

# BARNETT & MAY

**EnergyConnect PEC East Project**

**SSI 9172452**

October 2025 Construction Phase Independent  
Environmental Audit

Prepared for

**Secure Energy**

Client representative

**Rebecca Walker-Edwards**

Date: 20 December 2025

Rev 0



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Prepared by — K. Holmes		Date 20 December 2025
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## Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
<b>a</b>	Draft for client Review	K Holmes	M Holmes	K Holmes	16/12/2025
<b>0</b>	Final Report	K Holmes	K Holmes	K Holmes	20/12/2025

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# 1. Introduction

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

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

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

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

The audit was undertaken in accordance with the Barnett and May's proposal dated 27 September 2023, and the requirements of the NSW of Planning and Environment (DPE) Independent Audit Post Approval Guidelines (May 2020). This series of construction phase audits were commissioned by the Secure Energy on 14 November 2023. DPHI approved the appointment of the Lead Auditor for this audit on 9 September 2025.

## 1.1 Audit and Report Program

The audit site inspections commenced on 27 October and concluded on 30 October 2025.

## 1.2 Project Description and Status of Construction

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

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

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

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

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

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

This Independent Environmental Audit covers the works on the eastern section under SSI 9172452. The construction of the western section was completed in April 2025.

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

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

At the time of this audit the works were nearing completion, with circa 95% of the transmission line installed and the works on substations substantially complete. Decommissioning of the construction camps had commenced, and site rehabilitation works well progressed.

It is anticipated that all construction works will be completed early in 2026.

## 1.3 Audit Objectives

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

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

## 1.4 Audit Scope

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

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

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

## 1.5 Audit Period

This audit of the construction phase of the project covers the period of 30 April 2025 to 27 October 2025.

## 1.6 Limitations of this Report

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

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

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

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

## 2. Definitions

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

### 3. Auditor Certification

#### Independent Audit Certification Form

Development Name	EnergyConnect Project (NSW Eastern Section)
Application Number	SSI 9172452
Description of Development	High Voltage Electricity Transmission Line
Development Address	Southwestern NSW
Proponent	Transgrid
Title of Audit	EnergyConnect PEC East October 2025 Independent Environmental Audit

*I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:*

- *The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (May 2020).*
- *The findings of the audit are reported truthfully, accurately and completely;*
- *I have exercised due diligence and professional judgement in conducting the audit;*
- *I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;*
- *I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;*
- *I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);*
- *Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and*
- *I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.*

*Note.*

- a) *The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.*
- b) *The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).*

Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	75-77 Foamcrest Avenue, Newport, NSW
Email Address	ken@baeckeaa.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	20 December 2025

### 3.1 Audit Details

*Table 1 - Audit Details*

<b>Audit Title:</b>	<b>EnergyConnect (NSW – Eastern Section) October 2025 Construction Phase Independent Environmental Audit</b>
Site:	EnergyConnect (NSW – Eastern Section)
Client Contact:	Rebecca Walker-Edwards
Position:	Environmental Manager (Elecnor)
Client:	Transgrid
Client Address:	Level 19, 83 Clarence St Sydney NSW 2000
Client Phone Number:	+61 420974540
Client Email:	Rebecca.walker-edwards@elecnor.es
Auditor Team	Ken Holmes (Certified Lead Auditor)
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baecke.com.au
Date of Audit Commencement:	27 October 2025

## 4. Audit process

### 4.1 Audit Guidelines

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

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

*Table 2 - Post Approval Audit Guidelines*

Section	Independent Audit Report Requirements	Addressed
4.1	<b>Version Control</b> 1) the application number of the project; 2) each version or revision number of the report; 3) the date on which the report was prepared and issued to the Department; and 4) the title and name of the person who certified the Independent Audit Report.	Section 3 Page iii Page iii Section 3.1
4.2	<b>Contents</b>	
4.2.1	<b>Introduction</b> – a brief overview of the audit including: 1) background of the project; 2) the audit team (including qualifications and experience); 3) the objectives of the audit; 4) the audit scope; and 5) the temporal period covered by the audit.	Section 1.1 Section 4.3.1 and Appendix E Section 1.2 Section 1.3 Section 1.4
4.2.2	<b>Audit Methodology</b> 1) documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 2) how the audit scope was developed; 3) a summary of the audit process adopted to determine the compliance status and assess if documents are adequate; 4) site personnel interviewed including their name and position title (and including if access was not granted or possible with any required personnel and why); 5) details of site inspections undertaken (including any areas where access was not granted or possible and why); 6) a summary of the consultation undertaken; and 7) meanings of compliance status descriptors used, as set out in this document.	Appendix C Section 1.3 Section 4 Section 4.5.3 Section 4.5.2 Section 5 Section 4.6
4.2.3	<b>Audit Findings</b> 1) a list of the approvals and documents audited; 2) a summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period. Graphics can be used to summarise project performance in relation to compliance requirements; 3) a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period;	Appendix A Section 6.1 Section 7.3

Section	Independent Audit Report Requirements	Addressed
4.2.3	4) exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance;	Section 6.2
	5) a brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action. Details must include the source of the action, reference (condition number), action proposed, proposed completion date, the status (date completed, if relevant) and the action complete.	Section 7.6
	6) a brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement;	Section 7.5
	7) a discussion of other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance;	Section 7.9
	8) documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation;	Section 5
	9) a summary of complaints, and the adequacy of the response to, and management of complaints;	Section 7.2
	10) details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents;	Section 7.1
	11) an assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the Environmental Planning and Assessment Act 1979;	Section 7.8
	12) evidence collected through site inspections undertaken during the audit;	Appendix A
	13) evidence to support compliance assessment provided by the personnel interviewed during the audit;	Appendix A
	14) a brief discussion of any continual environmental management improvement opportunities identified as part of the audit; and	Section 6.2
	15) key strengths of the development's environmental management and performance identified by the auditor.	Section 7.4
4.2.4	Recommendations and opportunities for Improvement	Section 6.3
4.2.5	Appendices	
	1) a completed Independent Audit Table with all relevant conditions of consent, identifying each requirement, compliance status assessed, documenting verified evidence and providing recommendations for any non-compliance that is identified;	Appendix A
	2) a copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s);	Appendix C
	3) documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee;	Appendix D
	4) completed and signed Independent Audit Declaration Form(s);	Section 3
	5) any reports prepared by the agreed technical specialist(s), as required; and 6) site inspection photographs.	Not required Appendix B

## 4.2 Overview

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

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

## 4.3 Preliminary activities

Off-site planning for the site audit comprised:

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

### 4.3.1 Approval of audit teams

Transgrid sought the Secretary's endorsement for the audit team to undertake this Independent Environmental Audit. The Secretary approved the appointment of the Auditor (Ken Holmes) on 9 September 2025 (refer to Appendix C).

### 4.3.2 Consultation with Agencies

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

## 4.4 Information Review and Compliance Register

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

## 4.5 Site audit

The site inspection components of the audit were undertaken between 27 October 2025 and 30 October 2025.

#### 4.5.1 Opening Meeting

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

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

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

#### 4.5.2 Site Inspections

27 October and concluded on 30 October 2025.

The site inspections included observation of:

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

#### 4.5.3 Site Interviews

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

*Table 3 - Audit Interviews*

Name	Company	Role
Willem Venter	Elecnor	Deputy Environmental Manager
Shaun Beauchamp	Elecnor	Construction Supervisor
Ozlem Anar	Elecnor	Environmental Coordinator
Rebecca Walker-Edwards	Elecnor	Environmental Manager
Cameron Weller	Hutchinson Weller	Environmental Representative
Megan Calver	Transgrid	Senior Environmental Approvals Coordinator
Luke Fania	Transgrid	Environment and Sustainability Manager

#### 4.5.4 Closing Meeting

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

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

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

#### 4.5.5 Document Review

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

## 4.6 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix A**. The audit criteria used to determine compliance for this audit is defined in 4.

Table 4 - Compliance Assessment Matrix

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

Risk levels for each non-compliance identified have been assessed in accordance with Table 5.

Table 5 - Risk Assessment Matrix

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

## 5. Stakeholder Consultation

The Stakeholder Consultation for both the PEC East and PEC West Independent Environmental Audits were undertaken together. 6 provides a summary of the Stakeholder Consultation undertaken by the Auditor.

Table 6 - Summary of Stakeholder Inputs

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	DPHI (telephone conversation K O'Reilly) requests that the following issues be addressed in this IEA:	
		Areas to be focused to include:	
		<ul style="list-style-type: none"> <li>• Evidence of compliance with commitments, reporting and monitoring in all management plans.</li> </ul>	Please refer to Appendix A.
		<ul style="list-style-type: none"> <li>• Evidence of any adaptive management identified/ implemented.</li> </ul>	Adaptive management (the use of both temporary fencing and green flagging) is being applied to address landholder livestock concerns at this location.
		<ul style="list-style-type: none"> <li>• Evidence of compliance with approved footprint and current activities.</li> </ul>	<p>During the last IEA, a Biodiversity specialist undertook a detailed review of the project and verified that clearing works complied with the Approval requirements.</p> <p>All of the clearing for the project was completed prior to commencement of this audit. However, based on the Auditor's observations during this IEA and the review of the project clearing register, the works undertaken to date are contained within the approved project boundaries.</p>
		<ul style="list-style-type: none"> <li>• Erosion and sediment controls, management, monitoring and maintenance.</li> </ul>	The erosion and sediment controls observed during this audit were in accordance with the current ERSED plans.
		<ul style="list-style-type: none"> <li>• Comparison between EA predictions and actual impacts.</li> </ul>	Please refer to Section 7.9
	Katrina O'Reilly	<ul style="list-style-type: none"> <li>• Evidence (tracking documentation/measures implemented) to ensure compliance with clearing and disturbance limits c 23.</li> </ul>	The construction of the PEC East project is nearing completion and all clearing works had been completed. During the previous

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure			IEA, a Biodiversity specialist undertook a detailed review of the project and verified that clearing works complied with the Approval requirements. A clearing register has been maintained.
		<ul style="list-style-type: none"> <li>Road maintenance/ monitoring and management and the interface /access onto road networks.</li> </ul>	Road dilapidation surveys were completed during this audit period and evidence of consultation with Councils across the project were sighted.
		<ul style="list-style-type: none"> <li>Evidence of Progressive Rehabilitation.</li> </ul>	Rehabilitation works along the power line corridor, where over 50% complete.
		<ul style="list-style-type: none"> <li>Implementation of ACHMP and compliance with conditions and evidence of consultation with Local RAPS.</li> </ul>	No heritage related incidents were identified during this IEA. All RAPs were given the opportunity to provide input to this IEA.
		Complaints management, monitoring and response.	Refer to Section 7.2.
Heritage NSW	Alison Lamond	<p>Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for your project. Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans.</p> <p>Heritage NSW has been made aware of multiple unexpected Aboriginal Cultural Heritage Finds during construction works, we advise that ensuring the management requirements of the conditions of consent and the Aboriginal Cultural Heritage Management plan with relation to the newly identified sites is also included in your scope.</p>	<p>The Auditor reviewed each of the Unexpected finds reports. In all cases the Proponent satisfied all of the requirements of the Approval and the Heritage Management Plan.</p>
Transport for NSW	Glen Hanchard	TfNSW remit is to ensure that the safety and efficiency of the state road network is maintained. Can the audit please ensure compliance with the Transport and Traffic conditions levied by the consent authority, commitments made in the EIS and compliance with the Traffic Management Plan is considered.	Please refer to Appendix A for the assessment of compliance against the traffic related sections of the Planning Approval.

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Environment Protection Authority	Georgia Feben	<p>The EPA understand that you are carrying out an independent audit of the NSW Eastern Section of the Project Energy Connect (NSW Eastern Section – Buronga to Wagga).</p> <p>As per the information provided during the previous 6 monthly audit, the EPA's interest in the project relates to the requirement for an Environment Protection Licence under section 43 and 48 of the Protection of the Environment Operations Act 1997 (POEO Act) for crushing, grinding or separating, clause 16 of Schedule 1 - for the upgrade of the Dinawan Substation (SSI-9172452).</p> <p>The proponent should be aware that under section 120 of the POEO Act, it is an offence in NSW to pollute waters. During construction the proponent must take all necessary precautions and implement all practical measures that could be taken to prevent, control, abate or mitigate water pollution and protect human health and the environment from harm during the construction phase.</p> <p>The proponent should also be aware of the management of noise and vibration from the construction sites, ensuring that all practical measures that could be taken to prevent noise and vibration impacts on sensitive receptors are undertaken, including the scheduling of noisy activities.</p> <p>In addition, note should be taken on the management of dust from the work sites, in particular ensuring that all practical measures that could be taken to prevent dust moving from the work sites are being implemented.</p>	<p>Noted, the audit covered compliance issues related to surface water, dust, noise and vibration management and found that the project was being operated in compliance with the relevant sections of the Planning Approval. No evidence of any breaches of Sections 43 and 48 of the POEO Act was found.</p>
Conservation Programs, Heritage and Regulation Group DCCEEW	Andrew Fisher Senior Team Leader South West	<p>As part of the upcoming November 2025 audit please confirm that the Biodiversity Management Plan has been updated consistent with improvement recommendation 'Biodiversity 4'.</p> <p>We note from Table 12 of the previous audit titled 'EnergyConnect PEC East Project SSI 9172452, April 2025 Construction Phase Independent Environmental Audit' that the proposed completion date for updating and finalising the Biodiversity Management Plan was 31 May 2025.</p>	<p>The Biodiversity Management Plan has been revised in response to all of the recommendations made by the Ecology Specialist. The plan has been completed and submitted to DPHI is, at the time of this audit was awaiting DPHI review.</p>

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

Department	Contact	Stakeholder Comments	Auditor Comments
<b>DCCEEW Water Group</b>	Tim Baker	<ul style="list-style-type: none"> <li>○ Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.</li> </ul>	No water access licences are required for this project by the Proponent. Evidence was sighted that Water Access Licences are held by the entities providing water for the project.
		Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.	The Planning Approval does not require annual reporting.
<b>Local Land Services</b>	Susie Holbery	Local Land Services did not respond to the consultation request	Noted
<b>Crown Lands</b>	Jarrod Smith	Crown Lands did not respond to the consultation request	Noted
<b>National Parks and Wildlife Service</b>	Simone Carmichael	The NPWS responded to the consultation request but did not raise any specific issues and concerns.	Noted
<b>Rural Fire Service</b>	Stephen Walker	The RFS did not respond to the consultation request	Noted
<b>Forestry NSW</b>	Jarod Dashwood	Forestry responded to the consultation request however did not identify any issues or concerns.	Noted
<b>Commonwealth Department of Climate Change, Energy, the Environment and Water</b>	Katrina Corby	The Commonwealth acknowledged receipt of the consultation request but did not provide any further input.	Noted
<b>Wentworth Council</b>	Jarrod Roberts	Wentworth Council responded to the consultation request however Council raised no issues or concerns.	Noted
<b>Wagga Wagga Council</b>	David Woods	Council did not respond to the consultation request.	Noted
<b>Balranald Council</b>	Peter Bascomb	Council did not respond to the consultation request.	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
<b>Berrigan Shire Council</b>	Sarah Griffiths	<p>While the haulage route is not near Berrigan Shire, we note that heavy haulage vehicles will be travelling from VIC and Sydney to the site. Can you please ensure that your audits look at the impacts on infrastructure; environmental impacts resulting from heavy haulage; and impacts on local areas (EG as a result of camp sites used by traffic haulers, stopping mid journey) in terms of noise, fumes etc.</p> <p>To complete our records, we would be grateful if you can confirm what the expected heavy movements / haulage are (and have been) through Berrigan Shire Council. Thanks.</p>	The Auditor noted Council's request for transportation records relevant to their local government area and passed on that request to Elecnor.
<b>Federation Council</b>	Susan Appleyard	Council did not respond to the consultation request.	Noted
<b>Edward River Council</b>	General Manager	Council did not respond to the consultation request.	Noted
<b>Hay Shire Council</b>	David Webb	I can advise that Hay Shire Council does not have any issues or concerns in regards to the environmental performance of the construction project over the past six months.	Noted
<b>Lockhart Council</b>	Austin Morris	Council responded to the consultation request but did not raise any specific issues and concerns.	Noted
<b>Murray River Council</b>	General Manager	Council did not respond to the consultation request.	Noted

Registered Aboriginal Party	Contact	Stakeholder Comments	Auditor Comments
Southern West Yiradyuri Clans	Ray Woods / Mark Williams / Will Carter	<p>Following an initial response to the consultation request, a virtual meeting was held between the three RAP representatives and the Auditor.</p> <p>The RAP believes there is no net benefit to Aboriginal communities from these projects. A summary of the key issues raised by the RAP follows.</p> <p><b>General Issues associated with regional projects such as Project Energy Connect:</b></p> <ul style="list-style-type: none"> <li>• There is a lack of effective opportunities to provide meaningful inputs into the project, starting at EIS stage of projects and throughout construction.</li> </ul>	<p>The Auditor raised these issues raised with the Proponent and construction contractor.</p> <p>The Following responses were provided by TransGrid / Elecnor:</p> <p>The Southern West Yiradyuri Clan were engaged for test excavation works, salvage works, and will be engaged for repatriation activities when they occur.</p> <p>Additional to the Approval requirements, the project engaged this RAP group to be present during clearing works and we're working to protect severally cultural important trees which were otherwise approved for removal.</p> <p>There was quite a large amount of work which arose from this, and we understand that it's enabled this RAP group to use that income to employ additional personnel and to assist in purchasing a local property.</p>
		<ul style="list-style-type: none"> <li>• They believe that the consultation focus is with the Local Aboriginal Land Councils and that the RAPs are not adequately consulted.</li> </ul>	<p>For the entire construction phase all RAPs have been consulted with, not just the Lands Councils</p>
		<ul style="list-style-type: none"> <li>• There are insufficient employment opportunities on these projects and the RAP questioned whether the proponent and contractor were operating in accordance with their Employment Plans.</li> </ul>	<p>Please refer to the first response above.</p>
		<ul style="list-style-type: none"> <li>• The processes in place (both during the EIS stage and post Approval stage) for the identification and selection of RAPs is questionable. They believe that some of the RAPs selected do not have legitimate connections to the lands on which the projects are being constructed, i.e. not Wiradjuri people.</li> </ul>	<p>During the post-approval stage Elecnor is required to comply with our Approval in determining which RAPs to engage with. The Aboriginal stakeholders are defined in the Infrastructure Approval and requires that consultation with the RAPs identified within the EIS is undertaken.</p>

Registered Aboriginal Party	Contact	Stakeholder Comments	Auditor Comments
Southern West Yiradyuri Clans	Ray Woods / Mark Williams / Will Carter	<p><b>General Issues continued:</b></p> <ul style="list-style-type: none"> <li>The employment of RAPs who do not have legitimate connection to the local land may and have resulted in violent interactions.</li> <li>The remuneration of RAPs is not consistent.</li> <li>They have been asked to tender for work outside of the lands to which they are connected. They declined to tender but were assured that there were no local RAPs able to undertake the work. Subsequent to the submission of a formal tender, there were advised that a local RAP was commissioned to undertake the work. Thus, the effort they put into the tender was wasted. This example highlighted the lack of Cultural Protocols relating to seeking tenders.</li> <li>Most people who represent RAPs are volunteers and are required to spend significant amount of time throughout the various consultation stages. This is inequitable as all other parties are remunerated for their work associate with consultation.</li> <li>There is a need to establish Cultural Protocols at the start of each project in consultation with the appropriate RAPs.</li> <li>While complementary about the incumbent project consultant Archaeologists, they believe that most of the consultants are inexperienced and do not understand the Cultural sensitivities.</li> <li>RAPs are treated as individuals and not as legitimate representatives of their communities.</li> </ul>	Neither Elecnor or Transgrid area aware of any incidents between RAPs.
		<p><b>Project Specific Issues:</b></p> <ul style="list-style-type: none"> <li>The RAP does not know who gave permission for the naming of the Dinawan Substation as any use of Aboriginal names needs to be approved by the Naming Trust.</li> </ul>	Transgrid sought permission from the Lands Council I believe and liaised with the relevant RAP prior to naming the substation.

