will deploy LinkedSite on AGJV vehicles to track vehicle movements and to assist with scheduling.

Regards
Katrina

Katrina O'Reilly
Team Leader
Operations & Planning Delivery
Development Assessment & Sustainability
Department of Planning, Housing and Infrastructure
M 0429400261 | **E** katrina.oreilly@dphi.gov.au

richard.peterson-trigalana@outlook.com

From: Briohny Seaman <Briohny.Seaman@epa.nsw.gov.au>
Sent: Wednesday, 15 July 2026 8:51 AM
To: Richard Peterson
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).

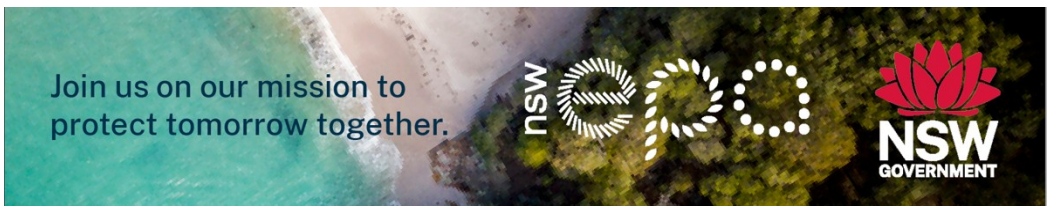
Please note, the EPA is currently investigating several community complaints made in relation to the Humelink project. Should our investigations reveal any additional issues, we will notify you accordingly.

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

Regards,

Briohny

Briohny Seaman
Compliance Program Coordinator – Field Operations
NSW Environment Protection Authority
T 02 6983 4918 | www.epa.nsw.gov.au



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

I work on Wiradjuri Country.

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

richard.peterson-trigalana@outlook.com

From: Kate Wooll <Kate.Wooll@goulburn.nsw.gov.au>
Sent: Friday, 24 July 2026 1:44 PM
To: Richard Peterson
Subject: Goulburn Mulwaree Council - Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Hi Richard,

Thank you for providing the opportunity for feedback to Goulburn Mulwaree Council on the upcoming audit. The following comments summarise issues Council is experiencing in relation to this project:

- Within the Summary of Mitigation/Management Strategy section of the Social Impact Management Plan there were some items within the Monitoring and Reporting Frequency that had not been addressed or not actioned within the specified timeframe.

- There was a requirement of a Monthly Contractor report + pulse checks in active work zones, these have not been received.

- There was a requirement to demonstrate *Evidence of proactive event planning trough dynamic scheduling measures in collaboration with local tourism operators or services;* and *Quarterly engagement with Destination Networks and local councils to discuss emerging tourism issues...* This had not taken place prior to a meeting with Council on 25/6/2026.

- There are ongoing concerns regarding the impact of Hume Link on accommodation occupancy in Goulburn, given it did not proceed with the originally proposed accommodation camp in Upper Lachlan. This has resulted in Goulburn being the key location for workers on the Upper Lachlan section of the project. Following a 25/06/26 Teams meeting with Hume Link, we understand they are using a mix of 17 hotel/motel/caravan park properties currently, alongside a further two Airbnb properties and several rental properties.

  Whilst at the moment the impact is minimal due to the lower staff numbers currently on the project, when the project reaches its peak (which is now delayed), it will see accommodation in Goulburn at maximum capacity between February and April 2027 - this period, and other periods of high staff numbers cause us great concern for accommodation availability for major events, multiple-event weekends, and for Goulburn generally. This is a peak period for Goulburn regardless, where accommodation is hard to find anyway, reputationally this has the capacity to be very damaging for Goulburn as visitors will be unable to source accommodation.

  At the 25/06/26 Teams meeting, it was agreed that a monthly stakeholder meeting would occur to discuss these issues, flag key event periods, and for Hume Link to use their Travel Manager to assist with logistics to move workers in/out as required, which has not occurred. A meeting is scheduled with Hume Link next week to focus specifically on events and identifying periods of concern.

- Likewise, Council has concerns about the impact on rental accommodation availability and subsequent rental pricing and impacts on the local community. Council has raised concerns around the significant increase in the rental prices (all houses) (long term) during the construction period. The weekly rent has risen 10.7% from $500.79 to $553.88 in the 10-month period from June 2025 - May 2026.

- An ongoing issue raised during the meeting on 25/6/2026, is project vehicle parking within the Goulburn CBD taking up parking for community visiting council and other nearby facilities. The number of vehicles is excessive,

and multiple complaints have been received by patrons of the Goulburn Region Art Gallery, Goulburn Regional Library and the private businesses who occupy the same building at HumeLink.

- The proponents' contractors do not appear to be complying with the Transport Management Plan (TMP). We are aware that they have been applying for permits to travel on roads not listed in the TMP. The additional roads are showing significant damage and do not appear to have had dilapidation reports. The expectation around permits and timeframes (typically lodged at the last minute) isn't acceptable.

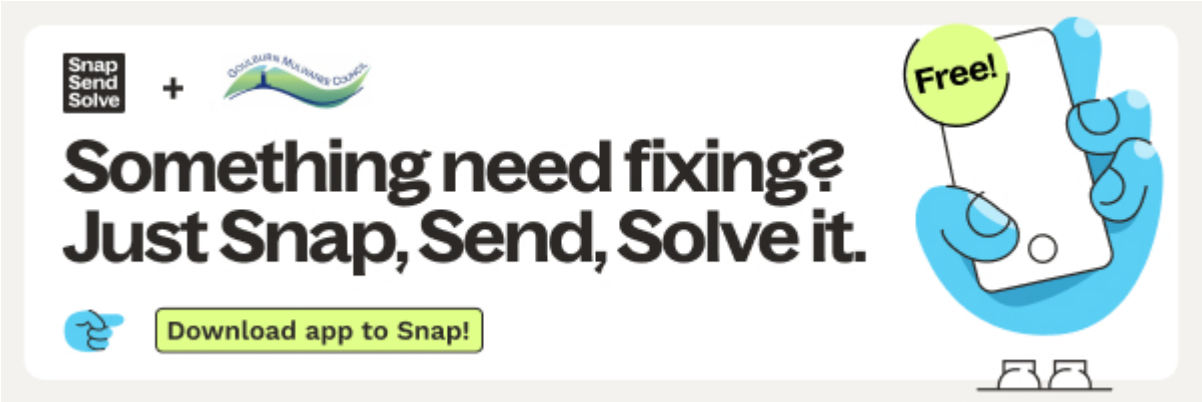
Council is willing to provide additional information where available or to discuss the above concerns with you. Please do not hesitate to contact me and I will connect you to the relevant area for feedback.

Regards,

Kate

Goulburn Mulwaree Council
Resilient. Vibrant. Connected.

Kate Wooll
Business Manager Strategic Planning
P 02 4823 4408 | **M** 0490 858 678
E Kate.Wooll@goulburn.nsw.gov.au
www.goulburn.nsw.gov.au
Locked Bag 22 | Goulburn NSW 2580



Goulburn Mulwaree Council acknowledge the traditional custodians of the land where the Goulburn Mulwaree Local Government operates today and pay our respects to Elders past, present and emerging.

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Sunday, 12 July 2026 4:55 PM
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

> You don't often get email from richard.peterson-trigalana@outlook.com. Learn why this is important

To whom it may concern

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.

COOTAMUNDRA-GUNDAGAI REGIONAL COUNCIL

ABN: 46 211 642 339
PO Box 420, Cootamundra NSW 2590
Ph: 1300 459 689 Fax:02 6940 2127
Email: mail@cgrc.nsw.gov.au
www.cgrc.nsw.gov.au

Cootamundra Office
81 Wallendoon Street,
Cootamundra NSW 2590

Gundagai Office:
255 Sheridan Street,
Gundagai NSW 2722

Lauren Dawes
REC251118-LD-100100

Mr Richard Peterson
Trigalana Environmental Pty Ltd

Via email: 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

richard.peterson-trigalana@outlook.com

From: Anne Shanahan <ashanahan@svc.nsw.gov.au>
Sent: Thursday, 30 July 2026 2:18 PM
To: Richard Peterson
Subject: RE: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation - SVC response

Good afternoon Richard,

Thank you again for reaching out. Please see conditions of particular interest to Council below:

Condition	Notes
Part B – Environmental Conditions – General	
B15	Operational Noise Compliance Verification
B16	Noice vibration management plan
B17	Air quality a. minimise the off-site dust, fume, blast emissions and other air pollutants of the development
B19	Erosion and Sedimentation
B36	Transport strategy
B22	Reparian Areas
B25	Restrictions on Clearing and Habitat
B38	Road maintenance
B39	Traffic and transport management plan
B40	Aerial Activities
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	
C2	Revision of Strategies, Plans and Programs
C7	Notification of Department
C10	Incident notification
C11	Non-compliance notification

Please feel free to contact me should you require any additional information.

Kind regards,

Anne

Anne Shanahan

Interface Manager - HumeLink

Snowy Valleys Council

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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richard.peterson-trigalana@outlook.com

From: Environmental Assessments <Environmental.Assessments@waternsw.com.au>
Sent: Monday, 13 July 2026 9:13 AM
To: Richard Peterson
Subject: RE: CS0945934 - WaterNSW response - Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation - second audit

Dear Richard

Thank you for your email request seeking WaterNSW's input into areas or items for consideration for the second audit of the Humelink project (SSI-36656827).

As advised for the first audit, the main things we would be seeking the audit to address would are as follows. These items are directly related to water quality risks.

- implementation of effective erosion and sediment controls
- suitable groundcover/stabilisation maintained across the project area
- suitable management/storage/use of chemicals and fuels etc
- appropriate installation/management of any waterway crossings, including appropriate approvals
- any roads constructed and maintained to reduce risks to water quality
- appropriate management and disposal of onsite wastewater from construction compounds
- analysis of water quality monitoring results
- assessment of the effectiveness of the soil and water management plan

Plus

- implementation of consent conditions, including an analysis on what has worked and what hasn't worked.

We would appreciate your advice on how the above was addressed in the first audit, as I cannot see the audit findings report in the Portal. And the same goes for advice re results for from the second audit, when made available.

If you have any questions relating to this response, please reach out.

Kind Regards

Justine Clarke (She/Her)
Planning & Assessment Specialist - Environment & Heritage
WaterNSW
Level 25, 6 Parramatta Square
10 Darcy Street, Parramatta, NSW 2150
PO Box 398
Parramatta NSW 2150

From: Customer Service Desk <customer.helpdesk@waternsw.com.au>
Sent: Monday, 13 July 2026 8:57 AM
To: Environmental Assessments <Environmental.Assessments@waternsw.com.au>
Subject: CS0945934 - Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

richard.peterson-trigalana@outlook.com

From: Eddie Kobeissi <ekobeissi@yass.nsw.gov.au>
Sent: Wednesday, 29 July 2026 4:53 PM
To: Richard Peterson
Subject: RE: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

Hi Richard,

Sorry for the delay in responding to your email below. Hope it's not too late!!

With the HumeLink East project well underway, the only environmental matters that Council was dealing with are complaints/concerns from residents regarding dust generation from unsealed roads that their heavy vehicles have and are using.

Other general concerns received by Council were about their heavy vehicle driver's behaviour (i.e. reckless driving, speeding, etc) on our roads. HumeLink East project contractor was very responsive to these concerns acting promptly to address them.

Regards,

Eddie Kobeissi | Development & Standards Engineer | **Yass Valley Council**
D: +61 (0)2 6226 9288 | P: +61 (0)2 6226 1477
E: ekobeissi@yass.nsw.gov.au | W: www.yassvalley.nsw.gov.au

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From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Sunday, 12 July 2026 4:55 PM
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

[EXTERNAL] Please exercise caution when clicking on links or attachments from external sources.

To whom it may concern

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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026.

Outlook

SSI 36656827 - Independent Environmental Audit #2 - Hume Link

From Richard Peterson <Richard.Peterson@trigalana.com>
Date Thu 2/07/2026 1:58 PM
To Katrina O'Reilly <katrina.oreilly@planning.nsw.gov.au>
Cc DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>; nathan.garvey@naturepositiveadvisory.au <nathan.garvey@naturepositiveadvisory.au>; rebecca.a.eddington@energyco.nsw.gov.au <rebecca.a.eddington@energyco.nsw.gov.au>

Hi Katrina,

I hope you are well.

We are planning the second Audit for HumeLink with site visits planned for the following dates.

- HumeLink East - 28-29 July 2026
- Humelink West - 12-13 August 2026

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
- Confirm the requirement for the ongoing involvement of the Biodiversity specialist (or otherwise)
- Confirm the organisations to be consulted with in preparing the Audit. In this regard the following are the organisations consulted with during IEA #1.
    - 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
- The organisations highlighted in yellow indicated they did not have an interest in the project, however I will confirm their desire to be consulted with for future Audits

If you can please provide a response by 16 July, that would be greatly appreciated.

Outlook

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

From Richard Peterson <richard.peterson-trigalana@outlook.com>
Date Sun 12/07/2026 2:17 PM
To ROG South East Region Mailbox <rog.southeast@environment.nsw.gov.au>; Allison.Treweek@dcceew.nsw.gov.au <Allison.Treweek@dcceew.nsw.gov.au>
Cc Nathan Garvey <nathan.garvey@naturepositiveadvisory.au>

Hi Alison

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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026. As per the fist Audit, Nathan will be undertaking the biodiversity component of the Audit.

The Audit will commence on 28th of July 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 CHPR so any issues or focus areas that CHPR may see relevant may be considered by the Audit.

In this regard a response by 26 July 2026 would be greatly appreciated. Please cc Nathan in on any communication and if you would like to arrange a discussion session like we did last time, we would be happy to do so.

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

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Outlook

Re: FOR ACTION: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation [SEC=OFFICIAL]

From Richard Peterson <richard.peterson-trigalana@outlook.com>
Date Sun 12/07/2026 2:54 PM
To Angela DREW <Angela.Drew@dcceew.gov.au>

Hi Angela

Thank you for your response for consultation regarding the initial Audit for the Humelink Project

I note your comments below and have directed my enquiries to NSW DCCEEW

I am about to commence the second Audit, please confirm DCCEEW would not like to be consulted with regarding future Audits.

Best Regards

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

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From: Angela DREW <Angela.Drew@dcceew.gov.au>
Sent: Thursday, 4 December 2025 4:58 PM
To: richard.peterson-trigalana@outlook.com <richard.peterson-trigalana@outlook.com>
Subject: FW: FOR ACTION: Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation [SEC=OFFICIAL]

OFFICIAL

Hi Richard

Your enquiry below has been passed on to my section for response.

I note the audit is in relation to the NSW approval and is to be undertaken in accordance with the NSW Department of Planning, Housing and Infrastructure - Post Approval Requirements.

Based on this, I wonder if your request for consultation on the matter was intended for NSW DCCEEW?

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

Regards

Angela Drew
A/g Director

Environment Regulation Division | Environment Assessments NSW and ACT | Southern NSW Assessments
M 0459 162 288 |**E** angela.drew@dcceew.gov.au

OFFICIAL

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Thursday, 4 December 2025 9:33 AM
To: RewiringtheNation <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

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Outlook

Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

From Richard Peterson <richard.peterson-trigalana@outlook.com>
Date Sun 12/07/2026 3:00 PM
To DPIE Water Assessments Mailbox <water.assessments@dpie.nsw.gov.au>

To DPIE Water Assessments

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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026.

The Audit will commence on 28th of July 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 DPIE Water Assessments so any issues or focus areas that you may see relevant may be considered by the Audit.

In this regard a response by 26 July 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

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Outlook

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

From Richard Peterson <richard.peterson-trigalana@outlook.com>
Date Sun 12/07/2026 12:32 PM
To info@fcnsw.com.au <info@fcnsw.com.au>

To whom it may concern

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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026.

The Audit will commence on 28th of July 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 26 July 2026 would be greatly appreciated.

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

Many thanks in advance

Outlook

RE: NRAR0019459 : Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

From Richard Peterson <richard.peterson-trigalana@outlook.com>
Date Sun 12/07/2026 2:42 PM
To Natural Resources Access Regulator <cspconnect@service-now.com>

Hi there

Thank you for your response for consultation regarding the initial Audit for the Humelink Project

I note your comments below and have directed my enquiries to the organisations as noted.

Please confirm NRAR would not like to be consulted with regarding future Audits.

Best Regards

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

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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

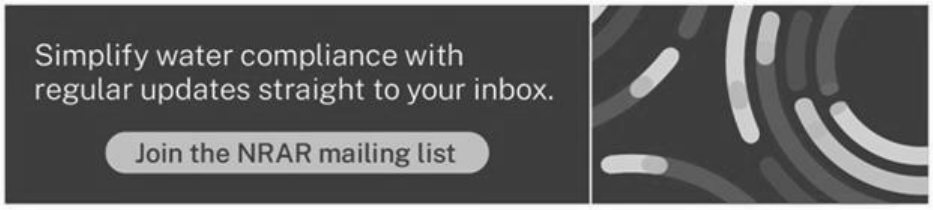
Regulatory Support Team

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.

Ref:MSG24015946_zlMahf0JW3Rvo4YARCE

Outlook

Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

From Richard Peterson <richard.peterson-trigalana@outlook.com>
Date Sun 12/07/2026 2:35 PM
To OEH HD Heritage Mailbox <heritagemailbox@environment.nsw.gov.au>

To OEH Heritage

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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026.

The Audit will commence on 28th of July 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 OEH so any issues or focus areas that OEH may see relevant may be considered by the Audit.

In this regard a response by 26 July 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

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Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

From Richard Peterson <richard.peterson-trigalana@outlook.com>
Date Sun 12/07/2026 2:28 PM
To Webmaster <webmaster@rfs.nsw.gov.au>

To RFS

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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026.

The Audit will commence on 28th of July 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 RFS so any issues or focus areas that RFS may see relevant may be considered by the Audit.

