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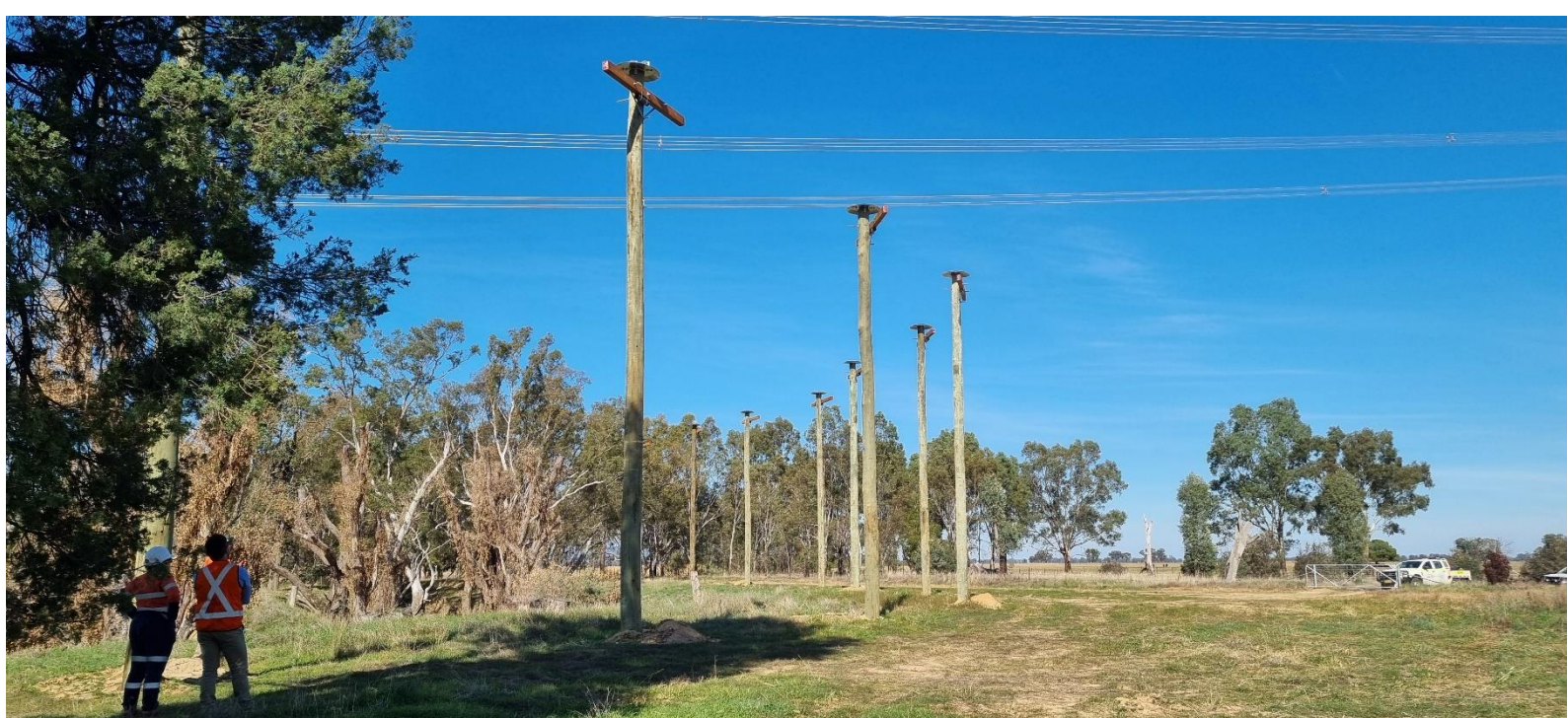
EnergyConnect PEC East Project SSI 9172452

April 2026 Construction Phase Independent
Environmental Audit

Prepared for
Secure Energy

Client representative
Rebecca Walker-Edwards

Date: 30 July 2026
Rev 1



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Prepared by — K. Holmes		Date 30 July 2026
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Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
a	Draft for client Review	K Holmes	M Holmes	K Holmes	21/06/2026
0	Final Report	K Holmes	K Holmes	K Holmes	26/06/2026
1	Revised to address additional information	K Holmes	K Holmes	K Holmes	30/07/2026

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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 seventh and final construction phase Independent Environmental Audit (IEA) of the Secure Energy PEC East Project.

The project consists of the construction of a 330 kV and 500 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 substation at 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 27 February 2026.

This audit report (Revision 1) was revised to address additional information provided by the Auditee following the issue of Revision 0.

1.1 Audit timing

The audit site inspections commenced on 29 April 2026 and concluded on 1 May 2026.

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 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 of the accommodation camps
- Establishment of 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. All of the transmission line installed and the works on substations complete. Decommissioning of the construction camps and laydown areas were progressing, and site rehabilitation works well progressed.

The photograph on the cover of this report shows the glider pole installation between Towers 71 and 72.

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 28 October 2025 to 1 May 2026.

1.6 Limitations of this Report

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

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

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

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

2. Definitions

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

3. Auditor Certification

Independent Audit Certification Form	
Development Name	EnergyConnect Project (NSW Eastern Section)
Application Number	SSI 9172452
Description of Development	High Voltage Electricity Transmission Line
Development Address	Southwestern NSW
Proponent	Transgrid
Title of Audit	EnergyConnect PEC East April 2026 Independent Environmental Audit
<i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (May 2020).</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</i> <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <i>Note.</i> <i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i> <i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i>	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	75-77 Foamcrest Avenue, Newport, NSW
Email Address	ken@baeckea.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	30 July 2026

3.1 Audit Details

Table 1 - Audit Details

Audit Title:	EnergyConnect (NSW – Eastern Section) April 2026 Construction Phase Independent Environmental Audit
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@baeckea.com.au
Date of Audit Commencement:	28 April 2026

4. Audit process

4.1 Audit Guidelines

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

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

Table 2 - Post Approval Audit Guidelines

Section	Independent Audit Report Requirements	Addressed
4.1	Version Control 1) the application number of the project; 2) each version or revision number of the report; 3) the date on which the report was prepared and issued to the Department; and 4) the title and name of the person who certified the Independent Audit Report.	Section 3 Page iii Page iii Section 3.1
4.2	Contents	
4.2.1	Introduction – a brief overview of the audit including: 1) background of the project; 2) the audit team (including qualifications and experience); 3) the objectives of the audit; 4) the audit scope; and 5) the temporal period covered by the audit.	Section 1.1 Section 4.3.1 and Appendix E Section 1.2 Section 1.3 Section 1.4
4.2.2	Audit Methodology 1) documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 2) how the audit scope was developed; 3) a summary of the audit process adopted to determine the compliance status and assess if documents are adequate; 4) site personnel interviewed including their name and position title (and including if access was not granted or possible with any required personnel and why); 5) details of site inspections undertaken (including any areas where access was not granted or possible and why); 6) a summary of the consultation undertaken; and 7) meanings of compliance status descriptors used, as set out in this document.	Appendix C Section 1.3 Section 4 Section 4.5.3 Section 4.5.2 Section 5 Section 4.6
4.2.3	Audit Findings 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	Not required
	6) site inspection photographs.	Appendix B

4.2 Overview

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

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

4.3 Preliminary activities

Off-site planning for the site audit comprised:

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

4.3.1 Approval of audit teams

Transgrid sought the Secretary's endorsement for the audit team to undertake this Independent Environmental Audit. The Secretary approved the appointment of the Auditor (Ken Holmes) on 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 components of the audit were undertaken between 28 April 2026 and 1 May 2026.

4.5.1 Opening Meeting

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

- Rebecca Walker-Edwards – Environmental Manager Elecnor
- Jared Lipton – Environment Manager Transgrid
- Benjamin Harper – Senior Environment Coordinator Elecnor
- Clare Oakey – Environmental Coordinator Elecnor
- Nathan Macadam - Environmental Advisor Elecnor
- Lochlainn Ryan – Interface Manager
- Gabriel Maier – Camp Construction Coordinator Elecnor
- 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

The site inspection components of the audit were undertaken between 28 April 2026 and 1 May 2026.

The site inspections included observation of:

- Currently operational areas, including:
 - Site access and security;
 - Soil and mulch stockpile areas;
 - Surface water management infrastructure;
 - Erosion and sediment controls;
 - Accommodation Camps, office and parking facilities, both operational and being demobilised;
 - On-site maintenance workshops;
 - Hazardous Materials Storage;
 - Waste storage facilities;
- Completed construction areas, including:
 - Typical areas of the transmission line easement that had been cleared of vegetation and awaiting rehabilitation;
 - Completed tower construction sites on the easement;
 - Completed creek crossings and associated clearing works;
 - Typical areas of the transmission line easement that had been cleared of vegetation and were undergoing rehabilitation;
 - Typical areas of the transmission line easement that had been cleared of vegetation where rehabilitation works were complete; and
 - Equipment Laydown areas that were operational demobilized and awaiting either hand over to the landowners or commencement of rehabilitation.

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
Rebecca Walker-Edwards	Elecnor	Environmental Manager
Jared Lipton	Transgrid	Environment and Sustainability Manager
Benjamin Harper	Elecnor	Senior Environmental Advisor Elecnor
Ozlem Anar	Elecnor	Environmental Coordinator
Clare Oakey	Elecnor	Environmental Coordinator
Nathan Macadam	Elecnor	Environmental Advisor
Lochlainn Ryan	Elecnor	Interface Manager
Gabriel Maier	Elecnor	Camp Construction Coordinator Elecnor
Keeley Hartzler	Elecnor	Environmental Advisor

4.5.4 Closing Meeting

The closing meeting was held at the completion of the site inspection at Transgrid's offices in Wagga Wagga and was attended by the following personnel:

- Jared Lipton – Transgrid
- Nathan Macdam – Elecnor
- Keeley Hartzler - Elecnor
- 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.

Condition D11 of the Approval requires that this Environmental Audit be undertaken in accordance with the Independent Audit Post Approval Requirements (May 2020). The Compliance Register (Appendix A) and the summary of non-compliances and recommendation contained in Table also satisfy the requirements of the recent update to the audit requirements contained in Independent Audit Post Approval Requirements (February 2026).

Table 4 - Compliance Assessment Matrix

Assessment	Criteria
Complies	Compliance The site complies with the requirements of applicable pre-operational Consent Conditions. 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.
Non-Compliance	Non-Compliance Clear evidence has been collected to demonstrate the requirement has not been complied with and is within the scope of the audit. Site displays little or no evidence of compliance with the requirements of the regulatory documentation. 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 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.
Not Triggered	Not Applicable / Not Triggered The respective conditions / requirement was not activated within the scope of the audit.

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

Table 5 - Risk Assessment Matrix

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences but is likely to occur.
Low	Non-compliance with: • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences but is likely to occur.
Administrative non-compliance	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

5. Stakeholder Consultation

The Stakeholder Consultation for both the PEC East and PEC West Independent Environmental Audits were undertaken together. 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	The Department would like the below stakeholders to be consulted: • EPA, • NSW Conservation, Programs, Heritage and Regulation Department of Climate Change, Energy, the Environment and Water (DCCEEW) • Commonwealth Department of Climate Change, Energy, the Environment and Water DCCEEW, • TfNSW, • Wentworth Council, Balranald Shire Council, Edward River Council, Federation Council, Hay Shire Council, Lockhart Shire Council, Murray River Shire Council, Murrumbidgee Council, Wagga Wagga City Council, Wentworth Shire Council • Forestry, • RFS, • NSW Fire and Rescue, • Local Aboriginal Councils (RAPS), • NPWS, • Heritage NSW, • Heritage council, • DPI. • DPE Water, • Local Lands service.	The Auditor consulted with all nominated stakeholders. A summary of the inputs provided by each stakeholder is provided in this Table and copies of each stakeholder response received is included in Appendix D.

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	Areas to be focused to include: 1. Evidence of compliance with commitments, reporting and monitoring in all management plans.	Please refer to Appendix A.
		2. Evidence of any adaptive management identified/ implemented.	During the last Independent Environmental Audit, no non-compliances were identified and as the project is nearing completion the opportunity for the implementation of adaptive management actions is limited.
		3. Evidence of compliance with approved footprint and current activities.	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. For further details please refer to Condition C23 in Appendix A.
		4. Erosion and sediment controls, management, monitoring and maintenance.	During the site inspection, the Auditor inspected the erosion and sediment controls in place at the equipment laydown areas and accommodation camps. As construction of all towers is now complete, the erosion and sediment controls installed are being progressively removed. No issues of concern were noted. The remaining erosion and sediment controls observed during this audit were in general accordance with the current ERSER plans. Where still required (for example at the remaining operational accommodation camps) the ERSER controls were still effective, albeit some sediment fencing is nearing the end of its functional life. Again, no issues of concern were identified. In the weeks prior to this audit, very heavy rainfall had been received and only one area of erosion was sighted at the former Limondale equipment laydown area (Photograph 1). For further information please refer to Condition C14 in Appendix A.

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	5. Comparison between EA predictions and actual impacts.	Please refer to Section 7.9
		6. Evidence (tracking documentation/measures implemented) to ensure compliance with clearing and disturbance limits c 23.	The construction of the PEC East project is nearing completion, and all clearing works had been completed. During the previous 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 and the records related to this audit period have been reviewed by the Auditor. No issues of concern were identified. For further information please refer to Condition C14 in Appendix A.
		7. Evidence of compliance with partial clearing, clearing commitments (how is this tracked, managed and monitored). Has the clearing (in particular partial clearing) activity being undertaken in accordance with the commitments within BMP, EA, BDAR and description of partial clearing.	
		8. Implementation of ACHMP and compliance with conditions and evidence of consultation with Local RAPS.	No heritage related incidents were identified during this IEA. All RAPs were given the opportunity to provide input to this IEA. For further information please refer to Appendix A Conditions C28 to C30 inclusive.
		9. Evidence of progress, timing and implementation of Progressive Rehabilitation	During this IEA, extensive rehabilitation works were inspected across all areas of the project.
		10. Road maintenance/ monitoring and management and the interface /access onto road networks. Recent media has stated that councils are not happy with road upgrades/ maintenance repair and payment for road repairs etc across both PEC projects so would be good to deep dive into what road upgrades occurred and what (and where) maintenance and repairs were required and occurred throughout construction (and what consultation did they have with the relevant councils), how undertook and paid for those repairs and maintenance (council and or contractors) and compliance with all related conditions and management plans and the dilapidation reports specifically compliance with all requirements in conditions D39 and D40 and evidence of consultation with all relevant councils. I would suggest when consulting councils to highlight this issue for their comment etc.	The Audit interviewed the Elecnor personnel responsible for management of road dilapidation surveys, local road maintenance and liaison with each of the impacted Councils and provided a series of follow up questions in writing. Elecnor has responded to those questions. As part of the stakeholder consultation undertaken, the Auditor contracted each Council and offered each Council the opportunity to provide specific information in this issue. None of the Councils raised any issues relating to road maintenance. A detailed review of road maintenance activities undertaken and related communications with Councils within the project area is provided in Section 7.9.1.