Registered Aboriginal Party	Contact	Stakeholder Comments	Auditor Comments
Southern West Yiradyuri Clans	Ray Woods / Mark Williams / Will Carter	<p><b>Project Specific Issues continued</b></p> <ul style="list-style-type: none"> <li>They were unaware that the Project had purchased the Simbarimbah property and believed they should have been notified as the appropriate RAP for that area.</li> <li>They believe the Hay LALC has been appointed to manage the Simbarimbah property and that they were not given the opportunity to tender.</li> </ul>	Elecnor understands that the Southern West Yiradyuri Clans was provided with the opportunity to tender.
		<p><b>The RAPs desired outcomes:</b></p> <ul style="list-style-type: none"> <li>No relocation of artifacts without RAP consultation.</li> </ul>	The artefacts are only salvaged or surface collected with RAPs present. Repatriation occurred in accordance with their wishes (ie immediate repatriation in this section of the project in line with requests). This RAP group requested that we include that as an option in the HMP, which occurred.
		<ul style="list-style-type: none"> <li>Establishment of Cultural Protocols</li> </ul>	
		<ul style="list-style-type: none"> <li>Remuneration for actual time spent relating to consultation and other services (such as smoking ceremonies) provided.</li> </ul>	On Project EnergyConnect, all RAPs are paid for all site work (survey, test excavation, salvage, repatriation) and for smoking ceremonies.
		<ul style="list-style-type: none"> <li>Consult with only the RAPs that have a genuine connection to the land.</li> </ul>	Substantial work was undertaken on the start of the project to achieve this outcome
		<ul style="list-style-type: none"> <li>Treat Raps as genuine representatives of their communities, not as only individuals.</li> <li>All project should implement the NSW Aboriginal Affairs Cultural Knowledge Standards and the Federal Government's response to the Juukan Gorge Incident as both of these documents highlight the requirement to uphold the Free, Prior and Informed Consent (FPIC) of Aboriginal peoples and to respect their rights as affirmed under the UN Declaration on the Rights of Indigenous Peoples (UNDRIP).</li> </ul>	

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

Registered Aboriginal Party	Contact	Stakeholder Comments	Auditor Comments
<b>Balranald Mutthi Mutthi Traditional Owners</b>	Kaleana Reyland	The RAP did not respond to the consultation request	Noted
<b>Barkindji Maraura Elders Environment Team Limited</b>	Arthur Kirby	The RAP did not respond to the consultation request	Noted
<b>Riverina Murray Regional Alliance</b>	John Fernando	The RAP did not respond to the consultation request	Noted
<b>Hay Aboriginal working party</b>	Ronald Goulding	The RAP did not respond to the consultation request	Noted
<b>Yalmambirra</b>	The Chairperson	The RAP did not respond to the consultation request	Noted
<b>Kureinji Nation</b>	Michael Carter	The RAP did not respond to the consultation request	Noted
<b>Individual Registered Aboriginal Parties</b>	Roley Williams Cheryl Penrith Cherokee Dixon Tiem Wilson Jermaine Dixon Mabel Fitzpatrick Kerrie Parker Richard Dixon Jamie Woods Sissy Petit Havea Terrance Singh Dalas Togo Singh	These RAPs did not respond to the consultation request	Noted

Registered Aboriginal Party	Contact	Stakeholder Comments	Auditor Comments
<b>Individual Registered Aboriginal Parties</b>	Zakk, Togo Singh Jed Petit Alvira Wighton Alice Petit Marie Murray Edward Murray Smith Daryl Singh	These RAPs did not respond to the consultation request	Noted

## 6. Statutory Compliance and Recommendations

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

### 6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 7 - Summary of Statutory Compliance. The number of conditions include sub-clauses within each approval document.

Table 7 - Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non-Compliant	Noted	Not Triggered
Project Approval 9172452	178	144	0	11	33

## 6.2 Non-Compliances and other recommendations

No non-compliances against the requirements of the Planning Approval were identified during this Independent Environmental Audit. The details of the site inspection, interviews and document reviews are recorded in the Compliance Registers in **Appendix A**. Independent Audit Post Approval Requirements

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

## 6.3 Summary of Environmental Incidents

The Auditor was provided with a copy of the Incident Register and incident report correspondence between DPHI and Transgrid.

**One reportable incident** was recorded during this audit period. This incident that occurred on 17 July 2025 related to a motor vehicle accident involving a project vehicle and a private vehicle. Transgrid reported the incident that involved '*actual or potential harm to the health or safety of human beings...that is not trivial*' under Condition D6 of the Planning approval to DPHI on 17 July 2025.

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

- Twenty-six (26) minor hydrocarbon leaks or spills
- Nine (9) biodiversity related incidents, all involving unapproved disturbance (for example vehicle cutting the corner of an approved access track) on areas within outside of flagged work zones.
- Six (6) minor wastewater spills.
- Two (2) Air Quality (SF6) gas leaks during maintenance work works.
- One (1) heritage incident (concrete blocks at a breaking site stored outside of the approved work area).
- One (1) failure to follow internal procedures
- One site access incident (truck parked on public road)

### 6.3.1 Incident Response Assessment

The system implemented as documented in the EMS includes:

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

The incident management system is being implemented as documented.

## 6.4 Summary of Complaints

Twenty-four complaints related to the construction of the project were recorded by the Proponent over the Audit Period. A summary of the complaints received that were extracted from Transgrid's complaints Register is provided in Table 8. One of the complaints received was not related to the Project EnergyConnect works.

The compliant categories were:

- Failure of alternate power supply (3)
- Property Access (4)
- Gates left open - 4
- Biosecurity (vehicle cleaning prior to private land access) – 2
- Traffic (speeding / dangerous driving by project vehicles) – 2
- Road Damage (3)
- Employee conduct - 2
- Dust (1)
- Property Damage (1)
- Telecommunications (1)
- Other (2)

### 6.4.1 Compliant Management System Assessment

The complaints management system as documented in the EMS includes:

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

The Auditor is satisfied that the project is implemented that complaint management system.

Table 8 - Summary of Complaints

Date	Summary	Response and Investigation	Category
1-May	A community member reported a speeding vehicle on Lockhart-Boree Creek Road. The community member also raised concerns about trees blocking visibility near the railway signs, which have been reported to Lockhart Shire Council.	Construction team reminded about the hazards of this section of road including the blind corner, local speed limits and its narrow width. The Safety team are planning a workforce campaign for safe driving protocols.	Traffic
5-May	L/H189-190 reported non-compliance with agreed property biosecurity protocols referencing vehicle inspections, hygiene sheets and property entry point. The landholder locked the entry property gates.	The PEC Land Access and Construction Team met with the landholder and agreed to improved mitigation measures including the training of dedicated vehicle inspection staff, supplying of weekly construction schedules and the installation of new lock on an internal gate, and reminders to the workforce of biosecurity protocols.	Biosecurity
6-May	Construction stringing activity caused damage to an internal fence on L/H 046. Landholder alleged that this incident potentially allowed Merino stud sheep to mix with Dorper sheep in adjoining paddock.	Fence was fixed the same day by construction. The team has reviewed stringing approach on this property. The PEC Land Access Manager met with L/H and agreed on mitigation measures to manage stock.	Property Damage
15-May	A community member advised the PEC Engagement Team that a driver of a contract cement truck caused a passenger vehicle to veer off Booroorban Tchleray Road, and that there have been other reports of these trucks displaying dangerous road use.	Road safety protocols reinforced with the workforce, included targeted conversations with contract cement truck operators. Incident was lodged in Safety Management system.	Traffic
17-May	H176 notified the Land Access Officer that his sheep had been boxed in a paddock due to the PEC construction crew not closing an internal property gate correctly.	Construction Team notified and the gate was closed and locked correctly the same day. Internal gate closure protocols reinforced with the work crew and reminders included in morning pre-start briefing.	Gate Left Open
23-Jun	L/H191 called the Land Access Officer advising that a PEC survey vehicle had travelled through his property leaving a gate open, which resulted in stock being boxed.	The contractor responsible was reminded of gate protocols. Additional reminders communicated at pre-start meetings the following morning. EA installed open and close signs.	Gate Left Open
2-Jul	A complaint regarding employee conduct was received by Transgrid via email, following a phone conversation between a representative of Griffith Local Aboriginal Land Council (LALC) and a member of the PEC Engagement Team.	The complaint was acknowledged, and an internal investigation was undertaken. Transgrid provided a formal response to Griffith LALC, and no disciplinary action issued to the PEC Engagement Team member.	Employee Conduct

Date	Summary	Response and Investigation	Category
8-Jul	A complaint regarding the impact on mobile phone coverage since the increase in construction activities in the Dinawan area was emailed to Transgrid. The complainant is seeking reimbursement for the purchase of Starlink.	The complaint was acknowledged by Transgrid, who will remain in contact with the community member while inquiries are undertaken with EnergyCo. Elecnor provided Transgrid with data and an overview of workforce mobile phone use patterns and Starlink activity, which was used to inform the feedback to the community member	Telecommunications
9-Jul	L/H H205 contacted EA Land & Access Officer to complain that two large trees have been removed from his property. The L/H also advised he had no knowledge of brake and winch equipment being mobilised on his property.	The Land Access Team organised to meet with the L/H to discuss the stringing schedule, once supplied by the Construction Team and L/H confirms availability. The complaint has been closed and a commitment made to discuss mitigation measures with the landholder.	Land Access
16-Jul	H165 contacted EA Land & Access Officer to inform the project that the supplied generator had broken down and there was no power to the house.	The generator was fueled by the L/H. Enercon was called to site to investigate the issue. The Landholder was satisfied that the complaint was actioned.	Alternate Power Supply
19-Jul	H069 emailed the PEC Construction and Land Access Team Managers advising that PEC vehicles had been accessing the easement via the stock grid adjacent to the designated gates.	The Construction Team acknowledged the complaint with the L/H and advised him there will be follow-up with the reported vehicle operators and the matter will be discussed at prestart meetings.	Land Access
21-Jul	The Transgrid community inbox received an email from a near-neighbour to the PEC alignment complaining about the conduct of a Community Liaison Officer	Transgrid investigated the circumstances of the complaint and liaised with the community on the outcome of their findings.	Employee Conduct
28-Jul	H209 called PEC Land Access Officer advising that a gate had been left open and sheep had walked into neighbouring property. L/H mustered sheep back into his property and requested that this gate is always closed after entry.	The Land Access Officer acknowledged the complaint and advised the L/H the Construction team were notified. A gate sign was installed to communicate that it should be left in the closed position. The L/H was happy with this mitigation.	Gate Left Open
31-Jul	A community member residing in Tootool lodged a complaint with Transgrid's community call centre regarding the impact of construction vehicles on the condition of Hendersons Road.	Transgrid acknowledged the community member's complaint. The PEC Engagement Manager then advised the community member that the Construction Team is scheduled to undertake repairs to Henderson Road on the 7th of August. The community member was satisfied with the quick resolution of the complaint and the attendance to the repairs.	Road Damage
8-Aug	A First Nations business that was booked to provide cultural awareness training at two of the project's camps issued a complaint following the postponing of the sessions.	The Complaint was acknowledged by the project's Communications and Engagement Lead. A follow-up call was made to apologise for the miscommunication and explain the reason for postponing. The intention to continue engagement with the organisation and its Elders after further planning was reaffirmed, and the Elders expressed appreciation for the clarification.	Other

Date	Summary	Response and Investigation	Category
28-Aug	H094 called the PEC Land Access Officer reporting gates left open onto Thurrowa Rd and Bundure Rd, raising risks to property and livestock.	The Land Access Officer acknowledged the complaint and then visited the property, closed the gates, and confirmed the issue was resolved. The Construction team were notified and reminded of gate protocols. The landholder has been invited to meet and discuss further if needed.	Gate Left Open
28-Aug	H095 reported the poor condition of Bundure Road, raising safety concerns and requesting repairs.	The Land Access Officer acknowledged the complaint. advised the landholder that project crews will be undertaking repairs to Bundure and surrounding roads with works commencing 15 Sept.	Road Damage
30-Aug	A community member living near to the PEC corridor called the community 1800 number advising that an Essential Energy worker had accessed her property without notification and begun setting up works.	The Community Stakeholder Manager advised the community member that Essential Energy is not a contractor to Elecnor, and that the project team only undertakes works within the PEC easement and approved hours. The community member was referred to Essential Energy for further information about the works.	Not Project Related
7-Sep	Landholder H195 reported that a project vehicle entered their property without complying with equipment and vehicle cleaning procedures..	The Land Access Officer acknowledged the complaint and inspected the property. The driver was reminded of vehicle hygiene requirements and directed to remove the vehicle. The construction team has issued fobs for Wagga based operators to use at car wash facility	Biosecurity
21-Sep	A community member living next to the project easement reported that a subcontractor security guard working for Elecnor entered their property without authority.	The residents were advised that the security guard mistakenly entered their driveway, believing it was access to the project easement. The security company has been instructed not to enter the property, and a 'No Entry' sign will be installed at the front gate.	Land Access
22-Sep	Landholder H205 reported that a stud ewe became entangled in environmental flagging and perished after a period of time. The landholder expressed concern for animal welfare and has moved sheep out of paddocks where flagging is currently in place.	The Land Access Officer acknowledged the complaint. The carcass and flagging were removed, an apology was issued, and the landholder will be reimbursed for costs associated with the ewe. Additional mitigations include prompt removal of environmental flagging after tower stringing and revised flag-tying techniques to improve durability and reduce future risks.	Other

Date	Summary	Response and Investigation	Category
23-Sep	Elecnor received a letter from the Office of the Australian Energy Infrastructure Commissioner (AEIC) raising community concerns regarding the condition and safety of several local roads in the Hay and Edward River regions, with specific reference to Booroorban Tchelery Road, Willurah Road, and Carrathool Road.	The Engagement Manager acknowledged receipt of the letter. Elecnor provided a response outlining the Project's obligations under the Infrastructure Approval and the road maintenance activities underway with councils, including the ongoing dilapidation survey program. Elecnor also extended an invitation for continued engagement with the AEIC.	Road Damage
25-Sep	Landholder H176 contacted the PEC Land Access Officer to report that three project-related vehicles entered their driveway without authorisation.	The complaint was acknowledged with the landholder. Investigation confirmed the crew were new to this section of the project and had mistakenly entered via an incorrect access point. The crew apologised directly to the landholder. Updates have been made to the in-vehicle monitoring system (IVMS) to activate exclusion boundary alarms on contractor vehicles, and additional reminders on correct entry points have been reinforced at pre-shift safety briefings.	Land Access
24-Sep	The PEC Engagement Manager and Engagement Lead met with the local resident as part of a follow-up to a previous complaint. During the meeting, the community member raised several concerns about the project, including a project-related generator that appeared to be faulty and had caused multiple electrical outages on the property resulting in damage to the owner's fridge.	The subcontractor attended the property and repaired the generator. The Project's Engagement Team investigated the additional concerns raised by the community member and confirmed that signage will be installed at the property's entry gate. All crews have been reminded that access to the easement is via the neighbouring property	Alternate Power Supply
30-Sep	The Energy and Water Ombudsman (EWON) issued correspondence to Transgrid's community inbox regarding a community complaint about a faulty generator supplied during an Essential Energy outage, undertaken to facilitate project stringing works approximately 500m from the property.	Transgrid acknowledged the complaint and made a commitment to respond to the community member and EWON within the required timeframe with the outcome of its investigation.	Alternate Power Supply

## 6.5 Summary of Notices

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

## 6.6 Project Environmental Management System

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

The Auditor has concluded that the degree of compliance identified in this audit indicates the CEMP is appropriate and is generally being implemented.

## 6.7 Implementation of the Environmental Management Plan and Sub-plans

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

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

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

## 6.8 Status of Previous IEA Findings

The previous Independent Environmental Audit was undertaken by Barnett and May, and the audit report was finalised on 13 June 2024. The status of the finds from that audit are summarised in Table 9.

