

ANNUAL COMPLIANCE REPORT

**New Substation and associated 330 kV
transmission line works, Belconnen and Holt (ACT)**

14 June 2019 to 14 June 2020

Prepared By:

Urban Perspectives on behalf of TransGrid

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Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed

David Donehue

Full name (please print) David Donehue

Position (please print) Corporate Environment Manager

Organisation (please print including ABN/ACN if applicable)

NSW Electricity Networks Operations Pty Limited trading as "TransGrid" (as Trustee for the NSW Electricity Operations Trust) ACN 609 169 959.

Date: 3/9/2020

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Version	Description	Date	Approved by
1	Draft Annual Compliance Report		

ACRONYMS AND DEFINITIONS

ACT	Australian Capital Territory
CEMP	Construction Environmental Management Plan
COVID 19	Corona Virus 2019
EPBC	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
kV	Kilovolt
NSW	New South Wales
mg/L	Milligrams per litre
PD Act	<i>ACT Planning and Development Act 2007</i>
pH	Power of Hydrogen
Safe Approach Distance	TransGrid stipulated clearance required at all times to conductors at Maximum Line Operating Conditions. It is the sum of minimum safe working distance and regrowth allowance identified by a competent easement inspector.
The Department	The Department of Environment and Energy
TSS	Total Suspended Solids

Construction Compliance Report

1. Introduction

1.1 PROJECT BACKGROUND

TransGrid is currently constructing a 330/132 kV Stockdill Substation and associated 330kV transmission line located in proximity to Stockdill Drive in the ACT. The works are occurring in conjunction with Evoenergy's construction of a 132kV line between the new 330/132 kV Stockdill Substation and the existing Evoenergy Canberra–Woden transmission line easement. The works are being undertaken to ensure both electricity providers meet their electricity reliability obligations required under the ACT Government's Electricity Transmission Supply Code.

The ACT Minister for Planning and Land Management issued separate consents pursuant to section 162 of the Planning and Development Act 2007 for the TransGrid and Evoenergy components of the Project. The Minister granted consent for the TransGrid component on 8th November 2018.

Approval was also sought under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) due to potential impacts on Pink-tailed Worm Lizard habitat. The Australian Department of Environment and Energy granted approval on 7 March 2019 which applies to both the TransGrid and Evoenergy component of the works. Condition 7 of the EPBC Act Approval requires the approval holders to prepare a compliance report for each 12-month period following the date the action commenced.

This compliance report is prepared on behalf of TransGrid for their component of works only. Evoenergy will prepare an Annual Compliance Report 12 months following the commencement date for their component works. This report is TransGrid's first Annual Compliance report for the works.

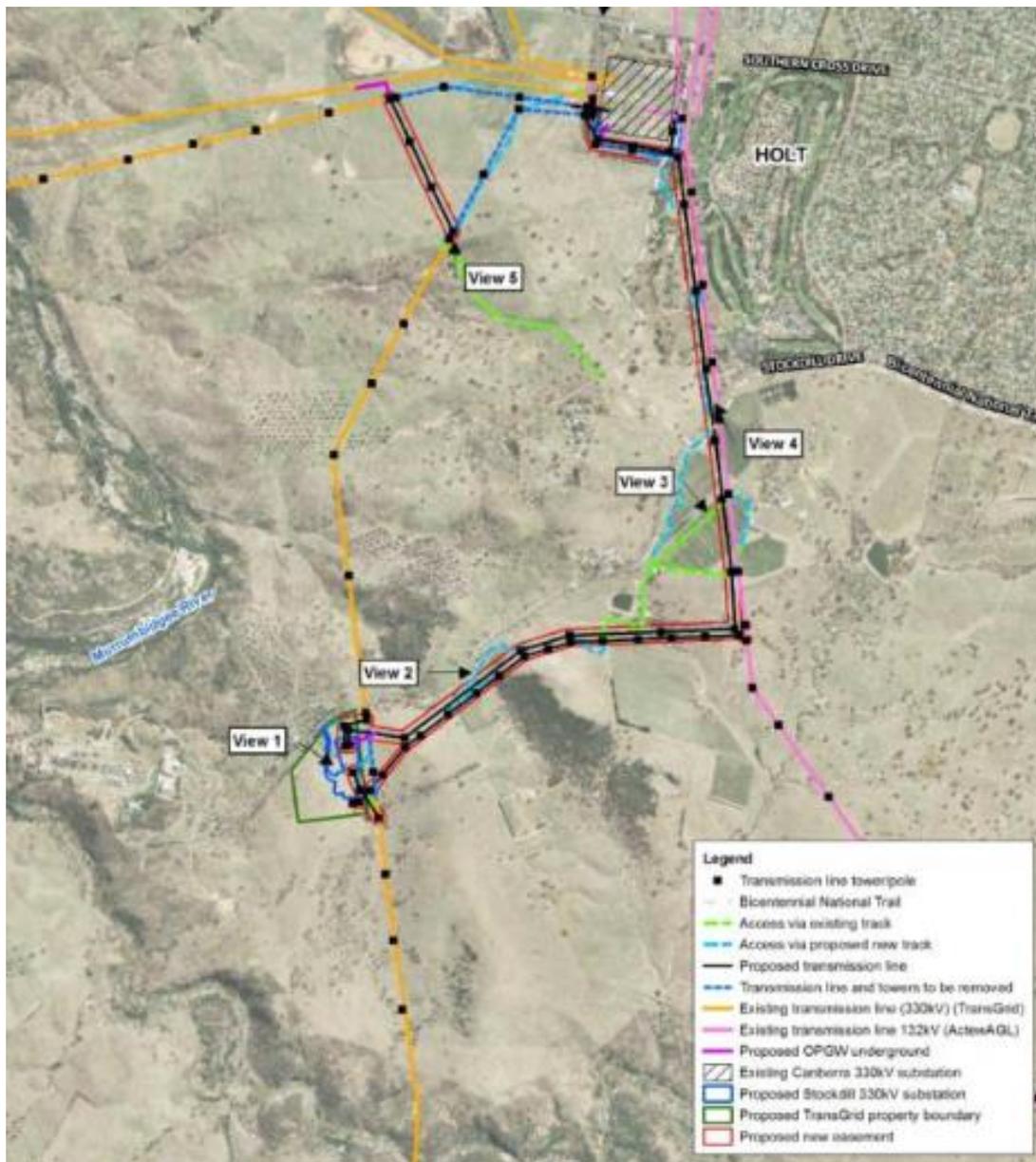
Commencement Date:	14 June 2019
Compliance Period:	14 June 2019 to 14 June 2020
DA Number:	201732500
EPBC number:	2016 / 7784
Project name:	Construction of new substation and associated transmission lines works at Belconnen and Holt, ACT
TransGrid ABN:	609 169 959
Approved action:	To construct a new substation and associated transmission line works near Stockdill Drive, Holt, Australian Capital Territory.