In this regard a response by 26 July 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

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Outlook

Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

From Richard Peterson <richard.peterson-trigalana@outlook.com>
Date Sun 12/07/2026 2:06 PM
To Development South <development.south@transport.nsw.gov.au>
Cc Maurice Morgan <maurice.morgan@transport.nsw.gov.au>; Alexandra Power <alexandra.power@transport.nsw.gov.au>

To whom it may concern

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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026.

The Audit will commence on 28th of July 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 (TfNSW)so any issues or focus areas that TfNSW may see relevant may be considered by the Audit.

In this regard a response by 26 July 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

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Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

From Richard Peterson <richard.peterson-trigalana@outlook.com>
Date Sun 12/07/2026 3:10 PM
To enquiries@waternsw.com.au <enquiries@waternsw.com.au>

To Water NSW

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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026.

The Audit will commence on 28th of July 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 Water NSW so any issues or focus areas that you may see relevant may be considered by the Audit.

In this regard a response by 26 July 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

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Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

From Richard Peterson <richard.peterson-trigalana@outlook.com>
Date Sun 12/07/2026 3:29 PM
To info@epa.nsw.gov.au <info@epa.nsw.gov.au>

To EPA

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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026.

The Audit will commence on 28th of July 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 may be considered by the Audit.

In this regard a response by 26 July 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

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From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Sunday, July 12, 2026 12:32 PM

Outlook

Hume Link (SSI 36656827) - Independent Environmental Audit - Consultation

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

Date Sun 12/07/2026 4:55 PM

Bcc City of Wagga Wagga <Council@wagga.nsw.gov.au>; council@yass.nsw.gov.au <council@yass.nsw.gov.au>; Council <council@goulburn.nsw.gov.au>; Snowy Valleys Council <info@svc.nsw.gov.au>; council@upperlachlan.nsw.gov.au <council@upperlachlan.nsw.gov.au>

To whom it may concern

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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026.

The Audit will commence on 28th of July 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 may be considered by the Audit.

In this regard a response by 26 July 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

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richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Sunday, 12 July 2026 5:05 PM
Subject: Hume Link (SSI 36656827) - Independent Environmental Audit - 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.

This is the second Audit for the project and follows the initial Audit undertaken in February 2026.

The Audit will commence on 28th of July 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 Aboriginal Stakeholder groups so any issues or focus areas you may see relevant may be considered by the Audit.

In this regard a response by 26 July 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

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Appendix E Photographs

Yass Accommodation Camp



Photo 1: Sealed internal, access road, camp buildings and revegetated swale drain



Photo 2: Camp facilities



Photo 3: Carpark



Photo 4: Emergency information container at site entrance



Photo 5: Water supply tank and fire fighting water signage



Photo 6: Waste skip bins



Photo 7: Stabilised batter, boundary fence and storage area



Photo 8: Internal drainage and stabilised batter

Adjungbilly Accommodation Camp

Photo 9: External access road and low level lighting

Photo 10: Perimeter fencing and revegetated drainage swale



Photo 11: Mobile water cart



Photo 12: Chemical storage bund



Photo 13: External drainage and sediment basin



Photo 14: Sediment basin



Photo 15: Fire water tank with connection valve signage



Photo 16: Mobile amenities caravan, spill kit and fire fighting extinguishers



Photo 17: Vehicle refuelling area



Photo 18: Waste and Recycling facilities (construction waste)



Photo 19: Waste and Recycling facilities (domestic waste)



Photo 20: Pest abatement



Photo 21: Polymer application trailer



Photo 22: Polymer chemicals and bunded storage



Photo 23: Sediment basin

Bannaby Substation



Photo 24: General construction



Photo 25: General Construction



Photo 26: Sediment basin and embankment rehabilitation



Photo 27: Piling Activities



Photo 28: Internal access road, lockable gate and emergency assembly area



Photo 29: Sealed access road



Photo 30 : Internal drainage and graded internal access road



Photo 31: Sediment basin



Photo 32: Sediment basin advisory signage

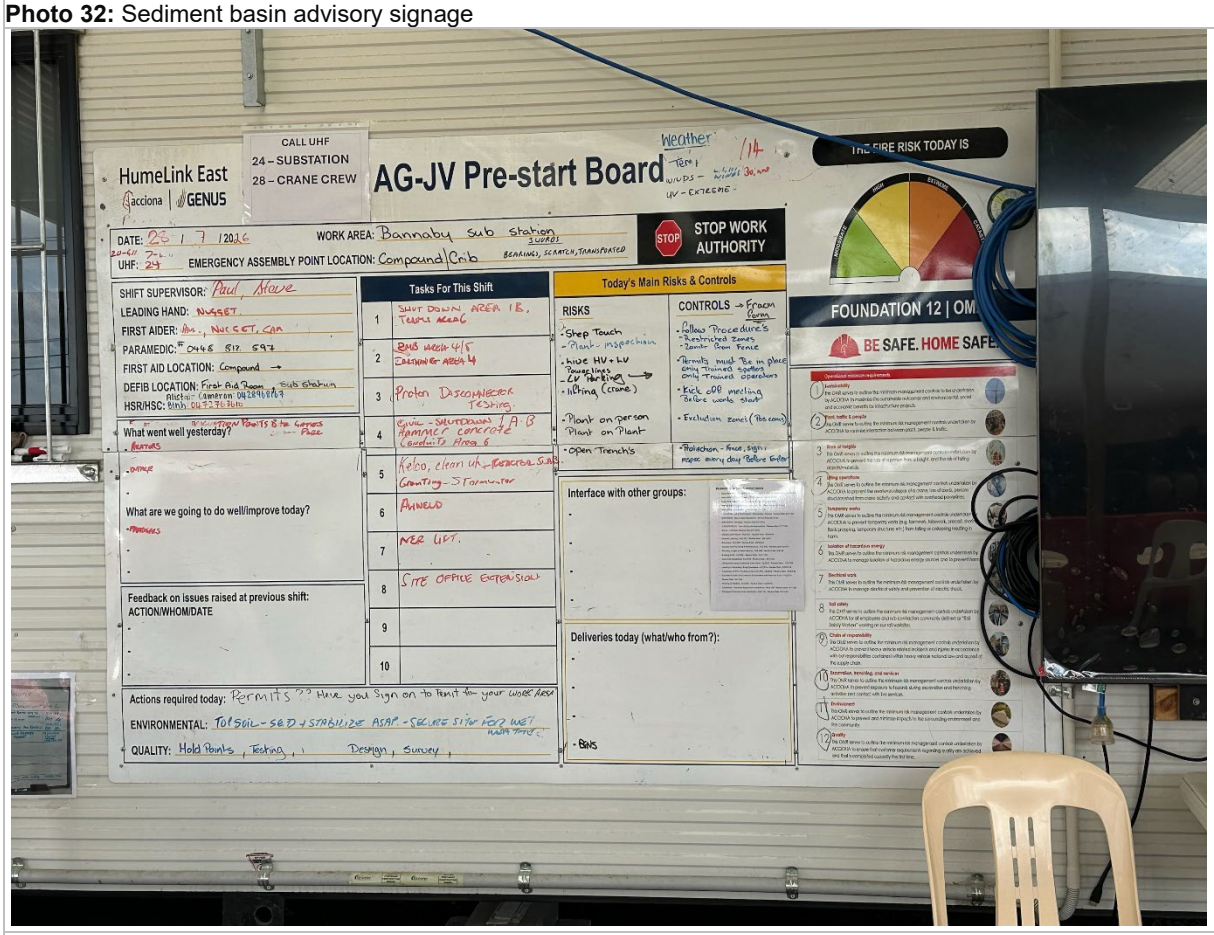


Photo 33: Prestart notice board



Photo 34: Equipment registration code – for maintenance planning and tracking



Photo 35: Chemical storage container



Photo 36: Fire fighting equipment



Photo 37: Haulage truck with dust covers

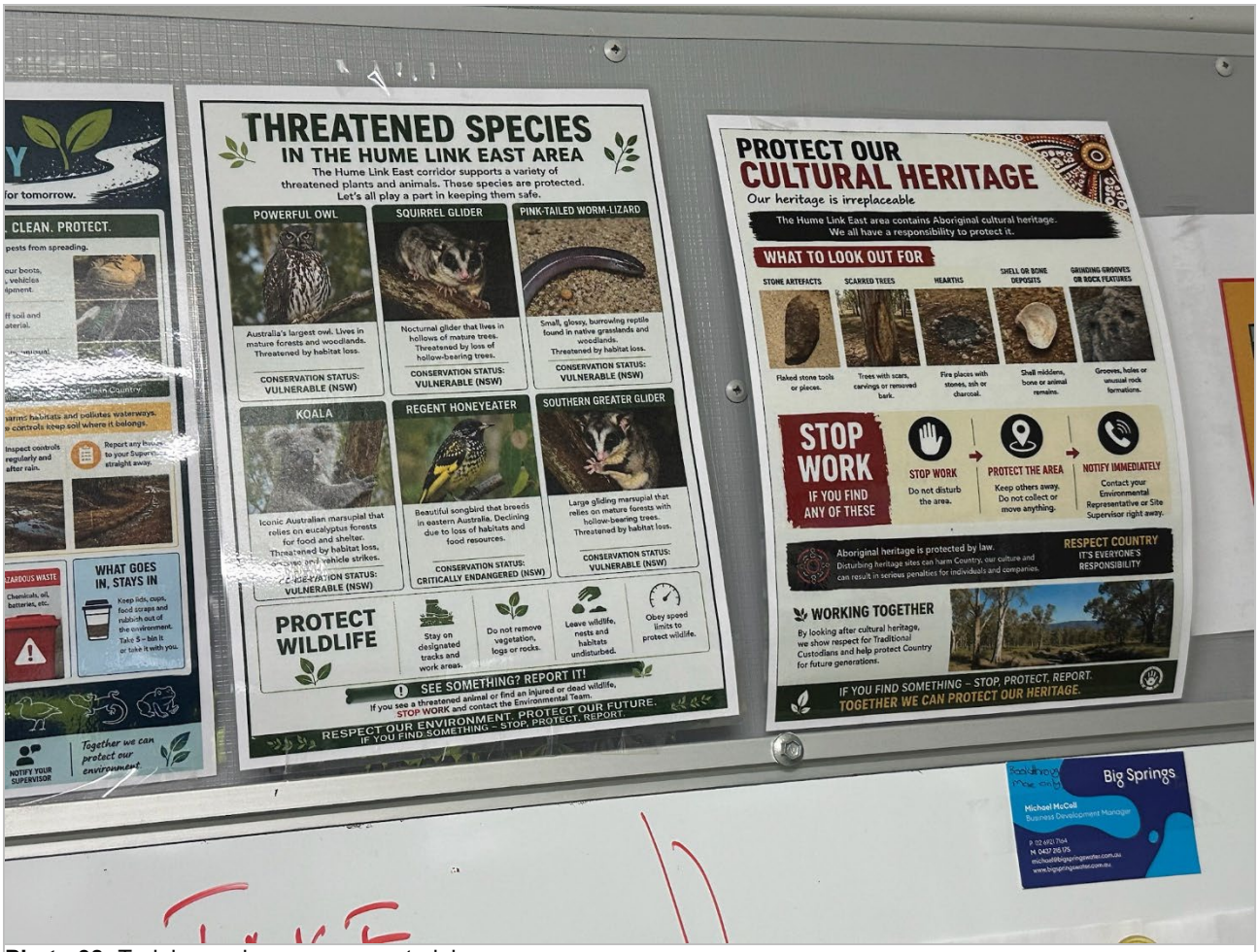


Photo 38: Training and awareness materials

General Alignment



Photo 39: Access point signage



Photo 40: Stabilised access point and locked gate



Photo 41: Timber window and earthen sediment bund



Photo 42: Completed PAD and tower base installation



Photo 43: Timber windrows for erosion control

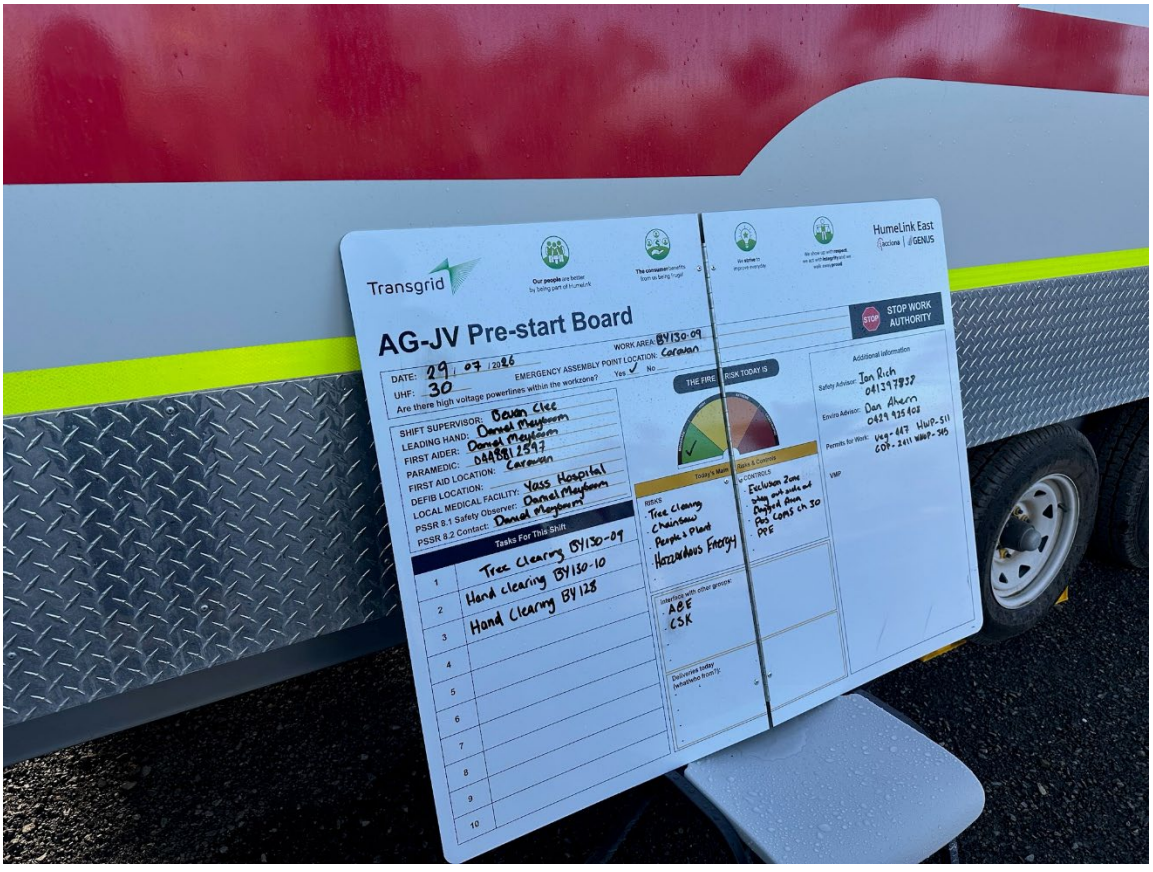


Photo 44: Mobile pre-start notice board



Photo 45: Site entrance, emergency assembly point and lockable gate



Photo 46: Rehabilitated tower PAD batter



Photo 47: Stabilised site access/egress point



Photo 48: Rock diversion/batter chute



Photo 49: Rock sediment check bund



Photo 50: Spill kit

Appendix F Specialist Report - Biodiversity



NaturePositive Advisory

HumeLink East

Independent Environmental Audit No. 2 - Biodiversity

Prepared for Transgrid

14 October 2026

Document overview

Transgrid

N260022 | 3

14 October 2026

Version	Date	Prepared by	Reviewed by	Comments
1.0	12 September 2026	Nathan Garvey	Richard Petersen (Trigalana Environmental)	Initial draft for review
2.0	24 September 2026	Nathan Garvey	–	Final version
3.0	12 October 2026	Nathan Garvey	–	Minor revisions based on further feedback
4.0	14 October 2026	Nathan Garvey	-	Minor revisions

Prepared by



Nathan Garvey
Director | Principal Advisor
14 October 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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Appendix C. Audit table 109

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
CLDP	Clearing and Land Disturbance Permit
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 *Environmental Protection and Biodiversity Conservation Act 1999*
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

Abbreviation	Description
NRAR	NSW Natural Resources Access Regulator
NSW	New South Wales
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
SODA	Strategic Offset Delivery Agreement
TCZ	Total Clearing Zone
TEC	threatened ecological community

Executive E. Executive Summary

Nature Positive Advisory Pty Ltd has been engaged to undertake the second independent environmental Audit (IEA) 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 second Audit covers construction activities for the period from the site inspection for Audit 1 (11 February 2026) to the date of the site inspection for this audit (19 August 2026). The Audit consisted of a site inspection, an interview with key project personnel and a review of biodiversity related management plans, project documents and management records.

A general site inspection was undertaken by the Biodiversity Specialist on 19-20 August 2026 . Members of AGJV and Transgrid teams were present for the inspection.

Key findings of the Audit are:

- The Project has now commenced partial clearing within the easement clearing zone (ECZ).
- Transgrid has recently sought revised clearing limits under Condition B25 of the Infrastructure Approval following finalisation of the final layout plans (FLPs) with both HLE and HumeLink West (HLW). Amendments to the FLPs, associated with surveys undertaken for the Biodiversity Assessment Verification report (BAVR), have resulted in reductions in the amount of native vegetation and threatened ecological communities to be cleared, as well an overall reduction in impacts to habitat for threatened species. There have been some increases for individual threatened species (see Section 4.1).
- The revision to clearing limits under Condition B25 triggers a revised BAVR to be provided to DPHI by 20 November 2026. Once the BAVR is revised, this will also trigger revisions to the Biodiversity Offset Package (BOP) and Biodiversity Management Plans (BMPs) for both HLE (and HLW).
- During this audit period, there were no reportable non-compliances related to biodiversity. There were four non-conformances (non-reportable) related to biodiversity. The audit identified one non-compliance in relation to condition B29, which was reported by Transgrid to DPHI in accordance with condition C11 of the Infrastructure Approval.
- Overall, the audit found that the management measures outlined in the BMP are being implemented well, with good processes around unexpected finds, clearing controls and inductions, access controls and ongoing measures to avoid and minimise impacts during construction. The project remains well advanced in the installation of nest boxes and has currently installed more nest boxes than required based on identification of occupied hollows.