*Table 9 – Status of previous IEA Findings.*

Ref.	April 2025 Audit Finding	April 2025 Audit Recommendation	Auditee Response / Observation	Status
A13	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A12, as well as the complaints register for any complaints received (on the day they are received).	<p>Transgrid advised DPHI of the failure to advise the ER of a complaint relating to a traffic incident on 4 December 2024.</p> <p>Correspondence from Elecnor to the ER advising the ER of the receipt of other complaints was reviewed. The correspondence reviewed indicated that the ER was advised on the day the complaint was received.</p> <p>Ensure that the ER is advised on all complaints received.</p>	The ER was provided with all relevant complaints information during this audit period.	Closed
B2	<p>NC1 *Specialist Biodiversity Audit Report (Appendix F)</p> <p>Related to BMP measure BD14 which requires pre-clearing or clearing activities in areas of Plains-wanderer habitat to be undertaken in accordance with the Plains-wanderer Protocol in Appendix F of the BMP.</p>	<p>Overall, sufficient evidence was sighted that requirements relating to pre-clearing or clearing activities in areas of Plains-wanderer habitat are undertaken in accordance with the Plains-wanderer Protocol in Appendix F of the BMP.</p> <p><b>Non-compliance:</b> Relates to green flagging that was observed to be down at Line 2, Tower 154, Plains Wanderer habitat.</p> <p><b>Recommendation:</b> Flagging to be inspected regularly and maintained to appropriately to protect Plains Wanderer Habitat until construction is complete.</p> <p>It is acknowledged that the project has encountered disturbance to flagging and pegs by landholders and/or livestock and ongoing maintenance of pegs and flagging can therefore be challenging, especially at the location (Tower 154) where the non-compliance was noted.</p> <p>Adaptive management (the use of both temporary fencing and green flagging) is being applied to address landholder livestock concerns at this location.</p> <p>The evidence provided to the auditor, relating to the flagging register and monitoring of flagged sites, is noted. The auditor is satisfied that there are suitable checks in place prior to construction activities commencing, meaning that Plains Wanderer Habitat would be protected prior to construction activities (which were not occurring at the time of the audit).</p>	During this IEA no incidences of damaged / missing flagging was observed.	Closed

Ref.	April 2025 Audit Finding	April 2025 Audit Recommendation	Auditee Response / Observation	Status
C28	<p>The Proponent must:</p> <p>b) implement all reasonable and feasible measures to avoid and minimise harm to Aboriginal heritage items and PADs within the development area; and</p>	<p>Two compliance incidents relating to protection of Aboriginal Heritage were recorded during this audit period. The incidents relate to the unexpected heritage finds on Line 2 at Tower 430 (21/11/24) and Tower 485 (23/11/24). Works undertaken prior to the release of the hold point associated with the unexpected finds. Subsequent investigations found that the artefact(s) at Tower 430 were not of heritage significance. The works at Tower 485 did not impact the heritage artefact found.</p> <p><b>Recommendation:</b></p> <p>Detailed investigations were undertaken and actions taken, including training and procedure updates. No further actions have been identified by the Auditor.</p>	<p>No reportable heritage incidents were recorded during this audit period.</p>	Closed
Recommendations for Improvement				
C41	<p>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.</p>	<p>All fuels and chemicals observed were stored appropriately and there was no evidence of spills or leakages in any storage locations inspected. However, it was noted that, as is common practice on construction and industrial sites, that drummed liquids (20L to 1000L) are often stored on bunded pallets (See photograph 12). It is noted that bunded pallets do not meet the requirements of AS1940 for the storage of flammable and combustible materials as those pallets are not designed to prevent the escape of containerised liquids when the side of the container is accidentally penetrated. See recommendations for improvement in Section 6.2</p> <p><b>Recommendation:</b></p> <p>Transition from the storage of containerised liquids (drums or IBCs) on bunded pallets to storage in temporary (temporary bunding is commercially available) to permanently bunded areas.</p>	<p>The storage of flammable and combustible liquids was being undertaken in accordance with the relevant Australian Standards</p>	Closed
C23a	<p>Unless otherwise agreed with the Planning Secretary, the Proponent must:</p> <p>a) ensure that clearing does not exceed the limits identified in Appendix 2; and</p>	<p>Calculations in predicted versus actual clearing were not undertaken by the biodiversity auditor due to the size of the dataset and limited time for the audit. Transgrid confirmed that a third-party check (WSP) was undertaken to confirm all clearing calculations and that cleared areas were calculated using both on ground surveys and up to date LiDAR imagery.</p> <p><b>Recommendation:</b></p> <p>It is recommended that a report by the third-party reviewer should be provided to the auditor during the next audit period, to satisfy that auditor that clearing has not exceeded the limits specified in the BMP.</p>	<p>This recommendation has not been implemented.</p>	Open

## 6.9 Specialist Auditor Reports

No specialist audit reports were prepared for this audit.

## 6.10 Environmental Impacts

The assessment of construction impacts against those predicted in the Environmental Impact Assessment, prepared by WSP (13 January 2022), are summarised in 10.

*Table 10 - Predicted vs Actual Impacts*

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

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

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

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

#### 6.10.1 Extent of Project Operations

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

## 6.11 Other Matters

### 6.11.1 Water Take Records

Schedule 2, Condition C13 requires that the Proponent must report on water-take during construction. The water-take records provided by SecureEnergy are provided in Table 11 and Table 12 below.

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

Table 11 - Non-Potable Water Take

Water Source	Non-potable Water take (litres)					
	April 2025	May 2025	June 2025	July 2025	August 2025	September 2025
Abbotts Tanks	121,000	-		-		
Alcheringa Hyrant (sic)	5,605,000	85,000	2,826,000	374,000	78,000	78,000
Balranald	66,000	-	-	-	-	-
Church St Balranald	-	22,000	-	-	-	-
Camp 2	70,000	-	-	418,000	-	797,000
Camp 3 Front Tanks	96,000	-	-	-	-	-
Camp 3 Turkeys Nest	311,000	-		126,000		44,000
Camp 3 WWTP	-	-	-	-	22,000	
Camp 4 Turkey's Nest	686,000	-	234,000	305,000	190,000	317,000
Camp 6 Turkey Nest	520,000	-	962,000	-	-	-
Carne Street	88,000	-	-	-	-	-
Church Street	246,000	-	-	-	-	-
Church Street, Balranald	614,000					
Coleambally	459,300	156,000	704,000	258,000	22,000	198,000
Euston	155,000	22,000	-	136,000	-	-
Hooks	100,000	-	-			
Hook Tanks	469,000	84,000	406,000	258,000	344,000	369,000
McCauley St Hay	-	-	-	-	-	-
Mallee Fire Tanks	-	-	13,000	-	-	-
Maude	-	264,000	250,000	168,000	-	-
Maude Tanks	-	43,000	-	-	-	-
MFT Tanks	-	-	-	-	-	-
Milburlong	1,765,160	-	422,000	300,000	-	-
Modica Crescent	-	44,000	-	-	17,300	-

Water Source	Non-potable Water take (litres)					
	April 2025	May 2025	June 2025	July 2025	August 2025	September 2025
On-site dam	-	-	-	396,000		-
Red Hill Road	36,000	-	-	-		-
Sediment Dam	124,000	-	10,000	-	-	-
T414 FWP08/T388 FWP08	1,300		-			-
The Rock	77,000	--	-			-
The Rock / Riverina Water	110,000	--	-		-	-
Tooleybuc	20,000	22,000	195,000		-	-
Turkey's nest	790,000	-	-	12,000	1,060,080	-
Urana	-	-	11,000	-	-	-
Wagga Wagga	705,780			-	256,000	-
Water Mains	28,000	-		-	-	-
Water Treatment Plant	194,000	-	272,000	-	-	-
WWTP	176,000	-	98,000	286,000	176,000	22,000
Wonga Tanks	-	247,000	22,000	54,000	-	

Table 12 - Potable Water Take

Water Source	Potable Water take (litres)					
	April 2025	May 2025	June 2025	July 2025	August 2025	September 2025
Camp 2 Potable	-	-	-	-	-	42,000
Coleambally	638,000	132,000	2,190,800	2,559,000	1,644,000	2,256,400
Deniliquin	-	-	504,000	-	84,000	126,000
Deniliquin Sale yard	-	-	-	-	-	858,000
Deni	45,000	22,000	420,000	1,053,000	588,000	-
Modica Crescent	619,000	36,000	1,415,000	20,000	-	-

## **Appendix A**

### **PEC East Project**

**October 2025 Independent Environmental Audit**

### **Audit Table**

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A1	Minimise harm to the Environment	In meeting the specific performance measures and criteria of this approval, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation, upgrading or decommissioning of the development.		<p>Deputy Environment Manager - One Reportable Incident with the potential to cause <i>"actual or potential harm to the health or safety of human beings...that is not trivial"</i>. occurred during the audit period.</p> <p>No reportable environmental incidents were recorded.</p> <p>Some minor environmental spills, including two gas release incidents occurred during August-2025, however those incidents did not meet the threshold of "material harm"</p>	<p>No evidence of actual or potential material environmental harm was sighted during the site inspection.</p>	<p>No evidence of actual or potential material environmental harm was sighted during the site inspection.</p>	Complies	
S2 A2	Terms of Approval	The Development may only be carried out:		Deputy Environment Manager – No non-compliances were reported to DPHI during the audit period.		Refer to the specific conditions below.	Not Triggered	
		a. in compliance with this approval		Environment Manager - No directions from DPE were received during the audit period.			Not Triggered	
S2 A3	Terms of Approval	c. Generally, in accordance with the EIS; and		Environment Manager - While changes to the project compared to what was initially approved have been made, these changes have been subjected to Consistency Assessments and do not represent a fundamental or significant change to what has previously been approved.		No evidence was found that the works undertaken to date associated with SSD 9172452 (Modification 1) has not been undertaken in general accordance with the EIS or the approved plans.	Complies	
		d. generally, in accordance with the Development Layout in Appendix 1.				No evidence was found that the works undertaken to date associated with SSD 9172452 (Modification 1) has not been undertaken in general accordance with the EIS or the approved plans.	Complies	
S2 A3	Terms of Approval	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:		Environment Manager – DPHI did not issue any requirements to the project in relation to any plans, strategies or correspondence.		DPHI did not issue any requirements to the project in relation to any plans, strategies or correspondence.	Not Triggered	
S2 A3		b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and		Environment Manager - There were no reports or reviews commissioned by the Department regarding compliance with this approval.		There were no reports or reviews commissioned by DPHI regarding compliance with this approval.	Not Triggered	
S2 A3	Terms of Approval	c) the implementation of any actions or measures contained in these documents.				There were no reports or reviews commissioned by DPHI regarding compliance with this approval.	Not Triggered	
S2 A4	Terms of Approval	The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency,					Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A5	Terms of Approval	ambiguity or conflict. Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This condition does not apply to the immediate written notification required in respect of an incident under condition E6.					Noted	
S2 A6	Lapse of Approval	This approval will lapse five years after the date on which it is granted unless construction has physically commenced on or before that time.				The construction of the project is nearing completion.	Not Triggered	
S2 A7	Evidence of Consultation	Where conditions of this approval require consultation with an identified party, the Proponent must: a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved.				Refer to specific conditions below	Noted	
S2 A8	Staging, combining or revision of Strategies, Plans and Programs.	With the approval of the Planning Secretary, the Proponent may: a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);  b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and  c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager – no changes to the staging of plans or strategies have occurred during this audit period.	No changes were made to the staging of plans during this audit period.	Noted		
						No approval has been sought for the combining of any plans, programs, or similar documents during this audit period.	Not Triggered	
						Minor changes were made to the Emergency Management Plan and the Biodiversity Management Plan during this audit period.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A9	Environmental Representative	Prior to commencing the development, an environmental representative (ER) must be approved by the Secretary and engaged by the Proponent.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller was appointed as the Independent ER. DPE approval was provided on 20/9/2022.	Complies	
S2 A10	Environmental Representative	The Secretary's approval of an ER must be sought no later than one (1) week before commencing the development.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller was appointed as the Independent ER. DPE approval was provided on 20/9/2022.	Complies	
S2 A11	Environmental Representative	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in condition A2 and is independent from the design and construction of the development. The ER must meet only the requirements set out in sections 2.2, 2.3, 2.4 and 3 in the <i>Environmental Representative Protocol</i> (Department of Planning and Environment, October 2018).	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller was appointed as the Independent ER. DPE approval was provided on 20/9/2022.	Complies	
S2 A12	Environmental Representative	<p>From commencing the development, until commencing operation, or as agreed with the Secretary, the approved ER must:</p> <ul style="list-style-type: none"> <li>a) review the documents identified in conditions A22, B1, B2, C10, C45, C50 and C51, and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under this approval and if so: <ul style="list-style-type: none"> <li>(i) make a written statement to this effect before submission of such documents to the Secretary (if those documents are required to be approved by the Secretary); or</li> <li>(ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Department for information or are not required to be submitted to the Department);</li> </ul> </li> <li>b) as may be requested by the Secretary, assist the Department in the resolution of community complaints; and</li> </ul>	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			All plans covered by Condition S2 A10 were reviewed and endorsed by the ER prior to the commencement of construction (prior to this audit period).	Not Triggered	
				Environmental Representative DPHI did not request the assistance of the ER to resolve any community complaints during this audit period.		The ER was not required to assist in the resolution of community complaints during this audit period.	Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A12	Environmental Representative	<p>c) consider any minor amendments to be made to the plans / strategies in conditions A22, C50, C51, D3, D4, D5, D6 and D7 that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval.</p> <p>The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A19, as well as the complaints register for any complaints received (on the day they are received).</p>	Letter from Hutchison Weller (C Weller) to DPHI (Ms. Fishburn) titled "EnergyConnect (NSW – Eastern Section) (SSI-9172452) CEMP – Biodiversity Management Sub-Plan Stage 2 (Rev 5) ER Endorsement", dated 2 June 2025.	Environmental Manager - Minor changes were made to the Emergency Management Plan and the Biodiversity Management Plan during this audit period.		Minor changes were made to the Emergency Management Plan and the Biodiversity Management Plan during this audit period. A copy of the ER's endorsement letter for the BMP to DPHI was sighted.	Complies	
			Correspondence from Elecnor (J Hatchett) to the ER titled "L/H 176 complaint regarding gate closed incorrectly", dated 19 May 2025. Correspondence from Elecnor (J Hatchett) to the ER titled "L/191 complaint regarding gate left open", dated 23 June 2025 Correspondence from Elecnor (J Hatchett) to the ER titled "L/H 209 complaint regarding a gate left open", dated 28 July 2025. Correspondence from Elecnor (J Hatchett) to the ER titled "L/H 189 complaint about the onsite generator tripping", dated 2 October 2025.	Environment Representative – Elecnor provided notifications of the complaints received during the audit period.		The audit selected four complaints and was provided with copies of the notifications sent to the ER.		
S2 A14	Reasonable Costs	The Proponent must pay all reasonable costs incurred by the Department to engage a suitably qualified, experienced and independent expert(s) to review the adequacy of any strategy, plan, program or report required under this approval.		Environment Manager - DPHI has not requested compensation for the review of any plans or other documents during this audit period.		DPHI has not requested compensation for the review of any plans or strategies since September 2023 (prior to this audit period).	Not Triggered	
S2 A15	Protection of Public Infrastructure	<p>Unless the Proponent and the applicable authority agree otherwise, the Proponent must:</p> <p>a) undertake any works on or in the vicinity of public infrastructure in consultation with the applicable authority or service provider;</p> <p>b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</p> <p>This condition does not apply to any damage to roads caused as a result of general road usage which is expressly provided for in the conditions of this approval.</p>	<p>Complaints Register Incident Register Stakeholder Consultation (refer to Section 5 of this report)</p> <p>Email from Elecnor (L Ryan) to Essential Energy (G Leman / G LeCerf) titled "Advise on Essential Energy LV Connection to Existing HV Lines", dated 14 October 2025</p> <p>Email from Elecnor (L Ryan) to Essential Energy (G Leman / G LeCerf) titled "L5-T301/302 DARs", dated 10 November 2025</p> <p>Email from Elecnor (L Ryan) to Essential Energy (G Leman / G LeCerf) titled "DIP - (ECN-133749) and Non-Standard Approval -Case Number: 00366705s", dated 1 December 2025</p> <p>Email from Elecnor (L Ryan) to Essential Energy (G Leman / G LeCerf) titled "Spans 37 Olympic Highway", dated 15 September 2025</p>	Environment Manager – The project undertakes consultation with Essential Energy regarding instances where the project must string/cross over essential energy assets.		<p>Elecnor has undertaken regular meetings with Essential Energy regarding impacts and actions to be taken in relation to impacts on their infrastructure.</p> <p>No incidents related to damage to public infrastructure were identified during this audit.</p> <p>Two complaints were received relating to damaged public roads. Elecnor has undertaken to make the appropriate repairs.</p>	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A16	Demolition	The Proponent must ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.		Environment Manager – no demolition works have been undertaken during this audit period.	No evidence of demolition was sighted during the site inspection.	No demolition work has been undertaken during this audit period.	Not Triggered	
S2 A17	Structure Adequacy	The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA; and where the BCA is not applicable, to the relevant Australian Standard.		Environment Manager – No permanent buildings were constructed during the audit period. Earthworks only occurred at the Wagga Wagga substation.	No evidence of building works for permanent structures was sighted during the site inspection.	No permanent buildings were constructed during the audit period. Earthworks only occurred at the Wagga Wagga substation.	Not Triggered	
S2 A18	Compliance	The Proponent must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this approval relevant to activities they carry out in respect of the development.	EnergyConnect Stringing Constraints (PowerPoint presentation) Revision 1. EnergyConnect Environmental Awareness (PowerPoint presentation). Revision 2  EnergyConnect Environmental Training (PowerPoint presentation): * Biodiversity Revision 2 * Environmental Approvals Revision 2 * Heritage, Revision 2 * Land Access and Biosecurity, Revision 1. * Training Noise and Vibration, Revision 1. * Soil & water, Revision 1.  Stringing Inductions: * Heritage * Plains Wanderer * Southern Bell frog * Special Biodiversity Protection Zone  Toolbox Attendance Records: in evidence folder * Plains Wanderer Toolbox Talk attendance July 2025 * Special Bio Zone T161-162 Toolbox Talk attendance May 2025 * Stringing Toolbox attendance 11 July 2025 * Stringing Toolbox attendance 12 July 2025 * Stringing Toolbox attendance August 2025 * Stringing Toolbox attendance May 2025 * Stringing Toolbox attendance October 2025 * Target Work Heritage Toolbox attendance at T485 July 2025	The auditor attended the morning Pre-start meeting during the site inspection. During those meetings, critical issues covering safety and environment were presented. A central feature of the meeting areas (where the pre-starts are presented) at each Camp is the Daily work plan board (Photograph 3). Copies of work permits and key management plans (for example the CEMP and Safety Plans are kept at each of those locations.	Training materials covering all elements of the approval were sighted. Records of training from the audit period were sighted. Information is provided to the workforce every morning at the pre-start meetings, including important compliance-related notifications.	Complies		
S2 A19	Operation of Plant and Equipment	The Proponent must ensure that all plant and equipment used on the site is: a) maintained in a proper and efficient condition. b) operated in a proper and efficient manner.	Extracts from the project maintenance management system were sighted, including: • Daily (pre-start) check lists • Maintenance requests • Maintenance records • Prestart workorders • Maintenance work orders.		Camps (accommodation, storage and maintenance areas) are well maintained and organised. All plant and equipment operating (on construction areas) appeared to be operational and well maintained.	Maintenance facilities (generally for light vehicles) are located at each camp. Records of inspections and maintenance were sighted.	Complies	
						All facilities, plant and equipment sighted during the audit were operational and appeared to be well maintained.	Complies	
S2 A20	Applicability of Guidelines	References in the conditions of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.					Noted	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A21	Applicability of Guidelines	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.					Noted	
S2 A22	Community Communications Strategy	Prior to the commencement of construction, the Proponent must prepare a Community Communication Strategy to provide mechanisms to facilitate communication between the Proponent and the community (including adjoining affected landowners) during construction. The Community Communication Strategy must: <ul style="list-style-type: none"> <li>a) identify landowners for potentially impacted receivers;</li> <li>b) ensure that the landowners identified in (a) are consulted during construction;</li> <li>c) set out procedures and mechanisms for the regular distribution of information to the wider community;</li> <li>d) establish a public liaison officer(s) to engage with the local community; and</li> <li>e) set out procedures and mechanisms:               <ul style="list-style-type: none"> <li>• through which the community can discuss or provide feedback to the Proponent;</li> <li>• through which the Proponent will respond to enquiries or feedback from the community; and</li> <li>• to resolve any issues and mediate any disputes that may arise in relation to construction of the development.</li> </ul> </li> </ul>	Community Communication Strategy EnergyConnect (NSW – Eastern Section), Rev 1, dated 8 October 2024.	Environment Manager - The Community Communication Strategy has been uploaded. Community Communications Strategy has not been modified within the reporting period.		The initial version of the Communication Strategy was prepared prior to the commencement of construction. This was verified during the previous IEA. Section 6.2 identifies potentially impacted landowners.	Complies	
						The Strategy identifies the mechanisms for stakeholder and landowner consultation. The Auditor sighted the materials that are provided to landowners each month and provide details the construction works planned for that month.	Complies	
						The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
						Section 4.4 of the Strategy identifies the public liaison officers.	Complies	
						The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
		The Proponent must implement the Community Communication Strategy for the duration of construction.	Community Communication Strategy EnergyConnect (NSW – Eastern Section), Rev 1, dated 22 March 2023.  Energy Connect Construction Notifications: <ul style="list-style-type: none"> <li>• May 2025</li> <li>• June 2025</li> <li>• July 2025</li> <li>• August 2025</li> <li>• September 2025</li> <li>• October 2025</li> </ul>			The Auditor, based on the review of complaints received and communications with the community, considers that the Community Consultation Strategy is being implemented. Copies of the construction notices issued over the audit period were sighted. Construction updates and the works notices are also published on Transgrid's project website.	Complies	