1.3 DESCRIPTION OF ACTIVITIES

The project is located approximately 14 kilometres north-west of the centre of Canberra, immediately to the west and south-west of the suburbs of Holt and MacGregor, respectively, and to the southeast of the NSW ACT border.

The substation component of the project is located near Stockdill Drive, West Belconnen, about three kilometres to the south-west of the of the existing TransGrid Canberra Substation. The Canberra Substation provides connections to Yass, Upper Tumut, Lower Tumut and Kangaroo Valley to the north and to Latham, Gold Creek, Woden, Queanbeyan and Williamsdale substations to the south.

Figure 1: Locality Map



1.4 COMPLIANCE STATUS DESCRIPTORS

The following designations is used to record findings in the compliance table:

- Compliant** 'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
- Non-compliant** A designation of 'non-compliance' should be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
- Not applicable** A designation of 'not applicable' should be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.

1.5 SCOPE OF THIS COMPLIANCE REPORT

This Compliance Report has been prepared in accordance with the Department's Annual Compliance Report Guidelines (2014) and includes:

- i. Details of compliance, incidents, and non-compliance with the conditions and the plans (Appendix A);
- ii. a schedule of all plans prepared and in existence in relation to the conditions during the relevant 12-month period (Appendix B);
- iii. a shapefile of Pink-tailed Worm Lizard habitat removed within the 12-month period (Appendix C);
- iv. a plan showing the location of nest boxes within the adjoining Woodstock Conservation Reserve (Appendix D).

2. Compliance Summary

2.1 COMPLIANCE SUMMARY

The compliance performance for the reporting period is summarised in this section. A compliance table showing the compliance status of each compliance requirement is in Appendix A.

Table 1: Summary of Compliance during the 12-month reporting period

STATUS	NUMBER
Compliant	56
Non-Compliant	3
Not Applicable	22
TOTAL	81

2.2 NON-COMPLIANCE

The independent environmental inspector undertook 17 inspections and prepared a compliance report for each inspection during the 12-month reporting period. The inspections consisted of reviewing documents as evidence of compliance and observing works on site during construction. No inspections occurred from 10 March to 7 May 2020 due to site restrictions during COVID 19 lockdown.

Consent Condition C.2 and C.7 required all works to be carried out in accordance with the CEMP, Sub-Plans and the *Environmental Protection Guidelines for Construction and Land Development in the ACT* (March 2011). The Guidelines were considered when preparing the CEMP and Sub-plans. The independent environmental inspector recorded six non-compliances against the Construction Environmental Management Plan or Sub-Plans on fourteen occasions during the 12-month period. These are summarised in Table 2 below. TransGrid did not notify the Commonwealth Department of the Environment and Energy of these non-compliance as required by Condition 8 of the EPBC approval for the project because the non-compliances did not relate to any protected matters.

The independent environmental inspector also identified several improvement opportunities during the inspections and Zinfra also regularly undertook its own compliance inspections during the 12-month period.