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	11. Complaints management, monitoring and responses.	Please refer to Section 7.2.
		12. Emergency preparedness including but not limited to appropriate fire equipment such as water tanks and mobile water karts, training etc, working in hot weather processes/policies.	Emergency response plans have been prepared. Fire fighting equipment is provided at all camps (including dedicated water supplies). Mobile fire fighting equipment is provided at all active work sites. Training Records have been maintained.
Commonwealth Department of Climate Change, Energy, the Environment and Water	Katrina Corby	The Commonwealth DCCEEW did not respond to the consultation request.	Noted
NSW Environment Protection Authority	Briohny Seaman / Georgia Feben	The EPA acknowledged receipt of the consultation request but did not provide any specific comments on the project.	Noted
Transport for NSW	Developm ent Approvals	TfNSW did not respond to the consultation request.	Noted
Conservation Programs, Heritage and Regulation Group DCCEEW	Andrew Fisher Senior Team Leader Southwest	With regard to partial clearing compliance, Transgrid prepared a document entitled 'PEC-East - Verification Report - Response Final' (dated 20 March 2026). This was in response to the DPHI letter to Transgrid regarding the PEC - Verification Report (dated 28 November 2025). DPHI requested that the 'PEC-East - Verification Report - Response Final' be submitted via the Major Projects Portal. For the final construction phase audit, you may wish to: 1. Confirm the 'PEC-East - Verification Report - Response Final' has been submitted via the Major Projects Portal	1. The Verification report is dated 20 May 2025. The Auditor was provided with a copy of the Post Approval submission receipt that verified that the report had been issued to the Department via the Major Projects Portal on 31 May 2025 and subsequent to a request for further information from the CPHR (28 November 2025), provided a response to that request via the Major Projects Portal on 20 March 2026.

Department	Contact	Stakeholder Comments	Auditor Comments
Conservation Programs, Heritage and Regulation Group DCCEEW	Andrew Fisher Senior Team Leader Southwest	2. Consider if the response and associated evidence given in the 'PEC-East - Verification Report - Response Final' meets the Consent Conditions, in particular A1, A3 and C23 b).	2. Assessment of compliance against Planning Approval Conditions A1 and 23b. An assessment of compliance against Conditions A1 and C23 (b), that is whether in the context of Transgrid's letter of 20 March 2026, that all reasonable and feasible measures have been implemented to minimise the impacts of the construction of the project should be undertaken by a suitably qualified and experienced biodiversity specialist. This IEA did not include a biodiversity technical specialist and as the completion of vegetation clearing has been completed and as the Auditor understands, practical completion is imminent, delaying the finalisation of this audit to engage the technical specialist is justified. The Auditor notes that in the September 2024 IEA the biodiversity specialist addressed this issue and reported a non-compliance against Condition C23b relating to clearing of groundcover at one location identified as a partial clearing zone. Recommendations were made in that report relating to the revision of the BMP. During the subsequent IEA (April 2025) a non-compliance against Condition C23b relating to the maintenance of clearing limits flagging was recorded, however no evidence of non-compliances relating to the actual clearing works or impacts of the clearing undertaken was reported. Further recommendations were made in that report for revisions to the BMP. Transgrid's submission of 20 March 2026 also included a Partial Impacts Report, prepared by WSP Consultants. That report provided additional data related to the impacts of the clearing undertaken and an assessment of the impacts of partial clearing. WSP findings indicate that the monitoring and assessment approach undertaken on the project are appropriate. The Auditor therefore has found no evidence that the clearing impact assessment methodology does not satisfy the intent of the Approval. It is therefore recommended that CPHR and the Proponent consult and agree on the scope of any additional information needed to verify the vegetation clearing impacts from construction and future vegetation maintenance for inclusion into future vegetation integrity reports.

Conservation Programs, Heritage and Regulation Group DCCEEW	Andrew Fisher Senior Team Leader Southwest	3. Consider if the response and associated evidence given in the 'PEC-East - Verification Report - Response Final' meets the Consent Conditions, in particular A1, A3 and C23 b).	3. Assessment of compliance against Planning Approval Condition A3 The Auditor has reviewed the documents provided by the Proponent (see Appendix A) following the submission received from CPHR by the Auditor. Following the submission of the Biodiversity Verification Report to DPHI on 30 May 2025, DPHI, in their letter of 28 November 2025, directed the Proponent to revise and reissue the verification report and the BMP to DPHI and CPHR by 30 January 2026. Transgrid requested an extension of time for the submission of the revised report on 12 February 2026. DPHI granted an extension of time (to 30 March 2026) on 26 February 2026. That letter, issued under the signature of the Secretary's Nominee, states: <i>"The Department notes:</i> <i>an extension ensures sufficient time for review and finalisation of the response; and</i> <i>the Conservation Programs, Heritage and Regulation (CPHR) Group have agreed that all parties will benefit from the preparation of a thorough report.</i> <i>Accordingly, the Secretary has granted an extension of time until 20 March 2026 for the submission of the revised Verification Report."</i> Transgrid provided a written response to the Department on 20 March 2026 providing justifications for not providing all of the information requested by CPHR. That submission included the Partial Impacts Report, prepared by WSP Consultants that contained much of the information requested by the Secretary, and associated GIS data. That response, however, did not include a revision of the Verification Report. It is the Auditor's view that irrespective of the technical arguments raised by TransGrid and the addition information provided in the WSP report, that the failure to revise and reissue the Verification Report by 20 March 2026 is non-compliant with Condition A3 of the Planning Approval that requires the Proponent to comply with any requirements of the Planning Secretary arising from (sub-clause a)) the assessment of any strategies, plans or correspondence submitted in accordance with the Approval and (sub-clause c)) the implementation of any actions or measures contained in these documents.
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Department	Contact	Stakeholder Comments	Auditor Comments
Wentworth Council	The General Manager	Council did not respond to the consultation request.	Noted
Balranald Council	Peter Bascomb	Council acknowledged receipt of the consultation request but did not provide any specific comments on the project.	Noted
Edward River Council	General Manager	Council did not respond to the consultation request.	Noted
Federation Council	Susan Appleyard	Council did not respond to the consultation request.	Noted
Hay Shire Council	David Webb	Thank you for your email and request for feedback. Hay Shire Council can report: • no environmental issues or concerns • road finalisation post project still to be resolved/actioned – this is with Elecnor.	Noted
Lockhart Council	Austin Morris	There are no issues to report from Lockhart.	Noted
Murray River Council	General Manager	Council acknowledged receipt of the consultation request but did not provide any specific comments on the project.	Noted
Murrumbidgee Council	General Manager	Council acknowledged receipt of the consultation request but did not provide any specific comments on the project.	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
Wagga Wagga Council	David Woods	Major Projects Wagga City Council previously sent an email with photos regarding the regrowth of trees, the build up of "dirt" around the towers and a number of barriers that were left in the paddocks. From inspection on Friday 8 May 2026, the following issues remain: - The build-up of dirt/tree roots around the towers - this will impact future above ground water flow and create issues and build up on the site, this needs to be levelled. In general, making good around the tower pads needs to be addressed. 2 x barriers (red) remain in the paddock - Trees I note have been poisoned again to stop regrowth; however, this has not been effective for some of the shrubs/trees. This will need further monitoring and treatment. If you wish to inspect the site or discuss, please don't hesitate to contact me. We understand that Clint Hassell from Transgrid will be undertaking inspection of the site before the 5 June 2026, as per his correspondence with Darryl.	Elecnor Response: Our construction rehabilitation team attended the WWCC site (Towers 1–4) over the weekend of 23–24 May 2026. A summary of the completed works against each item is set out below. - Build-up of dirt/tree roots and making good around the tower pads - All four tower sites have been rehabilitated including the removal of timber and debris. The access track between Towers 2–4 was retained in situ, while the track at Tower 1 was lightly ripped and levelled. Levelling of the dirt build-up, has been addressed as part of this work. - Barriers remaining in the paddock - The water-filled barriers that were protecting the water monitoring points during clearing and grubbing, construction and rehabilitation have now been removed from the paddock and relocated to Camp 2. - Poisoned trees / regrowth - The tower sites were most recently treated for weeds and regrowth on 14–15 April 2026 (Grason Extra, targeted application), following earlier treatment in 2025. As the latest application was only around three weeks before Council's 8 May inspection, it is too early to reliably assess effectiveness particularly for woody shrubs and trees. Our team will continue to monitor these locations. Our construction team is now awaiting feedback from a follow-up inspection with WWCC in consultation with our land access team.
Forestry NSW	Jarod Dashwood	Two outstanding items. Despite the construction having been essentially completed, the easement is not finalised and FCNSW has not been compensated for the loss of use of the land.	The issues raised by Forestry NSW have been passed on to the Proponent. The Auditor understands that all nest boxes that were located within Forestry managed lands have been relocated.

Department	Contact	Stakeholder Comments	Auditor Comments
		there remains outstanding a plan for FCNSWs approval guiding Transgrid's life of project management of fauna habitat structures (nest boxes, glider poles etc).	
Rural Fire Service	Mid Murray Zone Southern Border Zone Riverina Zone	The RFS did not respond to the consultation request	Noted
NSW Fire and Rescue	Ops Liaison	In relation to this project, FRNSW have no specific issues or matters that we would require to be addressed within the audit process.	Noted
NSW National Parkes and Wildlife Service	Simone Carmichael	The NPWS did not respond to the consultation request	Noted
Heritage NSW	Alison Lamond	Heritage NSW did not respond to the consultation request	Noted
Australian Heritage Council	AHC Secretariat	Your email has been provided to the Chair and Members of the Australian Heritage Council. As this is a state government project and heritage was not a controlling provision, it is unlikely the Council will provide a submission (but they have been provided the option to do so by the due date). The Council's remit covers heritage places on the National and Commonwealth Heritage Lists and this project sits more appropriately with the NSW Heritage Council.	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
DCCEEW Water Group	Tim Baker	NSW DCCEEW Water Group did not respond to the consultation request.	Noted
Local Land Services	Susie Holbery	Local Land Services did not respond to the consultation request	Noted
Crown Lands	Jarrold Smith	Crown Lands did not respond to the consultation request	Noted

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

Registered Aboriginal Party	Contact	Stakeholder Comments	Auditor Comments
Nari Nari Tribal Council	Tara Dixon	The RAP did not respond to the consultation request	Noted
Balranald Mutthi Mutthi Traditional Owners	Kaleana Reyland	The RAP did not respond to the consultation request	Noted
Barkindji Maraura Elders Environment Team Limited	Arthur Kirby	The RAP did not respond to the consultation request	Noted
Riverina Murray Regional Alliance	John Fernando	The RAP did not respond to the consultation request	Noted
Hay Aboriginal working party	Ronald Goulding	The RAP did not respond to the consultation request	Noted
Yalmambirra	The Chairperson	The RAP did not respond to the consultation request	Noted
Kureinji Nation	Michael Carter	The RAP did not respond to the consultation request	Noted
Individual Registered Aboriginal Parties	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
Individual Registered Aboriginal Parties	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	Not Triggered
Project Approval 9172452	192	144	2	46

6.2 Non-Compliances and other recommendations

Two 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**.

Table 8 - Statutory Non-Compliances, Observations and Recommendations

No.	Condition	Finding	Recommendation	Risk Level
Project Approval SSI 9172452				
A3	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this approval; b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and c) the implementation of any actions or measures contained in these documents.	Following the submission of the Biodiversity Verification Report to DPHI on 30 May 2025, DPHI, in their letter of 28 November 2025, directed the Proponent to revise and reissue the verification report and the BMP to DPHI and CPHR by 30 January 2026. Following the submission of the Biodiversity Verification Report to DPHI on 30 May 2025, DPHI, in their letter of 28 November 2025, directed the Proponent to revise and reissue the verification report and the BMP to DPHI and CPHR by 30 January 2026. Transgrid requested an extension of time for the submission of the revised report on 12 February 2026. DPHI granted an extension of time (to 20 March 2026) on 26 February 2026. That letter, issued under the signature of the Secretary's Nominee, states: <i>"The Department notes:</i> <i>an extension ensures sufficient time for review and finalisation of the response; and</i> <i>the Conservation Programs, Heritage and Regulation (CPHR) Group have agreed that all parties will benefit from the preparation of a thorough report.</i> <i>Accordingly, the Secretary has granted an extension of time until 20 March 2026 for the submission of the revised Verification Report."</i> Transgrid provided a written response to the Department on 20 March 2026 providing justifications for not providing all of the information requested by CPHR. That submission included the Partial Impacts Report, prepared by WSP Consultants that contained much of the information requested by the Secretary, and associated GIS data. That response, however, did not include a revision of the Verification Report. It is the Auditor's view that irrespective of the technical arguments raised by TransGrid and the addition information provided in the WSP report, that the failure to revise and reissue the Verification Report by 20 March 2026 is non-compliant with Condition A3 of the Planning Approval that requires the Proponent to comply with any requirements of the Planning Secretary arising from (sub-clause a)) the assessment of any strategies, plans or correspondence submitted in accordance with the Approval and (sub-clause c)) the implementation of any actions or measures contained in these documents.	It is recommended that CPHR and the Proponent consult and agree on the scope of any additional information needed to verify the vegetation clearing impacts from construction and future vegetation maintenance for inclusion into future vegetation integrity reports.	Administrative non-compliance

No.	Condition	Finding	Recommendation	Risk Level
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 A19, as well as the complaints register for any complaints received (on the day they are received).	Twenty-seven complaints were received during this audit period. The proponent provided details of each complaint in accordance with Condition A13, except for the complaint received on 23 January 2026. The ER was notified of all previous and subsequent complaints in accordance with this Condition.	The auditor is satisfied that the failure to notify the ER of one complaint was an isolated event and therefore no recommendation has been made.	Administrative non-compliance

7. Independent Audit Post Approval Requirements

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

7.1 Summary of Environmental Incidents

The Auditor was provided with a copy of the Incident Register.

No reportable incidents were recorded during this audit period.

The Incident Register also included fifteen (15) minor incidents, typical of any linear infrastructure project, that were not classified as reportable incidents. The non-reportable incidents included:

- fourteen (13) minor hydrocarbon leaks or spills – no material impact was recorded for these incidents
- Two (2) biodiversity related incidents:
 - all involving unapproved disturbance (placement of a stockpile of aggregate outside of the approved disturbance footprint. The Environment Team reported that the stockpile was placed in the location directed by the landholder. A section 143 notice had been given to the landholder, and a signed version has been issued to the project.
 - PEC Line 5 personal driving over green flagging (NO-GO Zones) near Plains Wanderer Habitat. Following the survey pick-up of the impacted area, no impacts to Plains-wanderer habitat were identified. Approx. 21 sqm outside of the pre-clearance survey report in the subject location showed signs of vehicle tyre tracks. There was, however, no damage to vegetation reported.

7.1.1 Incident Response Assessment

The system implemented as documented in the EMS includes:

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

The incident management system is being implemented as documented.

7.2 Summary of Complaints

Twenty-seven complaints related to the construction of the project were recorded by the Proponent over the Audit Period. Three of the complaints were caused by an adjacent project.

A summary of the complaints received that were extracted from Transgrid's complaints Register is provided in Table 9.