- The audit identified some areas for improvement, particularly around:
  - implementation of mitigation measures, particularly hand-clearing, delineation of clearing limits and ensuring plant operators have access to the clearing limits loaded into survey-grade GPS, during vegetation clearing,
  - stabilisation of batter slopes and implementation of erosion controls to reduce the potential for inadvertent impacts to biodiversity,
  - implementation of biosecurity controls, particularly washdowns, and
  - construction of waterway crossings to ensure unimpeded and natural flows along waterways.

Overall, 14 recommendations are made to help improve the implementation of the BMP and ensure the project is compliant with the CoA. Many of these have been adopted and addressed by AGJV following the audit.

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.

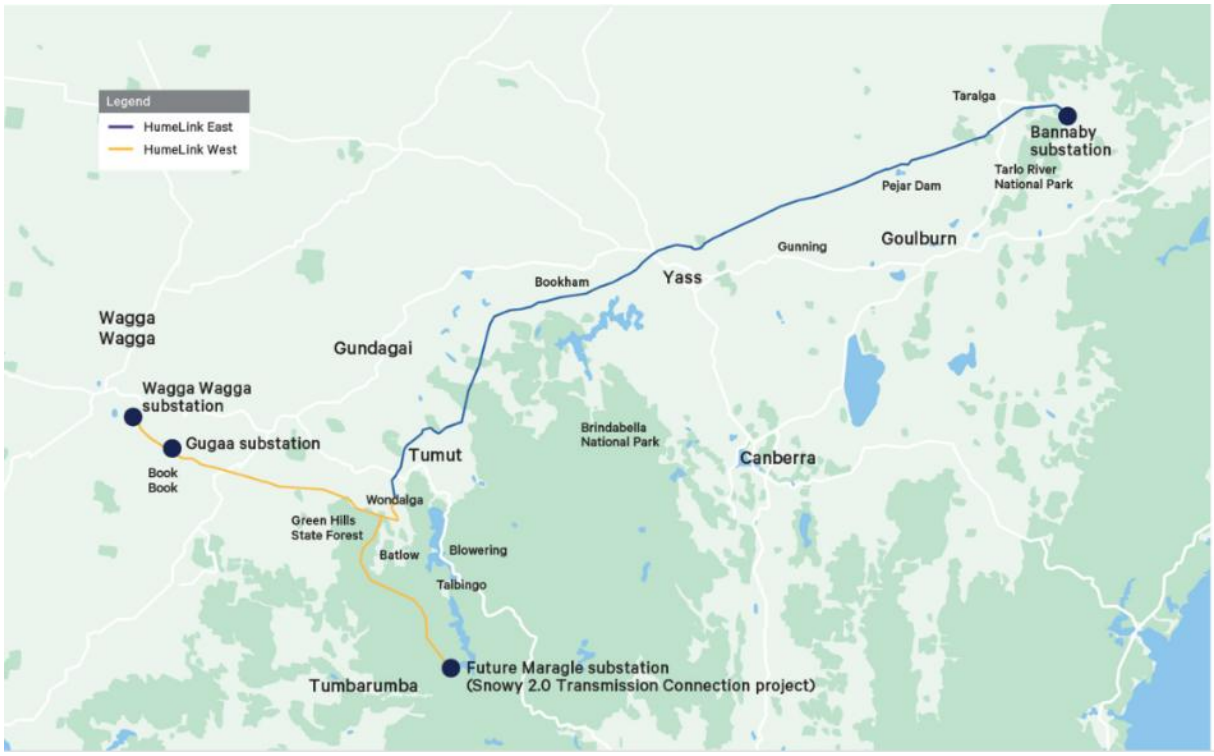


Figure 1-1: Humelink project – general alignment (source: Transgrid)

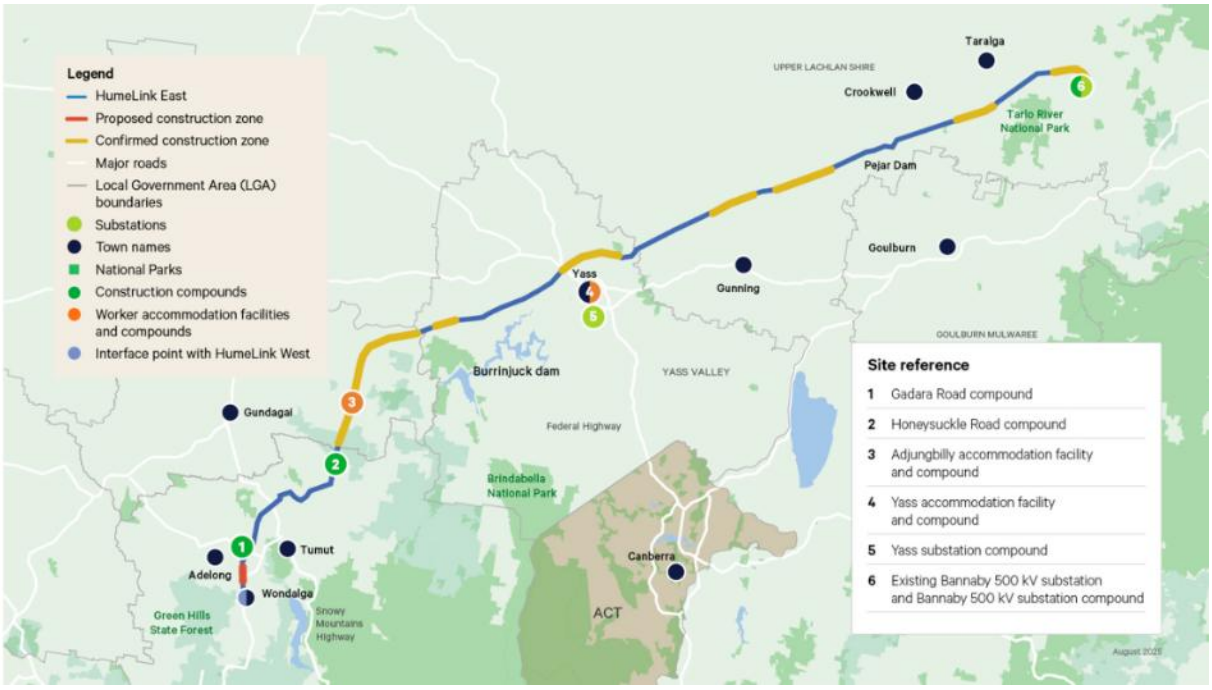


Figure 1-2: Humelink East – key features and extent (source: Transgrid)

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 (Table 1-2). 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: • HumeLink independent environmental audit • 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 Mining: Maules Creek Continuation Project • 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 *Independent Audit Post Approval Requirements* (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

Condition Reference	Condition
	(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 *Prasophyllum bagoense*, *Prasophyllum keltonni* and *Pterostylis oreophila* as mapped in the BDAR.
B26	Biodiversity Offset Package 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: (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. Following the Planning Secretary's approval, the Proponent must implement and deliver the Biodiversity Offset Package.
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.
B28	Supplementary Biodiversity Strategy 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: (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; (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:

Condition Reference	Condition
	(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; (ii) surveys for the following serious and irreversible impact (SAII) entities: • *Prasophyllum bagoense* • *Grevillea iaspicula* • *Pterostylis oreophila* • *Pomaderris pallida* • *Caladenia concolor* • *Mixophyes balbus* • *Genoplesium superburn* • *Prasophyllum keltonii* • *Pomaderris delicatat* • *Bossiae fragrans* • *Litoria castanea* • *Eucalyptus robertsonii* subsp, *hemisphaerica* • *Prasophyllum innubum* • *Solanum armourense* • *Grevillea wilkinsonii* • *Calotis glandulosa* • *Chalinolobus dwyeri* • *Pseudomy fumeus* • *Tyto tenebricosa* • *Pimelea bracteata*
B29	**Biodiversity Assessment Verification Report** 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: (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: (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

Condition Reference	Condition
	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. 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.
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 keltonni and Pterostylis oreophila; (vii) rehabilitating temporary disturbance areas to facilitate natural regeneration of suitable native species;

Condition Reference	Condition
	(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 (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 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. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan. Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67."

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.

This is the second audit. The Audit period is from the site inspection for Audit 1 (11 February 2026) to the date of the site inspection for this audit (19 August 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 and Commonwealth DCCEEW. No response was received during the audit period.

2.3 Summary of the audit process

The audit process involved the following steps

- Opening meeting
- Site inspection, noting environmental practices and controls
- Audit interview
- 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 19-20 August 2026 with representatives of Acciona and Genus Joint Venture (AGJV) and Transgrid.

The site inspection on 19 August 2026 included:

- review of material in the office, including:
  - an overview of the proposed schedule for the site inspection,
  - unexpected find of the Pink-tailed Legless Lizard (*Aprasia parapulchella*) at YG-030 to YG-039, and
  - management of the Yass Daisy (*Ammobium craspeoides*) at YG-020.
- inspection of property YG-031 where an unexpected find of the Pink-tailed Legless Lizard (*Aprasia parapulchella*) had occurred and the unexpected finds procedure had been implemented,

- inspection of property YG-020 where the Yass Daisy (*Ammobium craspeoides*) had been recorded during pre-clearing surveys and thus the controls set out in Section 2.4 of the *Vegetation Clearing Procedure* (Appendix B of the Biodiversity Management Plan (BMP)) were being implemented,
- inspection of BY-130-19, including:
  - a waterway crossing at Manton Creek, where the design had required some upgrade due to the initial design being unsuitable for the creek flows,
  - PAD14 where partial clearing was scheduled to commence the next day, including a hand-clearing zone, and clearing controls had been established, and
- inspection of Pull20 and PAD198 in BY-130-09 where partial clearing had been undertaken and a monitoring plot had been established to monitor vegetation condition against the assumptions in the BDAR, as required by Section 3 of the *Flora and Fauna Monitoring Program* (Appendix H of the BMP).

The site inspection on 20 August 2026 included:

- review of material in the office, including:
  - partial clearing at PAD33,
  - total clearing in BY-056, including in steep and challenging terrain,
  - a waterway crossing at Melamalong Creek,
- inspection of PAD34 and Pull3 in BY-019 where clearing was underway and being supervised by project Ecologists,
- inspection of PAD75-77 in BY-052 where total clearing had been completed adjacent to a connectivity corridor and BY-054 where nest boxes had been installed, and
- inspection of a waterway crossing over Melamalong Creek in BY-057 where crossing was required over a braided floodplain with multiple channels.

Contrary to Audit 1, during this audit partial clearing of the easement clearing zone (ECZ) had commenced and the auditor was able to review the processes being implemented.

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

Table 2-1: Site inspection – key observations

Aspect	Observations	Photo reference (Appendix A)
YG-031		
Unexpected find of Pink-tailed Legless-lizard	During the 24-hours pre-clearing surveys on 5 June 2026, the Pink-tailed Legless-lizard was recorded in YG-029 to YG-034 and classified as an unexpected find. During the site inspection, the Environment Manager advised that the following process was put in place: • A stop work was put in place via email (5 June 2026).	Photo 2 to Photo 11

Aspect	Observations	Photo reference (Appendix A)
	• Project Ecologists were engaged to undertake a survey of the area. This survey identified additional animals with suitable rocky habitat on mid to upper slopes. • Identified habitat was buffered by 50 m, with the area flagged off using bunting. • As the Project Ecologists did not identify suitable habitat on lower slopes, this area was re-opened and works continued. • An unexpected finds report was prepared and provided to CPHR. This procedure outlined controls to be implemented, including a relocation plan with release sites identified adjacent to the clearing area. This plan has been endorsed by CPHR. Evidence of surveys (rocks rolled over) was observed during the site inspection. The grader driver present on site was also aware of the presence of a lizard and advised that this had been identified in the pre-start. The unexpected finds procedure had been implemented well, with suitable control put in place to manage the species. The species-specific controls outlined in the BMP had been implemented and a relocation plan devised and endorsed by CPHR.	
YG-020		
Unexpected find of Yass Daisy	During pre-clearing surveys at YG-020, the Yass Daisy was recorded outside the species polygon mapped in the BDAR (Niche, 2024) and the Biodiversity Assessment Verification Report (BAVR) (Niche, 2025), including areas designated for both TCZ and ECZ clearing. New records were buffered by 30 m. However, review of the pre-clearing report for YG-020 indicates this buffer appears not to have been applied to all new records. During the site inspection, implementation of controls outlined in Table 2, Section 2.4 of the *Vegetation Clearing Procedure* (Appendix B of the BMP) was observed, with exclusion fencing and signage installed along the edge of the TCZ boundary. It was identified during the site inspection that a ~50 m wide area had been fenced for the TCZ, compared to a 6-15 m wide as-built disturbance area. This indicates that further mitigation was feasible by reducing the construction corridor and fencing of this reduced corridor. The Environmental Manager advised that partial clearing of the ECZ would be restricted and completed using hand-clearing within the Yass Daisy species polygon, with retention of mid-storey and groundcover vegetation. Overall, the species-specific controls outlined in the BMP were observed to be well implemented. Recommendations: • Ensure appropriate buffers are applied to all records of unexpected finds and mitigation measures are implemented accordingly.	Photo 13 to Photo 20

Aspect	Observations	Photo reference (Appendix A)
	• Where feasible, to help manage unexpected finds or species requiring specific mitigation measures, reduce the width of the construction corridor and ensure exclusion fencing is installed along this reduced area.	
Drainage culvert	A crossing of a 1st order waterway was observed along the access track between Towers 283 and 284 using a single pipe. This had been well constructed with flow through the pipe. However, minor erosion was observed at the downstream extent following recent rains. When raised with the Environment team the auditor was advised that there was an action in Lucidity to rectify this with evidence provided following the audit. The Environmental team advised that culverts are inspected weekly or following a rainfall event.	Photo 21 to Photo 22
Rocky habitat	During the site inspection, the auditor observed that rocky habitat had been identified and then fenced to ensure adequate protection.	Photo 23
BY-130-19		
Waterway crossing at Mantons Creek	A waterway crossing had been constructed through a highly incised, 2nd order section of Mantons Creek. The Environment team advised that an aquatic assessment was not undertaken as this waterway was not identified as Class 1 fish habitat. It is noted that the pre-clearing report for BY-130-19 identifies Class 1 key fish habitat in Mantons Creek and states that a Pre-construction Aquatic Habitat Survey Report had been prepared by East Coast Ecology. As such, the additional controls outlined at UMM B33 would have been required to be implemented, including a bridge structure and consultation with DPI Fisheries. It is noted that Mantons Creek is not identified in Section 7.8 of the BMP as Class 1 key fish habitat. Review of the BDAR and the pre-clearing report for BY-130-19 identifies that the waterway crossing was proposed for construction further downstream, in a cleared section of the creek Following high rainfall approximately 2 months prior to the site inspection, the initial waterway crossing was washed away. There was evidence of this, with road base observed in the downstream section of the waterway below the crossing point. Subsequently, the waterway crossing had been upgraded with increased rock armouring and a dual culvert design. The culverts were observed to be perched approximately 30-40 cm above bed level at the downstream extent of the crossing, limiting fish passage during low flow conditions. At the upstream extent, culverts were found to be partially blocked by woody debris, even though the crossing had been recently constructed. This may cause a blockage issue long-term and inspection and maintenance may be required. Recommendations: • Ensure adequate aquatic assessment is undertaken for all Class 1 key fish habitat.	Photo 24 to Photo 29

Aspect	Observations	Photo reference (Appendix A)
	• Confirm whether Mantons Creek provides Class 1 key fish habitat. If so, advise why the controls listed in UMM B33 were not implemented • Ensure that culverts are placed at bed level at the upstream and downstream extent of the crossing to maintain fish passage across all flow conditions. • Review whether an inspection and maintenance regime for waterway crossings is required to ensure crossings don't become blocked and flows are maintained.	
Nest box installation	A nest box had been installed within riparian vegetation along Mantons Creek.	Photo 30
Sediment controls	Sediment controls, incorporating double sediment fencing, had been installed around a brake and winch site north-west of Tower 214. These sediment controls were generally well installed, but some maintenance was required. Batter slopes were found to have not been sprayed with polymer to help minimise erosion. This is a matter for the Lead Auditor. Recommendations: • Review need to stabilise batter slopes with polymer.	Photo 31
Partial clearing scheduled in the Easement Clearing Zone	The ECZ south-west of Tower 214 was inspected. Partial clearing of this area was scheduled to commence the following day. Clearing controls were observed to be well implemented, with clear definition of clearing boundaries using bunting and signage, clear definition of the single-use access track and marking of habitat features. The controls included designation of a hand-clearing zone required due to a record of the Hoary Sunray in this area. Review of the pre-clearing report for BY-130-19 indicates that while this record is identified the report requirements for hand-clearing on this area are not. This ECZ clearing area will be subject to monitoring of partial clearing in accordance with the *Flora and Fauna Monitoring Program* (Appendix H to the BMP), with the BAM plot clearly marked out and signage observed. The Environment team identified that a pre-start briefing of all contractors would take place prior to clearing. The clearing controls required by the BMP were well implemented and clear. Appropriate controls were in place to minimise impacts during clearing works. Recommendations: • Ensure mitigation measures required by the BMP, such as hand-clearing, are clearly outlined in the pre-clearing reports.	Photo 32 to Photo 40
Construction on steep slopes	The pad for Tower 214 was inspected. This pad has been constructed on steep slopes.	Photo 41