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
	Construction Environmental Management Plan	<p>Prior to commencing construction, a Construction Environmental Management Plan (CEMP) must be prepared to detail how the performance outcomes, commitments and measures specified in the EIS will be implemented and achieved during construction to the satisfaction of the Planning Secretary.</p> <p>The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan in Table 1.</p>	<p>Construction Environmental Management Plan EnergyConnect (NSW-Eastern Section) Stage 1 and Stage 2, Revision 2, dated 20 June 2023.</p> <p>Screen shot from the Major Projects Portal indicating that Revision 4 of the CEMP was issued to DPHI on 28 July 2025.</p>	<p>Environment Manager - The Construction Environmental Management Plan was revised and submitted to the Department in August 2024 (prior to this audit), however was not approved. It is currently undergoing updates in response to DPHI comments and will be reissued for approval upon completion.</p>		<p>The version of the CEMP that is uploaded to the website is revision 2. That version of the plan was approved by the Planning Secretary on 6 July 2023.</p> <p>The CEMP was revised during the last audit period and has been submitted to DPHI for approval.</p>	Complies	
S2 B1	Table 1	<p><b>Required Plan</b></p> <p>Noise and Vibration</p> <p>Soil and Water</p> <p>Biodiversity</p> <p>Heritage</p> <p>Traffic and Transport</p>	<p><b>Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan</b></p> <p>Council</p> <p>DPIE Water</p> <p>BCS Council</p> <p>Heritage NSW Aboriginal Stakeholders TfNSW Council</p>	<p><b>Documents Reviewed</b></p>		<p><b>Compliance Assessment</b></p>	Complies	
						<p>The NVMP was not revised during this audit period</p> <p>The SWMP was not revised during this audit period.</p> <p>The BMP has undergone revision during the last audit period following receipt of the biodiversity audit report on 18 February 2025. All appendices were revised as part of this process. The revised version was sent to the ER (after the reporting period) and has been endorsed. The plan has been submitted to DPHI for consultation with the relevant Regulators and Approval.</p> <p>The HMP was not revised during this audit period.</p> <p>The Traffic and Transport Management Plan was not revised during the current audit period.</p>		
S2 B2	CEMP and Subplan requirements	<p>The EMP Sub-plans must be prepared in accordance with relevant guidelines and in consultation with the relevant government agencies identified for each Sub-plan in Table 1, and include:</p> <p>a) a summary of relevant background or baseline data;</p> <p>b) details of:</p> <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements.</li> <li>(ii) any relevant limits or performance measures and criteria; and</li> <li>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> <p>c) any relevant commitments or recommendations identified in the EIS;</p> <p>d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</p>	<p>Traffic and Transport Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 11, dated 25 November</p> <p>Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.</p> <p>Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March.2024.</p> <p>Biodiversity Management Plan (NSW - Eastern Section) Stage 1 and Stage 2, Revision4, dated 5 July.2023.</p> <p>Heritage Management Plan (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 7 February 2025.</p>		<p>A hard copy of the CEMP is available at each Camp.</p>	<p>Section 3 of each Subplan describes the pre-project baseline conditions. This requirement is not relevant to the TTMP plan.</p>	Complies	
						<p>Legislative requirements are summarised in Section 2.1 and 2.2 of the Subplans.</p> <p>Section 4 of the BMP details the relevant performance limits and indicators.</p> <p>This requirement is not relevant to the TTMP plan.</p>	Complies	
						<p>Relevant commitments from the EIS are covered in Section 2.3 of the Subplans.</p>	Complies	
						<p>Management and mitigation measures are described in Section 5 of the Subplans.</p>	Complies	

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 B2	CEMP and Subplan requirements	e) a program to monitor and report on the: (i) impacts and environmental performance of the development (including a table summarising all the monitoring and reporting obligations under the conditions of this approval); and (ii) effectiveness of the management measures set out pursuant to paragraph d);	Traffic and Transport Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 11, dated 25 November Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024. Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024. Biodiversity Management Plan (NSW - Eastern Section) Stage 1 and Stage 2, Revision4, dated 5 July.2023. Heritage Management Plan (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 7 February 2025.			Monitoring and reporting measures are described in Sections 6.3 and 6.6 of the Subplans.	Complies	
		f) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;				Contingency measures are described in Section 6.8 of the Subplans.	Complies	
		g) a program to investigate and implement ways to improve the environmental performance of the development over time;				Section 6 of the Subplans describe compliance management, that includes monitoring and reporting.	Complies	
		h) a protocol for managing and reporting any: (i) incident, non-compliance or exceedance of any impact assessment criterion and performance criterion; (ii) complaint; or (iii) failure to comply with other statutory requirements;				Section 6 of the SWMP, Section 7 of the TTMP and Section 8 of the NVMP describe compliance management, that includes monitoring, inspections, audits and reporting.	Complies	
		i) set out the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the construction and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and				Section 6 of the SWMP, Section 7 of the TTMP and Section 8 of the NVMP describe compliance management, that includes monitoring, inspections, audits and reporting.	Complies	
		j) a description of the roles and environmental responsibilities, authority and accountability for all relevant employees, as well as training and awareness; and				Roles and responsibilities are described in Section 6.2 of the SWMP, Section 7.2 of the TTMP and Section 8.2 of the NVMP.	Complies	
		k) a protocol for periodic review of the CEMP and associated Sub-plans and programs.				Section 1.9 of the Subplans cover periodic review of the CEMP and plans.	Complies	

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C1	Construction Hours	Road upgrades, construction, upgrading and decommissioning activities may only be undertaken between: a) 7 am to 6 pm Monday to Friday; b) 8 am to 1 pm Saturdays; and c) at no time on Sundays and NSW public holidays; unless the Planning Secretary agrees otherwise.	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024. Out-of-Hours Work Protocol (Appendix A to the NVMP).	There have been no non-compliances in relation to the approved construction hours.		The approved hours of construction are documented in the Noise and Vibration Management Plan and in the training provided to supervisors and workers on the project. No complaints relating to OOHW were received during the audit period.	Complies	
S2 C2	Construction Hours	The following construction, upgrading and decommissioning activities may be carried out outside the hours specified in condition C1 above: a) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons;		Environment Manager – There are construction activities which occur on PEC East which are either inaudible or occur in accordance with a negotiated agreement. For works which are inaudible, the OOHW Protocol and permit system does not apply, however we do prepare permits anyway to ensure the noise levels are assessed.		No deliveries or dispatches from the project were required by the NSW Police or other public authorities during this audit period.	Not Triggered	
		b) emergency work to avoid the loss of life, property or to prevent material harm to the environment; or		Environment Manager – No emergency works were required during this audit period.		No emergency OOHW were required during this audit period.	Not Triggered	
S2 C2	Construction Hours	c) works carried out in accordance with the hours and noise limits specified in any negotiated agreements with sensitive receivers (owners and occupiers), provided the negotiated agreements are in writing and finalised before the commencement of works.	Record of Contact Form with Landowner relating to works on the landowners property out side of normal construction hours, dated 25 June 2025.	Environment Manager - To allow stringing to occur on Line 5 between T80 and T90 during the hours of 7:00 am to 7:00 pm (Monday to Sunday, including Public Holidays), an OOHW-E064 has been developed. In addition to the OOHW permit, an agreement is also in place for the Kingston property.		An agreement has negotiated with the potentially impacted landowner for out-of-hours work during stringing operations between T80 and T 90 (Line 5).	Complies	
		d) activities that are inaudible at non-associated residences;					Noted	
		e) road upgrades required by the relevant roads authority to be undertaken outside the standard construction hours; or		Environment Manager – No works were required by RMS or Council(s) during this audit period.		No out-of-hour work was required by RMS or Council(s) during this audit period.	Noted	
		f) works carried out in accordance with an Out-of-Hours Work Protocol approved in accordance with condition C10.				OOHW training is provided to supervisors and workers on the project. Four complaints relating to OOHW were received during the audit period.	Noted	

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C3	Construction and Demolition Noise	The Proponent must take all reasonable and feasible steps to minimise the construction, upgrading or decommissioning noise of the development in the locations where the noise is audible to sensitive receivers, including any associated traffic noise.	Complaints Register Environmental Training Noise and Vibration (PowerPoint training presentation)	Environment Manager – No noise complaints were recorded during this audit period.	During the inspection of works compounds and construction on the easement, no rock breaking, blasting or impulsive noise generating activities were observed.	No noise complaints were recorded during the audit period. No complaints were received regarding construction related noise or vibration. The majority of the works associated with PEC East are remote from sensitive receivers.	Complies	
S2 C4	Construction and Demolition Noise	The Proponent must implement mitigation measures: a) to ensure that the noise generated by any construction, upgrading or decommissioning activities is managed in accordance with the requirements for construction 'noise affected' management levels established in accordance with Interim Construction Noise Guideline (DECC, 2009); and b) with the aim of achieving the road traffic noise assessment criteria for residential land uses from NSW Road Noise Policy (DECCW, 2011).	Complaints Register Noise Monitoring 19 July 2024 (spreadsheet) Environmental Training Noise and Vibration (PowerPoint training presentation)	Environment Manager - One noise monitoring event occurred during the audit period.		With construction works nearing completion, and the remaining works located in sparsely populated areas with a considerable buffer distance between construction activities and most residential receivers, minimal noise impacts are expected. No high noise generating activities were observed during the audit inspection. No noise complaints were recorded during the audit period.	Complies	
S2 C5	Construction and Demolition Noise	The Proponent must comply with the following vibration limits: a) vibration criteria established using the Assessing vibration: a technical guideline (DEC 2006) (for human exposure); b) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and c) vibration limits set out in the German Standard DIN 4150-3: Structural Vibration - effects of vibration on structures (for structural damage).	Complaints Register	Environment Manager - No vibration monitoring occurred during the audit period.	No vibration generating activities were observed during the audit inspection.	Current construction activities are in sparsely populated areas with a considerable buffer distance between construction activities and residential receivers. No vibration-related complaints were received during the audit period.	Complies	
S2 C6	Construction and Demolition Noise	Blasting may only be carried out on the site between 9 am and 5 pm Monday to Friday and between 9 am to 1 pm on Saturday. No blasting is allowed on Sundays or public holidays.		Environment Manager - No blasting occurred during the audit period.		No blasting occurred during the audit period.	Not Triggered	
S2 C7	Blasting Limit Conditions	The Proponent must ensure that any blasting carried out on the site does not exceed the criteria in Table 2.	All blast monitoring records covering this audit period.	Environment Manager - No blasting occurred during the audit period.		No blasting occurred during the audit period.	Not Triggered	
	Table 5	Location	Airblast overpressure	Ground Vibration		5% of the total number of blasts or events over a rolling period of 12 months		
			dB (Lin Peak)		Allowance			
		Any non-associated residence	120	10	0%			
S2 C8	Operational Noise	Except for corona discharge noise, the Proponent must ensure that the noise generated by the operation of the development does not exceed 35 dB(A) LAeq,15min, at the reasonably most affected point of the residence, in accordance with the NPfI, at any non-associated residence.				Operational requirement only	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C9	Operational Noise	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>a) take all reasonable and feasible steps to minimise corona discharge noise during operation of the project;</li> <li>b) identify residences predicted to experience corona discharge noise levels above 35 dB(A) LAeq,15min at the reasonably most affected point of the residence, determined in accordance with the NPfI, and how often corona noise is expected to be above this level per year;</li> <li>c) implement all reasonable and feasible noise mitigation measures, determined in accordance with the NPfI, at receivers predicted to experience corona discharge noise levels that exceed the noise level identified in condition C8; and</li> <li>d) prepare and implement a Research Program and allocate \$150,000 to this program, prepared in consultation with EPA, and be submitted to the Planning Secretary for approval.</li> </ul>				Operational requirement only	Not Triggered	
S2 C10	Noise and Vibration CEMP Sub-Plan	<p>The Noise and Vibration CEMP Sub-Plan required under condition B2 must:</p> <ul style="list-style-type: none"> <li>a) ensure the requirements in conditions C1 to C12 are complied with;</li> </ul>	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			<p>The current version of the NVMP was prepared and approved during the previous audit period.</p> <p>The NVMP provides a framework designed to ensure compliance with Conditions C1 to C12.</p>	Complies	
		<ul style="list-style-type: none"> <li>b) include a description of the reasonable and feasible measures that would be implemented to minimise noise and vibration impacts of the development;</li> </ul>	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			<p>Section 7.3 of the NVMP describes the noise and vibration mitigation measures to be implemented.</p>	Complies	
		<ul style="list-style-type: none"> <li>c) include a detailed description of the noise and vibration management system for the development;</li> </ul>	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			<p>Section 1.4 of the plan describes the environmental management system as it applies to noise and vibration management.</p>	Complies	
		<ul style="list-style-type: none"> <li>d) include a protocol for the identification, notification and management of works that exceed the noise management levels; and</li> </ul>	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			<p>Section 7.2 and Section 8 of the plan describes compliance management, including the notification requirements and management of works that may exceed noise criteria.</p>	Complies	
		<ul style="list-style-type: none"> <li>e) include a monitoring program that evaluates and reports on the effectiveness of the noise and vibration management system.</li> </ul>	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			<p>Section 8.3 describes the noise and vibration monitoring program.</p>	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C10	Noise and Vibration CEMP Sub-Plan	f) include an Out-of-Hours Work Protocol to identify a process for the consideration, management and approval of works that are outside the hours defined in conditions C1 and C6, which must: (i) be prepared in consultation with the relevant Council; (ii) identify low risk activities that can be undertaken without the approval of the Planning Secretary and with the approval of the ER; (iii) identify high risk activities that must be approved by the Planning Secretary; and (iv) identify Department, Council and community notification arrangements for approved out of hours work.	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			Appendix A of the Noise and Vibration Management Plan describes the Out of Hours Works Protocol.	Complies	
S2 C11	Air Quality	In addition to the performance outcomes, commitments and mitigation measures specified in the EIS, the Proponent must take all reasonable steps to: a) minimise the off-site dust, fume, blast emissions and other air pollutants of the development; and	Complaints Register	Environment Manager - Two air-quality-related incident occurred during the reporting period, involving an SF <sub>6</sub> gas release at the substation. Refer to the incident register for details.	During the site inspection water carts were observed operating at construction Camps, on access roads to active works areas and the substation construction site. Some dust was observed from vehicle movements on-site, however no evidence of significant migration of dust off-site was observed.	Water carts are available and were observed in all areas inspected (construction compounds and construction areas) to be in operation to reduce dust emissions during the site inspection. One dust-related complaint was received during this audit period. Two incidents (release of SF <sub>6</sub> ) were reported.	Complies	
		b) minimise the surface disturbance of the site.			At the time of this audit, clearing works had been completed. No evidence of over clearing was observed during the site inspection.	All vegetation clearing observed appeared to be limited to the approved construction limits.	Complies	
S2 C12	Water Supply	The Proponent must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.		Environment Manager - Sufficient water was extracted from the sediment basins to allow for earthworks.		Sufficient water was extracted from the sediment basins to allow for earthworks.	Complies	
S2 C13	Water Supply	The Proponent must report on water take at the site during construction (whether direct or indirect and whether licensable or exempt) in the Independent Audit, including water taken under each water licence for the development.	Water Delivery Tracker (the data provided in the table below has been extracted directly from the Water Delivery Tracker without editing by the Auditor).	Environment Manager – sufficient water has been available for the project during the audit period. The following water licenses were in place for privately owned water sources: <ul style="list-style-type: none"><li>• WAL 21411 – 145ML limit Groundwater (Huckles Farm)</li><li>• WAL 1909 – 370 ML limit Groundwater (Wonga Station)</li><li>• WAL 7725 – 345 ML limit Groundwater (Coleambally Station)</li><li>• WAL 7731 – 65181.2 ML limit from Murrumbidgee River (Western Murray Irrigation)</li><li>• WAL 41857 – 101 ML limit from Murrumbidgee River (Iluka)</li></ul>		Water-take from each location as reported by SecureEnergy and has been summarised in Section 7.9 above.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C14	Erosion and Sediment Control	The Proponent must: a) minimise erosion and control sediment generation; and b) ensure all land disturbances have appropriate drainage and erosion, and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008);	Erosion and Sediment Control Strategy EnergyConnect (NSW – Eastern Section), Revision C, dated 15/8/2022. Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21/3/2024. PESCP – Culvert Crossings Dry Conditions, dated 22 October 2024. Erosion and Sediment Control Inspection Report, Camps 2, 3 and 4 Line 2 and Line 5 Rehabilitation and Construction Impacts, prepared by Ron Billyard CPESC NO 9496, dated 14 November 2024. Elecnor Weekly environmental checklists (covering the audit period)	Environment Manager - The CPESCs involved in project work during the audit period was:  Regional Project Consulting Ron Billyard CPESC 9496 and Adam Pullen CPESC #4758  Weekly and Monthly environmental inspections are undertaken by Environmental Advisors.  The contract CPES undertook (and reported on ERSED inspections reports during the audit period.	Generally, ERSED controls at all areas inspected were installed in accordance with the relevant ERSED plans and were well maintained.  During the site inspection the following observations were made: <ul style="list-style-type: none"><li>• Surface water management (surface drains, sedimentation / retention ponds) are provided at each of the accommodation camps / laydown areas and key construction areas.</li><li>• Generally, the management of sediment tracking onto public roads had improved significantly since previous IEAs.</li><li>• Light and heavy vehicle wash pads are located at the other sites.</li><li>• Each camp has a cattle grid at the site entrance.</li><li>• Rehabilitation of disturbed areas is well progressed.</li></ul>	Appropriate erosion and sediment (surface water management) controls were in place at all sites inspected during this IEA.  Routine environmental inspections are undertaken (monthly, weekly and pre-rain) and these are recorded on standard checklists.  The weekly environmental checklist includes confirmation of the operation and maintenance of vehicle wash facilities and other devices including shaker / rumble grids.  An external ERSED specialist undertakes additional inspections and provides advice to the project team.  The management of erosion and sediment control is being undertaken in general accordance with the approved management plan.  Generally, sediment tracking onto public roads from the Camps was acceptable (at the time of this IEA site inspection).	Complies	
S2 C15	Pollution of Waters	Unless otherwise authorised by an EPL, the Proponent must ensure the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	Incident Register	Environment Manager – No water related incidents occurred during this audit period.		No water-related incidents were recorded during this audit period.	Complies	
S2 C16	Pollution of Waters	The Proponent must: a) ensure that appropriate components of the concrete batching plants and substation are suitably bunded; and b) minimise any spills of hazardous materials or hydrocarbons and clean up any spills as soon as possible after they occur.			Fuel and chemical storage areas were inspected at all camps. All fuels are stored in double-skinned, bunded tanks that comply with AS1940 (Photograph 11).  All chemical storage and potentially hazardous waste storage observed were generally appropriately contained. Spill kits were available at those locations.		Complies	
S2 C17	Pollution of Waters	The Proponent must ensure that any groundwater dewatering activities do not discharge to watercourses.	Dewatering Procedure EnergyConnect (NSW – Eastern Section), Revision C, dated 11 November 2022.	Environment Manager - Following rain events, water can collect within the pile footings. These are dewatered in accordance with the Dewatering Procedure. There has been no groundwater dewatering undertaken during this audit period.	No groundwater dewatering observed during the site inspection.	Procedures for groundwater dewatering have been established.	Complies	