The complaint categories were:

- Property Access (12)
- Dust (6) note that three of these complaints were not attributed to the PEC East project.
- Road Damage (2)
- Non-payment of Easement Registration Compensation (2)
- Employee conduct (1)
- Dust (1)
- Rehabilitation (1)
- Property Damage (1)
- Other (1)

7.2.1 Compliant Management System Assessment

The complaints management system as documented in the EMS includes:

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

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

Table 9 - Summary of Complaints

Date	Summary	Response and Investigation	Category
5-Nov	A landowner contacted the PEC Land Access Officer expressing concern that project vehicles were using recently repaired unsealed roads during wet conditions, potentially causing renewed deterioration.	The Land Access Officer acknowledged the concern and referred it to the Construction team. The Construction team confirmed maintenance works are underway in the area and will advise crews to use sealed roads where practicable to minimise impacts on unsealed sections.	Road condition
11-Nov	A landowner reported to the PEC Land Access Officer that gates on his property were left open by project personnel, allowing livestock to escape into adjoining paddocks. The landholder noted that mustering the animals back is time-consuming and requested a plan from the project team to prevent recurrence.	A reminder was sent to all stringing crews of Elecnor's property access policy. Additionally Stringing Supervisors were directed to immediately inspect all property gates between towers T236 and T277. Going forward, a dedicated team member has been assigned to patrol the area throughout the day to enforce gate-closure requirements and ensure no loose materials or debris are left behind.	Property Access
17-Nov	A Uranquinty resident contacted the Transgrid community line with concerns about the condition of repair works on Paynes Road and South Boundary Road, as well as dust impacts by vehicles using the roads.	The complaint was discussed with the residents. The Construction Team confirmed that the project had not undertaken any work at this location. However, after liaising with Wagga City Council, they agreed to dispatch a maintenance crew (weather permitting) to commence works from Wednesday, 26 November. The community member was informed and appreciated the update.	Road condition
25-Nov	A landowner reported that a property gate was left open, allowing cattle to enter his crop and cause damage.	The Land & Access Officer acknowledged the complaint and notified the Construction team to investigate. A meeting was held with the landholder to assess the damage and outline measures to prevent a recurrence. The investigation revealed that it was a fence that had been cut and it has now been subsequently repaired. The Landholder to be reimbursed for damages to cropping after harvest.	Property Access
4-Dec	A landowner reported that project vehicles are not driving to local road conditions and requested that drivers reduce their speed when travelling on Yuluma Road, particularly when pulling onto the road shoulder.	The Land & Access Officer acknowledged the complaint and advised that the Construction team was notified with a reminder issued to the workforce regarding appropriate driving behaviour.	Driver behaviour
5-Dec	A landowner reported to the Land & Access Officer that a property gate was left open and concerned of the effort involved in potentially drafting boxed sheep.	The Land & Access Officer acknowledged the complaint and notified the Construction team to investigate. A meeting was held with the landholder to outline measures to prevent recurrence including crews sending the Construction Manager photos of closed gates at the end of each shift, and additional pre-start reminders.	Property Access

Date	Summary	Response and Investigation	Category
6-Dec	A landowner advised the PEC Land & Access Officer that a gate was left open and consequently the landholder's lambs were boxed with ewes.	The Land & Access Officer acknowledged the complaint via phone call and notified the Construction team to investigate. A meeting was arranged with landholder to outline measures to prevent recurrence including re-installation of shut the gate sign and image distributed to staff indicating how to secure the gate properly with the supplied lock.	Property Access
11-Dec	The Land & Access Officer contacted a landowner to report that a gate had been left open, allowing young rams to leave their paddock and enter an adjoining laneway. The landholder advised that this gate must remain closed at all times.	The Land Access Officer returned the rams to their paddock and secured the gate. PEC waste items were also removed from property. The Construction team advised that crews would send the Construction Manager images of locked gates at the end of each work shift. A meeting was held with the landholder to confirm the actions to be taken.	Property Access
13-Dec	A landowner advised the Land & Access Officer that he has locked his gates and is denying project access to his property pending receipt of payment from Transgrid under the Easement Option program.	The matter has been escalated to Transgrid. Transgrid will provide the landholder with a further update regarding the status of the Special Benefits Scheme payment and any outstanding administrative requirements to be completed.	Easement registration payment
16-Dec	A landowner advised the PEC Land & Access Officer that his gate was shut but not locked as agreed due to an insurance policy /claim.	The matter referred to the Construction Team with additional mitigation of crews sending an image of the locked gate at the end of each work shift to the Construction Manager. The Landholder was satisfied to trial the new process.	Property Access
16-Dec	A landowner lodged a complaint with the Land Access Officer advising that PEC construction staff exited the property via a cattle grid rather than the approved construction access point and advised that ongoing non-compliance may result in access being revoked.	The L&A Team acknowledged the complaint and advised the Construction Manager of the issue. PEC Sub-contractor crews were reminded of the approved off-easement access route and procedures. The Landowner was satisfied with the reminder but insisted procedure must be followed.	Property Access
24-Dec	A landholder called the Land Access Officer advising that he had discovered six cows that had perished from what appears to be plastic ingestion relating to PEC flagging and debris. The landholder will be submitting costs to the project in the new year and seeking reimbursement.	The Land Access Officer acknowledged the complaint and agreed with the landowner that a meeting will take place following the project Christmas shutdown to discuss costs for reimbursement. The Landowner has removed the flagging and plastic debris from his property to prevent recurrence.	Animal welfare and PEC flagging
15-Jan	A landholder advised the Land Access Officer that he is not satisfied with rehabilitation works on his property. He noted that in his agreement the property is to be reinstated to a condition that is the same or better than pre-construction condition.	The Land Access Team & Construction Supervisor met with landholder and viewed the property rehabilitation area. A commitment is now in place for the Rehabilitation Team to remove the rocks and level the site to landholder's satisfaction prior to completion documentation will be signed.	Unsatisfactory Rehab on property
19-Jan	A landholder advised PEC Land & Access Officer that his gate was shut but not locked as agreed and outlined in the insurance policy. The gate was locked by the Landholder until an onsite meeting.	The complaint was acknowledged and the matter referred to the Construction Team for investigation and consideration of mitigations. The Land Access team is seeking a follow-up meeting with the Landholder	Property Access

Date	Summary	Response and Investigation	Category
20-Jan	A landholder advised the PEC Land Access Officer that a gate had been left open, resulting in neighbouring sheep entering his property.	The Land Access Officer acknowledged the complaint and met the landholder onsite with a senior construction supervisor to discuss the issue and reinforce with the onsite crews the requirements for gates to be closed at all times. The sheep were mustered back into the correct paddock, and the neighbouring owner was advised. The Landholder was satisfied with the Supervisor's instructions to staff.	Property Access
23-Jan	The Transgrid community team shared three complaints regarding vehicles causing dust while travelling on Redbank Road, which is unsealed.	An investigation confirmed that the complaints related to vehicles from HumeLink West and not EnergyConnect. Transgrid responded to the complainants accordingly.	Dust (three complaints)
26-Jan	The Land Access Officer received a notification from landholder advising that a vehicle was observed entering the property without authorised access.	The Land Access Officer acknowledged the complaint and notified the Construction Supervisor. An investigation confirmed the vehicle had mistakenly accessed the landholder's property while inspecting an incorrect transmission tower. The crew were instructed to immediately leave the property. The Land Access Officer advised the landholder of the outcome, who confirmed they were satisfied with the response.	Property Access
30-Jan	A landholder advised the Transgrid Land & Access Manager that he has locked his gates and is denying project access to his property pending receipt of payment from Transgrid under the Easement Option program.	The matter was escalated to Transgrid management. Transgrid arranged a meeting with the landholder to provide an update on the payment status and to address any outstanding issues, with the aim of ensuring construction access remains in place to ensure completion of project work. The landholder was satisfied with the update.	Easement registration payment
13-Feb	A landholder contacted the PEC Land Access Manager to express frustration about multiple crew visits to the same tower within the easement.	The Land Access Manager acknowledged the concern and advised that the construction program is complex, with multiple specialised crews were required to undertake works prior to energisation. An onsite meeting was held with the landholder to outline the program of works, explain the required sequencing, and address concerns.	Property Access
10-Mar	Land Access Officer met with a landholder who complained about repeated visits by EA to his property without prior notice as previously agreed.	The Land Access Officer acknowledged the complaint and advised the Construction team. Reminders were issued at workforce prestarts meetings outlining property access procedures must be followed. The landholder was satisfied with the update and access remains unconstrained.	Property Access

Date	Summary	Response and Investigation	Category
11-Mar	A sensitive receiver to the EnergyConnect construction corridor phoned to complain about construction dust generated by the movement of rocks by an Elecnor subcontractor. This activity combined with the direction of the wind led to higher-than-normal dust levels to their home.	The complaint was acknowledged with the community member. The Construction Manager was immediately advised to stop work. The Elecnor Construction team reminded subcontractors of project obligation and going forward to closely monitor dust generation during high winds. The community member was satisfied with the response.	Dust
12-Mar	A landholder met with the Land Access Officer and discussed stock management issues. The landholder claimed that their stock grids along the PEC construction corridor have not been maintained to a stock proof condition. This has allowed stock to pass over the grids and become boxed in with other stock on the property.	The Land Access Team acknowledged the complaint with the landholder. The Construction Team issued reminders to subcontractors to close gates and undertook a stock grid inspection and maintenance. The Land Access Team will continue working with the landholder to manage the reimbursement of stock management costs.	Damage to private property
23-Mar	The Land Access Officer received a complaint regarding several issues including the manner in which project vehicles are accessing the property and potential impacts on biosecurity. In addition, the complainant has observed loose rubbish beyond the construction easement.	The complaint was acknowledged by the Land Access Officer, and the Construction team was advised. Mitigation measures were implemented including the installation of signage on the boundary fence with a lock, the rubbish was collected by crews, and reminders issued at pre-starts of entry protocols on the property and vehicle hygiene standards. The landholder was satisfied with the actions taken.	Property Access
25-Mar	The Community Engagement team received a complaint from a community resident regarding dust impacts experienced over the past 12 months from construction vehicle movements along Old Station Road while accessing the nearby project easement. The resident has requested a contribution towards costs for cleaning their home and air conditioning unit.	The Community Engagement Manager contacted the resident to acknowledge the complaint and discuss the concerns raised. The resident was advised that the matter will be investigated to understand vehicle movements and to review the submitted cleaning costs and any supporting evidence. A commitment was made to update the resident upon receipt of the information and outcome of the review. The resident acknowledged the proposed course of action and was satisfied with the response.	Dust
13-Apr	A Land Access Officer received a call from a resident who lives on Old Station Road advising that construction vehicles were travelling too fast and causing dust while driving along Old Station Road.	The Land Access Officer acknowledged the complaint and notified the Community Engagement and Construction teams. Mitigation measures have been implemented, including reminders to crews to drive to local conditions and the allocation of a water cart to accompany vehicles while utilising Old Station Road to access the nearby site for the remaining works.	Dust

7.3 Summary of Notices

SecureEnergy provided a letter from DPHI to TransGrid, titled “Advisory Letter – Breach of Section 5.14 of the Environmental Planning and Assessment Act 1979”, dated 18 December 2025. That letter identifies three alleged non-compliances against the Approval covering Condition B1 (Implementation of Management Plans. The breach related to the non-compliance findings from the September 2024 Independent Environmental Audit. The letter advised that no further action would be taken in relation to those non-compliances.

7.4 Project Environmental Management System

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

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

7.5 Implementation of the Environmental Management Plan and Sub-plans

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

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

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

7.6 Status of Previous IEA Findings

No non-compliances were identified during the last Audit.

7.7 Specialist Auditor Reports

No specialist audit reports were required to be prepared for this audit.

7.8 Environmental Impacts

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

Table 10 - Predicted vs Actual Impacts

Category	Predicted Impact	Actual Impacts to Date
Biodiversity	The main impacts on biodiversity during construction would be: • Direct impacts on six threatened ecological communities, seven under the BC Act; two of the threatened ecological communities are listed as serious and irreversible impacts. • Direct impacts on seven threatened ecological communities listed under the (Commonwealth) Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). • Direct impacts to threatened flora species including nine threatened flora species listed under the BC Act and two serious and irreversible impacts. • Direct impacts on four threatened flora species listed under the EPBC Act. • Direct impacts to candidate threatened fauna species including six threatened fauna species listed under the BC Act with one listed as serious and irreversible impact. • Direct impacts on four threatened fauna species listed under the EPBC Act. • Impacts to threatened aquatic species, ecological communities or their habitats are unlikely. • Impacts to groundwater dependant ecosystems are unlikely • Impacts to wetlands of national or international importance are unlikely • The proposal would be unlikely to lead to a significant impact on any threatened species or their habitat, or migratory birds (and their habitat) listed under the EPBC Act	Clearing has occurred within the approved project footprint. Clearing records indicate that the extent of vegetation removal has been consistent with that predicted in the EIS.
Landuse	Private landowners may be impacted while construction activities are underway on or in proximity to their property, through the temporary loss of access to parts of their property, a potential loss of privacy and amenity (dust/noise/visual) impacts. Given the short duration of construction works, these potential impacts will be of limited duration. It is also expected that no residents would be required to relocate during the construction phase of the Project. All construction works along the transmission pipeline alignment will take place within the proposed construction footprint.	Construction impacts to date are consistent with those predicted in the EIA. Where landowners have been impacted, the project has responded to landowner concerns. The Auditor is unaware of any outstanding issues with Landowners.

Category	Predicted Impact	Actual Impacts to Date
Hydrology and Flooding	Impacts to flooding from construction of the proposal are anticipated to be limited to temporary and localised impacts due to the progressive nature of the construction activities. Potential impacts would also be limited to periods of flooding, which have a low likelihood of occurring during construction on flood prone areas. Potential impacts to water quality are anticipated to be limited to temporary and localised impacts due to the progressive nature of the construction activities.	No material flooding or surface water impacts have been identified during the audit period.
Hazardous Materials	During construction, potential hazards and risks to the surrounding community or environment may be associated with: - the on-site storage, handling and transport of dangerous and hazardous goods, contaminated soil and hazardous waste - potential interaction with existing utilities - potential bushfire risks - changes to emergency egress and excavation routes.	During this audit period, no bushfire or hazardous materials related incidents were recorded.
Historical Heritage	No direct impacts on the Yanga Pastoral Station Complex. A significant impact was predicted on the sheep yards in the Willows Precinct. Potential for impacts on: - survey marker - Bundure Railway Station - Nyingay Station	No unapproved impacts on heritage sites were identified during this IEA.
Visual Amenity	Across all landscape character areas, construction activities would involve the temporary mobilisation of plant throughout the proposal landscape to construct the proposal and to provide ancillary infrastructure (e.g. construction compounds and access tracks). Construction activity would be most prominent around transmission line structure footings. Vegetation removal would be required, which would mostly comprise of shrubs and groundcovers. Landform modification would be small and localised.	No impacts relating to visual amenity were identified during this IEA.
Aboriginal Heritage	The proposal has the potential to directly and/or indirectly impact Aboriginal sites including: - four artefact-only sites of low significance and seven with moderate significance - four artefact and hearth sites with moderate significance - one artefact scatter, hearth and modified tree site with moderate to high significance - three earth mound and hearth sites with moderate	No heritage related incidents were identified during this audit.

Category	Predicted Impact	Actual Impacts to Date
	significance • five hearth-only sites with moderate significance • 15 isolated finds with low significance and five with moderate significance • five isolated finds and hearth sites with moderate significance • one midden site with moderate significance • seven modified/scar tree sites with moderate significance. The proposal also has the potential to directly and/or indirectly Potential Archaeological Deposits (PADs) including: • 23 PADs through direct impact • 16 PADs through potential direct impact.	
Soils	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: • erosion of exposed soils and stockpiled materials • dust generation from • increased sediment loads entering the surrounding waterways • compaction of soils leading to impacts on drainage	No soil erosion issues were identified during the audit period.
Contamination	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.	To date no contamination has been encountered.
Acid Sulphate Soils	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.	No acid sulphate soils were encountered during this audit period.
Salinity	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.	No salinity related impacts were encountered during this audit period.
Construction Noise and Vibration	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	No noise complaints were received during this audit period.