Aspect	Observations	Photo reference (Appendix A)
BY-130-09		
Access controls	During the site inspection of BY-130-09, positive access controls were observed to be in place. A side access track, which did not form part of approved access for the project, was found to be clearly fenced off with bunting.	Photo 42
Partial clearing completed in the Easement Clearing Zone	Partial clearing of the ECZ had recently been undertaken within BY-130-09. Access to the ECZ was clearly marked with bunting, clearly identifying clearing limits. The centreline of the ECZ was found to be heavily disturbed due to tracking of machinery, with adjacent areas less heavily disturbed. The next audit should review recovery of these areas. Logs and woody debris were found to be stored within the ECZ for later removal. The potential for these log piles to create secondary habitat following clearing was raised. The Environment team advised that these areas were considered ground habitat and that supervision of the removal of these piles by project Ecologists was required. However, it is unclear how this is captured in the clearing permit system to ensure this is not inadvertently missed. Clearing of trees in the ECZ had been minimised through further analysis of LiDAR data and in conjunction with an Arborist. This process results in a reduction in the extent of partial clearing compared with what was proposed in the FLPs. This provides evidence of the application of Condition A1 of the Infrastructure Approval to minimise harm to the environment. A BAM plot has been established to monitor partial clearing areas and verify the assumptions of the BDAR (Niche, 2024) around impacts arising from partial clearing. It was noted that the BAM plot was located in an area where partial clearing had been avoided. Given this area is no longer subject to partial clearing, there is potential for the monitoring of this plot to inadvertently elevate scores. Locating monitoring plots in areas which will not be subject to partial clearing may not best represent the outcomes arising from partial clearing. Recommendations: • Review the procedure for removal of log piles to ensure inadvertent impacts do not occur. • Review the location of BAM monitoring plots to ensure they are representative of partial clearing.	Photo 43 to Photo 56
Total Clearing Zone work	TCZ clearing along the access track between Towers 197 and 198 and the pad of Tower 198 were inspected. The tower at pad 198 had been constructed. No issues were identified.	Photo 57 to Photo 60
BY-019		
Log storage	During the site inspection, a large log pile was observed to have been deposited west of Tower 34. The Environment team advised that the location of the log pile had been designated by the landowner under a	Photo 61

Aspect	Observations	Photo reference (Appendix A)
	Timber Acceptance Form, and that stockpile locations are generally identified as PCT 0 and near a clearing zone. Review of the mapping from the BDAR (Niche, 2024) appears to indicate that the log pile is stored in an area mapped as PCT 1097: Ribbon Gum - Narrow-leaved Peppermint grassy open forest on basalt plateaux, Sydney Basin Bioregion and South Eastern Highlands Bioregion in very low condition. This PCT forms part of the Tableland Basalt Forest threatened ecological community. Recommendations: • Review how log stockpile locations are identified and ensure inadvertent and unintended impacts to biodiversity values are not occurring.	
Partial clearing works in the Easement Clearing Zone	Partial clearing of the ECZ was underway at the time of the site inspection in BY-019 between Towers 34 and 35. The Easement Clearing and Land Disturbance Permit was readily available at the site office and was reviewed as a part of the audit. Daily Ecologist's and Arborist's checklists were also provided. A review of the Environmental Control Maps indicates potential for confusion with 'Threatened Flora', Flora Species Polygons' and Connectivity Corridor 10 m Buffer (20 m width)' using similar colours. Marking of the clearing boundaries was evident, with boundaries marked using bunting and signage. Evidence of clearing controls was also in place, with habitat features clearly marked. As was found in BY-130-09, the centreline of the ECZ was found to be heavily disturbed due to tracking of machinery, with clear ground disturbance due to the slope. Clearing works were being undertaken using a forest harvester and were being supervised by project Ecologists. During clearing works, a habitat tree had been felled with a hollow found to be occupied by a Common Brushtail Possum. The project Ecologists were implementing suitable controls as per the *Vegetation Clearing Procedure* (Appendix B of the BMP) and attempting to capture the animal to ensure relocation to a suitable area which would not be cleared later. The plant operator was asked to show the clearing limits loaded into survey-grade GPS. However, the operator was unable to do so due to a lack of signal allowing data access. Further, the operator appeared to be using a mobile device with non-survey-grade accuracy. As found on other parts of the HLE project, clearing boundaries are well established and delineated, and clearing controls are being implemented as per the BMP. However, redundant controls were not found to be in place and there is potential for inadvertent clearing to occur outside the clearing limits. Recommendations: • Review colours used in the Environmental Control Maps to ensure adequate contrast to avoid confusion between controls.	Photo 62 to Photo 76

Aspect	Observations	Photo reference (Appendix A)
	• Ensure all plant operators have access to the clearing limits loaded into survey-grade GPS to ensure inadvertent clearing outside limits does not occur.	
Batter slopes on pad of Tower 74	The site inspection reviewed the batter slopes of Tower 74. The majority of boundary marking was still in place. Batter slopes had not been stabilised using polymer spray, and minor erosion of the slopes was evident. Weeds had started to colonise batter slopes.	Photo 77 to Photo 82
Biosecurity controls	A biosecurity point and washdown bay had been established on the pad of Tower 34, with the Environment team indicating this was a washdown bay for frog pathogens implemented as a part of the Property Management Plan. During the site inspection, a water cart was observed to drive straight past the washdown bay without implementing controls. It is unclear whether this vehicle was traversing within the same property, and did not require washdown, or was leaving the property, and was required to implement controls. On review, no log of use of the washdown bay had been implemented, with the Environment team relying on inductions and goodwill of all project personnel to implement controls. Use of washdown stations cannot be audited due to a lack of suitable records. Weeds had started to appear on the batter slopes of Tower 24 following clearing. The Environment team advised that a program of works was about to be commenced to manage weeds, with priority areas for management identified during the closeout process. Recommendations: • Ensure controls are implemented to identify who is using washdown bays and the frequency of use to ensure project personnel are implementing biosecurity controls in accordance with the *Biosecurity Management Plan* (Appendix D of the BMP) and Property Management Plans.	Photo 83 to Photo 87
BY-052 and BY-054		
Completion of TCZ works at Tower 75	TCZ works have been completed at Tower 75 and the closeout process undertaken. The Closeout checklist was reviewed, and follow-up actions were found to have been implemented, except for stabilisation of batter slopes with polymer spray. The Environment team advised that due to a breakdown of equipment, the polymer spray unit had not been available. This is a matter for the Lead Auditor. As was found in Audit 1, the use of coarse woody debris was very effective at erosion and sediment control. In areas where coarse woody debris had not been used for erosion and sediment control, batter slopes had eroded following recent heavy rain, and erosion had resulted in minor impacts to adjacent vegetation, including retained vegetation. This had been reviewed, and the project Ecologists advised that remediation would result in further damage to native vegetation.	Photo 88 to Photo 100

Aspect	Observations	Photo reference (Appendix A)
	Minor erosion of access tracks and pads was observed broadly across the project during the site inspection, with inadvertent impacts to biodiversity values, highlighting the importance of rapid stabilisation of slopes following works. Review of clearing boundaries indicated there may be some stockpiling of material outside the clearing boundaries. Recommendations: • Review need for more rapid stabilisation of batter slopes following completion of works. • Review feasibility of redistributing coarse woody debris from upper slopes above Tower 75 to lower slopes to stop erosion into retained vegetation. • Given the effectiveness of this technique, review use of coarse woody debris as a part of erosion and sediment controls across all clearing works. • Ensure clearing limits are clearly flagged and all impacts, including stockpiling of material and deposition of coarse woody debris, are retained within clearing limits.	
Nest box installation	A nest box installation area was visited, with several hollows installed using the Hollow Hog.	Photo 101 to Photo 102
BY-057		
Waterway crossing over Melamalong Creek	Several waterway crossings had been constructed over a braided waterway system associated with Melamalong Creek, including over two 2nd order tributaries of Melamalong Creek and across the 3rd order section of Melamalong Creek. The Environment team advised that an aquatic assessment was not undertaken as this waterway was not identified as Class 1 fish habitat. This is consistent with the BMP and the pre-clearing report. The Environment team advised that the crossing of the first waterway, an unnamed tributary of Melamalong Creek, involved an upgrade to an existing bed level crossing. The waterway crossing had resulted in filling of the waterway with road base, impeding water flows. No culvert had been installed, resulting in ponding of water upstream of the crossing. This may require rectification works to ensure water flow along this waterway, noting it is not key fish habitat. The second crossing of an unnamed tributary of Melamalong Creek was also an upgrade to an existing bed level crossing. Construction of the upgraded crossing had resulted in raising of the crossing above bed level by around 40-50 cm. This was resulting in ponding of water upstream of the crossing point. Vegetation along all waterways, between the crossing points is identified in the BDAR (Niche, 2024) as part of the Montane Peatlands and Swamps threatened ecological community. This community can be sensitive to inundation. This crossing is also in key fish habitat. Rectification works are likely to be required to ensure the crossing is bed level and allows unimpeded flows.	Photo 103 to Photo 114

Aspect	Observations	Photo reference (Appendix A)
	The crossing of Melamalong Creek itself was generally well constructed, with the crossing at bed level with signs of flows over the crossing point. Recommendations: • Review a requirement for rectification works to be undertaken at the first crossing point (see Photo 103) to install a culvert under the crossing to maintain flows. • Undertake rectification works at the second crossing point to ensure the crossing is bed level and results in unimpeded flows. • Ensure bed level crossings are constructed at bed level on the upstream and downstream extents, allowing for unimpeded flows and that they do not result in ponding upstream of the crossing.	

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 20 August 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
Andrew Robertson	AGJV	Environmental Manager, North
Isaac Walsh	AGJV	Environmental Coordinator, North
Jack Brennan	AGJV	Environmental Advisor, North
Huw Rabone	AGJV	Environmental Manager, Central
Daniel O'Hearn	AGJV	Senior Environmental Advisor, Central
Andre Schmidt	AGJV	Environmental Graduate, Central
Mira Segaran	AGJV	Environmental Coordinator, HumeLink East
Michael Moroney	Transgrid	Senior Environmental Business Partner | Major Projects
Sam Hudson	Transgrid	Biodiversity Business Partner | Major Projects

An additional and separate audit interview was held with Transgrid (Peter Monsted, Sam Hudson and Shani Walton) on 31 August 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).

A full list of documents is provided in the audit table (Table C.1 in Appendix C).

2.8 Compliance descriptions

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 24 September 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
Huw Rabone	AGJV	Environmental Manager, Central
Amy-Lee Conroy	AGJV	Environmental Manager, South
Andrew Robertson	AGJV	Environmental Manager, North
Sam Pathammavong	Transgrid	Environment and Sustainability Manager | Major Projects
Michael Moroney	Transgrid	Senior Environmental Business Partner | Major Projects
Shani Walton	Transgrid	Senior Environmental Approvals Coordinator | Major Projects
Priya Murthy	Transgrid	Environmental Business Partner Major Projects

Name	Organisation	Role
Richard Peterson	Trigalana Environment	Lead Auditor

3 Audit findings1

3.1 Compliance performance

A summary of compliance performance is provided in Table 3-1. During this audit period, there were no reportable non-compliances related to biodiversity. There was one non-compliance in relation to B29 which was reported by Transgrid to DPHI in accordance with Condition C11 of the Infrastructure Approval. There were four non-conformances (non-reportable) related to biodiversity; these are discussed as observations. Twelve recommendations have been made. Both the non-compliance, observations 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	Non-compliant (NC)
B30	Biodiversity Management Plan	Compliant (C)
C8	Final Layout Plans	Compliant (C)

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

Unique ID	Condition(s)	Auditor observations	Recommendation
Non-compliances			
HLE-NC-10	B29	The revised BAVR was due on 30 April 2026. Due to delays with finalising the FLPs and associated clearing, on 17 April 2026 Transgrid submitted an application for an extension to the due date for the revised BAVR. This application was approved by DPHI on 12 June 2026. The application for an extension to the due date was submitted prior to the due date, but approval was not granted until after the due date. This represents an administrative non-compliance with Condition B29 of the Infrastructure Approval. This was reported by Transgrid as a non-compliance on 8 May 2026 in accordance with Condition C11 of the Infrastructure Approval.	A revised BAVR is required to be submitted by 20 November 2026.
Observations and recommendations			
HLE-Obs-17 (No Lucidity ID)	B30	Clearing was undertaken at BY-130-19 on a weekend without supervision by the Ecologist. Clearing included areas with habitat features identified. This occurred as the site foreman failed to re-review the Clearing and Land Disturbance Permit (CLDP). This was considered a non-conformance (non-reportable) by AGJV.	Reaffirm the requirement for site forepersons to review the CLDP prior to commencement of works. Ensure teams understand the constraints in the CLDP prior to signing. Reaffirm the requirement to have project Ecologists present during any clearing works.
HLE-Obs-18 (Lucidity ID 48599)	B30	During clearing works at BY-026, a Wombat burrow was cleared without supervision of project Ecologists. This was considered a non-conformance (non-reportable) by AGJV.	
HLE-Obs-19 (Lucidity ID 49067)	B30	During clearing works within BY-069, a rock garden was cleared in BY-069 without supervision of project Ecologists. This was considered a non-conformance (non-reportable) by AGJV.	
HLE-Obs-20	B30	Clearing occurred outside the CLDP area due to the placement of felled trees. This was considered a non-conformance (non-reportable) by AGJV.	The HLE project should review where log stockpiles are placed during clearing. Where stockpiles are to later be mulched and/or removed, they must be placed

Unique ID	Condition(s)	Auditor observations	Recommendation
(Lucidity ID 48197)			within TCZ clearing limits or be accounted for during CLDPs. Where timber is to be provided for re-use by landowners, storage of timber should not result in unintended impacts to biodiversity values. During Audit 2, AGJV identified opportunities for improvement in the landowner timber acceptance process, including identifying that landowner timber stockpiles are not placed in areas of biodiversity value.
HLE-Obs-21	A1 – Obligation to minimise harm to the environment	Constraints mapped (Appendix J of the BMP) is used to define micrositing efforts and assess any design changes. Following changes to the FLPs for HLE and approval of revised clearing limits, updates to the BAVR are required. This will trigger updates to the BMP. This should include updates to constraints mapping.	Ensure updates to the BMP (required under Condition B29 of the Infrastructure Approval following updates to the BAVR) incorporate updated constraints mapping which reflects the FLPs and updated BAVR mapping. AGJV have advised that this action is captured within the planned BAVR and BMP update process.
HLE-Obs-22	B22 – Riparian areas	The site inspection identified that: • the culverts installed in the waterway crossing at Mantons Creek were perched at the downstream end, limiting fish passage during low flow conditions, • an aquatic assessment of Class 1 fish habitat was not undertaken at Melamalong Creek, • no culvert had been installed in a waterway crossing of a tributary of Melamalong Creek, impeding flow, and	Ensure adequate aquatic assessment is undertaken for all Class 1 key fish habitat. Ensure waterway crossings are constructed to avoid becoming perched at the upstream or downstream end. Ensure bed level crossings are constructed at bed level on the upstream and downstream extents, allowing for

Unique ID	Condition(s)	Auditor observations	Recommendation
		• the bed level waterway crossings at Melamalong Creek were raised above bed level, impeding flow and resulting in ponding of water..	unimpeded flows and that they do not result in ponding upstream of the crossing. Rectification works may be required at Melamalong Creek, including: • installation of a culvert in the first waterway crossing, and • reconstruction of the second waterway crossing to ensure the crossing is at bed level. Other waterway crossings should be reviewed. Consider long-term inspection and maintenance requirements to ensure waterway crossings do not become obstructed.
HLE-Obs-23	B25 – Clearing limits	The Clearing Limits Tracking Dashboard provided during the audits does not separate full and partial clearing, as required by Condition B25 of the Infrastructure Approval for native vegetation. The Clearing Limits Tracking Dashboard does not predict future clearing required by the uncleared portions of the FLP, with potential for exceedances of clearing limits to inadvertently occur in future. Following approval of revised clearing limits, this dashboard will require updating to reflect revised clearing limits.	The Clearing Limits Tracking Dashboard is updated to allow tracking of full and partial clearing to ensure alignment with the revised clearing limits as approved by DPHI. This recommendation has been adopted and the Clearing Limits Tracking Dashboard has been updated. The Clearing Limits Tracking Dashboard is updated to allow for future clearing to ensure potential exceedances are identified early, or an alternative process is put in place to ensure exceedances of clearing limits do not inadvertently occur.