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C18	Riparian Areas	<p>The Proponent must ensure:</p> <ul style="list-style-type: none"> <li>a) all activities on waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012), unless DPIE Water agrees otherwise; and</li> <li>b) the geomorphic condition of the major rivers and distributary channels crossed by the development is not impacted.</li> </ul>	Incident Register Clearing and land disturbance permit (CDP) for Colombo Creek (viewed post impacted). <ul style="list-style-type: none"> <li>• Pre-clear report for Colombo Creek crossing (viewed post inspection)</li> <li>• Nest box report for Colombo Creek crossing (viewed post inspection)</li> </ul>	Environment Manager - No riparian zone incidents have occurred during the audit period.	Line 5, Tower 245-246, Colombo Creek crossing riparian zone Murrumbidgee crossing near Tower 513 on Line 2. Refer to Photograph 8.	No riparian zones were cleared during the audit period ad works in those areas was completed prior to the commencement of this Audit The Auditor inspected two riparian areas during the audit. Rehabilitation works were complete at both locations and no issues of concern were identified. No incidents were reported in any riparian zones.	Complies	
						A detailed assessment of flooding and water management issues was undertaken during the previous audits. No changes in design have occurred during this audit period. No flooding impacts have occurred during this audit period.		
S2 C19	Flooding	The Proponent must ensure that the development: <ul style="list-style-type: none"> <li>a) does not materially alter the flood storage capacity, flows or characteristics in the development area or off-site; and</li> <li>b) is designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site, unless otherwise agreed by Council.</li> </ul>		Environment Manager - There were no flooding issues during the audit period. Consultation with council has not been required as the project has not been designed to increase impacts on surface water, localised flooding and groundwater.			Complies	
S2 C20	Acid Sulphate Soils	<p>The Proponent must ensure that any construction activities in identified areas of acid sulphate soil risk are undertaken in accordance with the <i>Acid Sulphate Soil Manual</i> (Acid Sulphate Soil Management Advisory Committee, 1998).</p>	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.	Environment Manager - No ASS has been encountered during the audit period. If encountered PASS would be managed in accordance with the SWMP. Current activities are outside the areas of known acid sulphate soil risk areas.		Current activities are outside the areas of known acid sulphate soil risk areas.	Not Triggered	
			Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.	Environment Manager - No works have occurred within high salinity areas during the audit period. Consequently, no salinity management activities have been undertaken.		No work occurred within high salinity areas during this audit period.		
	Salinity	<p>The Proponent must ensure that any construction activities in identified areas of moderate to high salinity are undertaken in accordance with the Salinity Training Manual (DPI, 2014) and Book 4 Dryland Salinity: Productive use of Saline Land and Water (NSW DECC, 2008).</p> <p>The Soil and Water CEMP Sub-Plan required under condition B2 must include provisions for:</p> <ul style="list-style-type: none"> <li>a) ensuring the requirements in conditions C12 – C21 are complied with;</li> <li>b) managing flood risk during construction;</li> <li>c) investigating, assessing and managing contaminated land, soils and groundwater in the development area;</li> <li>d) investigating, assessing and managing the potential for asbestos and other hazardous materials in the development area; and</li> </ul>	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.	Environment Manager - No reviews or revisions of Soil and Water Management Plan have taken place during the audit period.		The Soil and Water Management Plan provides an appropriate framework to manage compliance with the relevant conditions of the Approval. The plan was not revised during this audit period.	Complies	
			Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Section 5.7 of the SWMP describes the proposed flood response procedures for the project.		
			Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Section 5.6 of the Plan describes the procedures for management of contaminated materials. Section 6.3 of the plan describes the monitoring program.		
S2 C22	Soil and Water CEMP Sub-Plan		Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Investigating, assessing and Management of contaminated land is addressed in Section 5.5. Investigating, assessing and managing groundwater is addressed in Section 3.3.5 and Section 5.8.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C22	Soil and Water CEMP Sub-Plan	e) managing any unexpected and / or suspected contaminated land, asbestos and unexploded ordinance excavated, disturbed or otherwise discovered during construction.	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Appendix B of the plan describes the management of unexpected finds (including hazardous materials).	Complies	
S2 C23	Biodiversity Restrictions on and Habitat	Unless otherwise agreed with the Planning Secretary, the Proponent must: a) ensure that clearing does not exceed the limits identified in Appendix 2; and  b) minimise: • the impacts of the development on hollow-bearing trees; • the impacts of the development on threatened bird and bat populations; and • the clearing of native vegetation and key habitat.	Project Energy Connect PEC East Project SSI-9172452, April 2025 Construction Phase Independent Environmental Audit, prepared by Barnett and May, dated 16 July 2025. The following documents were also sighted: <ul style="list-style-type: none"><li>• Clearing and land disturbance permit (CDP) (Thyme Rice Flower was not undertaken during the audit period as such I have included a TEC permit)</li><li>• Unexpected finds register</li><li>• Clearing and land disturbance permit (CDP)</li><li>• Pre-clear report dated June 2025</li><li>• CDP form for partial cleared area not available as no area has been partially cleared during the audit period Nest box installation report examples (from L2 and L5)</li><li>• Induction/toolbox for Austral Pillwort</li><li>• Induction/toolbox for Plains Wanderer mapped habitat</li><li>• Clearing and Draft permits register PDF</li><li>• Clearing and land disturbance register PDF</li><li>• Predicted clearing register</li></ul>		The Auditor inspected cleared areas along the length of the project. Clearing works were complete at the time of this audit. No evidence of over-clearing was identified.	As part of September 2024 and April 2025 Independent Audits, an ecologist undertook a detailed assessment of clearing and concluded that clearing has not exceeded the limits identified within the BMP.  During this audit period vegetation clearing has been completed and rehabilitation works are nearing completion.  Elecnor provides regular training to the project team on biodiversity and clearing management.  No evidence of over clearing was identified during this audit.	Complies	
S2 C23	Biodiversity Restrictions on and Habitat				The Auditor inspected cleared areas along the length of the project. Clearing works were complete at the time of this audit. No evidence of over-clearing was identified.	The April 2025 IEA Specialist Biodiversity Auditor verified that: <ul style="list-style-type: none"><li>• Clearing of native vegetation and key habitat is being minimised where possible</li><li>• Opportunities to minimise clearing has been occurring through review of temporary design and construction methodologies for the Stage 2 disturbance area, as demonstrated by proposed versus actual clearing calculations that are addressed via BD6 requirements</li><li>• Sufficient evidence sighted that clearing of native vegetation and key habitat is being minimised where possible.</li></ul>	Complies	
S2 C24	Biodiversity Offset Package	Prior to carrying out any development that would impact on biodiversity values, the Proponent must prepare a Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT and to the satisfaction of the Secretary in writing. The Package must include, but not necessarily be limited to: (a) details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS;	Project EnergyConnect (NSW – Eastern Section) - Biodiversity Offset Package (BOP), Revision 2 (Scout Ecology, 2025)	Environment Manager - The BOP was approved on 1 September 2025 after extensive RFI process with DPHI. Endorsement of Rev 1 was received from CPHR on 27 February and BCT on 7 March. 'Variation rules' were the main discussion point with DPHI from March until the BOP was approved.		The specific offset measures are documented in Section 4 of the BOP.	Complies	
		(b) the cost for each specific biodiversity offset measure, which would be required to be paid into the Biodiversity Conservation Fund if the relevant measure is not implemented and delivered (as calculated in accordance with Division 6 of the Biodiversity Conservation Act 2016 (NSW) and the offsets payment calculator that was established as at 29 July 2021);				The costs of each specific offset measure are documented in Section 4 of the BOP.	Complies	

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C24	Biodiversity Off-set Package	(c) the timing and responsibilities for the implementation and delivery of the measures required in the Package; and (d) confirmation that the biodiversity offset measures will have been implemented and delivered no later than <b>1 September 2025</b> .				Timing is documented in Section 6 of the BOP	Complies	
						The biodiversity offset delivery program is described in Table 32 of the BOP.		
		Following approval, the Proponent must implement and deliver the Biodiversity Offset Package.	Letter from DPHI (N Brewer) to Transgrid (L Fania) titled "Project Energy Connect East – Biodiversity Offset Package", dated 1 September 2025.	Environment Manager - The Proponent was unable to pay any residual amount into the BCF as the BCT does not believe the Consent Conditions allow the Proponent to do so. As a consequence, the Proponent, in consultation with DPHI decided to resolve the outstanding liability with the Bank Guarantee Deed (Condition C25). The Proponent enacted this mechanism with the agreement of the BOP. The Proponent is waiting for DPHI to issue the final Outstanding Offset Statement per the requirements of the BG Deed (Condition C25).		Implementation of the BOP is progressing as presented in Table 32 of the BOP, with delivery extended to 1 September 2025. The BOP was approved by DPHI in 1 September 2025. <b>The Auditor is satisfied that the Proponent has met the intent of this condition in consultation with DPHI.</b>	Complies	
S2 C25	Biodiversity Off-set Package	Prior to carrying out any development that could impact the biodiversity values requiring offset, the Proponent must lodge bank guarantee(s) with a total value of \$313,417,479.03, in accordance with the Deed of Agreement with the Planning Secretary (or delegate) executed on 1 September 2022. The Proponent must comply with the terms of the Deed.	Project EnergyConnect (NSW – Eastern Section) - Biodiversity Offset Package (BOP), Revision 2 (Scout Ecology, 2025) Bank Guarantee Deed and Qualifying Offset Statement (DG1023603418) (Transgrid, 2025) Letter from Transgrid (L Fania) to DPHI (D Gainsford / Fishburn) titled "Bank Guarantee Deed", dated 4 September 2025.			Transgrid satisfied the intent of this condition during previous audit periods with the establishment of two bank guarantees (DG1023603418 # 1 through 8 and #10 for \$303..5 Million and DG 1023603418 #9 for \$10 million). On 4 September 2025, Transgrid submitted a Qualifying Offset Statement and formally requested the release of the Bank Guarantee.	Complies	

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C26	Biodiversity CEMP Subplan	<p>The Biodiversity EMP Sub-Plan required under condition B2 must be prepared in accordance with the Revised Biodiversity Development Assessment Report (dated 19 August 2022) and include:</p> <p>a) a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> <li>(i) meeting the biodiversity mitigation requirements in condition C23;</li> <li>(ii) minimising the amount of native vegetation clearing within the development area;</li> <li>(iii) minimising the loss of key fauna habitat, including tree hollows;</li> <li>(iv) minimising the impacts on fauna on site, including undertaking pre-clearance surveys;</li> <li>(v) minimising the potential indirect impacts on threatened species, migratory species and 'at risk' species;</li> <li>(vi) rehabilitating and restoring disturbance areas to its pre-existing condition;</li> <li>(vii) avoiding and minimising impacts on Serious and Irreversible Impact (SAII);</li> <li>(viii) construction clearing and operation vegetation management protocols;</li> <li>(ix) monitoring of the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols;</li> <li>(x) protecting native vegetation and key fauna habitat outside the approved disturbance area;</li> <li>(xi) maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and restoration of the site;</li> <li>(xii) a Connectivity Strategy and a Supplementary Hollow and Nest Strategy;</li> <li>(xiii) controlling weeds;</li> <li>(xiv) controlling erosion; and</li> <li>(xv) bushfire management; and</li> </ul> <p>b) a detailed program to monitor and report on the effectiveness of these measures.</p>	<p>Biodiversity Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2, Revision, dated 5 July 2023.</p>	<p>Environment Manager – this plan was revised during this audit period.</p>		<p>The current version of the Biodiversity Management Plan is Revision 4. Revision 5 of the plan has been submitted to DPHI for approval. Biodiversity management measures are described in Section 5 and compliance management is presented in Section 6 of the Biodiversity Management Plan.</p>	Complies	
			<p>Biodiversity Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2, Revision 5, dated 26 May 2025.</p>			<p>Biodiversity management measures are described in Section 5 and compliance management is presented in Section 6 of the Biodiversity Management Plan.</p>	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C27	Heritage Un-Surveyed Areas	<p>Prior to carrying out any construction within the unsurveyed areas of the development area identified in the EIS, or any potential archaeological deposits (PADs) identified for impact during detailed design, the Proponent must provide an Addendum Aboriginal Cultural Heritage Assessment Report (Addendum ACHAR), prepared in consultation with the Aboriginal stakeholders and Heritage NSW, to the satisfaction of the Planning Secretary.</p> <p>The report must:</p> <p>a) include details of consultation with the Aboriginal stakeholders;</p>	<p>Notifications, investigation results and related correspondence were sighted for:</p> <ol style="list-style-type: none"> <li>1. UXF0058-E = archaeologist confirmed that it is not a UXF</li> <li>2. UXF0059-E = archaeologist confirmed that it is not a heritage item</li> <li>3. UCF0060-E = archaeologist confirmed that it is not a heritage item</li> <li>4. UXF0062-E = The location of the UXF is outside the project site boundary and will not be impacted by the project works.</li> </ol>	<p>1. Environment Manager - A total of 4x Potential UXF was recorded within the reporting period.</p>	<p>During the site inspection the PAD sites observed were fenced and signposted as no go areas.</p>	<p>Compliance with Condition S2 C27 was initially verified in the first IEA. Detailed records relating to each find were provided to the Auditor. Where heritage value was confirmed, the finds were managed in accordance with the management plan and heritage protocols. The Addendum ACHAR details the consultation undertaken with the relevant aboriginal stakeholders.</p>	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C27	Heritage Un-Surveyed Areas	b) describe the additional Aboriginal heritage surveys that were undertaken, including test excavations of PADs;	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Section 5 of the Addendum to the ACHAR describes the additional heritage assessment carried out in previously unsurveyed areas.	Complies	
		c) describe any potential additional impacts to heritage items;	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Section 6 and 7 assesses the potential impacts to the new sites identified during the additional surveys.		
		d) identify further mitigation measures, including avoidance or salvage;	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Table 8.1 provides recommended impact mitigation strategies for each identified heritage site.	Complies	
		e) include detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Section 7.1 provides justifications for unavoidable impacts to heritage items.	Complies	
		f) provide an updated and consolidated list of sites that would be protected and remain in-situ throughout construction and sites that would be salvaged and relocated to suitable alternative locations.	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Table 8.1 provides a consolidated list of sites that will be protected, salvaged or relocated.	Complies	

S2 C28	Protection of Heritage Items	<p>The Proponent must:</p> <p>a) ensure the development does not cause any direct or indirect harm to Aboriginal heritage items located outside the development area;</p>	<p>Incident Register</p> <p>Consultation with RAPs.</p>	<p>Environmental Manager –one potential heritage-related incidents occurred during this audit period.</p> <p>Consultation has occurred associated with preparation works for repatriation of heritage item</p>	<p>No construction work was undertaken outside the approved project boundary/development area to date.</p> <p>No harm to aboriginal items located outside of the approved project boundaries has been reported during</p>	Complies	
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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
						this audit period. One minor incident (the storage of concrete blocks was recorded. A review of that incident found that no harm to heritage artifacts or encroachment on any heritage site occurred.		
		b) implement all reasonable and feasible measures to avoid and minimise harm to Aboriginal heritage items and PADs within the development area; and	Incident Register Heritage Management Plan (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 7 February 2025.	Environmental Manager –heritage-related impacts occurred during this audit period. Consultation has occurred associated with preparation works for repatriation of heritage item	During the site inspection the PAD sites observed were fenced and signposted as no go areas.	No heritage impacts or non-compliance were identified during this audit period. Consultation with the RAPs did not identify any specific concerns regarding the management of PADs or other sites of potential heritage value. The Heritage Management Plan describes the management measures to be implemented. During the site inspection, the Auditor inspected several PAD sites, scar tree and burial tree locations. All the sites inspected properly protected and were being managed in accordance with the requirements of the HMP.	Complies	
S2 C28	Protection of Heritage Items	c) salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version.	RAP Consultation	Environmental Manager –no heritage-related incidents occurred during this audit period. Consultation has occurred associated with preparation works for repatriation of heritage item		No issues were identified in relation to the salvage and relocation of artefacts during this audit period.	Complies	
S2 C29	Protection of Heritage Items	The Proponent must; a) Ensure the development does not cause any direct or indirect harm to any heritage items located outside the development area; and	Incident Register	Environmental Manager –no heritage-related incidents occurred during this audit period.		No work has been undertaken outside the approved project boundary/development area to date. No harm to aboriginal items located outside of the approved project boundaries has been reported during this audit period.	Complies	
		b) Implement all reasonable and feasible measures to avoid and minimise harm to PEC-E-H1 (Survey Marker Tree), the Yanga Pastoral Station Complex sheep yards at PEC-E-H3 (Bundure railway station dwelling artefact scatter), prior to carrying out any development that could harm the items or deposits.	Incident Reports	Environment Manager - No impact to PEC-E-H1 (Survey Marker Tree), the Yanga Pastoral Station Complex sheep yards at PEC-E-H3 (Bundure railway station dwelling artefact scatter) have occurred.		No impacts to PEC-E-H1 (Survey Marker Tree), the Yanga Pastoral Station Complex sheep yards at PEC-E-H3 (Bundure railway station dwelling artefact scatter) were reported during this audit period.	Complies	

c)