Category	Predicted Impact	Actual Impacts to Date
	compounds. 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.	
Construction Air Quality	The assessment of air quality impacts at these identified sensitive receivers found that the impacts to sensitive receivers would be negligible.	No dust complaint were received during the audit period. No material air quality impacts from construction have been identified.
Traffic and access	The increase of light vehicles and heavy vehicle movements from current traffic volume would not be expected to adversely impact the capacity and serviceability of the road network and at intersections. Heavy vehicle traffic movements would also be distributed throughout the day to minimise their impact on town centres' peak traffic activities.	No traffic impacts exceeding the predictions in the EIS have been identified.

7.8.1 Extent of Project Operations

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

7.9 Other Matters

7.9.1 Road Dilapidation Surveys and Local Road Maintenance.

Condition C34 describes the road condition survey and road maintenance actions to be undertaken by the Proponent during construction. Condition 34 states:

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.

Completion on the pre-construction surveys and previous annual road condition surveys were verified during previous Independent Environmental Audits. Table 11 lists the road condition surveys undertaken during the previous twelve months. The Auditor sighted sufficient evidence to conclude that the required road surveys were undertaken during 2025 and reports provided to Council.

Table 11 - Summary of the 2025/6 Road condition surveys completed

Council	Survey Reports			
	Sealed Road Survey	Unsealed Road Survey	Final Survey Issued to Council	Evidence provided
Balranald	December 2025	December 2025	14 April 2026	Reports
Edward River	Second half 2025	Second half 2025	14 April 2026	Transmission email (reports for 2024 sighted)
Federation	December 2025	December 2025	14 April 2026	Reports
Hay	December 2025	December 2025	14 April 2026	Reports
Lockhart	Not provided	Not provided	14 April 2026	Transmission email (reports for 2023 sighted)
Murray River	December 2025	December 2025	14 April 2026	Reports
Murrumbidgee	December 2025	December 2025	14 April 2026	Reports
Wagga Wagga	December 2025	December 2025	15 April 2025	Reports
Wentworth	Not provided	December 2025	15 April 2025	Report

Communications with Council and Road Maintenance Undertaken during the audit period.

The road maintenance works undertaken during this audit period is listed in Table 12 below.

Table 12 - Road maintenance works completed in this audit period

Council	Road / Project	Timing	Works Required	Works Completed By	Cost	Elecnor Contribution
Wentworth	Silver City - Access Point upgrade	Dec-25	Line work & Guard rail	Council	Approx 60k	Paid in Full
Edward River	Boooroban – Trchelery Road	Dec-25	Grading, Sealing & 8 Cattle Grids	Council	Approx 1M	Elecnor has proposed 650k contribution. Under negotiation.
Edward River	North Boundary Road	Dec-25	Grading	Council	Approx 90K	Elecnor to pay in Full.
Balranald	Keri Keri Rd	Oct-25	Grading	Elecnor	Elecnor Cost	Paid in Full
Murrumbidgee	Bundure Rd 14 Km	Sep-25	Grading	Elecnor	Elecnor Cost	Paid in Full
Murrumbidgee	Thurrowa Rd 6 Km	Sep-25	Grading	Elecnor	Elecnor Cost	Paid in Full
Wagga	Boiling Down Road Sealing	Jan-26	Sealing	Council	Approx 75k	Paid in Full

The Auditor was provided with extensive records of communication relating to road maintenance for Edward River, Federation, Murrumbidgee and Wagga Wagga Council. Those records included:

- Email exchanges between Council and Elecnor
- Dilapidation Meeting Minutes
- Records of quotes (from Council for agreed road works) and Council Invoices for provision of road maintenance works.
- Summaries of road maintenance activities undertaken by Elecnor on unsealed roads within the Council areas.

With respect to the correspondence provided for the Councils, there is sufficient evidence to conclude that:

- *The project has undertaken the road conditions surveys required under the Approval*
- *Regular road maintenance, especially on unsealed roads has occurred throughout the project*
- *Councils have been engaged to undertake road maintenance activities on sealed roads and the project has funded those road works.*
- *Complaints from the landowners in relation to road conditions have been investigated and where required road repairs undertaken*

7.9.2 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 13 and Table 14 below. Note that the water sources listed are presented as described in SecureEnergy's records.

Table 13 - Non-Potable Water Take

Water Source	Non-potable Water take (litres)						
	October 2025	November 2025	December 2025	January 2026	February 2026	March 2026	April 2026
Alcheringa	-	102,000	528,000	1,545,000	-	-	-
Balranald	-	-	-	221,000	-	-	-
Camp 2 Dam	508,000		-	-	-	-	-
Camp 2 Standpipe		378,000					
Camp 2 Turkeys Nest	-	697,000	-	-	-	-	-
Camp 3 Front Tanks	-	160,000	-	-	-	-	-
Camp 3 Turkeys Nest	993,000	3,519,000	96,000	-	-	-	-
Camp 4 Turkey's Nest	-	21,000	-	-	-	-	-
Coleambally Bencubbin Rd	296,000	360,000	66,000	-	-	-	-
Gilbert Road	-	1,758,000	2,407,000	1,825,000	802,000	442,000	-
Hook Tanks	1,256,000	700,000	-	342,000	-	-	-
Lochart Tanks	-	-	-	210,000	-	-	-
Mallee Fire Tanks	26,000	-	-	-	-	-	-

Water Source	Non-potable Water take (litres)						
	October 2025	November 2025	December 2025	January 2026	February 2026	March 2026	April 2026
Tooleybuc	101,000	-	-	-	-	-	-
Turkey's nest	143,000	-	166,850	310,000	-	268,000	1,592,000
WWTP	21,000	-	-	96,000	863,000	934,000	39,000
Wonga Tanks	-	432,000	-	-	-	-	-

Table 14 - Potable Water Take

Water Source	Non-potable Water take (litres)						
	October 2025	November 2025	December 2025	January 2026	February 2026	March 2026	April 2026
Coleambally Bencubbin Rd	2,634,000	-	1,430,450	1,883,000	1,816,000	3,629,500	1,212,000
Deniliquin	830,000	-	540,000	540,000	-	-	-
Lochart SP	-	-	-	1,014,000	198,000	-	-
Wentworth SP	13,000	-	-	24,760	-	-	-

Appendix A

PEC East Project

April 2026 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.		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. No reportable environmental incidents were recorded. Some minor environmental spills, including two gas release incidents occurred during August-2025, however those incidents did meet the threshold of "material harm"	No evidence of actual or potential material environmental harm was sighted during the site inspection.	No evidence of actual or potential material environmental harm was sighted during the site inspection.	Complies	
S2 A2	Terms of Approval	The Development may only be carried out: a. in compliance with this approval		Deputy Environment Manager – No non-compliances were reported to DPHI during the audit period.		Refer to the specific conditions below.	Complies	
		b. In accordance with all written directions of the Planning Secretary;		Environment Manager - No directions from DPE were received during the audit period.			Not Triggered	
		c. Generally, in accordance with the EIS; and		Environment Manager - While changes to the project compared to what was initially approved have been made, these changes have been subjected to Consistency Assessments and do not represent a fundamental or significant change to what has previously been approved.		No evidence was found that the works undertaken to date associated with SSD 9172452 (Modification 1) has not been undertaken in general accordance with the EIS or the approved plans.	Complies	
		d. generally, in accordance with the Development Layout in Appendix 1.					Complies	
	S2 A3	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department’s assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this approval; b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and c) the implementation of any actions or measures contained in these documents.	Project EnergyConnect East, Biodiversity Technical Specialist Audit Report Final, dated 18 February 2025. Verification Report EnergyConnect (NSW Eastern Section), Initial Report dated 30 May 2025. Letter from TransGrid (J Lipton) to DPHI (The Planning Secretary) titled “Re: EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Verification Report – Biodiversity Management Plan”, dated 20 March 2026.	Environment Manager - There were no reports or reviews commissioned by the Department regarding compliance with this approval.	Following the submission of the Biodiversity Verification Report to DPHI on 30 May 2025, DPHI, in their letter of 28 November 2025, directed the Proponent to revise and reissue the verification report and the BMP to DPHI and CPHR by 30 January 2026. Transgrid requested an extension of time for the submission of the revised report on 12/2/2026. DPHI granted an extension of time (to 30 March 2026) on 26/2/2026. That letter, issued under the signature of the Secretary’s Nominee, states: “The Department notes: • an extension ensures sufficient time for review and finalisation of the response; and • the Conservation Programs, Heritage and Regulation (CPHR) Group have agreed that all parties will benefit from the preparation of a thorough report. Accordingly, the Secretary has granted an extension of time until 20 March 2026 for the submission of the revised Verification Report.” Transgrid provided a written response to the Department on 20 March 2026 providing justifications for not providing the detailed information requested by CPHR. That response did not include a revision of the Verification Report. It is the Auditor’s view that irrespective of the technical arguments raised by TransGrid and the addition information provided in the WSP report, that the failure to revise and reissue the Verification Report by 30 March2026 is non-compliant with Condition A3 of the Planning Approval that requires the Proponent to comply with any requirements of the Planning Secretary arising from (sub-clause a)) the assessment of any strategies, plans or correspondence submitted in accordance with the Approval and (sub-clause c)) the implementation of any actions or measures contained in these documents.		Non-compliance	It is recommended that CPHR and the Proponent consult and agree on the scope of any additional information needed to verify the vegetation clearing impacts from construction and future vegetation maintenance for inclusion into future vegetation integrity reports.

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A4	Terms of Approval	The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		Environment Manager – DPHI did not issue any requirements to the project in relation to any plans, strategies or correspondence.		DPHI did not issue any written directions to Transgrid in relation to this project during this audit period.	Not Triggered	
S2 A5	Terms of Approval	Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This condition does not apply to the immediate written notification required in respect of an incident under condition E6.				All documentation submitted to DPHI during this audit period was submitted in accordance with this Condition.	Complies	
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. All stakeholder consultation required under the Approval, during this audit period has been undertaken.	Complies	
	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);		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.	Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A8	Staging, combining or revision of Strategies, Plans and Programs.	b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager – No approval has been sought for the combining of any plans, programs, or similar documents during this audit period.		No approval has been sought for the combining of any plans, programs, or similar documents during this audit period.	Not Triggered	
		c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).		Environment Manager – no changes were made to any management plans or strategies during this audit period.		No changes were made to the management plans during this audit period. It is noted that the Biodiversity Management Plan was revised during the last audit period and submitted to DPHI for approval. That plan was approved during this audit period.	Not Triggered	
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.					Complies	
S2 A11	Environmental Representative	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in condition A2 and is independent from the design and construction of the development. The ER must meet only the requirements set out in sections 2.2, 2.3, 2.4 and 3 in the <i>Environmental Representative Protocol</i> (Department of Planning and Environment, October 2018).	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller was appointed as the Independent ER. DPE approval was provided on 20/9/2022.	Complies	
S2 A12	Environmental Representative	From commencing the development, until commencing operation, or as agreed with the Secretary, the approved ER must: a) review the documents identified in conditions A22, B1, B2, C10, C45, C50 and C51, and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) make a written statement to this effect before submission of such documents to the Secretary (if those documents are required to be approved by the Secretary); or (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Department for information or are not required to be submitted to the Department);	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager – no changes were made to ant management plans or strategies during this audit period.		No changes were made to the management plans during this audit period. DPHI did not request the review or revision of any plans during this audit period.	Not Triggered	
		b) as may be requested by the Secretary, assist the Department in the resolution of community complaints; and		Environmental Representative 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	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.		Environment Manager – no changes were made to ant management plans or strategies during this audit period.		No changes were made to the management plans during this audit period. DPHI did not request the review or revision of any plans during this audit period.	Not Triggered	
S2 A13	Environmental Representative	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A19, as well as the complaints register for any complaints received (on the day they are received).	Complaints Register Letter from Transgrid (L Fania) to DPHI (The Planning Secretary) titled “EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of potential non-compliance with condition A13”, dated 1 April 2026.	Environment Representative – Elecnor provided notifications of the complaints received during the audit period. However, due to an administrative oversight, the ER was not notified within the required time frame for one complaint received on 23 January 2026.		Twenty-seven complaints were received during this audit period. The proponent provided details of each complaint in accordance with Condition A13, except for the complaint received on 23 January 2026. The ER was notified of all previous and subsequent complaints in accordance with this Condition.	Non-compliance	The auditor is satisfied that the failure to notify DPHI of one complaint was an isolated event and therefore no recommendation has been made.
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.		Environmental Supervisor- DPHI has not requested compensation for the review of any plans or other documents during this audit period.		DPHI has not requested compensation for the review of any plans or strategies since September 2023 (prior to this audit period).	Not Triggered	
S2 A15	Protection of Public Infrastructure	Unless the Proponent and the applicable authority agree otherwise, the Proponent must: a) undertake any works on or in the vicinity of public infrastructure in consultation with the applicable authority or service provider; b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to any damage to roads caused as a result of general road usage which is expressly provided for in the conditions of this approval.	Complaints Register Incident Register Stakeholder Consultation (refer to Section 5 of this report)	Environmental Supervisor – Consultation with relevant service providers (e.g. Essential energy) continued during the audit period in relation to works in the vicinity of, or crossing over, their assets. No damage to public infrastructure occurred during the audit period.		Elecnor has undertaken regular meetings with Essential Energy regarding impacts and actions to be taken in relation to impacts on their infrastructure. No incidents related to damage to public infrastructure were identified during this audit. Two complaints were received relating to damaged public roads. Elecnor undertook road repairs in those locations.	Complies	
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	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
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 new 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): - Spill Response - 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. Environmental Work Method Statements: - Clearing and Grubbing - Herbicide Application - Conductor Stringing - Heritage Rehabilitation Works Inductions and Toolbox sessions: - Toolbox Attendance Records: - Daily pre-shift briefing Meet-130023 - Daily pre-shift briefing Meet-130417 - Daily pre-shift briefing Meet-129988 - Christmas Toolbox (risk management priorities) - Rehabilitation Inductions dated 24 December 2025. - Rehabilitation Crew Toolbox – heritage refresher presentation – 7 December 2025. - Spill Management Toolbox – 13 October 2025. - Snake Awareness Toolbox – 11 October 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. Copies of work permits and key management plans (for example the CEMP and Safety Plans are kept at each of those locations.	Training materials covering all elements of the approval were sighted. Records of training from the audit period were sighted. Information is provided to the workforce every morning at the pre-start meetings, including important compliance-related notifications.	Complies	
S2 A19	Operation of Plant and Equipment	The Proponent must ensure that all plant and equipment used on the site is: a) maintained in a proper and efficient condition.	Extracts from the project maintenance management system were sighted, including: - Daily (pre-start) check lists - Maintenance requests - Maintenance records - Prestart workorders - Maintenance work orders.	Environmental Supervisor - MEX continues to be used as the online maintenance management platform on PEC. Examples of work orders/maintenance records, maintenance requests and daily prestart checks covering the audit period are provided in the evidence folder.	Camps (accommodation, storage and maintenance areas) are well maintained and organised. All plant and equipment operating (on construction areas) appeared to be operational and well maintained.	Maintenance facilities (generally for light vehicles) are located at each camp. Records of inspections and maintenance were sighted.	Complies	
		b) operated in a proper and efficient manner.				All facilities, plant and equipment sighted during the audit were operational and appeared to be well maintained.	Complies	
S2 A20	Applicability oof Guidelines	References in the conditions of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.	Approved Management Plans			The references in the approved management plans meet the requirement of this condition.	Complies	