Unique ID	Condition(s)	Auditor observations	Recommendation
HLE-Obs-24	B26 – BOP	Transgrid has flagged their intent to enter into a Strategic Offset Delivery Agreement (SODA) after all other measures have been exhausted and is currently finalising negotiations with DCCEEW. A modification to the Infrastructure Approval is required to enable a SODA between Transgrid and NSW DCCEEW.	Include the intent to enter into a SODA in the updated BOP.
HLE-Obs-25	B29 – BAVR	Audit 1 found that the recommendations in Section 9 of the BAVR do not include targeted measures for avoidance based on the findings of the BAVR, as required by Condition B29 (d(ii)) of the Infrastructure Approval. Some species have been recorded during the SBS outside species polygons identified in the Revised BDAR (Niche, 2024). These species, such as the Squirrel Glider, were not reported in the BAVR as they were not targeted species. Pre-clearing surveys can identify species outside the species polygon but within the known range of the species. Transgrid has advised AGJV that these are not unexpected finds. It is unclear how these species are to be treated with regard to updates to the BAVR, clearing limits and offset requirements.	Section 9 of the revised BAVR, due on 20 November 2026, should include targeted measures for avoidance based on the findings of the BAVR, as required by Condition B29 (d(ii)) of the Infrastructure Approval. Ensure the BAVR incorporates all results of the SBS, particularly where species were recorded outside of species polygons in the Revised BDAR. Confirm how records of threatened species outside the species polygon but which are not defined as unexpected finds are to be treated as part of the updates to the BAVR.
HLE-Obs-26	B30 – BMP	The initial BMP was prepared by suitably qualified and experienced persons. However, updates to the BMP have been undertaken by members of the Environment team at AGJV. It is unclear whether these amendments fulfil the requirement under Condition B30(a) of the Infrastructure Approval. Condition B30 (d(xiii)) of the Infrastructure Approval requires identification of specific measures to minimise impacts on entities at risk of SAII. The HLE BMP states this is included in Sections 7.3 and 7.6; however, these mitigation measures are general in nature and are considered insufficient to address the requirements of the condition.	Ensure amendments to the BMP, other than routine administrative and implementation updates, are prepared by or reviewed and endorsed by suitably qualified and experienced biodiversity experts, as required by Condition B30(a) of the Infrastructure Approval. Updates to the HLE BMP following submission of the revised BAVR should incorporate the specific measures to

Unique ID	Condition(s)	Auditor observations	Recommendation
			minimise impacts on entities at risk of SAII, as required by Condition B30 (d(xiii)) of the Infrastructure Approval.
HLE-Obs-27	B30 – Unexpected finds	The site inspection and review of documentation in this audit identified that not all records of unexpected finds of the Yass Daisy at YG-020 were buffered by 30 m in the Pre-clearing Report. The site inspection also identified that fencing of exclusion zones had occurred across a wider area of ~50 m than was required for construction of the access track. There is an opportunity to minimise impacts to threatened species by reviewing requirements for construction and ensuring fencing is brought in to the smallest possible area.	Ensure appropriate buffers are applied to all records of unexpected finds and mitigation measures are implemented accordingly. Where feasible, to help manage unexpected finds or species requiring specific mitigation measures, reduce the width of the construction corridor and ensure exclusion fencing is installed along this reduced area. This recommendation has been adopted and implemented for YG-020.
HLE-Obs-28	B30 – Erosion and sediment control	During the site inspection, numerous areas of erosion were observed across the project area following recent heavy rains, with minor impacts to biodiversity values. An example is provided in Table 2-1 for Towers 74 and 75. Erosion controls were observed to be inconsistently applied across the project. Where applied, use of coarse woody debris at the base of batter slopes was found to be most effective at controlling erosion following rainfall. In some areas this was not installed, and sediment fencing was used. In other areas, no sediment control measures were installed. Slope stabilisation had not occurred in a number of areas due to a breakdown of the polymer spraying unit.	Review need to stabilise batter slopes with polymer as soon as possible following construction. Given the effectiveness of the use of coarse woody debris as a part of erosion and sediment controls, review potential for broader use of this technique across all clearing works. Following the audit, slope stabilisation works have been completed at Tower 75.
HLE-Obs-29	B30 – Vegetation	Review of pre-clearing reports, where species requiring implementation of specific mitigation measures outlined in Section 2.4 and 2.5 of the Vegetation Clearing Procedure (Appendix B of the BMP) had been identified, did not make clear	Ensure mitigation measures required by the BMP, such as hand-clearing, are clearly outlined in the pre-clearing reports.

Unique ID	Condition(s)	Auditor observations	Recommendation
	clearing procedures	recommendations on how these mitigation measures should be implemented. There is potential for project teams to fail to implement these measures if they are not clearly outlined. Review of the Environmental Control Maps identified that similar colours are used in the legend of these maps, with potential for confusion by project teams in how the maps should be implemented. During Audit 1, the auditor was advised that plant operators had the clearing limits loaded into survey grade GPS to ensure inadvertent clearing outside the clearing limits did not occur. This was also a recommendation of Audit 1 (see HLE-NC-01). During the site inspection, a plant operator was found not to have access to the clearing limits due to a lack of data access. Further, the plant operator was relying on a mobile device with non-survey grade accuracy. This is somewhat mitigated by clear definition of clearing boundaries using bunting and signage, but the lack of redundant controls diminishes the effectiveness of the Swiss cheese model of risk mitigation discussed during the site inspection.	Review colours used in the Environmental Control Maps to ensure adequate contrast to avoid confusion between controls. Ensure all plant operators have access to the clearing limits loaded into survey-grade GPS to ensure inadvertent clearing outside limits does not occur.
HLE-Obs-30	B25 – Clearing limits B30 – Vegetation Clearing	During clearing works, logs and coarse woody debris are stockpiled for: • use by the landowner (where requested), or • for mulching at a later stage. Where logs are to be used by the landowner, the location of log stockpiles is identified in consultation with the landowner via a Timber Acceptance Form, with the location for stockpiles identified in this agreement. The location of log stockpiles has the potential to result in inadvertent impacts on biodiversity values (see HLE-Obs-20, Lucidity ID 48197 above). Further, in some instances stockpiling of material is occurring outside the clearing limits. This stockpiling of material can also create secondary habitat with animals recolonising this habitat post the initial clearing event. Later disturbance of these stockpiles could result in inadvertent impacts to animals if they have relocated into these stockpiles. The Environment team advised that the disturbance of these stockpiles required	Ensure clearing limits are clearly flagged and all impacts, including stockpiling of material and deposition of coarse woody debris, are retained within clearing limits. Review how log stockpile locations are identified in the Timber Acceptance Form and ensure PCT mapping is included in the agreement, and that log stockpiles are placed in areas of PCT 0 to ensure inadvertent and unintended impacts to biodiversity values are not occurring. Review the procedure for removal of log piles to ensure inadvertent impacts do not occur.

Unique ID	Condition(s)	Auditor observations	Recommendation
		supervision of the project Ecologists, but the process for ensuring this occurs is not clear.	During Audit 2, AGJV identified opportunities for improvement in the landowner timber acceptance process, including identifying that landowner timber stockpiles are not placed in areas of biodiversity value.
HLE-Obs-31	B30 – Flora and fauna monitoring	AGJV have undertaken further analysis of partial clearing area in the ECZ using LiDAR and input from project Arborists, to reduce clearing in the ECZ. This is commendable and demonstrates minimisation of harm to the environment in accordance with Condition A1 of the Infrastructure Approval. However, some BAM plots are located within areas which will no longer be cleared. There is potential that the location of these plots will misrepresent the outcomes which are achieved by partial clearing with regards to future vegetation integrity scores.	Review the location of BAM monitoring plots to ensure they are representative of partial clearing.
HLE-Obs-32	B30 - Biosecurity	During the site inspection, it was identified that the use of washdown bays as required by the Biosecurity Management Plan (Appendix D of the BMP) and Property Management Plans cannot be reviewed to ensure compliance. No usage log or auditable mechanism is in place to ensure usage.	Ensure controls are implemented to identify who is using washdown bays and the frequency of use to ensure project personnel are implementing biosecurity controls in accordance with the Biosecurity Management Plan (Appendix D of the BMP) and Property Management Plans. This recommendation has been adopted and implemented with evidence provided following the audit.

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 Auditor's report outlines several non-compliances and observations which are unrelated to biodiversity.

Four incidents, assessed by AGJV as non-conformance (non-reportable) incidents, were recorded in the Humelink East Incidents & NCR Register (see Table 3-2).

3.4 Status of recommendations from previous Audits

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

Table 3-3: Recommendations from previous audits and current status

Unique ID	Condition(s)	Recommendation	Current status
Non-Compliances			
HLE-NC-01	A2(d)/B30	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. 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. AGJV should review use of flagging to determine whether this is appropriate and easily observed by all 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. The impacts should be incorporated into the updates to condition B25 currently being sought by Transgrid.	Status – Open The site inspection for Audit 2 found this recommendation was not being consistently implemented: • A plant operator undertaking partial clearing within the ECZ at BY-109 did not have the clearing limits loaded into a device and was using a mobile device with non-survey grade accuracy. However, flagging of clearing limits was found to be significantly improved, with use of bunting across the majority of the project clearly delineating clearing limits.
HLE-NC-02	B64		
Observations and Recommendations			
HLE-Obs-06	A1	The BMP is updated to include revised constraints mapping.	Status – Open This is yet to be implemented. AGJV have advised that this be included in the updates to the BMP required by Condition B29 of the Infrastructure Approval following revisions to the BAVR.
HLE-Obs-07	B30 / Unexpected Finds Protocol	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.	Status – Open AGJV advised that the Unexpected Finds Procedure was updated in the latest revision of the BMP (Rev 02.2) to include a

Unique ID	Condition(s)	Recommendation	Current status
			process for reporting when an unexpected find is confirmed during pre-clearing surveys or any other survey. Whilst these changes make responsibilities clearer, the recommendation related to a potential unexpected find of the Striped Legless Lizard during pre-clearing surveys, which was recorded on a daily ecologist checklist, but no clear record of resolution of this was documented. The amendments to the BMP will not resolve this issue. It is recommended that a system be established requiring the project Ecologists to report potential unexpected finds to the Environment team, flagging these for resolution within a certain timeframe (e.g. 24 hours).
HLE-Obs-08	B30 / Vegetation Clearing Procedures	AGJV explore improved data sharing processes with their Project Ecologists to ensure consistent datasets are used.	**Status – Closed** AGJV advised that they now provide the ecologists with all data layers for pre-clearing surveys and reporting, ensuring both Ecologists and AGJV are using the same, correct design footprint. As a fail-safe, the pre-clearing survey area is checked against the permitted area to identify any possible discrepancies.
HLE-Obs-09	B30 / Vegetation Clearing Procedure / Biosecurity Management Plan	AGJV engage with CPHR with a view to simplifying baseline data collection for weed species. This could include: • 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.	**Status – Open** AGJV advised that the process for documenting weeds was amended in the latest revision of the BMP (Rev 02.2). A revised process for documenting weed species in pre-clearing reports for baseline monitoring was also included to ensure consistency between the Vegetation Clearing Procedure and the Biosecurity Management Plan. Review of this process indicates a more simplified process, but there is still a lack of nexus between weeds occurring at low densities, which project teams need to just be aware of, and

Unique ID	Condition(s)	Recommendation	Current status
			those occurring at higher densities, which will need to be managed during construction. Further amendments are recommended.
HLE-Obs-10	B30 / C8	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. 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.	**Status – Closed** AGJV advised that an investigation was undertaken into the observation made at Tower 55 during Audit 1. This investigation identified a post-rainfall ERSED maintenance action and determined it did not meet the criteria for non-compliance or an incident under the Project EMS, and confirmed it would be managed under the HLE SWMP, with no material harm identified.
HLE-Obs-11	B25	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, • 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.	**Status – Closed** Following Audit 2 this process has been revised with inclusion of partial and total clearing in the Clearing Tracking Dashboard (see Table 3-2).
HLE-Obs-12	B26	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.	**Status - Closed** Evidence of consultation with NSW Planning, Offsets, Threatened Species and Ecosystems (POTSE) and CPHR was provided after the submission of the previous audit report.
HLE-Obs-13	B30	Updates to the HLE BMP should include evidence of the date and timing for consultation with CPHR and the FCNSW. Include specific mitigation measures to be implemented for entities at risk of SAII.	**Status - Closed** A detailed consultation report has been provided indicating extensive consultation with both FCNSW and CPHR and an updated version of this consultation report was provided during Audit 2.

Unique ID	Condition(s)	Recommendation	Current status
HLE-Obs-14	B30	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: • Visual signage • Site inductions • EWMS/ECMS and Workpacks	**Status - Closed** The site inspection undertaken for Audit 2 identified consistent use of bunting to demarcate clearing limits with consistent signage used to indicate environmental protection zones, hand clearing areas and monitoring locations.

3.5 Stakeholder consultation outcomes

Stakeholder feedback was sought from the CPHR and Commonwealth DCCEEW. No response was received during the audit period.

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 in Table 3-2.

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

4 Actual versus predicted impacts

4.1 Predictions made by the EIS

Clearing limits set out in Condition B25 of the Infrastructure Approval have been revised following finalisation of the FLPs and submission of an application for revised clearing limits.

The application submitted by Transgrid for revised clearing limits outlines the changes to impacts predicted by the BDAR (Niche, 2024). This includes reductions in impacts to a number of species and communities, including:

- a reduction in clearing of native vegetation by around 47 ha (from 926.60 hectares to 879.18 hectares),
- a reduction in impacts to TECs listed under the EPBC Act by around 8.75 hectares (from 130.58 ha to 121.83 ha),
- a reduction in impacts to TECs listed under the BC Act by around 23.88 ha (from 490.38 ha to 466.50 ha),
- a reduction in impacts to 40 of 46 threatened flora species and reduction in overall impacts by 550 ha (from 1,494.04 ha to 944.52 ha),
- a reduction in impacts to 19 of 32 threatened fauna species and reduction in overall impacts by 537 ha (from 3,428.15 ha to 2,891.28 ha),
- a reduction in impacts to all SAII entities except for Delicate Pomaderris (*Pomaderris delicata*) and Pale Pomaderris (*Pomaderris pallida*), including:
  - 21.27 ha for Box Gum Woodland (from 477.04 ha to 455.77 ha),
  - 2.99 ha for Sooty Owl (*Tyto tenebricosa*) (from 68.81 ha to 65.82 ha),
  - 0.10 ha for Rice Flower (*Pimelea bracteata*) (from 4.76 ha to 4.66 ha), and

There will also be some increases in impacts for the following species:

- Bynoe's Wattle (*Acacia bynoeana*) by 0.24 ha (from 4.17 ha to 4.41 ha),
- Few-seeded Bossiaea (*Bossiaea oligosperma*) by 0.11 ha (from 2.42 ha to 2.53 ha),
- *Persoonia mollis* subsp. *revoluta* by 0.79 ha (from 1.37 ha to 2.16 ha),
- Cotoneaster Pomaderris (*Pomaderris cotoneaster*) by 0.56 ha (from 8.96 ha to 9.52 ha),
- Delicate Pomaderris (*Pomaderris delicata*) by 0.10 ha (from 1.37 ha to 1.47 ha),
- Pale Pomaderris (*Pomaderris pallida*) by 0.85 ha (from 1.17 ha to 2.02 ha,
- Pink-tailed Legless Lizard (*Aprasia parapulchella*) by 0.93 ha (from 37.29 ha to 38.22 ha),
- Striped Legless Lizard (*Delma impar*) by 20.78 ha (from 92.81 ha to 113.59 ha)
- White-bellied Sea-Eagle (*Haliaeetus leucoaster*) by 9.14 ha (from 3.05 ha to 12.19 (ha),
- Little Eagle (*Hieraaetus morphnoides*) by 7.05 ha (from 95.89 ha to 102.94 ha),
- Key's Matchstick Grasshopper (Keyacris scurra) by 38.43 ha (from 173.91 ha to 212.34 ha),
- Booroolong Frog (*Litoria booroolongensis*) by 3.38 ha (from 0.06 ha to 3.44 ha),
- Square-tailed Kite (*Lophoictinia isura*) by 35.96 ha (from 39.66 ha to 75.62 ha),
- Southern Myotis (Myotis macropus) by 0.43 ha (from 73.68 ha to 74.11 ha),
- Greater Glider (*Petauroides volans*) by 10.60 ha (from 158.42 ha to 169.02 ha),
- Squirrel Glider (*Petaurus norfolcensis*) by 27.84 ha (from 66.93 ha to 94.77 ha),
- Superb Parrot (*Polytelis swainsonii*) by 25.68 ha (from 127.01 ha to 152.68 ha),
- Golden Sun Moth (*Synemon plana*) by 7.59 ha (from 28.48 ha to 36.07 ha), and
- Yellow-bellied Glider population on the Bago Plateau by 15.01 ha (from 134.78 ha to 149.79 ha).

The HumeLink project will now be tracked against these revised clearing limits. It is recommended this be reviewed as part of the next audit.

Audit 2 identified that threatened species have been recorded outside the species polygons as mapped by the Revised BDAR (Niche, 2024) and the BAVR (Niche, 2025). It is unclear how these species are to be treated with regard to updates to the BAVR, clearing limits and offset requirements. However, due to requirements for assumed presence in the Revised BDAR (Niche, 2024) and the BAVR (Niche, 2025), and pre-clearing surveys not recording some species within these assumed presence species polygons, a true accounting of project impacts may never be feasible. It is recommended this be reviewed as a part of the next audit to confirm actual impacts against predicted impacts.

4.2 Project boundary

Delineation of the clearing limits was found to be significantly improved in Audit 2, with clear and consistent demarcation of clearing limits using bunting and signage.

However, a recommendation from Audit 1 was to ensure all plant operators had the clearing limits loaded into survey grade GPS and ensure devices with lower accuracy were not used. This recommendation was not found to be consistently applied during the audit. The lack of redundant controls diminishes the effectiveness of the Swiss cheese model of risk mitigation discussed during the site inspection.

Minor incursions outside clearing limits were observed due to the placement of coarse woody debris.

The stockpiling of logs and debris outside TCZ zones is also discussed in the audit table (Appendix C) with a recommendation to review where these log stockpiles are placed (Table 3-2).

4.3 Biodiversity clearing limits

As outlined above, revised clearing limits have recently been approved based on revised FLPs. The HumeLink project will now be reviewed against these revised clearing limits. At the time of Audit 2, clearing under these revised limits had only just been recommended and clearing limits for HLE had not been updated.

These revised clearing limits have triggered updates to the BAVR, with a requirement for amendments to the BMPs for both HLE and HumeLink West. This will include revisions to the clearing limits for both projects and updates to the Clearing Limits Tracking Dashboard.

The next audit should continue to review progress against these revised clearing limits.

4.4 Key strengths

Audit 2 has identified a number of key strengths for the HLE project:

- HLE continues to have good on-site controls and induction processes. Permits were readily available, with documentation of site inductions occurring. Impressively, during the inspection of the unexpected find of the Pink-tailed Legless-lizard at YG-031, the plant operator advised that he had been inducted the previous day and the presence of a lizard was highlighted and controls clearly explained.

- Marking of clearing limits had significantly improved. Clearing limits are clearly marked with bunting and signage, and appropriate controls are in place. This was highlighted during the site inspection of partial clearing at Tower 214 in BY-130-19 where clearing controls had been well established prior to commencement of clearing the next day.
- Project access is well managed, with areas not open to project personnel well marked, removing potential for inadvertent access and impacts to occur.
- Measures to minimise impacts are ongoing on the project. This was evidenced during the inspection of partial clearing at BY-130-09 where clearing of the overstorey/canopy layer had been reduced based on additional analysis of clearing distances to conductors using LiDAR and on-site assessment by an Arborist, resulting in a smaller area of partial clearing than predicted.
- Nest box installation continues to be well advanced. To date, the HLE team has installed 1,605 nest boxes or artificial hollows. This compares to 112 occupied hollows recorded during clearing works. The HLE project has currently installed more nest boxes than required based on identification of occupied hollows.