S2 C30	Heritage EMP Subplan	The Heritage EMP Sub-Plan must: a) include a description of the measures that would be implemented for:	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023,			The Aboriginal Cultural Heritage Management Strategy was prepared prior to the commencement of	Complies	
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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C30	Heritage EMP Subplan	<p>(i) protecting Aboriginal heritage items and PADs in accordance with conditions C28(a) and C28(b);</p> <p>(ii) minimising and managing the impacts of the development on heritage items within the development area, including:</p> <ul style="list-style-type: none"> <li>– salvaging and relocating the Aboriginal heritage items identified in accordance with condition C28(c);</li> <li>– archival recording and/or salvage of the heritage items and sites identified in condition C29, where impacts cannot be avoided, including consultation with NPWS for the Yanga Pastoral Station Complex sheep yards and Heritage Council for PEC-E-H3 (Bundure railway station dwelling artefact scatter);</li> <li>– a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works;</li> </ul> <p>(iii) a contingency plan and reporting procedure if:</p> <ul style="list-style-type: none"> <li>– heritage items outside the approved disturbance area are damaged;</li> <li>– previously unidentified heritage items are found; or</li> <li>– skeletal material is discovered;</li> </ul> <p>(iv) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and</p> <p>(v) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and</p> <p>b) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the development.</p>	<p>prepared by Trigalana Environmental.</p> <p>Heritage Management Plan (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 7 February 2025.</p> <p>Agency Consultation Report EnergyConnect (NSW – Eastern Section) Heritage Management Plan (Stage 2), Revision D, dated 17 January 2024.</p> <p>Aboriginal Cultural Heritage Management Strategy EnergyConnect (NSW – Western Section) Stage 1 and 2, Revision 5, dated 7 February 2024.</p>			<p>construction.</p> <p>The current version of the strategy was revised during the last audit period.</p> <p>The required consultation was undertaken during the preparation of this revision of the plan.</p> <p>The Strategy meets the contents requirements of this Condition, specifically:</p> <ul style="list-style-type: none"> <li>• protecting Aboriginal heritage items and PADs – Section 5.7</li> <li>• salvaging and relocating the Aboriginal heritage items – Section 5.6</li> <li>• archival recording – Section 5.6</li> <li>• consultation with NPWS for the Yanga Pastoral Station Complex sheep yards and Heritage Council for PEC-E-H3 – Section 5.6.6 and 5.6.7</li> <li>• long-term management of any heritage items or material collected – Section 5.8</li> <li>• a contingency plan and reporting – Section 6.6 and 6.8</li> <li>• heritage inductions – Section 6.1</li> <li>• ongoing consultation with Aboriginal stakeholders – Section 1.7</li> </ul>	Complies	

S2 C31	Traffic and Transport	All over-dimensional vehicles associated with the development must only travel to and from the site via the Primary Access Routes described in the EIS, as identified in the figure in Appendix 3, unless the Planning Secretary agrees otherwise.	<p>Traffic and Transport Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 11, dated 25 November</p> <p>2024.Complaints Register</p>	<p>Environment Manager -</p> <p>There have been no additional access routes included during the reporting period.</p> <p>The only feedback received from the Council was from Edward River and</p>	<p>No additional roads have been added to the approved transport routes. PHI.</p> <p>The TTMP contains details of all approved heavy vehicle routes.</p> <p>No complaints were received during the audit period relating to heavy</p>	Complies	
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## SSI 9172452

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
				related to large vehicle movements. A biweekly meeting has been established with this council to work through their comments. Project updates are also regularly provided to the councils through notifications.		vehicle routing.		
S2 C32	Traffic and Transport	All heavy and light vehicles associated with construction, upgrading and decommissioning of the development must travel to and from the site via the Primary Access Routes, Secondary Access Routes and Water Supply Routes as described in the EIS and identified in the figure in Appendix 3, unless the Planning Secretary agrees otherwise.	Driver's Code of Conduct EnergyConnect, Revision D, dated 9 October 2023. Complaints Register			No additional roads have been added to the approved transport routes. PHI. The TTMP contains details of all approved heavy vehicle routes. No complaints were received during the audit period relating to heavy vehicle routing.	Complies	
S2 C33	Road Upgrades	Unless the Planning Secretary agrees otherwise, the Proponent must implement the road upgrades identified in Appendix 3 in accordance with the relevant standard and timing requirements, to the satisfaction of the relevant roads authority.	Email from Hay Council (G Stewart) to SecureEnergy (D Maxwell) titled "A.P 2069", dated 20 March 2025.	Environment Manager – no road upgrade works were undertaken during this audit period.		The upgrading of the roads required by Appendix 3 was verified during a previous IEA.		
S2 C34	Road Maintenance	The Proponent must: a) undertake independent dilapidation surveys to assess the: (i) existing condition of all local roads on the transport routes (including local road crossings) prior to use for construction, upgrading or decommissioning works; and (ii) condition of all local roads on the transport routes (including local road crossings): – within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed to by the relevant roads authority; – on an annual basis during construction, or within a timeframe agreed to by the relevant roads authority; b) repair (or pay the full costs associated with repairing) any damage to local roads on the transport route (including local road crossings), if dilapidation surveys identify that the road has been damaged by the development during construction, upgrading or decommissioning works; and c) prepare a report in consultation with the relevant roads authority.	Dilapidation Surveys and correspondence with the following Councils during this audit period: <ul style="list-style-type: none"><li>• Balranald</li><li>• Berrigan</li><li>• Edwardd River</li><li>• Federation</li><li>• Hay Shire</li><li>• Lockhart</li><li>• Mildura</li><li>• Murray River</li><li>• Murrumbidgee</li><li>• Wagga Wagga</li><li>• Wentworth</li></ul> The surveys were undertaken by Pavement Management Services	Environment Manager - Dilapidation surveys for the PEC East project were undertaken during this audit period.	Dilapidation surveys covering all Council areas across the PEC East project were undertaken during this audit period. The dilapidation surveys were undertaken by PMS. Evidence of submission of the reports to each Council was sighted. The Auditor is not aware of any disputes with any Council regarding road maintenance works.	Complies		
S2 C35	Traffic and Transport CEMP Sub-Plan	The Traffic and Transport CEMP Sub-Plan required under condition B2 must include: a) details of the transport route to be used for all development-related traffic;  b) details of the road upgrade works required by condition D33 of this approval, including; (i) Final number, location and type of Minor Access Points intersections to be implemented; and (ii) Verification that the proposed types of	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 11, dated 25 November 2024.  Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 11, dated 25 November 2024.			Section 5 of the Traffic and Transport Management Plan describes the approved traffic routes.  Section 6.2 describes the Condition D33 upgrade works.	Complies	

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

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

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation	
S2 C36	Visual Impact Mitigation	<p>Unless the Planning Secretary agrees otherwise, for a period of 2 years from the commencement of operations, the owners of R186, R233, R385, R422, R432, R450, R461, R501, R502 and R26749 may ask the Proponent to implement visual impact mitigation measures on their land to minimise the visual impacts of the development on their residence (including its curtilage).</p> <p>Upon receiving such a written request from the owner of these residences, the Proponent must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner.</p> <p>These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the transmission line and towers from the residence and its curtilage, and commensurate with the level of visual impact on the residence.</p> <p>All agreed mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise.</p> <p>If the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.</p> <p>To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of transmission lines and towers from any other locations on the property other than the residence and its curtilage.</p>					Operations Phase Condition.	Not Triggered	
S2 C37	Visual Impact Mitigation	<p>Prior to submitting the Final Layout Plans for towers 16 and 17 as identified in the EIS, the Proponent must provide reasonable and feasible measures to minimise the visual impacts on residence R26749, including increasing setbacks, in consultation with the owner of the residence, to the satisfaction of the Planning Secretary.</p> <p>Following approval, the Proponent must implement these measures.</p>	<p>Letter from DPE (N Brewer) to Transgrid (J Fisher) titled "Project Energy Connect (NSW – Eastern Section) – Review of visual impact minimisation for residence R26749 under Schedule 2, Condition C37", dated 10 September 2023</p> <p>Letter from Transgrid (C Hansell) to resident on Holbrook Road titled "Project EnergyConnect – NSW Electricity Networks Operations Pty Ltd (Transgrid) – consent to enter [REDACTED] (You) (H200) Property: Lot [REDACTED] in Deposited Plan [REDACTED]", dated 29 July 2024. The letter was signed by the resident approving access to conduct visual mitigation works.</p>	<p>Environmental Manager - The Department approved the proposed visual mitigation measures on 10th September 2023.</p> <p>Visual mitigation progress provided with LH agreement, email and quotes to complete works.</p>		<p>Visual impact measures have been approved by DPHI. DPE noted they are satisfied with the measures proposed and approved the visual mitigation measures outlined in the Transgrid letter dated 15 August 2023.</p> <p>The impacted landowner has approved the visual impact mitigation works.</p>	Complies		
S2 C38	Visual Appearance	<p>The Proponent must:</p> <p>a) Take reasonable steps to minimise the offsite visual impacts of the development; and</p>	<p>Complaints Register.</p> <p>The Department approved the proposed visual mitigation measures 10th September 2023.</p>		<p>The operational camps were inspected. No lighting issues (for example intrusive lights on residential properties or road</p>	<p>Site compound locations are not visible from the residential areas and are unlikely to cause any visual impacts.</p> <p>The lighting provided is appropriate for</p>	Complies		

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
		Visual mitigation progress provided with landholder agreement, email and quotes to complete works.			users) were identified. The Auditor notes that the project is now winding down and that the Camps are being progressively decommissioned and dismantled.	the development and is unlikely to cause glare issues for road users. No lighting complaints were received during the audit period.	Complies	
		b) Not mount any advertising signs or logos on site, except where it is required for identification or safety purposes.			Signage at site access points across the construction corridor were observed. No signage considered to breach this condition was observed.	No advertising signs or logos were observed at either site, other than for the purposes of site identification and safety.		
S2 C39	Lighting	The Proponent must: a) take all reasonable steps to minimise the off-site lighting impacts of the development; and b) ensure that any external lighting associated with the development: • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; and • complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting.	Complaints Register.	Environment Manager - Temporary lighting at laydown areas and work fronts is directed downward, shielded, and positioned to prevent light spill beyond the worksite. All lighting arrangements comply with AS/NZS 4282:2019 – Control of the Obtrusive Effects of Outdoor Lighting.  Site lighting is installed and positioned to ensure all emitted light is cast below the horizontal plane. Visual inspections verify compliance, and any required adjustments are undertaken immediately. No lighting-related complaints or exceedances have been identified during the audit period.	Camps were inspected. No lighting issues (for example intrusive lights on residential properties or road users) were identified.  The Auditor notes that the project is now winding down and that the Camps are being progressively decommissioned and dismantled.	Site compounds constructed for the project locations are not visible from the residential areas and are unlikely to cause any visual impacts.  The lighting provided is appropriate for the development and is unlikely to cause glare issues for road users.  No lighting complaints were received during the audit period. The Auditor is satisfied that the camp lighting meets the requirements of the Approval.	Complies	
C40	Radio Communications	If the development results in the disruption to any radio communications services (including point-to-point microwave links) in the area, then the Applicant must make good any disruption to these services as soon as possible following the disruption, but no later than 1 month following the disruption of the service unless the relevant service provider or user or Planning Secretary agrees otherwise.	LS Assessment of Potential Impact of the EnergyConnect Project on Radiocommunication Services (Microwave Radio Links), Revision 2, dated 22 August 2024.	Environmental Manager – The project has conducted an analysis of the project's tower locations and their subsequent impact on point-to-point microwave links. Consultation with potentially impacted communication service providers has been conducted and documented.		The project has conducted an analysis of the project's tower locations and their subsequent impact on point-to-point microwave links.  No impact has occurred to date.	Not Triggered	
S2 C41	Dangerous Goods	The Proponent must ensure that the storage, handling, and transport of dangerous goods is undertaken in accordance with the relevant Australian Standards and guidelines, particularly AS1940 The storage and handling of flammable and combustible liquids and AS/NZS 1596:2014 The storage and handling of LP Gas, the Dangerous Goods Code, and the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.	Incident Register		During the site inspection, the Auditor inspected fuel and other hazardous materials storage facilities. All flammable and combustible materials sighted were stored in appropriately bunded containers / areas compliant with AS1940. Refer to Photographs 3 and 4.  Spill cleanup kits were located adjacent to storage areas.  The storage and management of hazardous materials is of a high standard.	All fuels and chemicals observed were stored appropriately and there was no evidence of spills or leakages in any storage locations inspected.  Twenty-six minor hydrocarbon spills were recorded. None of those incidents was the result of inappropriate storage.	Complies	
S2 C42	Electrical and Magnetic Fields	The Proponent must ensure that the design, construction and operation of the development is managed to comply with the applicable electric and magnetic fields (EMF) limits in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - Three design studies have been undertaken for the transmission lines and incorporate the requirements of the (ICNIRP) Guidelines. Each study concludes that the power frequency		Three design studies have been undertaken for the transmission lines and incorporate the requirements of the (ICNIRP) Guidelines.  Each study concludes that the power frequency electric and magnetic field	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
		limiting exposure to time-varying electric and magnetic fields (1Hz – 100kHz) (ICNIRP, 2010).		electric and magnetic field levels near ground level are confirmed to be acceptable to humans, livestock and plants.		levels near ground level are confirmed to be acceptable to humans, livestock and plants.		
S2 C43	Induced Current Risk	Prior to any works traversing the high-pressure gas main (Bowmen – Culcairn Pipeline) easement, including above ground electricity transmission lines, the proponent must undertake an induced electrical current risk assessment identifying potential risks to the pipeline, including any physical mitigation measures and ongoing management requirements.	PC L5 – 500kV Transmission Line Induction Study, Revision D, dated 4 July 2023.	Environmental Manager - Earthing report has been completed including the induced electrical current risk assessment for the Culcairn pipeline (approx. 100m from T41). Report completed on 29/01/2025 Team binder Reference: TL-914462.		The earthing report has been completed including the induced electrical current risk assessment for the Culcairn pipeline (approx. 100m from T41) satisfying this condition.	Complies	
S2 C44	Bushfire Safety	The Proponent must: a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022. Training PowerPoint Presentation titled "Fire Safety During Construction".	Environment Manager - No bushfire incidents have occurred during the audit period.		No bushfire incidents have occurred during the audit period. Fire safety training is provided to the workforce.	Complies	
		b) ensure that the development: <ul style="list-style-type: none"><li>• complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones;</li><li>• is suitably equipped to respond to any fires on site, including provision of a 20,000-litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds and accommodation camps;</li><li>• incorporates the recommendations of a fire risk assessment as per TransGrid's design standards;</li></ul>	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) - Rev 0 dated 2/3/22 Accommodation Camp Management Plan Lockhart - Rev 2 dated 9/3/23 Accommodation Camp Management Plan Dinawan – Rev 2 dated 10/3/23	Environment Manager – fire related incidents have occurred during the audit period.		The Accommodation Camp Management Plan describes the fire control strategies and resources available.	Complies	
		c) ensure that buildings within the compounds and accommodation camps comply with Australian Standard AS2959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS's Planning for Bushfire Protection 2019;				Plans for the camp building include specifications for compliance with the relevant fire standards and BAL specifications.	Complies	
		d) develop procedures to manage potential fires on site, in consultation with the RFS and FRNSW;	Agency Consultation Report EnergyConnect (NSW – Eastern Section) Emergency Plan, Rev A, dated 7 November 2022. PowerPoint presentation titled "Project Overview FRNSW".	Environment Manager – A meeting was held with FRNSW at which we presented our fire management strategy.		SecureEnergy sought RFS input during the preparation of the Emergency Plan. A presentation was provided to FRNSW on the fire management strategy.	Complies	
		e) assist the RFS, FRNSW and emergency services as much as practicable if there is a fire in the vicinity of the site; and		Environment Manager - No bushfire incidents have occurred during the audit period.		No bushfire incidents have occurred during the audit period.	Not Triggered	
		f) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.					Not Triggered	
S2 C45	Emergency Plan	Prior to commencing construction, the Proponent must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, in	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.	Environmental Manager – the current version of the Emergency Plan is with the RFS for consultation.	Hard Copies of the plan were located at each camp.	The Emergency Plan was updated during this audit period to take into account the requirements of the Elecnor management system and the	Complies	

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		consultation with the RFS, and provide a copy of the plan to the local Fire Control Centre. The Proponent must keep two copies of the plan on site in a prominent position adjacent to the site entry point(s) to the Buronga Substation, Dinawan Substation and Wagga Wagga Substation at all times.				recommendations from the last IEA. Neither the current or previous versions of the Emergency plan were available on the project website at the time of the site inspection. Hard Copies of the plan were located at each camp (at the security room near the site entrance and at the main meeting area. SecureEnergy provided the RFS with a copy of the plan and requested input from the RFS.		
		The plan must; a) be consistent with: • RFS's Planning for Bushfire Protection 2019 (or equivalent); • RFS's Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan; • the Fire and Rescue NSW Act 1989; • the Work Health and Safety (WHS) Act 2011; b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			The plan is generally consistent with the requirements of the relevant guidelines.	Complies	
			Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 4 of the plan identifies fire hazards and risks.	Complies	
		c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 8 (Emergency Response) describes the procedures to be implemented to address a fire on or near the site(s).	Complies	
		d) list works that should not be carried out during a total fire ban;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 6.3.1 describes the activities that must not be carried out during a total fire ban.	Complies	
		e) include availability of fire suppression equipment, access and water;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 7.4 describes the location and availability of firefighting water supplies.	Complies	
		f) include procedures for the storage and maintenance of any flammable materials	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 6.4 describes the management of flammable materials.	Complies	
		g) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 7.5 describes site access for emergency vehicles and Section 9.1 provides emergency contact information.	Complies	

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

S2 C46	Waste	<p>Waste generated during construction, operation, upgrading and decommissioning must be dealt with in accordance with the following priorities:</p> <p>a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced;</p> <p>b) where avoiding or reducing waste is not possible, waste must be re-used, recycled,</p>	Waste Management Plan EnergyConnect (NSW – Eastern Section) Revision C, dated 6 January 2025. All Logistics Waste Tracking Register and Predictions (excel spreadsheet maintained by Elecnor)		Recycling facilities (skip bins) are available on site for both general waste and recyclable waste.	A waste management plan has been prepared and was updated in January this year. Facilities for collections, segregation and storage of wastes are provided at each camp. Waste tracking register includes general waste, sanitary bin waste, concrete, contaminated soil,	Complies	
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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
		or recovered; and c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.					hydrocarbon waste and timber.	
S2 C47	Waste	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the Protection of the Environment Operations Act 1997, the Protection of the Environment Operations (Waste) Regulation 2014, and orders or exemptions under the regulation.			Environment Manager - No waste importing has been undertaken by the Project during the audit period.	No evidence of the importation of wastes was sighted during the site inspections.	No importation of waste onto the project site was reported for this audit period.	Not Triggered
S2 C48	Waste	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	All Logistics Waste Tracking Register and Predictions (excel spreadsheet maintained by Elecnor)  Cleanaway waste collection invoices covering the audit period.  EPA Intrastate waste movement form for the disposal of oily wastes.	Environment Manager – Cleanaway is contracted to provide waste and recycling bins, and to collect wastes for processing (recycling) or disposal.		A waste register is maintained that details the collection, recycling and disposal of all wastes generated by the project.  Waste records from Cleanaway covering the audit period were sighted. The records indicate that all wastes collected by Cleanaway were managed in accordance with this Condition.	Complies	
		All waste that is removed from site must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	All Logistics Waste Tracking Register and Predictions (excel spreadsheet maintained by Elecnor)  Waste Classification Report (hydrocarbon contaminated soil from Camp 3, prepared by Elecnor, dated 12 June 2025.			Records indicate that nine loads (93m <sup>3</sup> ) of contaminated soil were removed from PEC East during this audit period.		
S2 C50	Accommodation Camp	Prior to establishing the accommodation camps, the Proponent must prepare an Accommodation Camp Management Plan in consultation with the relevant Council. The plan must:  a) ensure utilities at the accommodation camps, including water, wastewater, waste and electricity, are designed and located in accordance with Council specifications and relevant standards;	Accommodation Camp Management Plan Lockhart (Camp 2) EnergyConnect (NSW Eastern Section), Rev 3 dated 4 June 2024.  Accommodation Camp Management Plan Dinawan – Rev 3 dated 4 June 2024.  Accommodation Camp Management Plan Cobb Highway (Camp 4) – Rev 2 dated 9 March 2023.	Environment Manager – a minor amendment to the Accommodation Plan was made in October last year to remove reference to Clough and to reflect the approved number of camps.	The Auditor inspected the remaining operational camps. It is noted that as the project is winding down, the camps are being progressively dismantled and the sites rehabilitated. See for example Photographs 1 and 2.	Three of the original six camps were in used at the time of this audit Dinawan, Cobb Highway and Lockhart.  The Accommodation Management Plans had been prepared and implemented. The plans were not revised during this audit period.  Section 2.4 of the plans reference the standards and guidelines used to develop the plan.	Complies	