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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.		Environmental Supervisor – DPHI has not requested that any plan is to be modified to take into account the issue of any new Standard.		Elecnor management advised that DPHI has not requested that any plan is to be modified to take into account the issue of any new Standard during this audit period.	Not Triggered	
		Prior to the commencement of construction, the Proponent must prepare a Community Communication Strategy to provide mechanisms to facilitate communication between the Proponent and the community (including adjoining affected landowners) during construction. The Community Communication Strategy must: a) identify landowners for potentially impacted receivers;	Community Communication Strategy EnergyConnect (NSW – Eastern Section), Rev 1, dated 8 October 2024.	Environment Manager - The Community Communication Strategy has been uploaded. 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	
S2 A22	Community Communications Strategy	b) ensure that the landowners identified in (a) are consulted during construction;				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	
		c) set out procedures and mechanisms for the regular distribution of information to the wider community;				The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
		d) establish a public liaison officer(s) to engage with the local community; and				Section 4.4 of the Strategy identifies the public liaison officers.	Complies	
		e) set out procedures and mechanisms: • through which the community can discuss or provide feedback to the Proponent; • through which the Proponent will respond to enquiries or feedback from the community; and • to resolve any issues and mediate any disputes that may arise in relation to construction of the development.	Community Communication Strategy EnergyConnect (NSW – Eastern Section), Rev 1, dated 22 March 2023.			The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
		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. Ten (10) Energy Connect Construction Notifications, including: • Construction Notification - Look Up and Live Line 5 - Dinawan to Wagga Wagga • Vegetation Management Activities January 2026 • Cobb Highway camp demobilization March-April 2026			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	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 B1	Construction Environmental Management Plan	Prior to commencing construction, a Construction Environmental Management Plan (CEMP) must be prepared to detail how the performance outcomes, commitments and measures specified in the EIS will be implemented and achieved during construction to the satisfaction of the Planning Secretary.	Construction Environmental Management Plan EnergyConnect (NSW-Eastern Section) Stage 1 and Stage 2, Revision 2, dated 20 June 2023. Screen shot from the Major Projects Portal indicating that Revision 4 of the CEMP was issued to DPHI on 28 July 2025.	Environment Manager - The Construction Environmental Management Plan was revised and submitted to the Department on 28 July 2025 (prior to this audit), however has not yet been approved.		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. CEMP Rev 4 was issued to DPHI on 28/07/2025 and is still with the department for approval.	Complies	
		The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan in Table 1.						Complies
	Table 1	Required Plan	Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan	Documents Reviewed	Compliance Assessment			
		Noise and Vibration	Council		The NVMP was not revised during this audit period			
		Soil and Water	DPIE Water		The SWMP was not revised during this audit period.			
		Biodiversity	BCS Council	Biodiversity Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2), Revision 5, dated 26 May 2025. Letter from DPHI (N Brewer) to Transgrid (J Lipton) titled “Project EnergyConnect (NSW – Eastern Section) - Biodiversity EMP Sub-Plan”, dated 4 March 2026. Email from DPHI (K Weeks) to Transgrid (J Liptin) titled “BMP PEC East”, dated 19 February 2026.	The BMP was revised 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 (during the last audit period) and has been endorsed. The plan was submitted to DPHI for review by DPHI. consultation with the relevant Regulators and Approval. DPHI subsequently approved the plan on 4 March 2026. In terms of consultation with CPHR (BCS), once uploaded to the Planning Portal, the Department sends the draft out for consultation via the Portal. DPHI sought comments from BCS in January 2026 on this revision.			
		Heritage	Heritage NSW Aboriginal Stakeholders		The HMP was not revised during this audit period.			
		Traffic and Transport	TfNSW Council		The Traffic and Transport Management Plan was not revised during the current audit period.			
S2 B2	CEMP and Subplan requirements	The EMP Sub-plans must be prepared in accordance with relevant guidelines and in consultation with the relevant government agencies identified for each Sub-plan in Table 1, and include: a) a summary of relevant background or baseline data;	Traffic and Transport Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 11, dated 25 November Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.		A hard copy of the CEMP is available at each Camp.	Section 3 of each Subplan describes the pre-project baseline conditions. This requirement is not relevant to the TTMP plan.	Complies	
		b) details of: (i) the relevant statutory requirements. (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March.2024. EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2), Revision 5, dated 26 May 2025.			Legislative requirements are summarised in Section 2.1 and 2.2 of the Subplans. Section 4 of the BMP details the relevant performance limits and indicators. This requirement is not relevant to the TTMP plan.	Complies	
		c) any relevant commitments or recommendations identified in the EIS;	Heritage Management Plan (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 7 February 2025.			Relevant commitments from the EIS are covered in Section 2.3 of the Subplans.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
		d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;				Management and mitigation measures are described in Section 5 of the Subplans.	Complies	
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. EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2), Revision 5, dated 26 May 2025. 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	

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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 not been any 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 some construction activities 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	
		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;	Out of Hours Work Permit dated 25 November 2025 between Line 5 T1 and T336. Out of Hours Work Permit dated 23 January 2026 on Line 5 T3 – T10, T49 – T61, T140 – T148 and T193 –T279a.			Out-of-hour works were approved for locations remote from sensitive receivers. All work that could potentially impact sensitive receivers were restricted to the Approved work hours. The location of the sensitive receivers was documented on the OHWPs. No complaints were received relating to these work locations.	Complies	
		e) road upgrades required by the relevant roads authority to be undertaken outside the standard construction hours; or		Environmental Supervisor– 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.	Not Triggered	
		f) works carried out in accordance with an Out-of-Hours Work Protocol approved in accordance with condition C10.	Out of Hours Work Permit dated 25 November 2025 between Line 5 T1 and T336. Out of Hours Work Permit dated 23 January 2026 on Line 5 T3 – T10, T49 – T61, T140 – T148 and T193 –T279a.			OOHW approvals had been prepared for all OOHW undertaken during this audit period. No complaints relating to OOHW were received during the audit period.	Complies	

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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. Refer to C1 above, construction work near sensitive receivers was undertaken during approved construction hours.		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 Environmental Training Noise and Vibration (PowerPoint training presentation)	Environmental Supervisor - No noise monitoring events 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	Allowance					
			dB (Lin Peak)							
			120		10	0%				
			115		5	5% of the total number of blasts or events over a rolling period of 12 months				
S2 C8	Operational Noise	Except for corona discharge noise, the Proponent must ensure that the noise generated by the operation of the development does not exceed 35 dB(A) LAeq,15min, at the reasonably most affected point of the residence, in accordance with the 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	The Proponent must: a) take all reasonable and feasible steps to minimise corona discharge noise during operation of the project; b) identify residences predicted to experience corona discharge noise levels above 35 dB(A) LAeq,15min at the reasonably most affected point of the residence, determined in accordance with the NPfl, and how often corona noise is expected to be above this this level per year; c) implement all reasonable and feasible noise mitigation measures, determined in accordance with the NPfl, at receivers predicted to experience corona discharge noise levels that exceed the noise level identified in condition C8; and d) prepare and implement a Research Program and allocate \$150,000 to this program, prepared in consultation with EPA, and be submitted to the Planning Secretary for approval.				Operational requirement only	Not Triggered	
		The Noise and Vibration CEMP Sub-Plan required under condition B2 must: a) ensure the requirements in conditions C1 to C12 are complied with;	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			The current version of the NVMP was prepared and approved during the previous audit period. The NVMP provides a framework designed to ensure compliance with Conditions C1 to C12.	Complies	
S2 C10	Noise and Vibration CEMP Sub-Plan	b) include a description of the reasonable and feasible measures that would be implemented to minimise noise and vibration impacts of the development;	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			Section 7.3 of the NVMP describes the noise and vibration mitigation measures to be implemented.	Complies	
		c) include a detailed description of the noise and vibration management system for the development;	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			Section 1.4 of the plan describes the environmental management system as it applies to noise and vibration management.	Complies	
		d) include a protocol for the identification, notification and management of works that exceed the noise management levels; and	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			Section 7,2 and Section 8 of the plan describes compliance management, including the notification requirements and management of works that may exceed noise criteria.	Complies	
		e) include a monitoring program that evaluates and reports on the effectiveness of the noise and vibration management system.	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 17 April 2024.			Section 8.3 describes the noise and vibration monitoring program.	Complies	

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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 – six dust complaints were received, however only three related to works on PEC East.	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 (accommodation camps and construction areas) to be in operation to reduce dust emissions during the site inspection. Six dust complaints were received, however only three related to work on PEC East.	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. Rehabilitation works were well progressed.	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 - Water was sourced as required during the audit period. The following water access licenses remain in place: WAL 21411 (Hookes Farm), WAL 1909 (Wonga Station), WAL 7725 (Coleambally Station), WAL 7731 (Western Murray Irrigation), WAL 41857 (Iluka). No bore water was used during the audit period		Sufficient water was extracted from the sediment basins to cater for dust suppression, which is the main water use activity undertaken during this audit period.	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: - WAL 21411 – 145ML limit Groundwater (Hookes Farm) - WAL 1909 – 370 ML limit Groundwater (Wonga Station) - WAL 7725 –345 ML limit Groundwater (Coleambally Station) - WAL 7731 – 65181.2 ML limit from Murrumbidgee River (Western Murray Irrigation) - WAL 41857 – 101 ML limit from Murrumbidgee River (Iluka)		Water-take from each location as reported by SecureEnergy and has been summarised in Section 7.9 above.	Complies	

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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);	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21/3/2024. Reinstatement and Rehabilitation Plan, Camp 2, prepared by Ron Billyard CPESC NO 9496, dated 5 April 2026. Reinstatement and Rehabilitation Plan, Camp 4, prepared by Ron Billyard CPESC NO 9496, dated 11 April 2026. Erosion and Sediment Control Inspection Report, Line 2 and Line 5 Rehabilitation, prepared by Ron Billyard CPESC NO 9496, dated 6 April 2026. Elecnor Weekly environmental checklists (covering the audit period)	Environment Manager - The CPESCs involved 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 (Photographs 3 ,4 ,5, and 8) at all areas inspected were installed in accordance with the relevant ERSED plans. During the site inspection the following observations were made: - Surface water management (surface drains, sedimentation / retention ponds) are provided at each of the accommodation camps / laydown areas and key construction areas. - Sediment tracking onto public roads was minor. - Light and heavy vehicle wash pads are located at the operating accommodation camps were being used at the time of the site inspection. - Each camp has a cattle grid at the site entrance. - Rehabilitation of disturbed areas is well progressed. - At the former Limondale laydown area, recent rains had resulted in a washout of the stormwater channel (photograph 4). The washout is understood to have occurred during rains the week prior to the site inspection.	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 Reinstatement and Rehabilitation Plans. 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	Environmental Supervisor– 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. The bunding observed in previous audit has been maintained. All chemical storage and potentially hazardous waste storage observed were generally appropriately contained. Spill kits were available at those locations. An example of the temporary bunding used at the accommodation camps is shown is Photograph 10.	All fuels and chemicals observed were stored appropriately and there was no evidence of spills or leakages in any storage locations inspected.	Complies	
S2 C17	Pollution of Waters	The Proponent must ensure that any groundwater dewatering activities do not discharge to watercourses.	Dewatering Procedure EnergyConnect (NSW – Eastern Section), Revision C, dated 11 November 2022.	Environment Manager – No groundwater dewatering was required during this audit period.	No groundwater dewatering observed during the site inspection.	Procedures for groundwater dewatering have been established. No groundwater dewatering was required during this audit period.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C18	Riparian Areas	The Proponent must ensure: a) all activities on waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012), unless DPIE Water agrees otherwise; and b) the geomorphic condition of the major rivers and distributary channels crossed by the development is not impacted.	Incident Register Clearing and land disturbance permit (CDP) for Colombo Creek Pre-clearance report for Colombo Creek Crossing (viewed post inspection)	Environment Manager - No riparian zone incidents have occurred during the audit period.	Line 5, Tower 245-246, Colombo Creek crossing riparian zone. Refer to Photograph 8. Creek crossing near Tower T71.	No riparian zones were cleared during this audit period and 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 completed at both locations, and no issues of concern were identified. No incidents were reported in any riparian zones.	Complies	
S2 C19	Flooding	The Proponent must ensure that the development: a) does not materially alter the flood storage capacity, flows or characteristics in the development area or off-site; and b) is designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site, unless otherwise agreed by Council.		Environment Manager - There were no flooding issues during the audit period. Consultation with council has not been required as the project has not been designed to increase impacts on surface water, localised flooding and groundwater.		A detailed assessment of flooding and water management issues was undertaken during the previous audits. No changes in design have occurred during this audit period. No flooding impacts have occurred during this audit period.	Complies	
S2 C20	Acid Sulphate Soils	The Proponent must ensure that any construction activities in identified areas of acid sulphate soil risk are undertaken in accordance with the <i>Acid Sulphate Soil Manual</i> (Acid Sulphate Soil Management Advisory Committee, 1998).	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.	Environment Manager - No ASS has been encountered during the audit period. If encountered PASS would be managed in accordance with the SWMP. Current activities are outside the areas of known acid sulphate soil risk areas.		Current activities are outside the areas of known acid sulphate soil risk areas.	Not Triggered	
S2 C21	Salinity	The Proponent must ensure that any construction activities in identified areas of moderate to high salinity are undertaken in accordance with the Salinity Training Manual (DPI, 2014) and Book 4 Dryland Salinity: Productive use of Saline Land and Water (NSW DECC, 2008).	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.	Environment Manager - No work 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.	Not Triggered	
S2 C22	Soil and Water CEMP Sub-Plan	The Soil and Water CEMP Sub-Plan required under condition B2 must include provisions for: a) ensuring the requirements in conditions C12 – C21 are complied with;	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.	Environment Manager - No reviews or revisions of Soil and Water Management Plan have taken place during the audit period.		The Soil and Water Management Plan provides an appropriate framework to manage compliance with the relevant conditions of the Approval. The plan was not revised during this audit period.	Complies	
		b) managing flood risk during construction;	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Section 5.7 of the SWMP describes the proposed flood response procedures for the project.	Complies	
		c) investigating, assessing and managing contaminated land, soils and groundwater in the development area;	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Section 5.6 of the Plan describes the procedures for management of contaminated materials. Section 6.3 of the plan describes the monitoring program.	Complies	
		d) investigating, assessing and managing the potential for asbestos and other hazardous materials in the development area; and	Soil and Water Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 2, dated 21 March 2024.			Investigating, assessing and 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	Clearing and land disturbance register PDF Clearing Permits prepared during this audit period: - CDP-E-395 T421 – T442 Hazard & Additional Trees Rev-01, 5/2/2026 - CDP-E-394 T74 - T92 Hazard & Additional Trees Rev-01, 4 /2/2026 Pre-clearance Survey: - T100 – 50, 5/11/2025 - Line 5 T1 – T30, 16/10/2025		The Auditor inspected cleared areas along the length of the project. All clearing works in the areas inspected were complete at the time of this audit. No evidence of over-clearing was identified. Rehabilitation of cleared areas was well progressed.	Most of the vegetation clearing had been completed prior to this audit period. Minor clearing was undertaken, generally related to the removal of trees under the transmission line (including some regrowth) within the easement corridor. Elecnor provides regular training to the project team on biodiversity and clearing management. No evidence of over clearing was identified during this audit.	Complies	
		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.			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 during this audit period was identified.	Based on the documentation reviewed, including the clearing register and clearing permits issued during this audit period, the Auditor is satisfied that: - Clearing of native vegetation and key habitat is being minimised where possible - Sufficient evidence sited that clearing of native vegetation and key habitat is being minimised - No evidence of clearing outside of the approved limits has occurred during this audit period.		
S2 C24	Biodiversity Off- set 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.		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 us documented in Section 4 of the BOP.	Complies	