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.

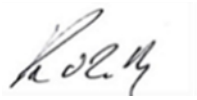
In accordance with Part C Condition C13 of the approval and the NSW Planning, Independent Audit Post Approval Requirements (2020), as nominee of the Planning Secretary, I endorse Nathan Garvey of Nature Positive Advisory as the Biodiversity Expert.

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.

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

Yours sincerely



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

Appendix B. Photographs from the site inspection

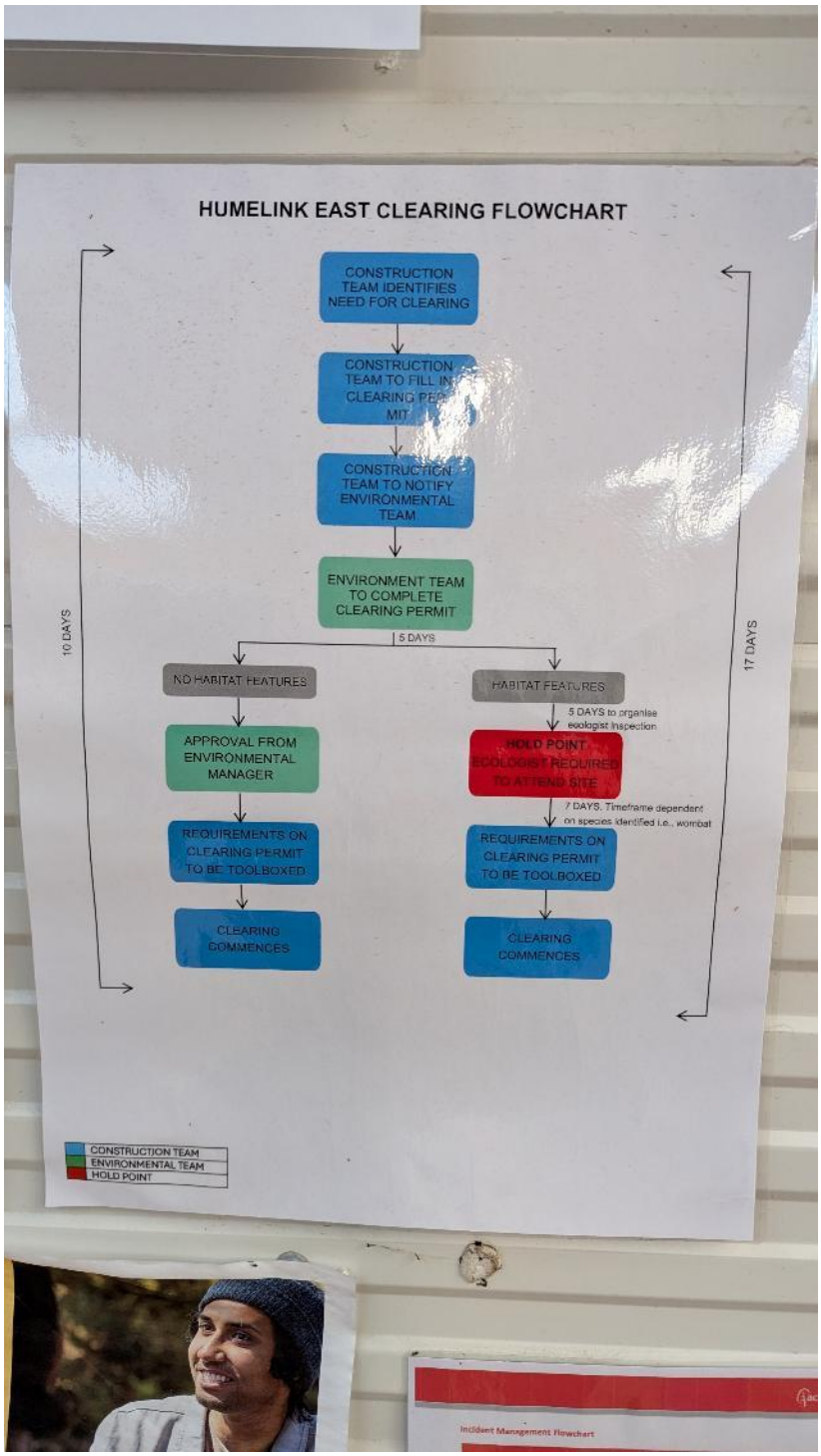


Photo 1: HLE Clearing Flowchart observed at Yass Camp



Photo 2: No-go fencing in BY-31 for the Pink-tailed Legless-lizard

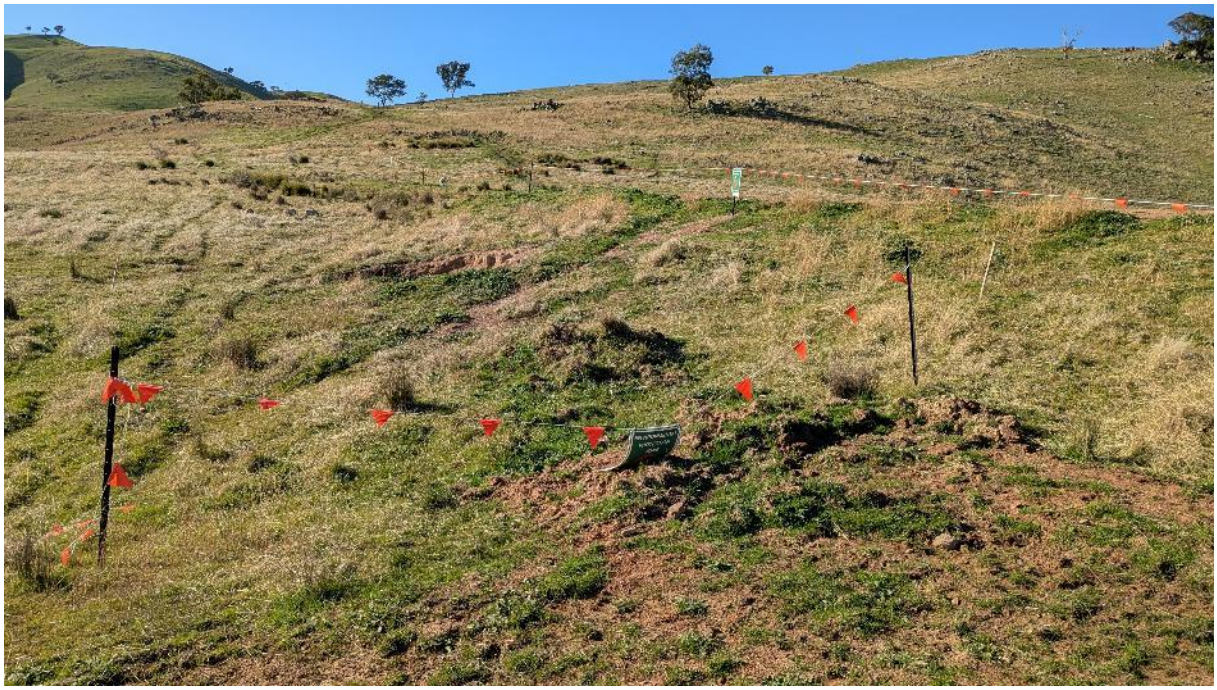


Photo 3: No-go fencing at the end of a track in BY-31 for the Pink-tailed Legless-lizard



Photo 4: Environmental protection zone signage and no-go fencing in BY-31 for the Pink-tailed Legless-lizard



Photo 5: Habitat for the Pink-tailed Legless-lizard in BY-31



Photo 6: Partially constructed access track in BY-31 following clearance by Project Ecologists, with no-go fencing for the Pink-tailed Legless-lizard on left of photo



Photo 7: Construction of the access track in BY-31 following clearance by Project Ecologists, with no-go fencing for the Pink-tailed Legless-lizard at the top of the photo



Photo 8: Environmental protection zone signage and no-go fencing in BY-31 for the Pink-tailed Legless-lizard at the end of the partially constructed access track

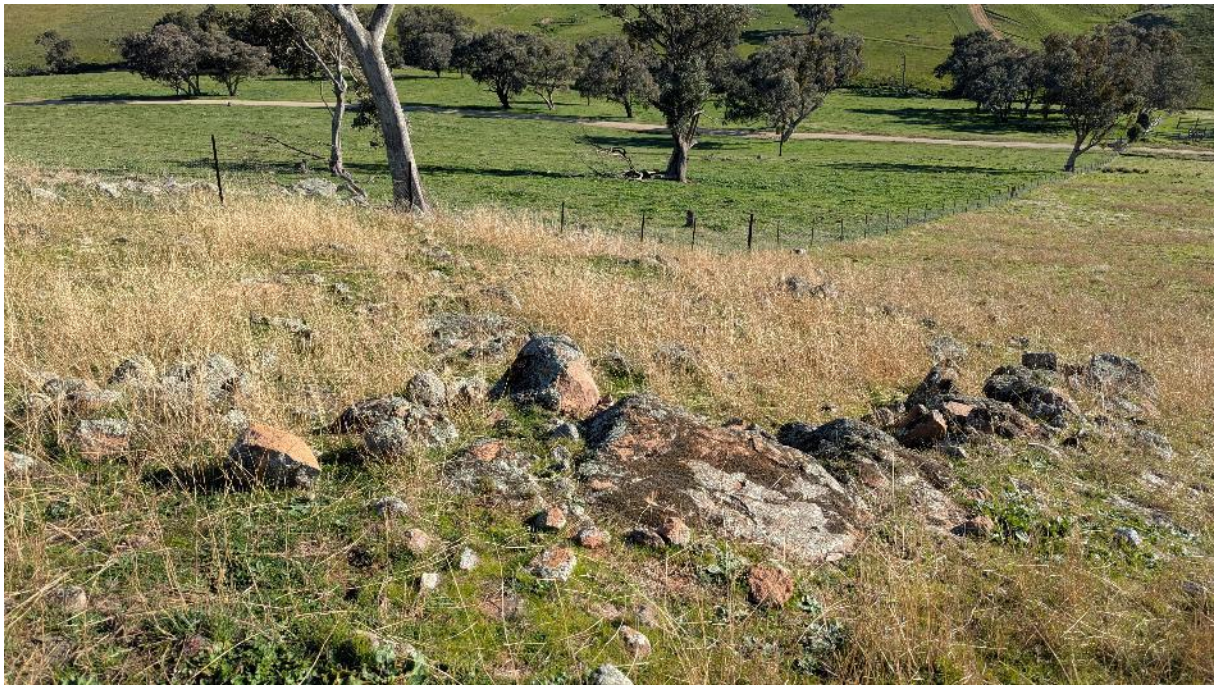


Photo 9: Habitat for the Pink-tailed Legless-lizard in BY-31



Photo 10: Habitat for the Pink-tailed Legless-lizard in BY-31 with evidence of surveys by Project Ecologists



Photo 11: Habitat for the Pink-tailed Legless-lizard in BY-31



Photo 12: Constructed footings for Tower 284 in YG-020



Photo 13: Access track between Towers 284 and 283 in YG-20 with no-go fencing for Yass Daisy on the left



Photo 14: Environmental protection zone signage for the Yass Daisy in YG-20



Photo 15: No-go fencing for Yass Daisy in YG-20



Photo 16: Habitat for the Yass Daisy identified in areas proposed for partial clearing and to be subject to hand-clearing



Photo 17: Yass Daisy individuals identified in areas proposed for partial clearing and to be subject to hand-clearing



Photo 18: Access track to Tower 283 in YG-20 with no-go fencing for Yass Daisy on the left – these areas are subject to partial clearing using hand clearing methods



Photo 19: Access track to Tower 283 in YG-20 with no-go fencing for Yass Daisy – these areas are not proposed to be cleared



Photo 20: Environmental protection zone signage for the Yass Daisy in YG-20



Photo 21: Upstream view of a culvert on a 1st-order waterway in YG-20 between Towers 284 and 283



Photo 22: Downstream view of a culvert on a 1st-order waterway in YG-20 between Towers 284 and 283



Photo 23: Rocky habitat in YG-020 adjacent to the access track with



Photo 24: Waterway crossing of Mantons Creek in BY-130-19 showing erosion and sediment control measures upslope



Photo 25: Upstream view of waterway crossing at Mantons Creek, showing partial blockage of culvert



Photo 26: Downstream view of waterway crossing at Mantons Creek



Photo 27: Blue metal washed downstream along Mantons Creek when the initial waterway crossing design was washed out



Photo 28: Blue metal washed downstream along Mantons Creek when the initial waterway crossing design was washed out



Photo 29: Looking upstream along Mantons Creek from waterway crossing



Photo 30: Nest box attached located adjacent to Mantons Creek



Photo 31: Sediment control fencing located downslope from pad in BY-130-19



Photo 32: Nest box located in BY-130-19



Photo 33: Fencing controls installed in preparation for partial clearing between Towers 214 and 215 in BY-130-19



Photo 34: Fencing controls installed in preparation for partial clearing between Towers 214 and 215 in BY-130-19, showing single-use access track



Photo 35: Fencing controls installed in preparation for partial clearing between Towers 214 and 215 in BY-130-19



Photo 36: Non-habitat tree marked for clearing in the ECZ between Towers 214 and 215 in BY-130-19



Photo 37: BAM plot located in partial clearing zone between Towers 214 and 215 in BY-130-19



Photo 38: Area to be subject to hand clearing in the partial clearing zone between Towers 214 and 215 in BY-130-19 due to known habitat for the Hoary Sunray



Photo 39: Marking of the hand clearing area in the partial clearing zone between Towers 214 and 215 in BY-130-19



Photo 40: Habitat tree marked for clearing in the ECZ between Towers 214 and 215 in BY-130-19



Photo 41: Construction of the pad for Tower 214 on steep slopes in BY-130-19



Photo 42: Example of marking of access track in BY-130-09 to prevent inadvertent access



Photo 43: Access to the ECZ in BY-130-09 between Towers 197 and 198, with access track flagged using bunting



Photo 44: Storage of logs and debris in the ECZ in BY-130-09 between Towers 197 and 198, which will create new habitat and require further clearing supervision



Photo 45: The ECZ following partial clearing in BY-130-09 between Towers 197 and 198, looking north-east towards Tower 197, showing ground disturbance



Photo 46: The ECZ following partial clearing in BY-130-09 between Towers 197 and 198, looking south-west towards Tower 198, showing ground disturbance



Photo 47: Log and debris piles in the ECZ in BY-130-09 between Towers 197 and 198, which will create new habitat and require further clearing supervision



Photo 48: The ECZ following partial clearing in BY-130-09 between Towers 197 and 198, looking south towards the existing 330 kV line, showing lower levels of ground disturbance



Photo 49: The ECZ following partial clearing in BY-130-09 between Towers 197 and 198, looking north-east towards Tower 197, showing lower levels of ground disturbance



Photo 50: The ECZ following partial clearing in BY-130-09 between Towers 197 and 198, looking south-east towards the existing 330 kV line, showing lower levels of ground disturbance



Photo 51: The ECZ following partial clearing in BY-130-09 between Towers 197 and 198, looking east towards the existing 330 kV line, showing small clumps of trees left in place following review of partial clearing requirements



Photo 52: The ECZ following partial clearing in BY-130-09 between Towers 197 and 198, looking south-west towards Tower 198, showing lower levels of ground disturbance and BAM plot location in the background



Photo 53: The ECZ following partial clearing in BY-130-09 between Towers 197 and 198, looking north into retained vegetation, showing lower levels of ground disturbance



Photo 54: BAM plot monitoring location in the ECZ in BY-130-09 between Towers 197 and 198, with plot flagged using bunting and showing retention of trees and lower impacts to groundcover following review of partial clearing requirements



Photo 55: Photo of BAM plot monitoring location in the ECZ in BY-130-09 between Towers 197 and 198



Photo 56: BAM plot monitoring location in the ECZ in BY-130-09 between Towers 197 and 198, with the plot showing retention of trees and lower impacts to groundcover following review of partial clearing requirements



Photo 57: Main access in BY-130-09 looking north-east with 330 kV transmission line on the right and HumeLink Tower 197 on the left



Photo 58: Main access in BY-130-09 looking south-west with 330 kV transmission line on the left and HumeLink Tower 198 on the right



Photo 59: Pad for Tower 198 in BY-130-09



Photo 60: Tower 198 in BY-130-09



Photo 61: Storage of logs and debris in BY-019 south-west of Tower 34



Photo 62: Marking of the ECZ using bunting in BY-019, looking back towards the pad for Tower 34



Photo 63: Marking of the ECZ using bunting in BY-019, looking south-west towards Tower 35



Photo 64: Signage located at the boundary of the ECZ in BY-019 indicating clearing is being undertaken



Photo 65: Habitat tree located within the ECZ in BY-019, between Towers 34 and 35



Photo 66: Clearing of the ECZ in BY-019, between Towers 34 and 35, for access by the harvester



Photo 67: Clearing of the ECZ in BY-019, between Towers 34 and 35, for access by the harvester with the harvester and project Ecologists in the background



Photo 68: Habitat tree felled in the ECZ in BY-019, between Towers 34 and 35, with a Brush-tailed Possum inside, showing clearing protocols being implemented by project Ecologists



Photo 69: Habitat tree felled in the ECZ in BY-019, between Towers 34 and 35, with a Brush-tailed Possum inside, showing clearing protocols being implemented by project Ecologists



Photo 70: Clearing operations being undertaken by the harvester within the ECZ in BY-019, between Towers 34 and 35, under supervision of project Ecologists



Photo 71: Clearing operations being supervised by project Ecologists within the ECZ in BY-019, between Towers 34 and 35