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		b) ensure the accommodation camp complies with conditions C19 and C44;  c) ensure any treated wastewater from the accommodation camps used for dust suppression during construction: <ul style="list-style-type: none"><li>• complies with the Australian and New Zealand Environment and Conservation Council (ANZECC) &amp; Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) guidelines for irrigation water quality;</li><li>• meets the requirements of the Public Health Act 2010;</li></ul> d) include measure for dust suppression within the accommodation camps;  e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and  f) include measures to support local suppliers in servicing the camp where possible.  Following approval, the Proponent must implement the Accommodation Camp Management Plan.			The Accommodation Management Plans provide an appropriate framework for compliance against the condition of approval.	Complies		
				Treated effluent from site water treatment systems is stored and used for dust suppression.	The reuse of treated wastewater is described in Section 7.4 and 7.5 of the Accommodation Management Plans.	Complies		
					Dust management is described in Section 7.5 of the Plans.	Complies		
					Site layout plans are provided in Section 4.1 (Figures 4.1 and 4.2).	Complies		
					Engagement of local suppliers is covered in Section 8.3.	Complies		
				The camps were inspected and appeared to be set out and operated in general accordance with the Accommodation Management Plans.	The camps were being operated in accordance with the Accommodation Management Plans at the time of this audit.	Complies		
S2 C51	Local Business and Employment Strategy	Prior to commencing construction, the Proponent must prepare a Local Business and Employment Strategy for the development in consultation with Council. This strategy must investigate options for prioritising the employment of local and Aboriginal workforce and suppliers for the construction of the development, where feasible.  The Proponent must implement the Accommodation and Employment Strategy.	Local Business and Employment Strategy EnergyConnect (NSW - Eastern Section), Revision 2, dated 7 November 2022.	Environmental Manager – the Local Business and Employment Strategy was not revised during this audit period.	Compliance with this condition was verified during the last IEA.  The Local Business and Employment Strategy has been prepared and implemented.  A Local Industry Participation Manager (LIPM) has been appointed to identify opportunities for local goods and services and facilitate their procurement. The Local industry and indigenous participation is monitored and reported internally on a monthly basis.  In addition, an Indigenous Participation Manager has been appointed whose role is to promote indigenous participation on the project.	Complies		
S2 C52	Rehabilitation	Within 6 months of the completion of construction, upgrading or decommissioning, unless the Planning Secretary agrees otherwise, the Proponent must rehabilitate the areas where ancillary facilities, accommodation camps and earthwork material sites are located, to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3.			With the exception of the two active work zones, rehabilitation works were undertaken in all areas inspected. Photographs 1, 2, 4, 5, 6, 7, 8, and 9.	Site rehabilitation works were well progressed.	Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D1	Environmental Management Strategy	The Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:	<p>The Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <ul style="list-style-type: none"> <li>a) provide the strategic framework for environmental management of the development;</li> <li>b) identify the statutory approvals that apply to the development;</li> <li>c) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</li> <li>d) set out the procedures to be implemented to: <ul style="list-style-type: none"> <li>(i) keep the local community and relevant agencies informed about the construction, operation and environmental performance of the development;</li> <li>(ii) receive record, handle and respond to complaints;</li> <li>(iii) resolve any disputes that may arise during the course of the development;</li> <li>(iv) respond to any non-compliance and any incident;</li> <li>(v) respond to emergencies; and</li> </ul> </li> <li>e) include: <ul style="list-style-type: none"> <li>(i) references to any strategies, plans and programs approved under the conditions of this consent; and</li> <li>(ii) a clear plan depicting all the monitoring to be carried out under the conditions of this consent.</li> </ul> </li> </ul>	Environment Manager - the EMS has been integrated with the CEMP. The CEMP was not revised during this audit period.		The Environmental Management Strategy has been integrated with the CEMP. The CEMP was not revised during this audit period. The CEMP / EMS provides an appropriate framework for environmental management of the construction phase of the project.	Complies	
		b) identify the statutory approvals that apply to the development;				Section 3.1 describes the statutory approvals required for this project.	Complies	
		c) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;				Section 4.9 describes the key roles and responsibilities assigned under the EMS.	Complies	
		d) set out the procedures to be implemented to:				Section 4 describes the Environmental management system and includes the requirements of this condition.	Complies	
		The Proponent must not commence construction until the Environmental Management Strategy is approved by the Planning Secretary.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental. Construction Environmental Management Plan EnergyConnect (NSW-Eastern Section) Stage 1 and 2, Revision 2, dated 20 June 2023.			Stage 2 construction works commenced on 17 July 2023. The CEMP was finalised on 20 June 2023.	Complies	
		The Proponent must implement the Environmental Management Strategy as approved by the Planning Secretary	Letter for Transgrid (J Fisher) to DPE (Cassel) titled "EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of commencement of construction (condition D3)", dated 10 July 2023.			The project is being undertaken in general accordance with the requirements of the EMS.	Complies	

S2 D2	Revision of Strategies, Plans and Programs.	The Proponent must review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 months of the:		Environment Manager –One safety related (car accident) reportable incident occurred during this audit period.		One safety-related (car accident) reportable incident occurred during this audit period.	Complies	
		• submission of an incident report under condition D6;				The incident was reported to DPHI. This incident did not trigger the requirement for a review of the Traffic Management Plan.		
		• submission of an audit report under condition D11; or	Post Approval Form – Independent Environmental Audit – Sept 2024 (issued by DPHI acknowledging receipt of the report).	Environmental Manager - The outstanding biodiversity component of the audit was submitted to DPHI		September 2024 IEA (Biodiversity elements) made a range of recommendations that have been	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
			Letter from Transgrid (L Fania) to DPHI (Fishburn) titled "EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Biodiversity component of the Independent Environment Audit (Condition D11)", dated 6 March 2025.	on 6 March 2025.		adopted by the PEC East project and have resulted in the revision of the Biodiversity Management Plan. The plan has been submitted to DPHI and is awaiting approval.		
		• any modification to the conditions of this approval.		Environment Manager - There have not been any Modifications of the Infrastructure Approval during this audit period.		There have been no modifications to this Approval during this audit period.	Not Triggered	
S2 D3	Notification	Prior to commencing construction, operations, upgrading or decommissioning of the development or, the Proponent must notify the Department in writing via the Major Projects website portal of the date of commencing the relevant phase. If any of these phases of the development are to be staged, then the Proponent must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	Letter for Transgrid (J Fisher) to DPE (D Cassel) titled "EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of commencement of construction (condition D3)", dated 10 July 2023.			Notifications of the commencement of works (both Stages 1 and 2) were issued to the Planning Secretary prior to the commencement of those works.	Complies	
S2 D4	Final Layout Plans	Prior to commencing construction, the Proponent must submit detailed plans of the final layout of the development to the Department's website, including; a) Details on siting of transmission towers, ancillary infrastructure and/ or ancillary facilities; and b) Showing comparison to the approved layout and approved vegetation clearing. The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			Final layout Plans for Stage 1 were submitted to DPE on 12/12/22 with updated plans submitted to DPE on 3/3/22. Final Layout plans for Stage 2 were submitted to DPE on the 12th of July 2023 and are available on the DPE website	Complies	
S2 D5	Work as Executed Plans	Prior to commencing operations, the Proponent must submit plans that confirm the constructed layout of the development and showing comparison to the final layout plans to the Planning Secretary, via the Major Projects website.				Not yet required	Not Triggered	
S2 D6	Incident Notification, Reporting and Response	The Department must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.				One reportable incident was recorded during this audit period. This incident that occurred on 17 July 2025 related to a motor vehicle accident involving a project vehicle and a private vehicle. Transgrid reported the incident that involved 'actual or potential harm to the health or safety of human beings...that is not trivial' under Condition D6 of the Planning approval to DPHI on 17 July 2025.	Complies	
S2 D7	Non-compliance Notification	The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.		Environmental Manager – No non-compliances were reported to DPHI during this audit period.		No non-compliances were reported to DPHI during this audit period.	Not Triggered	
S2 D8	Non-compliance Notification	A non-compliance notification must identify the development and the application number for it,		Environmental Manager – No non-compliances were reported to DPHI		No non-compliances were reported to DPHI during this audit period.	Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
		set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.		during this audit period.				
S2 D9	Non-compliance Notification	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.					Noted	
S2 D10	Notification to Landholders	Prior to the commencement of construction, the Proponent must notify the owners of the owners of R1489, R2022 and R2023 of their rights under condition D41.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			The notifications were issued to relevant landowners on 13 March 2023.	Complies	
S2 D11	Independent Environmental Audit	Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.	EnergyConnect PEC East Project SSI – 9172452 Independent September 2024 Construction Phase Independent Environmental Audit dated 24 December 2024, prepared by Barnett & May.			Initial audit was undertaken on 17 and 18 August 2022, within 3 months of construction commencement. Subsequent three audits were undertaken 6 monthly and in compliance with this condition. DPE / DPHI approved extensions of time for reporting of the last audit due to availability conflicts with the Biodiversity auditor.	Complies	
S2 D12	Access to Information	Before the commencement of construction until the completion of all rehabilitation required under this approval, the Proponent must: <ul style="list-style-type: none"> <li>a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this approval) publicly available on its website:               <ul style="list-style-type: none"> <li>(i) the EIS;</li> <li>(ii) current statutory approvals for the development;</li> <li>(iii) approved strategies, plans or programs required under the conditions of this approval;</li> <li>(iv) the proposed staging plans for the development if the construction, decommissioning and/or operation of the development is to be staged;</li> </ul> </li> </ul>	<a href="https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents">https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents</a>			All documents required by this Condition were available on the Transgrid website.	Complies	

## SSI 9172452

Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
		<p>(v) a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the <a href="https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents">https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents</a> various plans and programs approved under the conditions of this approval.</p> <p>(vi) a record of complaints, which is to be updated on a monthly basis;</p> <p>(vii) any independent environmental audit, and the Proponent's response to the recommendations in any audit; and</p> <p>(viii) any other matter required by the Planning Secretary; and</p>						
S2 D12	Access to Information	b) keep such information up to date, to the satisfaction of the Secretary.	<a href="https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents">https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents</a>			All documents provided on the website were up to date.	Complies	

## Appendix B

### Audit Photographs



Photograph 1 – Former Buronga Camp.



Photograph 2 – Former equipment laydown area at the Buronga Substation (rehabilitated)



Photograph 3 – Temporary bundled hydrocarbon storage



Photograph 4 – Typical Hazardous materials storage (Buronga Substation construction stores)

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Photograph 5 – Typical Rehabilitated tower footprint



Photograph 6 – Typical Rehabilitated tower footprint



Photograph 7 – Centre line access track



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Photograph 8 – Murrumbidgee Crossing near Tower 513 (Line 2)

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Photograph 9 – Power line corridor, noting that B4 and B10 areas have not been cleared.



Photograph 10 – Singorimbah property (near Hay) off-set area for the Plains Wander habitat.



Photograph 11 – Line Stringing Site

## Appendix C

## Auditor Approval

## Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-9172452-PA-90

Luke Fania  
Environment and Sustainability Manager  
NSW Electricity Networks Operations Pty Limited  
09/09/2025

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Sent via the Major Projects Portal only

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

Dear Mr Fania

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person to conduct the Independent Audit for the Project EnergyConnect (NSW - Eastern Section), submitted to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 8 September 2025, as required by Condition D11 State significant infrastructure approval SSI-9172452 (Approval).

Having considered the qualifications and experience of Mr Ken Holmes of Barnet & May Pty Ltd, as nominee of the Planning Secretary, I endorse the appointment of Mr Holmes, in accordance with Condition D11 of the approval. This approval is conditional on Mr Holmes being independent of the project and maintaining Exemplar Global certification.

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.
- 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.

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

Department of Planning, Housing and Infrastructure

Should you wish to discuss the matter further, please contact me on 0242471851 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Jennifer Rowe  
Senior Compliance Officer  
Compliance

As nominee of the Planning Secretary

# Stakeholder Consultation

## Appendix D

**From:** [South West Planning Mailbox](#)  
**To:** [Ken Holmes](#)  
**Cc:** [Simon Maffei](#)  
**Subject:** CPHR Response RE: Project Energy Connect PEC East Independent Environmental Audit - Consultation Request  
**Date:** Thursday, 30 October 2025 4:57:49 PM  
**Attachments:** [image001.png](#)

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Hi Ken,

As part of the upcoming November 2025 audit please confirm that the Biodiversity Management Plan has been updated consistent with improvement recommendation 'Biodiversity 4'.

We note from Table 12 of the previous audit titled 'EnergyConnect PEC East Project SSI 9172452, April 2025 Construction Phase Independent Environmental Audit' that the proposed completion date for updating and finalising the Biodiversity Management Plan was 31 May 2025.

Regards

**Andrew Fisher**

Senior Team Leader, Planning - South West  
Regional Delivery  
Conservation Programs, Heritage and Regulation Group  
Department of Climate Change, Energy, the Environment and Water  
T 02 6022 0623 M 0427 562 844 E [andrew.fisher@dcceew.nsw.gov.au](mailto:andrew.fisher@dcceew.nsw.gov.au)  
620 Macauley St, Albury NSW 2640  
[www.environment.nsw.gov.au](http://www.environment.nsw.gov.au)



*Contact the South West Planning Team about biodiversity and flood management planning in south-western NSW by emailing [planning.southwest@environment.nsw.gov.au](mailto:planning.southwest@environment.nsw.gov.au)*

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**From:** Ken Holmes <Ken@baeckea.com.au>  
**Sent:** Friday, 10 October 2025 3:15 PM  
**To:** Andrew Fisher <Andrew.Fisher@dcceew.nsw.gov.au>  
**Subject:** Project Energy Connect PEC East Independent Environmental Audit - Consultation Request DPHI -BCD

Andrew,

The NSW planning approval SSI 9172452 for the Project Energy Connect Eastern Section requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under the approval. The audit is scheduled for to commence in the early November.

The Audit will be undertaken accordance with the Project Approval Conditions that require:

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

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

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

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

Thanks and Regards,

**Ken Holmes**  
**Principal Environmental Auditor**  
**Director**

Barnett & May

**P +61 (0)438 046 261**  
**E [ken@baecke.com.au](mailto:ken@baecke.com.au)**  
**A PO Box 365 Belrose NSW 2085**

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Our ref: OUT25/13487

Name: Ken Holmes

Address: Barnett & May

Email: [Ken@baeckeau.com.au](mailto:Ken@baeckeau.com.au)

15/10/2025

---

Subject: Project Energy Connect PEC East - Independent Environmental Audit - SSI-9172452

Dear Ken Holmes

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

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

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

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

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



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

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

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

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Tim Baker".

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

**From:** [Georgia Feben](#)  
**To:** [Ken Holmes](#)  
**Subject:** Project Energy Connect PEC East - EPA Consultation Response  
**Date:** Wednesday, 15 October 2025 8:59:22 AM  
**Attachments:** [image001.png](#)

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Good morning Ken,

The EPA understand that you are carrying out an independent audit of the NSW Eastern Section of the Project Energy Connect (NSW Eastern Section – Buronga to Wagga).

As per the information provided during the previous 6 monthly audit, the EPA's interest in the project relates to the requirement for an Environment Protection Licence under section 43 and 48 of the *Protection of the Environment Operations Act 1997* (POEO Act) for crushing, grinding or separating, clause 16 of Schedule 1 - for the upgrade of the Dinawan Substation (SSI-9172452).

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

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

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

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

Kind regards,

**Georgia FEBEN**

Operations Officer

NSW Environment Protection Authority  
Buronga NSW 2739

M 0448 220 586 | E [georgia.feben@epa.nsw.gov.au](mailto:georgia.feben@epa.nsw.gov.au)

**N.B. Please send all official correspondence to [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au) (Cc [georgia.feben@epa.nsw.gov.au](mailto:georgia.feben@epa.nsw.gov.au) if appropriate)**



The EPA acknowledges the Traditional Custodians of the land, waters, and sky where we work.  
As part of the world's oldest surviving cultures, we pay our respect to Aboriginal Elders past and present.  
Report pollution and environmental incidents 131 555 or +61 2 9995 5555

----- Forwarded Message -----

**From:** Ken Holmes [ken@baecke.com.au]  
**Sent:** 10/10/2025 15:44  
**To:** [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)  
**Subject:** Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request EPA

The Responsible Officer,

The NSW planning approval SSI 9172452 for the Project Energy Connect Eastern Section requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under the approval. The audit is scheduled for to commence in the early November.

The Audit will be undertaken accordance with the Project Approval Conditions that require:

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

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

I would therefore appreciate if you could provide me with any information, comments or concerns that EPA may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

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

Thanks and Regards,

**Ken Holmes**  
**Principal Environmental Auditor**  
**Director**

**Barnett & May**

**P +61 (0)438 046 261**  
**E [ken@baecke.com.au](mailto:ken@baecke.com.au)**  
**A PO Box 365 Belrose NSW 2085**

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**From:** [Alison Lamond](#)  
**To:** [Ken Holmes](#); [Nicole Davis](#)  
**Subject:** RE: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request Heritage NSW  
**Date:** Friday, 10 October 2025 5:15:58 PM  
**Attachments:** [image001.png](#)

---

Hello Ken

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for your project. Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. Heritage NSW has been made aware of multiple unexpected Aboriginal Cultural Heritage Finds during construction works, we advise that ensuring the management requirements of the conditions of consent and the Aboriginal Cultural Heritage Management plan with relation to the newly identified sites is also included in your scope.

It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) to determine if there is any non-compliance with Conditions of Consent for the project.

If you have any questions regarding these comments, please contact [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au).

Kind regards,

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

A/ Strategic Manager - Major Projects  
Heritage NSW

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

**M** 0419 762 918 **E** [alison.lamond@dcceew.nsw.gov.au](mailto:alison.lamond@dcceew.nsw.gov.au)

[dcceew.nsw.gov.au](http://dcceew.nsw.gov.au)

Level 3, 6 Stewart Ave  
Newcastle West NSW 2303

Locked Bag 1002, Dangar NSW 2309

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



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

Please consider the environment before printing this email.