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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				Timing is documented in Section 6 of the BOP	Complies	
		(d) confirmation that the biodiversity offset measures will have been implemented and delivered no later than 1 September 2025 .				The biodiversity offset delivery program is described in Table 32 of the BOP.	Complies	
		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).		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. The Auditor is satisfied that the Proponent has met the intent of this condition in consultation with DPHI.	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.	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).		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	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C26	Biodiversity CEMP Subplan	The Biodiversity EMP Sub-Plan required under condition B2 must be prepared in accordance with the Revised Biodiversity Development Assessment Report (dated 19 August 2022) and include: a) a description of the measures that would be implemented for: (i) meeting the biodiversity mitigation requirements in condition C23; (ii) minimising the amount of native vegetation clearing within the development area; (iii) minimising the loss of key fauna habitat, including tree hollows; (iv) minimising the impacts on fauna on site, including undertaking pre-clearance surveys; (v) minimising the potential indirect impacts on threatened species, migratory species and ‘at risk’ species; (vi) rehabilitating and restoring disturbance areas to its pre-existing condition; (vii) avoiding and minimising impacts on Serious and Irreversible Impact (SAIL); (viii) construction clearing and operation vegetation management protocols; (ix) monitoring of the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols; (x) protecting native vegetation and key fauna habitat outside the approved disturbance area; (xi) maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and restoration of the site; (xii) a Connectivity Strategy and a Supplementary Hollow and Nest Strategy; (xiii) controlling weeds; (xiv) controlling erosion; and (xv) bushfire management; and	Biodiversity Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2), Revision, dated 5 July 2023. Verification Report	Environment Manager – this plan was not revised during this audit period.		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.	Complies	
		b) a detailed program to monitor and report on the effectiveness of these measures.	Biodiversity Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and Stage 2), Revision 5, dated 26 May 2025.			Biodiversity management measures are described in Section 5 and compliance management is presented in Section 6 of the Biodiversity Management Plan.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C27	Heritage Un-Surveyed Areas	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. The report must: a) include details of consultation with the Aboriginal stakeholders;	Unexpected Find Register Email from Everick Heritage (J Giang) titled “Potential UXF – Boundary Tree behind Wagg Sub”, dated 4 November 2025	Environment Manager – One potential UXF was recorded within the reporting period. This site was subsequently identified as a previously recorded site.	During the site inspection the PAD sites observed were fenced and signposted as no go areas.	No unexpected heritage finds were identified during this audit period.	Complies	

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

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C28	Protection of Heritage Items	The Proponent must: a) ensure the development does not cause any direct or indirect harm to Aboriginal heritage items located outside the development area;	Incident Register Consultation with RAPs.	Environmental Manager –one potential heritage-related incidents occurred during this audit period. Consultation has occurred associated with preparation works for repatriation of heritage item		No construction work was 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. 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.	Complies	
		b) implement all reasonable and feasible measures to avoid and minimise harm to Aboriginal heritage items and PADs within the development area; and	Incident Register Heritage Management Plan (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 7 February 2025. No Go Zone Permit Register Permit to Enter No Go Zone PADs 31, 32 and 33, dated 26 February 2026 (access for rehab works)	Environmental Manager –no heritage-related impacts occurred during this audit period. Rehabilitation works are planned for PAD 32. EWMS and access permits have been prepared for those works.	During the site inspection the PAD sites observed were fenced and signposted as no go areas.	No heritage impacts or non-compliances were identified during this audit period. Consultation undertaken by the Auditor 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 (T485). All the sites inspected properly protected and were being managed in accordance with the requirements of the HMP. Rehabilitation works are planned for the PAD site at T485. Access permits and EWMS have been prepared.	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 which has resulted in impacts to heritage items. 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	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C30	Heritage EMP Subplan	The Heritage EMP Sub-Plan must: a) include a description of the measures that would be implemented for: (i) protecting Aboriginal heritage items and PADs in accordance with conditions C28(a) and C28(b); (ii) minimising and managing the impacts of the development on heritage items within the development area, including: – salvaging and relocating the Aboriginal heritage items identified in accordance with condition C28(c); – archival recording and/or salvage of the heritage items and sites identified in condition C29, where impacts cannot be avoided, including consultation with NPWS for the Yanga Pastoral Station Complex sheep yards and Heritage Council for PEC-E-H3 (Bundure railway station dwelling artefact scatter); – a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works; (iii) a contingency plan and reporting procedure if: – heritage items outside the approved disturbance area are damaged; – previously unidentified heritage items are found; or – skeletal material is discovered; (iv) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and (v) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental. Heritage Management Plan (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 7 February 2025. Agency Consultation Report EnergyConnect (NSW – Eastern Section) Heritage Management Plan (Stage 2), Revision D, dated 17 January 2024.			The Aboriginal Cultural Heritage Management Strategy was prepared prior to the commencement of construction. The current version of the strategy was revised during a previous audit period. The required consultation was undertaken during the preparation of this revision of the plan. The Strategy meets the contents requirements of this Condition, specifically: - protecting Aboriginal heritage items and PADs – Section 5.7 - salvaging and relocating the Aboriginal heritage items – Section 5.6 - archival recording – Section 5.6 - consultation with NPWS for the Yanga Pastoral Station Complex sheep yards and Heritage Council for PEC-E-H3 – Section 5.6.6 and 5.6.7 - long-term management of any heritage items or material collected – Section 5.8 - a contingency plan and reporting – Section 6.6 and 6.8 - heritage inductions – Section 6.1 - ongoing consultation with Aboriginal stakeholders – Section 1.7	Complies	
S2 C30	Heritage EMP Subplan	b) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the development.	Aboriginal Cultural Heritage Management Strategy EnergyConnect (NSW – Western Section) Stage 1 and 2, Revision 5, dated 7 February 2024.			Inspections, audits, and reporting is described in Section 6 of the Aboriginal Cultural Heritage Management Strategy.	Complies	
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.	Traffic and Transport Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 11, dated 25 November Complaints Register	Environment Manager - There have been no additional access routes included during the reporting period.		No additional roads have been added to the approved transport routes. The TTMP contains details of all approved heavy vehicle routes. No complaints were received during the audit period relating to heavy vehicle routing.	Complies	
S2 C32	Traffic and Transport	All heavy and light vehicles associated with construction, upgrading and decommissioning of the development must travel to and from the site via the Primary Access Routes, Secondary Access Routes and Water Supply Routes as described in the EIS and identified in the figure in Appendix 3, unless the Planning Secretary agrees otherwise.	Driver's Code of Conduct EnergyConnect, Revision D, dated 9 October 2023. Complaints Register			No additional roads have been added to the approved transport routes. The TTMP contains details of all approved transport routes. No complaints were received during the audit period relating to vehicle routing.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
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 “ 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.	Complies	
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: • Balranald • Edward River • Federation • Hay Shire • Lockhart • Murray River • Murrumbidgee • Wagga Wagga • Wentworth The surveys were undertaken by Pavement Management Services	Environment Manager - Dilapidation surveys for the PEC East project were undertaken during this audit period.		The pre-construction dilapidation surveys covering all Council areas across the PEC East project were undertaken prior to the commencement of construction. During this audit period dilapidation surveys were undertaken and evidence of submission of the reports to each Council was provided to the Auditor. Each Council was invited to provide comments on in relation to road condition and maintenance during this audit. No issues were raised by any Council. For further details please refer to Section 7.9.1 of this report.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C35	Traffic and Transport CEMP Sub-Plan	The Traffic and Transport CEMP Sub-Plan required under condition B2 must include: a) details of the transport route to be used for all development-related traffic;	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 11, dated 25 November 2024.			Section 5 of the Traffic and Transport Management Plan describes the approved traffic routes.	Complies	
		b) details of the road upgrade works required by condition D33 of this approval, including; (i) Final number, location and type of Minor Access Points intersections to be implemented; and (ii) Verification that the proposed types of intersection treatments have sufficient capacity for the proposed vehicle numbers;	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 11, dated 25 November 2024.			Section 6.2 describes the Condition D33 upgrade works.	Complies	
		c) details of the measures that would be implemented to: • minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including: - a description of the proposed dilapidation surveys required by condition D39 of this approval; - a description of the proposed measures for managing traffic flow around the work sites, construction compounds and accommodation camps; - temporary traffic controls, including detours and signage; - procedures for stringing cables and transmission lines across roads; - notifying the local community about development-related traffic impacts; - procedures for receiving and addressing complaints from the community about development- related traffic; - minimising potential cumulative traffic impacts with other projects in the area; - minimising potential conflict between development-related traffic and rail services, stock movements and school buses, in consultation with local schools, including preventing queuing on the public road network; - implementing measures to minimise development-related traffic on the public road network outside of standard construction hours; - minimising dirt tracked onto the public road network from development-related traffic; employee use of this service;	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 10, dated 19 April 2024.			Section 6 of the plan describes the traffic and transport management measures to be implemented.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C35	Traffic and Transport CEMP Sub-Plan	The Traffic and Transport CEMP Sub-Plan required under condition B2 must include: c) details of the measures that would be implemented to: - details of the employee shuttle bus service (if proposed), including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage - encouraging car-pooling or ride sharing by employees; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; - ensuring loaded vehicles entering or leaving the site have their loads covered or contained; - responding to any emergency repair or maintenance requirements; - provisions for maintaining emergency vehicle access at all times; - a traffic management system for managing over-dimensional vehicles; and - fatigue management. • comply with the traffic conditions in this approval;	Traffic Management Plan Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 10, dated 19 April 2024.			Section 6 of the plan describes the traffic and transport management measures to be implemented.	Complies	
		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	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C36	Visual Impact Mitigation	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). Upon receiving such a written request from the owner of these residences, the Proponent must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner. These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the transmission line and towers from the residence and its curtilage, and commensurate with the level of visual impact on the residence. All agreed mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise. 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. 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.		Environment Manager – no requested for visual mitigation have been received during this audit period.		No requests for visual mitigation were received during this audit period.	Not Triggered	
		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. Following approval, the Proponent must implement these measures.	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 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.	Environmental Manager - The Department approved the proposed visual mitigation measures on 10th September 2023. Visual mitigation progress provided with LH agreement, email and quotes to complete works.		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. The impacted landowner has approved the visual impact mitigation works.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C38	Visual Appearance	The Proponent must: a) Take reasonable steps to minimise the offsite visual impacts of the development; and	Complaints Register. The Department approved the proposed visual mitigation measures 10th September 2023. Visual mitigation progress provided with landholder agreement, email and quotes to complete works.		The operational camps were inspected. No lighting issues (for example intrusive lights on residential properties or road users) were identified. See for example Photograph 6. The Auditor notes that the project is now winding down and that the Camps are being progressively decommissioned and dismantled.	Site compound locations are not visible from the residential areas and are unlikely to cause any visual impacts. The lighting provided is appropriate for the development and is unlikely to cause glare issues for road users. No lighting complaints were received during the audit period.	Complies	
		b) Not mount any advertising signs or logos on site, except where it is required for identification or safety purposes.			Signage at site access points across the construction corridor were observed. No signage considered to breach this condition was observed.	No advertising signs or logos were observed at either site, other than for the purposes of site identification and safety.	Complies	
S2 C39	Lighting	The Proponent must: a) take all reasonable steps to minimise the off-site lighting impacts of the development; and b) ensure that any external lighting associated with the development: - is installed as low intensity lighting (except where required for safety or emergency purposes); - does not shine above the horizontal; and - complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting.	Complaints Register.	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. See for example Photograph 6. 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.	L5 Assessment of Potential Impact of the EnergyConnect Project on Radiocommunication Services (Microwave Radio Links), Revision 2, dated 22 August 2024.	Environmental Manager – The project has conducted an analysis of the project’s tower locations and their subsequent impact on point-point microwave links. Consultation with potentially impacted communication service providers has been conducted and documented.		The project has conducted an analysis of the project’s tower locations and their subsequent impact on point-point microwave links. No impact has occurred to date.	Not Triggered	
S2 C41	Dangerous Goods	The Proponent must ensure that the storage, handling, and transport of dangerous goods is undertaken in accordance with the relevant Australian Standards and guidelines, particularly AS1940 The storage and handling of flammable and combustible liquids and AS/NZS 1596:2014 The storage and handling of LP Gas, the Dangerous Goods Code, and the EPA’s Storing and Handling of Liquids: Environmental Protection – Participants Manual.	Incident Register		During the site inspection, the Auditor inspected fuel and other hazardous materials storage facilities. All flammable and combustible materials sighted were stored in appropriately bunded containers / areas compliant with AS1940. Refer to Photographs 10 and 11. Spill cleanup kits were located adjacent to storage areas.	All fuels and chemicals observed were stored appropriately and there was no evidence of significant spills or leakages in any storage locations inspected. Thirteen (13) minor hydrocarbon spills were recorded. None of those incidents was the result of inappropriate storage. No material environmental impacts were recorded.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C42	Electrical and Magnetic Fields	The Proponent must ensure that the design, construction and operation of the development is managed to comply with the applicable electric and magnetic fields (EMF) limits in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz – 100kHz) (ICNIRP, 2010).	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	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 electric and magnetic field levels near ground level are confirmed to be acceptable to humans, livestock and plants.		Three design studies have been undertaken for the transmission lines and incorporate the requirements of the (ICNIRP) Guidelines. Each study concludes that the power frequency electric and magnetic field levels near ground level are confirmed to be acceptable to humans, livestock and plants.	Complies	
S2 C43	Induced Current Risk	Prior to any works traversing the high-pressure gas main (Bowmen – Culcairn Pipeline) easement, including above ground electricity transmission lines, the proponent must undertake an induced electrical current risk assessment identifying potential risks to the pipeline, including any physical mitigation measures and ongoing management requirements.	PC L5 – 500kV Transmission Line Induction Study, Revision D, dated 4 July 2023.	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	
		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	
S2 C44	Bushfire Safety	b) ensure that the development: • complies with the relevant asset protection requirements in the RFS’s Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; • is suitably equipped to respond to any fires on site, including provision of a 20,000-litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds and accommodation camps; • incorporates the recommendations of a fire risk assessment as per TransGrid’s design standards;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) - Rev 0 dated 2/3/22 Accommodation Camp Management Plan Lockhart - Rev 2 dated 9/3/23 Accommodation Camp Management Plan Dinawan – Rev 2 dated 10/3/23	Environment Manager – fire related incidents have occurred during the audit period.		The Accommodation Camp Management Plan describes the fire control strategies and resources available.	Complies	
		c) ensure that buildings within the compounds and accommodation camps comply with Australian Standard AS2959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS’s Planning for Bushfire Protection 2019;				Plans for the camp building include specifications for compliance with the relevant fire standards and BAL specifications.	Complies	
		d) develop procedures to manage potential fires on site, in consultation with the RFS and FRNSW;	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	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C44	Bushfire Safety	f) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.					Not Triggered	
S2 C45	Emergency Plan	Prior to commencing construction, the Proponent must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, in consultation with the RFS, and provide a copy of the plan to the local Fire Control Centre. The Proponent must keep two copies of the plan on site in a prominent position adjacent to the site entry point(s) to the Buronga Substation, Dinawan Substation and Wagga Wagga Substation at all times.	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.	Environmental Manager – The Emergency Plan was updated during this audit period.	Hard Copies of the plan were located at each camp.	Rev 2 is the current version. Dated 1 Oct 2025. Was revised for the 2025 / 2026 bushfire season. 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.	Complies	
		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;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			The plan is generally consistent with the requirements of the relevant guidelines.	Complies	
		b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 4 of the plan identifies fire hazards and risks.	Complies	
		c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 8 (Emergency Response) describes the procedures to be implemented to address a fire on or near the site(s).	Complies	
		d) list works that should not be carried out during a total fire ban;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 6.3.1 describes the activities that must not be carried out during a total fire ban.	Complies	
		e) include availability of fire suppression equipment, access and water;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 7.4 describes the location and availability of firefighting water supplies.	Complies	
		f) include procedures for the storage and maintenance of any flammable materials	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 6.4 describes the management of flammable materials.	Complies	
		g) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 7.5 describes site access for emergency vehicles and Section 9.1 provides emergency contact information.	Complies	
		h) include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank(s);	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Appendix B, titled “Asset protection zone”, of the Emergency Plan provides aerial photographs of each Camp and includes the location of the fire water tanks at each camp.	Complies	
		i) include location of hazards (physical, chemical and electrical) that may impact on fire fighting activities and procedures to manage identified hazards during fire fighting activities;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Appendix A provides details of the location of fire hazards.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D47	Emergency Plan	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;				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: • there is a fire on-site or in the vicinity of the site; • there are any activities on site that would have the potential to ignite surrounding vegetation; or • there are any proposed activities to be carried out during a bushfire danger period that have the potential to ignite surrounding vegetation; and	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 16 August 2024.			Section 9 describes emergency communications procedures.	Complies	
		m) include details on how live transmission infrastructure can be safely isolated in an emergency.				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 asset owner to allow an assessment of risks associated with de-energising the powerline”.	Complies	
S2 C46	Waste	Waste generated during construction, operation, upgrading and decommissioning must be dealt with in accordance with the following priorities: a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.	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, hydrocarbon waste and timber.	Complies	
S2 C47	Waste	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the Protection of the Environment Operations Act 1997, the Protection of the Environment Operations (Waste) Regulation 2014, and orders or exemptions under the regulation.		Environment Manager - No waste importing has been undertaken by the Project during the audit period.	No evidence of the importation of wastes was sighted during the site inspections.	No importation of waste onto the project site was reported for this audit period.	Not Triggered	
S2 C48	Waste	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	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	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C49	Waste	All waste that is removed from site must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	All Logistics Waste Tracking Register and Predictions (excel spreadsheet maintained by Elecnor)			Records indicate that one load (3m ³) of contaminated soil was removed from PEC East during this audit period.	Complies	
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. Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Project EnergyConnect (Eastern Section) - Condition C52, retention of Laydown 5”, dated 12, June 2026	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.	Two of the original six camps were in use at the time of this audit Dinawan and Lockhart. The Accommodation Camp 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	
		b) ensure the accommodation camp complies with conditions C19 and C44;				The Accommodation Camp Management Plans provide an appropriate framework for compliance against the condition of approval.	Complies	
		c) ensure any treated wastewater from the accommodation camps used for dust suppression during construction: • complies with the Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) guidelines for irrigation water quality; • meets the requirements of the Public Health Act 2010;			Treated effluent from site water treatment systems is stored and used for dust suppression.	The reuse of treated wastewater is described in Section 7.4 and 7.5 of the Accommodation Management Plans.	Complies	
		d) include measure for dust suppression within the accommodation camps;				Dust management is described in Section 7.5 of the Plans.	Complies	
		e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and				Site layout plans are provided in Section 4.1 (Figures 4.1 and 4.2).	Complies	
		f) include measures to support local suppliers in servicing the camp where possible.				Engagement of local suppliers is covered in Section 8.3.	Complies	
		Following approval, the Proponent must implement the Accommodation Camp Management Plan.			The camps were inspected and appeared to be set out and operated in general accordance with the Accommodation Management Plans.	The camps were being operated in 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 a previous IEA. The Local Business and Employment Strategy has been prepared and implemented. Local industry and indigenous participation is monitored and reported internally on a monthly basis by the Engagement Team.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C52	Rehabilitation	Within 6 months of the completion of construction, upgrading or decommissioning, unless the Planning Secretary agrees otherwise, the Proponent must rehabilitate the areas where ancillary facilities, accommodation camps and earthwork material sites are located, to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3.			Rehabilitation works were progressing in all areas inspected. Photographs 1, 2, 7, and 9.	Site rehabilitation works were well progressed.	Not Triggered	
		The Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: a) provide the strategic framework for environmental management of the development;	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental. Construction Environmental Management Plan EnergyConnect (NSW-Eastern Section) Stage 1 and 2, Revision 2, dated 20 June 2023.	Environment Manager - the EMS has been integrated with the CEMP. The CEMP was not revised during this audit period.		The Environmental Management Strategy has been integrated with the CEMP. The CEMP was not revised during this audit period. The CEMP / EMS provides an appropriate framework for environmental management of the construction phase of the project.	Complies	
	Environmental Management Strategy	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: (i) keep the local community and relevant agencies informed about the construction, operation and environmental performance of the development; (ii) receive record, handle and respond to complaints; (iii) resolve any disputes that may arise during the course of the development; (iv) respond to any non-compliance and any incident; (v) respond to emergencies; and e) include: (i) references to any strategies, plans and programs approved under the conditions of this consent; and (ii) a clear plan depicting all the monitoring to be carried out under the conditions of this consent.				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.				Stage 2 construction works commenced on 17 July 2023. The CEMP was finalised on 20 June 2023.	Complies	
		The Proponent must implement the Environmental Management Strategy as approved by the Planning Secretary				The project is being undertaken in general accordance with the requirements of the EMS.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D2	Revision of Strategies, Plans and Programs.	The Proponent must review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 months of the: • submission of an incident report under condition D6;		Environment Manager –No reportable incidents were reported during this audit period		No reportable incidents were recorded during this audit period	Not Triggered	
		• submission of an audit report under condition D11; or	EnergyConnect PEC East Project SSI 9172452 October 2025 Construction Phase Independent Environmental Audit, dated 20 December 2025, prepared by Barnett and May.			The October 2025 Independent Environmental Audit report did not trigger the review of any environmental management plans.	Not Triggered	
		• 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.				No reportable incidents were recorded during this audit period.	Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
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.	Letter from Transgrid (L Fania) to DPHI (The Planning Secretary) titled “EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of potential non-compliance with condition A13”, dated 1 April 2026.	Environment Manager – Elecnor provided notifications of the complaints received during the audit period. However, due to an administrative oversight, the ER was not notified within the required time frame for one complaint received on 23 January 2026.		Fifteen (15) complaints were received during this audit period. The proponent provided details of each complaint in accordance with Condition A13, except for the complaint received on 23 January 2026. TransGrid was advised by Elecnor of the non-compliance on 26 March 2026. DPHI was advised in writing of the non-compliance on 1 April 2026. The ER was notified of all previous and subsequent complaints in accordance with this Condition.	Complies	
S2 D8	Non-compliance Notification	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Letter from Transgrid (L Fania) to DPHI (The Planning Secretary) titled “EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of potential non-compliance with condition A13”, dated 1 April 2026.			The non-compliance notification contained the information required by the Condition.	Complies	
S2 D9	Non-compliance Notification	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.					Noted	
S2 D10	Notification to Landholders	Prior to the commencement of construction, the Proponent must notify the owners of the owners of R1489, R2022 and R2023 of their rights under condition D41.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			The notifications were issued to relevant landowners on 13 March 2023.	Complies	
S2 D11	Independent Environmental Audit	Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.	EnergyConnect PEC East Project SSI 9172452 October 2025 Construction Phase Independent Environmental Audit, dated 20 December 2025, prepared by Barnett and May.			The October 2025 audit inspection was undertaken between October 27 and October 30, 2025, within 6 months of April 2025 IEA. The audit report was issued on 20 December 2025, within the two month reporting deadline established in the DPHI Post Approval Audit Guidelines.	Complies	