Photo 72: Marking of the ECZ in BY-019, between Towers 34 and 35



Photo 73: Marking of the ECZ in BY-019, between Towers 34 and 35

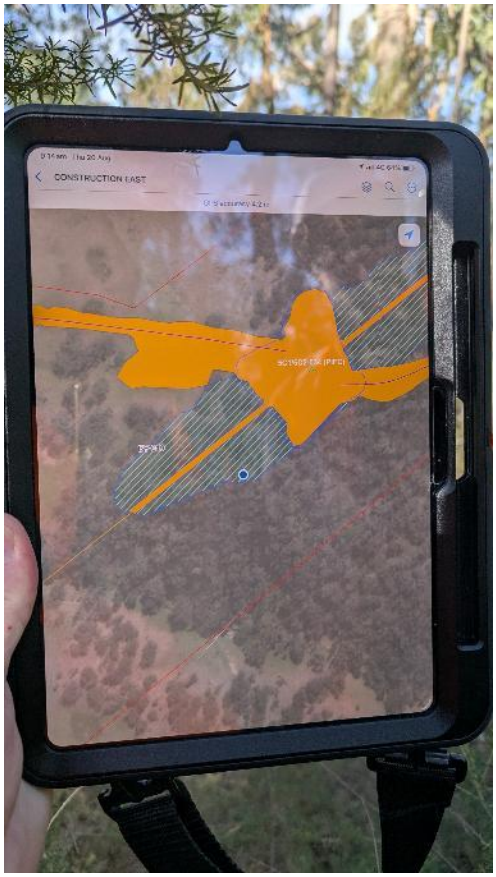


Photo 74: Photo of the spatial datasets showing ECZ (blue hatching) confirming correct installation of boundary marking for the ECZ in BY-019, between Towers 34 and 35



Photo 75: Ground habitat marked within the ECZ in BY-019, between Towers 34 and 35



Photo 76: The centreline of the ECZ in BY-019, between Towers 34 and 35 showing ground disturbance due to access by the harvester



Photo 77: North-western batter slope of the pad for Tower 24 in BY-019 looking north



Photo 78: North-western batter slope of the pad for Tower 24 in BY-019 looking south



Photo 79: Southern batter slope of the pad for Tower 24 in BY-019 looking north-east



Photo 80: Boundary marking for the TCZ at the pad for Tower 24 in BY-019



Photo 81: Access track between Tower 34 and 33 in BY-019 looking north-east



Photo 82: South-eastern batter slope of the pad for Tower 24 in BY-019 looking south-west



Photo 83: Wash down bay on pad for Tower 34 in BY-019



Photo 84: Excavator sitting on the pad for Tower 34 in BY-019



Photo 85: South-western batter slope of the pad for Tower 24 in BY-019 looking north-west



Photo 86: South-western batter slope of the pad for Tower 24 in BY-019 looking north-west, showing weeds starting to appear

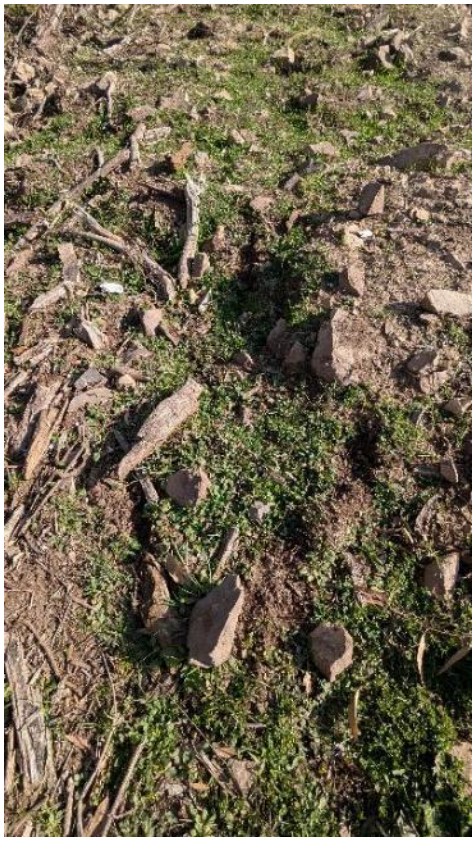


Photo 87: Weeds appearing on the south-western batter slope of the pad for Tower 24 in BY-019



Photo 88: Drain on pad for Tower 75 in BY-52



Photo 89: Looking west towards connectivity corridor CRO_6_25 from Tower 75 in BY-52



Photo 90: Footing for Tower 75 in BY-52 with coarse woody debris located at the top of the batter slope, used to divert clean water around the pad



Photo 91: Coarse woody debris located at the base of the northern batter slope for the pad for Tower 75 in BY-52



Photo 92: Northern batter slope of the pad for Tower 75 in BY-52 showing evidence of erosion following recent rain



Photo 93: Drain on the northern batter slope of the pad for Tower 75 in BY-52 showing evidence of erosion from the base of the drain following recent rain



Photo 94: Northern batter slope of the pad for Tower 75 in BY-52 showing evidence of erosion following recent rain



Photo 95: Northern batter slope of the pad for Tower 75 in BY-52 showing evidence of erosion beyond the TCZ following recent rain



Photo 96: Eroded material washing downslope of the pad for Tower 75 in BY-52 into areas which will not require clearing following review of partial clearing requirements



Photo 97: Drain located on the eastern edge of the pad for Tower 75 in BY-52



Photo 98: Stockpiling of coarse wood debris outside the ECZ (marked in pink) adjacent to the pad for Tower 75 in BY-52



Photo 99: Southern batter slope of the pad for Tower 75 in BY-52



Photo 100: Drain located on the eastern edge of the pad for Tower 75 in BY-52



Photo 101: Hollow installed using a Hollow Hog south-west of Tower 77 in BY-54



Photo 102: Hollow installed using a Hollow Hog south-west of Tower 77 in BY-54



Photo 103: Upstream photo of waterway crossing of an unnamed 2nd order tributary of Melamalong Creek on BY-57



Photo 104: Downstream photo of waterway crossing of an unnamed 2nd order tributary of Melamalong Creek on BY-57



Photo 105: Pools located downstream of waterway crossing of an unnamed 2nd order tributary of Melamalong Creek on BY-57



Photo 106: Areas mapped as the Montane Peatlands and Swamps threatened ecological community in the BDAR on the unnamed 2nd order tributary of Melamalong Creek on BY-57



Photo 107: Upstream photo of waterway crossing of an unnamed 3rd order tributary of Melamalong Creek on BY-57, between Towers 81 and 80



Photo 108: Upstream photo of waterway crossing of an unnamed 3rd order tributary of Melamalong Creek on BY-57, between Towers 81 and 80, showing the access track sitting above bed level resulting in damming of some water



Photo 109: Downstream photo of waterway crossing of an unnamed 3rd order tributary of Melamalong Creek on BY-57, between Towers 81 and 80



Photo 110: Upstream photo of waterway crossing of Melamalong Creek on BY-57, between Towers 81 and 80



Photo 111: Waterway crossing of Melamalong Creek on BY-57, between Towers 81 and 80



Photo 112: Downstream photo of waterway crossing of Melamalong Creek on BY-057, between Towers 81 and 80



Photo 113: Areas mapped as the Montane Peatlands and Swamps threatened ecological community in the BDAR on Melamalong Creek on BY-057, between Towers 81 and 80



Photo 114: Areas mapped as the Montane Peatlands and Swamps threatened ecological community in the BDAR on Melamalong Creek on BY-057, between Towers 81 and 80, immediately upstream of the waterway crossing

Appendix C. Audit table

Table C.1 HumeLink East Audit Table

CoA	Requirement	Evidence collected	Audit finding and recommendations	Compliance status
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.	• HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Rev 02.1 (dated 22 May 2026) • Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026) • Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228)	Measures to avoid and minimise impacts to biodiversity values are outlined in the letter from Transgrid to DPHI seeking approval to exceed the clearing limits set in Condition B25 of the Infrastructure Approval. This letter outlines that amendments to the design, along with reductions in assumed presence, have resulted in: • a reduction in clearing of native vegetation by around 47 ha (from 926.60 hectares to 879.18 hectares), • a reduction in impacts to TECs listed under the EPBC Act by around 8.75 hectares (from 130.58 ha to 121.83 ha), • a reduction in impacts to TECs listed under the BC Act by around 23.88 ha (from 490.38 ha to 466.50 ha), • a reduction in impacts to all SAII entities except for Delicate Pomaderris (*Pomaderris delicata*) and Pale Pomaderris (*Pomaderris pallida*), including: – 21.27 ha for Box Gum Woodland (from 477.04 ha to 455.77 ha), – 2.99 ha for Sooty Owl (*Tyto tenebricosa*) (from 68.81 ha to 65.82 ha), and – 0.10 ha for Rice Flower (*Pimelea bracteata*) (from 4.76 ha to 4.66 ha). These three species required specific measures to minimise impacts in accordance with Condition B30 (d)(xii) of the Infrastructure Approval. As outlined in Audit 1, data collected as 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 micrositing efforts and assess any design changes. Also as noted during Audit 1, this information was not included in the BMP reviewed as a part of that Audit. It is unclear whether updates to the BMP (Rev 02.1) include revised constraints mapping. Based on approval of changes to clearing limits under Condition B25 and approval of the final layout plans (FLPs), further amendments to these constraints maps will likely be required to reflect the results of the BAVR and these finalised FLPs. This should be included in the updates to the BMP required by Condition B29 of the Infrastructure Approval. Efforts to minimise harm were observed during the site visit to BY-040 during Audit 1. Evidence of reductions in impacts was also observed during the site inspection for Audit 2, as noted in partial clearing areas at Pull20 in BY-130-09. Clearing of the overstorey/canopy layer had been reduced based on additional analysis of clearing distances to conductors using LiDAR and on-site assessment by an Arborist, resulting in a smaller area of partial clearing than predicted. **Recommendations:** • Ensure updates to the BMP (required under Condition B29 of the Infrastructure Approval following updates to the BAVR) incorporate updated constraints mapping which reflects the FLPs and updated BAVR mapping.	Compliant (C)
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.	• Site visit to waterway crossing in BY-30 (Audit 1) • Site visit to waterway crossing at Mantons Creek and Melamalong Creek (Audit 2) • Waterway Crossing Methodology Rev 01 dated 22 April 2025 • Waterway crossing memo consultation dated 16 April 2025	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. The construction of waterway crossings are informed by detailed Pre-construction Aquatic Habitat Survey Reports prepared by the project ecologists (East Coast Ecology).	Compliant (C)

CoA	Requirement	Evidence collected	Audit finding and recommendations	Compliance status
		• 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	In Audit 1, only one waterway crossing had been constructed on HLE; a waterway crossing of an unnamed 3rd-order tributary of Cowpers Creek in BY-030. The waterway crossing has been constructed consistent with guidance documents and provided unimpeded fish passage. During Audit 2, two additional waterway crossing were inspected: • crossing of a 2nd-order section of Mantons Creek, and • crossing of a 4th-order section of Melamalong Creek and associated 2nd-order tributaries. At Mantons Creek, the lower culverts were perched above the bed of the waterway (Photo 26) impeding fish passage. Further, due to higher than expected flows, the pipe culverts were partially obstructed (Photo 25) and may become blocked long term. At Melamalong Creek, constructed bed level crossings on the second-order tributaries were constructed above natural bed levels (Photo 103, Photo 104, Photo 107, Photo 108, Photo 109). The crossing of the fourth-order section of Melamalong Creek was constructed at or near bed level with evidence of flow over the top of the crossing (Photo 110-Photo 112). **Recommendations:** • Ensure waterway crossings are constructed to avoid culverts becoming perched at the upstream or downstream end. • Ensure bed level crossings follow the natural bed levels and avoid raising the crossing above the bed level of the waterway. • Consider long-term inspection and maintenance requirements to ensure waterway crossings do not become obstructed.	
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 *Prasophyllum bagoense*, *Prasophyllum keltonni* and *Pterostylis oreophila* as mapped in the BDAR.	• Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026) • Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228) • Clearing Limits Tracking Dashboard	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 for Audit 1, evidence was presented demonstrating a robust process for tracking clearing against the clearing limits: • 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 of the Infrastructure Approval. Transgrid is responsible for compiling data across both HLE and HLW. Audit 1 identified a key gap in the allowance for future clearing. The Clearing Limits Tracking Dashboard did not account 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. This appears not have been addressed. Transgrid prepared and submitted an application for revised clearing limits to DPHI on 4 August 2026. This was subsequently approved by DPHI on 12 August 2026.	Compliant (C)

CoA	Requirement	Evidence collected	Audit finding and recommendations	Compliance status
			These clearing limits now replace the clearing limits set out in Condition B25 and Table 2-1, Table 2-2 and Table 2-3 of Appendix 2 of the Infrastructure Approval. Updates to the BOP and BAVR are required (see below). **Recommendations:** • The Clearing Limits Tracking Dashboard is updated to allow tracking of full and partial clearing to ensure alignment with the revised clearing limits as approved by DPHI. • The Clearing Limits Tracking Dashboard is updated to allow for future clearing to ensure potential exceedances are identified early, or an alternative process is put in place to ensure exceedances of clearing limits do not inadvertently occur.	
B26	**Biodiversity Offset Package** 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: (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. Following the Planning Secretary's approval, the Proponent must implement and deliver the Biodiversity Offset Package.	• 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) • Consultation Report – HumeLink, Conditional Approval – Biodiversity Offset Package (CoA B26) HumeLink Infrastructure Approval (SSI 36656827) (dated May 2025) • Six-Monthly Update Report – HumeLink Biodiversity Offset Package (letter from Transgrid to DPHI, dated 20 November 2025) • Re: Quarterly Update – HumeLink Biodiversity Offset Package (letter from Transgrid to DPHI, dated 20 February 2026) • Re: Six-Monthly Update – HumeLink Biodiversity Offset Package letter from Transgrid to DPHI, dated 18 May 2026) • Re: Quarterly Update – HumeLink Biodiversity Offset Package (letter from Transgrid to DPHI, dated 20 August 2026) • Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026) • Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228)	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. 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). Audit 1 noted a lack of evidence of consultation with BCS (now CPHR) or the BCT. Evidence of consultation with NSW Planning, Offsets, Threatened Species and Ecosystems (POTSE) and CPHR was provided after the submission of the previous audit report. This is considered resolved. Section 4 of the BOP outlines the offset measures to be implemented: • 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. 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. Section 6 outlines timing and responsibilities for the implementation and delivery of the BOP. 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. Six-monthly updates have been submitted to DPHI in November 2025 and May 2026, with a response received from DPHI in the same periods. Two quarterly updates have also been provided in February and August 2026. As noted in Audit 1, 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	Compliant (C)

CoA	Requirement	Evidence collected	Audit finding and recommendations	Compliance status
			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). Following approval of the revised clearing limits by DPHI on 12 August 2026, and finalisation of the FLPs, updates to the BAVR will be required. Under Condition B29 of the Infrastructure Approval, and as noted in the approval from DPHI, updates to the BOP are required to reflect these changes. In their application for revised clearing limits, Transgrid notes that they expect the "*overall biodiversity offset liability for the project has been reduced due to the reductions in the magnitude of clearing predicted for native vegetation and the total impacts on threatened flora and fauna species*". Implementation of the BOP is ongoing. As of 20 August 2026, Transgrid had delivered the following: • 12,890 ecosystem credits met via credits held by Transgrid, generated by BSAs undertaken by Transgrid or credits purchased from the market. • 58,169 species credits met via credits held by Transgrid or credits purchased from the market, representing 38% of the species credit liability for the project. 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 85% delivered to date. Since Audit 1, significant progress has been made against the species credit liability, with an increase from 1% met to 38% met. Transgrid has signalled its intent to enter into a SODA after all other measures have been exhausted and is currently finalising negotiations with DCCEEW. It is noted that an administrative modification to the Infrastructure Approval is required to enable a SODA between Transgrid and NSW DCCEEW. **Recommendations:** • Include the intent to enter into a SODA in the updated BOP.	
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.	• Transgrid Bank Guarantees (letter from Transgrid to DPHI, dated 20 December 2024)	The bank guarantee was lodged by Transgrid on 20 December 2024.	Compliant (C)
B28	**Supplementary Biodiversity Strategy** 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: (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;	• 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)	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 . . ."*. 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). 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. 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	Compliant (C)

CoA	Requirement	Evidence collected	Audit finding and recommendations	Compliance status
	(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: (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; (ii) surveys for the following serious and irreversible impact (SAII) entities: • *Prasophyllum bagoense* • *Grevillea iaspicula* • *Pterostylis oreophila* • *Pomaderris pallida* • *Caladenia concolor* • *Mixophyes balbus* • *Genoplesium superburn* • *Prasophyllum keltonii* • *Pomaderris delicatat* • *Bossiae fragrans* • *Litoria castanea* • *Eucalyptus robertsonii subsp, hemisphaerica* • *Prasophyllum innubum* • *Solanum armourense* • *Grevillea wilkinsonii* • *Calotis glandulosa* • *Chalinolobus dwyeri* • *Pseudomy fumeus* • *Tyto tenebricosa* • *Pimelea bracteata*		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. 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.	
B29	**Biodiversity Assessment Verification Report** 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: (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;	• HumeLink Biodiversity Assessment Verification Report, Version R5.1 (dated 29 August 2025) • 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) • Re: HumeLink – Request to Amend the Timeframe for Updating the BAVR – SSI-36656827 Condition B29 (letter from Transgrid to DPHI, dated 17 April 2026) • Subject: HumeLink - Revised Biodiversity Assessment Verification Report extension request	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 . . .*" . 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: *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;*	Non-compliant (NC)