---

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

**Sent:** Friday, 10 October 2025 3:23 PM

**To:** Nicole Davis <Nicole.Davis@dcceew.nsw.gov.au>

**Cc:** Alison Lamond <alison.lamond@dcceew.nsw.gov.au>

**Subject:** Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request Heritage NSW

Nicole / Alison,

The NSW planning approval SSI 9172452 for the Project Energy Connect Eastern Section requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under the approval. The audit is scheduled for to commence in the early November.

The Audit will be undertaken accordance with the Project Approval Conditions that require:

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

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

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

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

Thanks and Regards,

**Ken Holmes**  
**Principal Environmental Auditor**  
**Director**

Barnett & May

**P** +61 (0)438 046 261

**E** [ken@baecke.com.au](mailto:ken@baecke.com.au)

**A** PO Box 365 Belrose NSW 2085

**From:** [Jarod Dashwood](#)  
**To:** [Ken Holmes](#)  
**Subject:** Re: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request Forestry Corporation NSW  
**Date:** Tuesday, 14 October 2025 8:41:41 AM  
**Attachments:** [Re Transgrid - Project EnergyConnect - Independent Environmental Audits Official.eml.msg](#)

---

Hi Ken

Yes I am the contact.

Attached is our last correspondence. Can you send me the previous report to show the audit accurately reflected feedback from FCNSW? I'd like to know the action items from the last audit were dealt with.

Regards

Jarod

**Jarod Dashwood | Land Access Manager**  
**Forestry Corporation of NSW | Western Region**

Suite 2 Level 1

168-172 Brisbane Street | Dubbo NSW 2830  
PO Box 1207 | Dubbo NSW 2830  
M: 0410 149 385

E: [jarod.dashwood@fcnsw.com.au](mailto:jarod.dashwood@fcnsw.com.au)

W: [www.forestrycorporation.com.au](http://www.forestrycorporation.com.au)

---

**From:** Ken Holmes <Ken@baeckea.com.au>  
**Sent:** Friday, October 10, 2025 3:43 PM  
**To:** Jarod Dashwood <jarod.dashwood@fcnsw.com.au>  
**Subject:** Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request Forestry Corporation NSW

Jarod,

The NSW planning approval SSI 9172452 for the Project Energy Connect Eastern Section requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under the approval. The audit is scheduled for to commence in the early November.

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

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

Thanks and Regards,

**Ken Holmes**  
**Principal Environmental Auditor**  
**Director**

**Barnett & May**

**P +61 (0)438 046 261**  
**E [ken@baecke.com.au](mailto:ken@baecke.com.au)**  
**A PO Box 365 Belrose NSW 2085**

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**From:** [Glen Hanchard](#)  
**To:** [Ken Holmes](#)  
**Subject:** RE: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request TfNSW  
**Date:** Thursday, 23 October 2025 4:40:28 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

Hi Ken,

Thankyou for your email to TfNSW.

TfNSW remit is to ensure that the safety and efficiency of the state road network is maintained. Can the audit please ensure compliance with the Transport and Traffic conditions levied by the consent authority, commitments made in the EIS and compliance with the Traffic Management Plan is considered.

Please feel free to call regarding any of the above.

Kindest Regards,

**Glen Hanchard**

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

E [development.renewables@transport.nsw.gov.au](mailto:development.renewables@transport.nsw.gov.au)

[transport.nsw.gov.au](http://transport.nsw.gov.au)



I acknowledge the Aboriginal people of the country on which I work, their traditions, culture and a shared history and identity. I also pay my respects to Elders past and present and recognise the continued connection to country.

Please consider the environment before printing this email.

OFFICIAL

**From:** Ken Holmes <Ken@baecke.com.au>  
**Sent:** Friday, 10 October 2025 3:20 PM  
**To:** Development Renewables <development.renewables@transport.nsw.gov.au>  
**Subject:** Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request TfNSW

**CAUTION:** This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

The responsible officer,

The NSW planning approval SSI 9172452 for the Project Energy Connect Eastern Section requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under the approval. The audit is scheduled for to commence in the early November.

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I would therefore appreciate if you could provide me with any information, comments or concerns that TfNSW may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

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

Thanks and Regards,

**Ken Holmes**  
**Principal Environmental Auditor**  
**Director**

**Barnett & May**

**P +61 (0)438 046 261**  
**E [ken@baecke.com.au](mailto:ken@baecke.com.au)**  
**A PO Box 365 Belrose NSW 2085**

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**From:** [Sarah Griffiths](#)  
**To:** [Ken Holmes](#)  
**Cc:** [Darron Freund](#)  
**Subject:** RE: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request Berrigan Council  
**Date:** Tuesday, 14 October 2025 1:31:59 PM  
**Attachments:** [image002.png](#)

---

Ken

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

To complete our records, we would be grateful if you can confirm what the expected heavy movements / haulage are (and have been) through Berrigan Shire Council. Thanks.

Regards,



Sarah Griffiths  
Manager Planning and Development  
  
Berrigan Shire Council | 56 Chanter Street, Berrigan NSW 2712  
P: 03 5888 5100 M: 0438 479 899  
E: [sarah.griffiths@berriganshire.nsw.gov.au](mailto:sarah.griffiths@berriganshire.nsw.gov.au)  
W: [www.berriganshire.nsw.gov.au](http://www.berriganshire.nsw.gov.au)



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---

**From:** Sarah Griffiths  
**Sent:** Monday, 13 October 2025 3:35 PM  
**To:** Ken@baeckea.com.au  
**Subject:** RE: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request Berrigan Council

Hi Ken

I acknowledge receipt of your email relating to the 2 State Significant Infrastructure projects. I am happy to be your contact at Council again.

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

Regards,



Sarah Griffiths  
Manager Planning and Development  
  
Berrigan Shire Council | 56 Chanter Street, Berrigan NSW 2712  
P: 03 5888 5100 M: 0438 479 899  
E: [sarah.griffiths@berriganshire.nsw.gov.au](mailto:sarah.griffiths@berriganshire.nsw.gov.au)  
W: [www.berriganshire.nsw.gov.au](http://www.berriganshire.nsw.gov.au)



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---

**From:** Mail <[mail@berriganshire.nsw.gov.au](mailto:mail@berriganshire.nsw.gov.au)>  
**Sent:** Friday, 10 October 2025 4:07 PM  
**To:** Gary George <[Gary.George@berriganshire.nsw.gov.au](mailto:Gary.George@berriganshire.nsw.gov.au)>  
**Subject:** FW: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request Berrigan Council



Rebecca Ryan  
Customer Experience - Development Support  
Berrigan Shire Council | 56 Chanter Street, Berrigan NSW 2712  
P: 03 5888 5100  
E: [RRyan@berriganshire.nsw.gov.au](mailto:RRyan@berriganshire.nsw.gov.au)  
W: [www.berriganshire.nsw.gov.au](http://www.berriganshire.nsw.gov.au)



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---

**From:** Ken Holmes <[Ken@baeckea.com.au](mailto:Ken@baeckea.com.au)>  
**Sent:** Friday, 10 October 2025 3:37 PM  
**To:** Mail <[mail@berriganshire.nsw.gov.au](mailto:mail@berriganshire.nsw.gov.au)>  
**Subject:** Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request Berrigan Council

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

Attention: The Director Infrastructure

The NSW planning approval SSI 9172452 for the Project Energy Connect Eastern Section requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under the approval. The audit is scheduled for to commence in the early November.

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

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

Thanks and Regards,

**Ken Holmes**  
**Principal Environmental Auditor**  
**Director**

Barnett & May

**P** +61 (0)438 046 261  
**E** [ken@baecke.com.au](mailto:ken@baecke.com.au)  
**A** PO Box 365 Belrose NSW 2085

**From:** [David Webb](#)  
**To:** [Ken Holmes](#)  
**Cc:** [Hay Shire Council](#); [Alison McLean](#)  
**Subject:** RE: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request Hay Council  
**Date:** Friday, 17 October 2025 5:27:37 PM

---

Hi Ken,

I can advise that Hay Shire Council does not have any issues or concerns in regards to the environmental performance of the construction project over the past six months.

Thanks.



**David Webb**  
General Manager

**Hay Shire Council**  
134 Lachlan Street  
Hay NSW 2711

**Ph:** 02 6990 1100 **Fax:** 02 6993 1288 **Mobile:** 0429 693 499

**Values** - Integrity • Openness • Responsiveness • Quality of Service

[www.hay.nsw.gov.au](http://www.hay.nsw.gov.au) [www.visithay.com.au](http://www.visithay.com.au)  
Council Facebook Instagram Tourism Facebook

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Views expressed in this message are those of the individual sender, and are not necessarily the views of the Hay Shire Council.

---

**From:** Ken Holmes <Ken@baeckea.com.au>  
**Sent:** Friday, 10 October 2025 3:37 PM  
**To:** David Webb <DWebb@hay.nsw.gov.au>  
**Subject:** Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request Hay Council

David,

The NSW planning approval SSI 9172452 for the Project Energy Connect Eastern Section requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under the approval. The audit is scheduled for to commence in the early November.

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

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

Thanks and Regards,

**Ken Holmes**  
**Principal Environmental Auditor**  
**Director**

Barnett & May

**P +61 (0)438 046 261**  
**E [ken@baeckeau.com.au](mailto:ken@baeckeau.com.au)**  
**A PO Box 365 Belrose NSW 2085**

---

**From:** [Heritage](#)  
**To:** [Ken Holmes](#)  
**Cc:** [splintawoods](#); [Will Carter](#)  
**Subject:** Fw: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Registered Aboriginal Parties  
**Date:** Friday, 31 October 2025 5:25:15 PM  
**Attachments:** [Outlook-43t0pvuk.png](#)

---

Hi Ken,

My name is Mark Williams, I run the Heritage portfolio for South West Yiradyuri Clans (SWYC).

Uncle Ray Woods has asked me to respond and request a meeting to give feedback as per your request.

If you could respond with some dates/times on Nov 13/27 or 28 please?

Ta

Mark



Heritage Services  
Southern West Yiradyuri  
Clans  
<https://yiradyuri.au/>  
[Heritage@yiradyuri.au](mailto:Heritage@yiradyuri.au)

We acknowledge the Southern West Yiradyuri People as the Traditional Owners of Southern West Yiradyuri Country and pay respect to our unbroken connection to Land, Water, and Sky Country, Culture, and Community. Sovereignty has never been ceded!

---

**From:** Ray Woods <[splintawoods@bigpond.com](mailto:splintawoods@bigpond.com)>  
**Sent:** Friday, October 10, 2025 5:17 PM  
**To:** Mark Williams <[mark.williams@yiradyuri.au](mailto:mark.williams@yiradyuri.au)>  
**Subject:** Fwd: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Registered Aboriginal Parties

**From:** Ken Holmes <[Ken@baeckea.com.au](mailto:Ken@baeckea.com.au)>  
**Date:** 10 October 2025 at 3:38:46 pm AEDT

**Subject: RE: Project Energy Connect PEC East / West -  
Independent Environmental Audits - Consultation Request  
Registered Aboriginal Parties**

Hello,

The NSW planning approval SSI 9172452 for the Project Energy Connect Eastern Section requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under the approval. The audit is scheduled for to commence in the early November.

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

The Proponent has provided me with your contact details as the RAP representative. I would therefore appreciate if you could provide me with any information, comments or concerns that you or your organisation may have regarding the performance of the construction project over the past six months in relation to the protection of culture and heritage impacted by the project.

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

Thanks and Regards,

**Ken Holmes  
Principal Environmental Auditor  
Director**

**Barnett & May**

**P +61 (0)438 046 261**  
**E [ken@baecke.com.au](mailto:ken@baecke.com.au)**  
**A PO Box 365 Belrose NSW 2085**

**From:** [Mark Williams](#)  
**To:** [Heritage](#); [Ken Holmes](#)  
**Cc:** [splintawoods](#); [Will Carter](#)  
**Subject:** Re: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request  
Registered Aboriginal Parties  
**Date:** Thursday, 13 November 2025 5:38:28 PM  
**Attachments:** [image001.png](#)  
[Outlook-vb4hoisr.png](#)  
[Outlook-snk4xaw.png](#)

---

Hi Ken,

Thanks for hearing us out today. As you heard we have some serious frustrations going on with Transgrid and the SWREZ.

Can I request we see your write up of our conversations before submitting please?

In relation to Singorimbah we have been contacted by Ellaine Dickens from Navin Officer to register for cultural heritage work.

This is an example of what they ask: The purpose of the community consultation with **relevant Aboriginal people** is to assist Transgrid in the preparation of an application for an Aboriginal heritage impact permit and to assist the Director-General in their consideration and determination of the application.

As we discussed these heritage consultants/proponents will just take the RAP's who will just turn up, do as they are told and say nothing and 90% of the time are unqualified and worse not Yiradyuri people.

Here are also the two documents I spoke of: the recently released NSW Aboriginal Affairs Cultural Knowledge Standards Framework (<https://www.nsw.gov.au/living-nsw/aboriginal-outcomes/aboriginal-cultural-heritage/cultural-knowledge-standards>) and the federal government's response to the Juukan Gorge tragedy, Dhawura Ngilan – A Vision for Aboriginal and Torres Strait Islander Heritage (<https://www.dccceew.gov.au/parks-heritage/heritage/publications/dhawura-ngilan-vision-atsi-heritage>).

Both highlight the requirement to uphold the Free, Prior and Informed Consent (FPIC) of Aboriginal peoples and to respect our rights as affirmed under the UN Declaration on the Rights of Indigenous Peoples (UNDRIP).

We request these documents be put to Transgrid please.

We have had similar or worse experiences with Elecnor/Humelink West and VNI West.

Energy Co have been showing the same behavior towards us as well.  
I won't even start about the proponents on the SWREZ either!!!

Thanks for your time, hopefully something changes and some **real outcomes** for Yiradyuri people come of it?

Mark



Heritage Services  
Southern West Yiradyuri  
Clans  
<https://yiradyuri.au/>  
[Heritage@yiradyuri.au](mailto:Heritage@yiradyuri.au)

We acknowledge the Southern West Yiradyuri People as the Traditional Owners of Southern West Yiradyuri Country and pay respect to our unbroken connection to Land, Water, and Sky Country, Culture, and Community. Sovereignty has never been ceded!

---

**From:** Heritage <heritage@yiradyuri.au>  
**Sent:** Monday, November 3, 2025 4:27 PM  
**To:** Ken Holmes <Ken@baeckeae.com.au>; Heritage <heritage@yiradyuri.au>  
**Cc:** splintawoods <splintawoods@bigpond.com>; Will Carter <will.carter@yiradyuri.au>  
**Subject:** Re: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Registered Aboriginal Parties

Yes, Please Ken.

If you could send all three emails listed here.

Look forward to meeting you.

Mark



Heritage Services  
Southern West Yiradyuri  
Clans  
<https://yiradyuri.au/>  
[Heritage@yiradyuri.au](mailto:Heritage@yiradyuri.au)

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---

**From:** Ken Holmes <Ken@baeckea.com.au>  
**Sent:** Friday, October 31, 2025 7:32 PM  
**To:** Heritage <heritage@yiradyuri.au>  
**Cc:** splintawoods <splintawoods@bigpond.com>; Will Carter <will.carter@yiradyuri.au>  
**Subject:** RE: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Registered Aboriginal Parties

Hi Mark,

That would be fine. Thursday 13 November is good for me. It will need to be a Teams meeting as I am located in Sydney. Would you like me to set up the meeting?

Regards

**Ken Holmes**  
**Principal Environmental Consultant**  
**Director**

Barnett & May

**P** +61 (0)438 046 261  
**E** [ken@baeckea.com.au](mailto:ken@baeckea.com.au)  
**A** PO Box 867 Newport NSW 2106

---

**From:** Heritage <heritage@yiradyuri.au>  
**Sent:** Friday, 31 October 2025 5:25 PM  
**To:** Ken Holmes <Ken@baeckea.com.au>  
**Cc:** splintawoods <splintawoods@bigpond.com>; Will Carter <will.carter@yiradyuri.au>  
**Subject:** Fw: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Registered Aboriginal Parties

Hi Ken,

My name is Mark Williams, I run the Heritage portfolio for South West Yiradyuri Clans (SWYC).

Uncle Ray Woods has asked me to respond and request a meeting to give feedback as per your request.

If you could respond with some dates/times on Nov 13/27 or 28 please?

Ta

Mark



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Southern West Yiradyuri Clans  
<https://yiradyuri.au/>  
[Heritage@yiradyuri.au](mailto:Heritage@yiradyuri.au)

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---

**From:** Ray Woods <[splintawoods@bigpond.com](mailto:splintawoods@bigpond.com)>  
**Sent:** Friday, October 10, 2025 5:17 PM  
**To:** Mark Williams <[mark.williams@yiradyuri.au](mailto:mark.williams@yiradyuri.au)>  
**Subject:** Fwd: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Registered Aboriginal Parties

**From:** Ken Holmes <[Ken@baecke.com.au](mailto:Ken@baecke.com.au)>  
**Date:** 10 October 2025 at 3:38:46 pm AEDT  
**Subject: RE: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request Registered Aboriginal Parties**

Hello,

The NSW planning approval SSI 9172452 for the Project Energy

Connect Eastern Section requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under the approval. The audit is scheduled for to commence in the early November.

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The Proponent has provided me with your contact details as the RAP representative. I would therefore appreciate if you could provide me with any information, comments or concerns that you or your organisation may have regarding the performance of the construction project over the past six months in relation to the protection of culture and heritage impacted by the project.

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

Thanks and Regards,

**Ken Holmes**  
**Principal Environmental Auditor**  
**Director**

# Barnett & May

**P +61 (0)438 046 261**

**E [ken@baecke.com.au](mailto:ken@baecke.com.au)**

**A PO Box 365 Belrose NSW 2085**

# Lead Auditor Qualifications and Experience

## Appendix E

# KEN HOLMES

## Senior Principal Environmental Consultant



### Contact

Email [ken@baecke.com.au](mailto:ken@baecke.com.au)

Mobile +61 0438 046 261

### Qualifications & professional affiliations

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

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

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

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

### Project experience

#### Environmental Auditing (Audits completed in the recent years)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Environment Protection Licence.

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

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

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

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

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

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

EPBC Approval

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

Water Licences;

Environment Protection Licence; and all  
Mining Leases.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Coal Mine (2018, 2021 and 2024)**

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

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

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

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

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

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

The independent environmental audit was undertaken in

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Department of Planning and NSW EPA audit guidelines.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **Project Approvals**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **Other relevant Infrastructure Projects led by Ken include:**

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

#### **Investigative / Expert Roles**

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

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

of buried construction and demolition wastes.

#### **Environment Protection Authority — Expert Reports**

**Illegal Land Clearing and Waste Disposal Activities (2018)**  
- Ken was commissioned by the NSW Environment Protection Authority (EPA) to provide expert opinion regarding the alleged illegal vegetation clearing and waste disposal at a site in the Hawkesbury River Basin and Arcadia (north western Sydney).

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

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

In doing this, the audit Assessed the:

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

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

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

#### **Other**

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

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

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

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

#### **Waste Management**

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

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

##### **Shredder Waste Disposal Assessment – Sims Metal**

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