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

Appendix B

Audit Photographs



Photograph 1 – Rehabilitation (saltbush regrowth) at Tower 744.



Photograph 2 – Tower 485 (Near Limondale Solar Farm). Tower pad adjacent to PAD site prior to rehabilitation.



Photograph 3 – Former Limondale laydown area and surface water controls



Photograph 4 – Former Limondale laydown area washout from recent storm event



Photograph 5 – Camp 4 – site demobilization



Photograph 6 – Camp 3 carpark lighting



Photograph 7 – Rehabilitated broken winch site (T245) near Columbo Creek



Photograph 8 – ERSED controls at Columbo Creek



Photograph 9 – Example of rehabilitation using mulch (T130).

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



Photograph 10 – Camp 2 – bunding around water treatment plant.



Photograph 11 – Temporary Chemical Storage Container.



Photograph 12 – Glider poles installed between T71 and T72

Appendix C

Auditor Approval

Department of Planning, Housing and Infrastructure

Reference: SSI-9172452-PA-97
Mr Luke Fania
Environment and Sustainability Manager
NSW Electricity Networks Operations Pty Limited
27/02/2026

Sent via the Major Projects Portal only

Subject: Project EnergyConnect (NSW - Eastern Section) - Independent Environmental Audit (IEA) - February 2026

Dear Mr Fania

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person to conduct an Independent Environmental Audit (IEA) of the Project EnergyConnect (NSW - Eastern Section), submitted as required by Condition D11 of SSI-9172452 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (the Department) on 18 February 2026.

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

In accordance with Condition D11 of the approval and the Department's *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse Ken Holmes of Barnett & May Pty Ltd to undertake the IEA.

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 Department's *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.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

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

Yours sincerely



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

APPENDIX D

Stakeholder Consultation Responses

From: [Katrina O'Reilly](#)
To: [Ken Holmes](#)
Subject: PEC Eastern Section IEA consultation
Date: Monday, 30 March 2026 5:33:59 PM

Good afternoon Ken, I'm not sure if I have missed any email from you regarding consultation about the above upcoming audit.

The Department would like the below stakeholders to be consulted:

EPA,
NSW Conservation, Programs, Heritage and Regulation Department of Climate Change, Energy, the Environment and Water (DCCEEW)
Commonwealth Department of Climate Change, Energy, the Environment and Water DCCEEW,
TfNSW,
Wentworth Council, Balranald Shire Council, Edward River Council, Federation Council,
Hay Shire Council, Lockhart Shire Council, Murray River Shire Council, Murrumbidgee Council, Wagga Wagga City Council, Wentworth Shire Council
DPI,
Forestry,
RFS,
NSW Fire and Rescue,
Local Aboriginal Councils (RAPS),
NPWS,
Heritage NSW,
Heritage council,
DPI.
DPE Water,
Local Lands service.

Areas to focus on to include:

1. Evidence of compliance with commitments, reporting and monitoring in all management plans.
2. Evidence of any adaptive management identified and implemented.
3. Evidence of compliance with approved footprint and current activities.
4. Erosion and sediment controls, management, monitoring and maintenance.
5. Comparison between EA predictions and actual impacts.
6. Evidence (tracking documentation/measures implemented) to ensure compliance with clearing and disturbance limits.
7. Evidence of compliance with partial clearing, clearing commitments (how is this tracked, managed and monitored). Has the clearing (in particular partial clearing) activity being undertaken in accordance with the commitments within BMP, EA, BDAR and description of partial clearing.
8. Implementation of ACHMP and compliance with conditions and evidence of consultation with Local RAPS.
9. Evidence of progress, timing and implementation of Progressive Rehabilitation.

10. Road maintenance/ monitoring and management and the interface /access onto road networks. Recent media has stated that councils are not happy with road upgrades/ maintenance repair and payment for road repairs etc across both PEC projects so would be good to deep dive into what road upgrades occurred and what (and where) maintenance and repairs were required and occurred throughout construction (and what consultation did they have with the relevant councils), how undertook and paid for those repairs and maintenance (council and or contractors) and compliance with all related conditions and management plans and the dilapidation reports specifically compliance with all requirements in conditions D39 and D40 and evidence of consultation with all relevant councils. I would suggest when consulting councils to highlight this issue for their comment etc.

11. Complaints management, monitoring and responses.

12. Emergency preparedness including but not limited to appropriate fire equipment such as water tanks and mobile water karts, training etc, working in hot weather processes/policies.

This email is to be appended to the Audit Report.

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

Lastly, it is the expectation that the lead auditor attend audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to *provide the auditor with reasonable access to all requested development areas and activities*, thus the Departments expectation is the auditor are to attend the site inspection.

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

Regards

Katrina

Katrina O'Reilly

Team Leader

Operations & Planning Delivery

Development Assessment & Sustainability

Department of Planning, Housing and Infrastructure

M 0429400261 | **E** katrina.oreilly@planning.nsw.gov.au

dpie.nsw.gov.au

From: [South West Planning Mailbox](#)
To: [Ken Holmes](#)
Cc: [Mel Cotterill](#)
Subject: CPHR Response RE: Project Energy Connect PEC East - April 2026 (Final) Construction Phase IEA Consultation Request
Date: Thursday, 28 May 2026 3:44:08 PM
Attachments: [image001.png](#)

Hi Ken,

With regard to partial clearing compliance, Transgrid prepared a document entitled 'PEC-East - Verification Report - Response Final' (dated 20 March 2026). This was in response to the DPHI letter to Transgrid regarding the PEC - Verification Report (dated 28 November 2025).

DPHI requested that the 'PEC-East - Verification Report - Response Final' be submitted via the Major Projects Portal.

For the final construction phase audit you may wish to:

- Confirm the 'PEC-East - Verification Report - Response Final' has been submitted via the Major Projects Portal
- Consider if the response and associated evidence given in the 'PEC-East - Verification Report - Response Final' meets the Consent Conditions, in particular A1, A3 and C23 b).

Regards

Andrew Fisher
Senior Team Leader, South West

Conservation Planning and Assessment | 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
dcceew.nsw.gov.au



From: Ken Holmes <Ken@baeckea.com.au>
Sent: Tuesday, 26 May 2026 3:04 PM
To: Andrew Fisher <Andrew.Fisher@dcceew.nsw.gov.au>
Subject: CM Record: Project Energy Connect PEC East - April 2026 (Final) Construction Phase IEA Consultation Request - NSW Conservation, Programs, Heritage and Regulation Department of Climate Change, Energy, the Environment and Water

Andrew,

First off, my apologies, but I think I neglected to send you the consultation request for the final construction phase Independent Environmental Audit for Project Energy Connect.