CoA	Requirement	Evidence collected	Audit finding and recommendations	Compliance status
	(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: (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. 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.	(letter from DPHI to Transgrid, dated 24 April 2026, reference SSI-36656827-PA-187) • Response to Request for Information, HumeLink – Revised BAVR Extension Request (undated) • Re: HumeLink – Notification of Non-Compliance – Condition C11 (letter from Transgrid to DPHI, dated 8 May 2026) • HumeLink - Notification non-compliance - B29 (letter from DPHI to Transgrid, dated 19 May 2026, reference: SSI-36656827-PA-199) • Subject: HumeLink - Revised Biodiversity Assessment Verification Report extension request (letter from DPHI to Transgrid, dated 15 May 2026, reference SSI-36656827-PA-187) • Response to Request for Information, HumeLink – Revised BAVR Extension Request (undated) • Subject: HumeLink - Extension request for the revised Biodiversity Assessment Verification Report (letter from DPHI to Transgrid, dated 12 June 2026, reference SSI-36656827-PA-187) • Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026) • Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228) • Pre-clearing Survey Report, HumeLink East – BY-027, BY-028 and BY-028A (report prepared for AGJV by East Coast Ecology, dated 4 February 2026) • Unexpected Find: Leucochrysum albicans subsp. tricolor (Hoary Sunray)- HumeLink East, Property Holding BY-028 (letter from East Coast Ecology to AGJV, dated 12 February 2026) • Re: Unexpected Find – BY-028 (email from Transgrid to AGJV, dated 13 February 2026) • Re: Unexpected Find – BY-028 (email from AGJV to Transgrid , dated 24 February 2026)	*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.* Transgrid sought 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). Transgrid sought an additional extension to the due date for the revised BAVR with an application submitted on 17 April 2025 (prior to the due date for the BAVR). Following two RFIs from DPHI to confirm specific details, approval was granted on 12 June 2026 for an extension to the timing for the BAVR, with a revised due date of 20 November 2026. Transgrid has committed to preparing a revised BAVR which will capture the results of the SBS and the finalised FLPs. Transgrid is to provide this revised BAVR by 20 November 2026, as per the extension granted by DPHI. This application for an extension was submitted prior to the due date of 30 April 2026, but approval was not granted until after the due date. This represents an administrative non-compliance with Condition B29 of the Infrastructure Approval. This was reported by Transgrid as a non-compliance on 8 May 2026 in accordance with Condition C11 of the Infrastructure Approval. Under Condition B29 of the Infrastructure Approval, updates to the BMP and BOP are required following finalisation of the revised BAVR (see above and below). 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. Table 3 of the BAVR addresses the requirements of condition B29. • 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. Audit 1 found that the recommendations in Section 9 of the BAVR do not include targeted measures for avoidance based on the findings of the BAVR, as required by Condition B29 (d(ii)) of the Infrastructure Approval. 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: • Flockton Wattle (*Acacia flocktoniae*) • Blue-tongued Greenhood (*Pterostylis oreophila*) - SAII species • Alpine Sun-orchid (*Thelymitra alpicola*) • Mauve Burr-Daisy (*Calotis glandulosa*)	

CoA	Requirement	Evidence collected	Audit finding and recommendations	Compliance status
			• Smoky Mouse (*Pseudomys fumeus*) • Large-eared Pied Bat (Chalinolobus dwyeri) - SAll species Overall, 37 flora species and 22 fauna species had a reduction in impacts when compared to clearing limits sets under condition B25. Updates to these changes are likely as a result of the revised BAVR currently under preparation. The Squirrel Glider (*Petaurus norfolcensis*) 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. Further to the above, some species have been recorded during pre-clearing surveys outside of the species polygons identified in the BDAR (Niche, 2024) or the BAVR (Niche, 2025) but within the species' known range. Transgrid have advised AGJV that this does not meet the definition of an unexpected find in accordance with the Unexpected Finds Procedure (Appendix A of the BMP) as it is within the known range. However, it is unclear how these findings are treated as a part of the updates to the BAVR, clearing limits and offset requirements. **Recommendations:** • Section 9 of the revised BAVR, due on 20 November 2026, should include targeted measures for avoidance based on the findings of the BAVR, as required by Condition B29 (d(ii)) of the Infrastructure Approval. • Ensure the BAVR incorporates all results of the SBS, particularly where species were recorded outside of species polygons in the Revised BDAR. • Confirm how records of threatened species outside the species polygon but which are not defined as unexpected finds are to be treated as a part of the updates to the BAVR.	
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;	• HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Rev 02.2 (dated 28 May 2026) • HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Rev 02.1 (dated 22 May 2026) • HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Revision 02 (dated 15 September 2025) • HumeLink East Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Rev 02.1 (dated 22 May 2026) • Biodiversity Management Sub-plan, HLE-AGJ-MGT-ALE-PLN-0000-00025 | Rev 02.2 (dated 28 May 2026) • 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)	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 . . .*" . 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. An updated version of HLE BMP (Revision 02) was provided and this document was reviewed during Audit 1. The document control indicates no changes to the version approved by DPHI, stating that Revision 02 was "Issued for Use". AGJV advised that because the Planning Secretary endorsed Rev 01.07, CPHR requested that the BMP and appendices be reverted to Rev 01.07 to align with the revision submitted to and endorsed by the Planning Secretary. 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. An updated version of the HLE BMP (Rev 02.1) was provided as a part of Audit 2 and this document was reviewed during Audit 2. This revised BMP was endorsed by	Compliant (C)

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	(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 keltonni 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 (SAII), 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 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. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan. Note: The Biodiversity Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.	• A8 Consultation Report Biodiversity Management Plan Revision D (dated 29 May 2026) • RE: Proposed changes to BMP Connectivity Strategy relating to CLMP (email from CPHR to Transgrid, dated 22 May 2026) • HumeLink – HumeLink East Biodiversity Management Plan (letter from DPHI to Transgrid, dated 9 June 2026, reference SSI-36656827-PA-207) • Pre-clearing Survey Report, HumeLink East – Complete Coverage – YG-031, YG-032 & YG-034 (report prepared for AGJV by East Coast Ecology, dated 15 May 2026) • Pre-clearing Survey Report, HumeLink East – YG-020, YG-021, YG-022 & YG-023 (report prepared for AGJV by East Coast Ecology, dated 9 February 2026) • Pre-clearing Survey Report, HumeLink East – Complete Coverage – BY-130-19 (report prepared for AGJV by East Coast Ecology, dated 16 July 2026) • Pre-clearing Survey Report, HumeLink East – Complete Coverage – BY-130-09 & BY-130-10 (report prepared for AGJV by East Coast Ecology, dated 8 July 2026) • Pre-clearing Survey Report, HumeLink East – Complete Coverage – BY-019, BY-020, BY-021, BY-022 & BY-023 (report prepared for AGJV by East Coast Ecology, dated 17 April 2026) • Pre-clearing Survey Report, HumeLink East – Complete Coverage – BY-052 & BY-054 (report prepared for AGJV by East Coast Ecology, dated 15 May 2026) • Pre-clearing Survey Report, HumeLink East – Complete Coverage – BY-055, BY-056, BY-057 & BY-058 (report prepared for AGJV by East Coast Ecology, dated 15 May 2026) • RE: Pink tailed legless lizard (email from Huw Rabone (Environmental Manager, HLE) to Luke Smith (Project Engineer, HLE, dated 5 June 2026) • Identification of Pink tailed legless lizard (general correspondence from AGJV to Transgrid, dated 5 June 2026, Reference No.: AGJV-GEN-001205.00) • Pink-tailed Legless Lizard Relocation Plan HumeLink East – YG-031 (report prepared for AGJV by East Coast Ecology, dated 2 September 2026)	CPHR on 22 May 2026, and this updated version was acknowledged by DPHI on 9 June 2026. A further updated versions of the HLE BMP (Rev 02.2) was also provided as a part of Audit 2. Rev 02.2 was drafted and is being consulted on with CPHR and FCNSW. AGJV have advised that Rev 02.3 is being prepared to address comments from CPHR and previous audit recommendations. It is noted that updates have been undertaken by personnel from AGJV. It is unclear whether these personnel are considered suitably qualified and experienced biodiversity experts in accordance with Condition B30(a) of the Infrastructure Approval or whether changes have been reviewed and endorsed by the suitably qualified and experienced persons identified in Section 1.5 of the HLE BMP (Alex Graham and Jack Tattler). 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 and an updated version of this consultation report was provided during Audit 2. The BMP incorporates measures to meet the mitigation measures outlined in conditions B25 and B29 (see Sections 7.15 and Table 4) and to minimise clearing of native vegetation and fauna habitat as well as indirect impacts. A pre-clearing process is included to ensure clearing does not occur outside the disturbance footprint (noting amendments to the FLPs - see above). The audit found clearing controls are generally well implemented, with clearing limits clearly marked using bunting. However, plant operators were found not to always have clearing limits loaded into survey grade GPS or did not always have access to data due to signal issue, with potential for inadvertent impacts to biodiversity. Log stockpiles have been placed outside the clearing limits identified in the CLDPs (see Table 3-2) and placement of log stockpiles under Timber Acceptance Forms with landowners may have resulted in impacts to biodiversity; a recommendation is made to improve this process. An Unexpected Finds Protocol is outlined in Appendix A. This has been subject to minor updates in Rev 02.1 and Rev 02.2 to clarify responsibilities. These are minor. During the audit period for Audit 2, two unexpected finds were recorded: • Pink-tailed Legless-lizard at YG-031. • Striped Legless Lizard at MA-054. The site inspection included the area where the Pink-tailed Legless-lizard was identified at YG-031. As identified in Table 2-1, the site inspection identified that the unexpected finds protocol has been implemented well with suitable controls identified and measures put in place to manage this unexpected find. A relocation plan was developed by the project Ecologists and provided to CPHR. This plan was endorsed by CPHR. 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. 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	

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		• Re: HLE - Pink Tailed Legless Lizard Relocation Plan for review (email from Transgrid to CPHR, dated 1 September 2026) • 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 *Pimelea bracteata* (Rice Flower) through genomically diverse eed collection strategies (Botanic Gardens of Sydney) • Quarterly meeting - Pimelea bracteata - A&AM for HumeLink (email from Transgrid dated 16 December 2025) • RE: Landholder access request - Pimelia 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) • Glider Connectivity Corridor Validation Report for HumeLink East – Rev F (report prepared by WSP Australia Pty Ltd for AGJV, dated 25 August 2026) • RE: HLE CCVR CPHR Comments Response Sheet (email from NSW DCCEEW to Transgrid, dated 25 August 2026) • Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026) • Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from	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. As noted above, updates to the Bird Deterrent Measures in Section 7 of the Connectivity Strategy were included in Rev 02.1 of the BMP. A Glider Connectivity Corridor Validation Report has been prepared for HLE outlining the final location for glider connectivity corridors and the exact mitigation measures that will be installed at each glider corridor. This was endorsed by CPHR on 25 August 2026, and installation of glider corridors on HLE can commence. A Supplementary Hollow and Nest Strategy is provided at Appendix E. This strategy requires that any hollow with evidence of occupancy is replaced, with installation of 30% of required hollows installed prior to clearing. Review of information provided as a part of Audit 1 and 2 indicates that HLE is significantly exceeding this 30% target, and likely already exceeding the total number of occupied hollows required to be installed. This is largely due to hollows being identified during pre-clearing surveys that do not exhibit signs of occupation when removed during clearing works. No hollows have been salvaged for re-use. 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. AGJV advised during Audit 2 that no rehabilitation works occurred on the project to date. A process for monitoring clearing is outlined above, with further information incorporated into the HLE BMP (see Appendix B: Vegetation Clearing Procedure). Partial clearing had not commenced during Audit 1 but had commenced prior to Audit 2. Requirements for verification of partial clearing limits are outlined in the HLE BMP (see Appendix H: Flora and Fauna Monitoring Program) with monitoring to be conducted within 3 months of the completion of partial clearing, and a Partial Clearing Validation Report(PCVR) will be provided within 6 weeks of completion of the monitoring. During Audit 2, it was identified that monitoring of partial clearing was yet to commence. This should be reviewed during the next audit. Measures to salvage habitat resources are outlined in Section 3.3 of the HLE BMP. No hollows have been salvaged for re-use. As noted during Audit 1, minimal measures are incorporated for the collection and propagation of seed, excluding as a part of additional and appropriate measures (AAMs) for *Pimelea bracteata*. As noted during Audit 1, Table 3 of the HLE BMP states that measures to minimise impacts on entities at risk of SAII 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)). Transgrid has outlined AAMs for Box Gum Woodland, Sooty Owl and *Pimelea bracteata* in a letter to NSW DCCEEW in September 2025. In their RFI response, Transgrid provided an update to the implementation of AAMs:	

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		DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228) • Threatened Flora Baseline Monitoring Report Humelink East (report prepared for AGJV by East Coast Ecology, dated 3 September 2026) • Threatened Flora Baseline Monitoring Report (general correspondence from AGJV to Transgrid, dated 13 January 2026, Reference No.: AGJV-GEN-000859.00) • Threatened Frog Monitoring Report (Baseline), Humelink East (report prepared for AGJV by East Coast Ecology, dated 16 March 2026) • Threatened Frog Baseline Report (general correspondence from AGJV to Transgrid, dated 16 March 2026, Reference No.: AGJV-GEN-000944.00)	• 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. 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 SAII for this species and AAMs are no longer required. A flora and fauna monitoring program is outlined in Appendix H of the HLE BMP. • As outlined above, monitoring of partial clearing is yet to commence due to partial clearing only recently commencing. This should be reviewed during the next audit as the first monitoring report will be due. • AGJV have advised that specific monitoring for weeds, pathogens and pests has not started. • As outlined above, rehabilitation works have not yet commenced, so rehabilitation monitoring has not started. • Baseline monitoring of threatened flora was required to be undertaken prior to commencement of vegetation clearing, with a Threatened Flora Baseline Monitoring Report due to be submitted within three months of the completion of baseline monitoring works. Threatened flora monitoring is required biannually during spring and autumn, with a report due within 3 months of completion of monitoring. The initial revision of the baseline flora monitoring report was completed in January 2026 and provided to Transgrid on 13 January 2026. • Baseline monitoring of threatened frogs was required to be collected prior to collected prior to commencement of construction, with a Threatened Frog Baseline Monitoring Report due to be submitted within three months of the completion of baseline monitoring works. Threatened frog monitoring is required biannually in July to August and November to December, with a report due within 3 months of completion of monitoring. The initial revision of the baseline frog monitoring report was completed in March 2026 and provided to Transgrid on 16 March 2026. • Monitoring of artificial hollows and nest boxes is required biannually during construction, in spring and autumn. During the audit interview, AGJV advised that the first round of monitoring has occurred and has identified 8-10% occupancy. The monitoring report is yet to be completed. • As outlined above, HLE has recently received approval to commence installation of glider poles. As such, monitoring is yet to commence. In accordance with Condition B29 of the Infrastructure Approval, the BMP will require updating following the submission of the BAVR in November 2026. **Recommendations:** • Updates to monitoring of partial clearing (see recommendations under condition B25). • Include PCT mapping in Timber Agreement Forms with landowners and ensure log stockpiles are placed in areas of PCT 0 to ensure inadvertent impacts to biodiversity do not occur. • Ensure amendments to the BMP, other than routine administrative and implementation updates, are prepared by or reviewed and endorsed by suitably	

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			qualified and experienced biodiversity experts, as required by Condition B30(a) of the Infrastructure Approval. • Updates to the HLE BMP following submission of the revised BAVR should incorporate the specific measures to minimise impacts on entities at risk of SAII, as required by Condition B30 (d(xiii)) of the Infrastructure Approval.	
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: (a) details on siting of transmission towers and ancillary infrastructure and / or ancillary facilities; and (b) showing comparison to the approved layout and approved vegetation clearing. The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans.	• HumeLink – Final Layout Plans staging request (letter from DPHI to Transgrid, dated 22 August 2025, reference SSI-36656827-PA-109) • HumeLink – HumeLink East Final Layout Plans staging request letter from DPHI to Transgrid, dated 11 September 2025, reference SSI-36656827-PA-111) • HumeLink – HumeLink East Final Layout Plans Stage A Total Clearing (letter from DPHI to Transgrid, dated 23 February 2026, reference SSI-36656827-PA-167) • HumeLink – HumeLink East Final Layout Plans Stage A Total Clearing (letter from DPHI to Transgrid, dated 27 February 2026, reference SSI-36656827-PA-172) • HumeLink – HumeLink East Final Layout Plan Stage A Total Clearing Zone Rev 02 (letter from DPHI to Transgrid, dated 26 March 2026, reference SSI-36656827-PA-177) • HumeLink – HumeLink East Final Layout Plans Stage A Total Clearing (letter from DPHI to Transgrid, dated 13 May 2026, reference SSI-36656827-PA-191) • HumeLink – HumeLink East Final Layout Plans Stage A Total Clearing (letter from DPHI to Transgrid, dated 13 May 2026, reference SSI-36656827-PA-195) • HumeLink – HumeLink East Final Layout Plans (letter from DPHI to Transgrid, dated 13 May 2026, reference SSI-36656827-PA-196) • HumeLink – HumeLink East Final Layout Plans (letter from DPHI to Transgrid, dated 21 May 2026, reference SSI-36656827-PA-198) • HumeLink – HumeLink East Final Layout Plans (letter from DPHI to Transgrid, dated 3 June 2026, reference SSI-36656827-PA-205) • HumeLink – HumeLink East Final Layout Plans (letter from DPHI to Transgrid, dated 2 July 2026, reference SSI-36656827-PA-210) • HumeLink – HumeLink East Final Layout Plans (letter from DPHI to Transgrid, dated 16 July 2026, reference SSI-36656827-PA-221)	Transgrid has requested approval to stage the FLPs for the HumeLink project, including HLE. These requests have been approved by DPHI. Transgrid have now finalised the FLPs and the FLPs were submitted to DPHI between 12 February and 13 July 2026 and have been acknowledged by DPHI. Transgrid have applied for revised clearing limits under Condition B25 of the Infrastructure Approval (see above).	Compliant (C)

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		• Re: HumeLink – Request for Planning Secretary's agreement to exceed clearing limits for certain biodiversity entities – SSI-36656827 Condition B25 (letter from Transgrid to DPHI, dated 4 August 2026) • Subject: HumeLink – Request to exceed clearing limits for certain biodiversity entities (letter from DPHI to Transgrid, dated 12 August 2026, reference SSI-36656827-PA-228)		