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 and final construction phase independent audit. .

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 every six months. The Audit Guidelines also require the Auditor to consult 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 NSW DCCEEW may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

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

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

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

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From: [AHC Secretariat](#)
To: [Ken Holmes](#)
Cc: [AHC Secretariat](#)
Subject: RE: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Heritage Council [SEC=OFFICIAL]
Date: Thursday, 9 April 2026 9:27:15 AM

OFFICIAL

Dear Mr Holmes

Your email has been provided to the Chair and Members of the Australian Heritage Council. As this is a state government project and heritage was not a controlling provision, it is unlikely the Council will provide a submission (but they have been provided the option to do so by the due date). The Council's remit covers heritage places on the National and Commonwealth Heritage Lists and this project sits more appropriately with the NSW Heritage Council.

Kind regards

Australian Heritage Council Secretariat

Heritage Division | Heritage Policy Branch

Department of Climate Change, Energy, the Environment and Water

Ngunnawal Country, John Gorton Building, King Edward Terrace, Parkes ACT 2600

Australia

E AHC.Secretariat@dcceew.gov.au

DCCEEW.gov.au ABN 63 573 932 849



We acknowledge the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past and present.

OFFICIAL

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Wednesday, 1 April 2026 5:55 PM
To: AHC Secretariat <AHC.Secretariat@dcceew.gov.au>
Subject: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Heritage Council

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 and final construction phase independent audit. .

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 every six months. The Audit Guidelines also require the Auditor to consult with relevant stakeholders.

The NSW Department of Planning, Housing and Infrastructure has requested that I consult with your group and the Proponent has provided me with your contact details. I would therefore appreciate if you could provide me with any information, comments or concerns that the Heritage 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.

I would appreciate any input you might have be emailed to me by COB Friday 8 May 2026.

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

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 [0]438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

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From: [David Webb](#)
To: [Ken Holmes](#)
Cc: [Hay Shire Council](#)
Subject: RE: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Hay Shire Council
Date: Thursday, 9 April 2026 10:22:09 AM

Hi Ken,

Thank you for your email and request for feedback.

Hay Shire Council can report:

- no environmental issues or concerns
- road finalisation post project still to be resolved/actioned – this is with Elecnor.

Thanks.



Ph: 02 6990 1100 **Mobile:** 0429 693 499

Values - Integrity • Openness • Responsiveness • Quality of Service

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

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From: Ken Holmes <Ken@baeckea.com.au>
Sent: Thursday, 2 April 2026 8:13 AM
To: David Webb <DWebb@hay.nsw.gov.au>
Subject: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Hay Shire 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 and final construction phase independent audit. .

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 every six months. The Audit Guidelines also require the Auditor to consult with relevant stakeholders.

The Proponent has provided me with Council's contact details. 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.

I note that the Department of Planning, Housing and Infrastructure (DPHI) has contacted me and asked that I include an assessment of the response of the project to concerns raised by some council's regarding the maintenance and repair of Council roads from damage caused by construction traffic from that project. I would therefore appreciate any specific comments you may have regarding this issue.

I would appreciate any input you might have be emailed to me by COB Friday 8 May 2026.

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@baecka.com.au

A PO Box 365 Belrose NSW 2085

From: [Austin Morris](#)
To: [Ken Holmes](#)
Subject: RE: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Lockhart Shire Council
Date: Tuesday, 28 April 2026 11:51:09 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi Ken,
There are no issues to report from Lockhart.
Thanks

Austin Morris | Director of Engineering

Our Values: Leadership • Integrity • Progressiveness • Commitment • Accountability • Adaptability

Phone: (02) 6920 5305

Email: amorris@lockhart.nsw.gov.au

Address: Lockhart Shire Council, 65 Green Street (PO Box 21) Lockhart, NSW, 2656



"Lockhart Shire Council acknowledges the traditional custodians of the land, the Wiradjuri people, and pays respect to Elders past, present and future, and extends the respect to all First Nations People"

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

From: Ken Holmes <Ken@baeckea.com.au>
Sent: 2 April, 2026 7:55 AM
To: Austin Morris <amorris@lockhart.nsw.gov.au>
Subject: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Lockhart Shire Council

Austin,

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 and final construction phase independent audit. .

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 every six months. The Audit Guidelines also require the Auditor to consult with relevant stakeholders.

The Proponent has provided me with Council's contact details. 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.

I note that the Department of Planning, Housing and Infrastructure (DPHI) has contacted me and asked that I include an assessment of the response of the project to concerns raised by some council's regarding the maintenance and repair of Council roads from damage caused by construction traffic from that project. I would therefore appreciate any specific comments you may have regarding this issue.

I would appreciate any input you might have be emailed to me by COB Friday 8 May 2026.

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

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

From: [Operational Liaison](#)
To: [Ken Holmes](#)
Cc: [Operational Liaison](#)
Subject: RE: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request NSW Fire and Rescue
Date: Tuesday, 7 April 2026 9:37:38 AM
Attachments: [image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)

Good Morning Ken,

Thank you for your email.

In relation to this project, FRNSW have no specific issues or matters that we would require to be addressed within the audit process.

Kind regards



STATION OFFICER RICHARD JAY
Team Leader
Fire Safety Liaison Unit | Fire and Rescue NSW
M: [0407 103 571](tel:0407103571) **E:** richard.jay@fire.nsw.gov.au
1 Amarina Avenue Greenacre NSW 2190

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ANYTHING.**

www.fire.nsw.gov.au



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

From: Info <Info@fire.nsw.gov.au>
Sent: Thursday, 2 April 2026 10:05 AM
To: Fire Safety <FireSafety@fire.nsw.gov.au>
Subject: FW: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request NSW Fire and Rescue

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Thursday, 2 April 2026 8:21 AM
To: Info <Info@fire.nsw.gov.au>
Subject: Project Energy Connect PEC East - Final Construction Phase Independent Environmental

Audit - Consultation Request NSW Fire and Rescue

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 and final construction phase independent audit. .

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 every six months. The Audit Guidelines also require the Auditor to consult with relevant stakeholders.

The NSW Department of Planning, Housing and Infrastructure has requested that I consult with your group and the Proponent has provided me with your contact details. I would therefore appreciate if you could provide me with any information, comments or concerns that NSW Fire and Rescue 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.

I would appreciate any input you might have be emailed to me by COB Friday 8 May 2026.

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@baecka.com.au

A PO Box 365 Belrose NSW 2085

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From: [Fiona Piltz](#)
To: [Ken Holmes](#)
Cc: [Michelle Castle](#); [Darryl Woods](#)
Subject: Re: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Wagga Wagga City Council
Date: Monday, 11 May 2026 11:19:26 AM

Hi Ken,

Thanks for your correspondence in relation to Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Wagga Wagga City Council. Darryl Woods - Major Projects Wagga City Council previously sent an email with photos regarding the regrowth of trees, the build up of "dirt" around the towers and a number of barriers that were left in the paddocks.

From inspection on Friday 8 May 2026, the following issues remain:

- The build-up of dirt/tree roots around the towers - this will impact future above ground water flow and create issues and build up on the site, this needs to be levelled. In general, making good around the tower pads needs to be addressed.
- 2 x barriers (red) remain in the paddock
- Trees I note have been poisoned again to stop regrowth; however, this has not been effective for some of the shrubs/trees. This will need further monitoring and treatment.

If you wish to inspect the site or discuss, please don't hesitate to contact me.

We understand that Clint Hassell from Transgrid will be undertaking inspection of the site before the 5 June 2026, as per his correspondence with Darryl.

Kind regards

Fiona

Fiona Piltz

Director Economy, Business & Workforce

1300 292 442

d: +61 2 6926 9216 | **e:** Piltz.Fiona@wagga.nsw.gov.au

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

Wagga Wagga – a vibrant, growing and sustainable regional city

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

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

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

From: Michelle Castle <Castle.michelle@wagga.nsw.gov.au>
Sent: Friday, May 8, 2026 1:13 PM
To: Fiona Piltz <Piltz.Fiona@wagga.nsw.gov.au>
Subject: FW: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Wagga Wagga City Council

Fiona

Please see below. After today's inspection can you please prepare a response which is due today.

Regards

Michelle

Michelle Castle

Executive Assistant - Director Economy Business and Workforce Directorate

1300 292 442

d: +61 2 6926 9231 | **e:** Castle.michelle@wagga.nsw.gov.au

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

Wagga Wagga – a vibrant, growing and sustainable regional city

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

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

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

From: Michelle Castle
Sent: Wednesday, April 29, 2026 1:50 PM
To: ken@baeckea.com.au
Subject: Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Wagga Wagga City Council

Dear Ken

Thank your letter regarding Project Energy Connect PEC East - Final Construction Phase Independent Environmental Audit - Consultation Request Wagga Wagga City Council.

I confirm that Fiona Piltz, Director Economy Business & Workforce will undertake a site visit on 8 May 2026 and will provide a response there after.

For all future correspondence, please address to Fiona Piltz via my email.

Regards

Michelle

Michelle Castle

Executive Assistant - Director Economy Business and Workforce Directorate

1300 292 442

d: +61 2 6926 9231 | **e:** Castle.michelle@wagga.nsw.gov.au

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Lead Auditor Qualifications and Experience

Appendix E

KEN HOLMES

Senior Principal Environmental Consultant



Contact

Email ken@baeckea.com.au

Mobile +61 0438 046 261

Qualifications & professional affiliations

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

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

Ken's extensive Environmental Audit experience started in about 1992 when he undertook a series of acquisition environmental audits on a packaging company. Since that time he has undertaken audits across Australia and Internationally. His environmental expertise also includes Infrastructure Planning and Approvals experience includes the preparation of environmental impact statements for major projects, pre-construction approvals, and operational 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 (current and completed in the recent years)

Cowal Gold Mine 2026 - Ken is lead Auditor on the independent environmental audit of this major gold mine located in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- Conditions of Approval / Development Approvals;
- Water Licences;
- Mining Leases;

The independent environmental audit is being undertaken in accordance with AS/NZS ISO 19011:2014 and the March 2026 (the latest version of the DPHI Post Approvals Audit Guidelines).

In addition to his role as lead auditor managing a multidisciplinary team including specialist rehabilitation and biodiversity auditors, Ken is approved to cover the role as technical expert in surface water management, air quality and noise management.

HumeLink 2026 - Ken commissioned as the peer reviewer for the six monthly independent environmental audits of construction phase of this major electricity infrastructure. The project was approved under a NSW State Significant Infrastructure (SSI) Approval. The project involved the construction of high voltage power line and associated infrastructure construction in Southern NSW.

Federation Goldmine 2025

Ken led the first independent environmental audit for this new Gold Mine located near Cobar in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- Conditions of Approval / Development Approvals;
- Water 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 surface water management, air quality and noise management.

Project Energy Connect (April 2024 – April 2026). Ken was commissioned to conduct the six monthly independent environmental audits of construction phase of this major electricity infrastructure. The project was approved under two separate State Significant Infrastructure (SSI) Approvals. The project involved the construction of 900 km of high voltage power line and associated infrastructure construction between Wagga Wagga, Victoria and South Australia. The key issues focussed on in the audits included the impacts of clearing on biodiversity (several of the audits included a biodiversity specialist), aboriginal cultural heritage, impacts on public infrastructure (roads) and construction impacts on private properties. The final construction phase audit for the project was completed in April / May 2026.

Victoria Cross Over Station Development IEA (January 2023 – September 2025) Construction phase bi-annual independent audits) - Ken was commissioned to undertake all of the construction phase audits on 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 as part of the development of Sydney's commuter rail network expansion.

Hunter Power Project (Construction Phase IEA 2022 – on-going) - was commissioned to undertake all of the construction phase independent environmental audits on the Hunter Power Project. The Hunter Power Project involved 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 both the SSI Conditions of Approval and approval under the EPBC Act.

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

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

Newcastle Coal Infrastructure Group (2019, 2022 and 2025) - 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:

- 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.

As auditor, Ken's role covered 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 was commissioned to undertake the

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construction phase independent environmental audits and the initial operations phase audit 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 both the SSI Conditions of Approval and approval under the EPBC Act.

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

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

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:

- 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.

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

- 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 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:

- 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.

Dargues Gold Mine IEA (2023)- Ken led the independent environmental audit of the Dargues 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:

- Conditions of Approval;
- 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 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 (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

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:

- 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 surface water and noise management.

McArthur River Mine (Northern Territory) (2022) - Ken undertook 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
- (NSW) Conditions of Approval
- 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.

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 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.

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

As auditor, Ken's role covered all technical areas including construction management, waste, greenhouse gas, surface water management, 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.

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

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

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- 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.

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

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.

Benedict's 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.

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

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.

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

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 predications 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.

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

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.

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

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:

- Manildra Limited / Castlereagh Coal
- Bougainville Copper Limited (Bougainville, PNG)
- News Limited

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

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

Project Approvals

Central Station Re-development – Transport for NSW -

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

Sydney Metro – Transport for NSW -

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

M2 Widening Project Approvals (Roads and Maritime Services) –

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

The management and minimisation of vegetation clearing on this project (along with the minimisation of impacts on residents a high priority. Ken oversaw all the specialist

studies that supported the preparation of the Environmental Impact Assessment and subsequent Environmental Management Plans, including:

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

Sydney Light Rail – Acciona / Transport for NSW - Ken

led the team responsible for leading the construction approvals program and setting up the environmental management system for this significant brown fields infrastructure construction project. His responsibilities included:

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

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

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

- The scope of the ER's role is broad range and includes:
 - Interpreting and advising on requirements of the Project Approval.
 - Reviewing and assessing the performance of the project against the Conditions of Approval, Project Deed and other relevant project related approvals. In

that role, the ER reviews and approves all environmental related plans (EMPs), audits the implementation of environmental management plans and strategies, verifies (through audit and surveillance) compliance with the relevant project approval and project deed requirements, monitors and reports on regulatory compliance and provides reports to the Department and the project proponent on these matters.

- Reports on compliance related issues to the public and investigates environmental and compliance issues, complaints and incidents.
- Review and approval of vegetation clearing and other high (environmentally) impact activities.

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

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

Upper Hunter Valley Alliance (UHVA) – Leighton

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

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

Other relevant Infrastructure Projects led by Ken include:

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

Investigative / Expert Roles

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

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

Environment Protection Authority — Expert Reports Illegal Land Clearing and Waste Disposal Activities (2018) - Ken was commissioned by the NSW Environment Protection Authority (EPA) to provide expert opinion regarding the alleged illegal vegetation clearing and waste disposal at a site

in the Hawkesbury River Basin and Arcadia (north western Sydney).

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

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

In doing this, the audit Assessed the:

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

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

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

Other

Kelian Equatorial Mining (Kalimantan, Indonesia) - Ken led a specialist environmental and social impact audit team that was established by Rio Tinto (and approved by the Government) to investigate and report on the environmental and social impacts associated with alluvial mining operations (downstream) from the Rio Tinto (major owner) operated gold mine located in the remote, mountainous region of Kalimantan. The audit team included Government representatives and was undertaken to address the concerns of local village communities that were being impacted socially and economically.

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

Ken subsequently lead a team dispatched to Bougainville to chemically destroy 1 tonne of chlorine and other toxic gases.

The team built a treatment plant on site and successfully removed the toxic gas threat.

Waste Management

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

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

implementation within the Australian market, political and social framework.

Shredder Waste Disposal Assessment – Sims Metal

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