Table 2: Summary of Non-compliances

Reference	Description of non-compliance	Date	Notification to the Dept	Corrective Action	Corrective action by:	Date	Measure to avoid reoccurrence
EPBC Approval # 8	TransGrid did not notify the Department of the non-compliances with the CEMP and Sub-plans.	N/A	No	Notification to the Department made through this annual compliance report	TransGrid	7/2020	TransGrid to be made aware of its obligations
ACT PD Act Condition C2	All works were not in accordance with Environmental Protection Guidelines for Construction and Land Development in the ACT, March 2011 as required by Condition C7.	N/A	No	See below	TransGrid	7/2020	Maintain regular inspections
ACT PD Act Condition C7	All works were not in accordance with the endorsed CEMP and sub-plans as required by Condition C7.	N/A	No	See below	TransGrid	7/2020	Maintain regular inspections
CEMP: Section 1.4.2	Proper site plans were not developed for all sites.	16/10/ 2019	No	Site Plans to be prepared for each Tower Site.	Zinfra	11/2019	TransGrid undertook an audit of all Site Plans
CEMP Mitigation 19.15.17	Observed substantial dust generated on dry/ windy days	24/7/2019, 16/10/2019, 30/10/2019	No	Due to water restrictions and lack of water in dams dust suppression options were limited. Water	Zinfra	ongoing	Ongoing monitoring and limit work on windy days if possible.

Reference	Description of non-compliance	Date	Notification to the Dept	Corrective Action	Corrective action by:	Date	Measure to avoid reoccurrence
				cart was used where possible to suppress dust			
CEMP Mitigation 19.14.1	Normal Working Hours are 7:00am – 6:00pm Monday to Friday 7:00am – 1:00pm Saturday However, works at Tower 5 occurred until 6.30 pm during a concrete pour and out-of-hours approval had not been sought.	24/7/2019	No	None	Zinfra	8/2019	Undertake a risk assessment of when out-of-hours may be required for the whole project.
Hazardous Substance Management Plan Section 8.1	The Safety Data Sheets register at the Canberra Substation needed to be updated	29/11/2019	No	Update Safety Data Sheet Register	Zinfra	12/2019	Regular audit of Safety Data Sheet Register
Soil, Water and Contaminated Land Management Plan Section 8.14	Sediment fences required repair and relocation of a stockpile that was within a drainage line	16/10/2019, 30/10/2019, 20/11/2019, 29/11/2019, 9/1/2020	No	Repair sediment fences and relocate stockpile	Zinfra	As required	Regular inspection of sediment fences and stockpiles
Waste and Recycling Management Plan Section 8.34	Some concrete washout was stored within the stockpile area	8/8/2019 30/8/2019 16/10/2019	No	Remove concrete from stockpile area	Zinfra	As required	Ensure concrete truck drivers are aware they are to use designated

Reference	Description of non-compliance	Date	Notification to the Dept	Corrective Action	Corrective action by:	Date	Measure to avoid reoccurrence
							concrete washout bays.

2.3 INCIDENTS

An incident is defined as an event which has the potential to, or does, impact on protected matters. Protected matters relevant to this project are the listed threatened species Pink-tailed Worm Lizard (*Aprasia parapulchella*) Superb Parrot (*Polytelis swainonii*) and Regent Honeyeater (*Anthochaera Phrygia*). Four environmental issues were recorded in the last 12 months. None of the issues had potential harm or caused harm to any relevant protected matters.

The following table summarises all environmental issues TransGrid recorded in the 12-month period.

Table 3: Environmental Issues TransGrid record during the 12-month period

Title	Date	Status	Incident ID	Details	Actions
ENV- Contractor- Grinder sparks caused a small grass fire	16.12.2019	Closed	48241	Sparkes from Grinder started a small grass fire 5metres in area even after the grass (25mm in height) was wet down prior to grinding. Light winds prevent the spread in wet grass.	Zinfra Electrical spotters trained to ensure work areas are inspected prior to Hot works commencing for any task going forward Toolbox with crews on the checklist for Hot Works permits Verbal warning issued to responsible Supervisor
ENV - Contractor - Burst hydraulic hose minor spill	26.03.2020	Closed	50400	Whilst a contractor was drilling fence post holes through rock a hydraulic hose burst spraying hydraulic oil onto machine. Approximately 500ml made its way to ground off the machine after the event and prior to the crew placing absorbent cloth onto the spill	Material that went on ground (500ml) was cleaned up, bagged, and disposed of correctly
ENV - Wildlife injured external to site	23.06.2020	Closed	53295	Workers discovered a Kangaroo hung upside down with its leg caught in a stockfence external to the site boundary. Workers released the Kangaroos leg however it appeared broken at this time. HSE and Management were notified. Wires animal rescue were called to render assistance for the Wildlife. Upon their arrival the decision was made to humanely treat and remove the animal from site.	Nil

Title	Date	Status	Incident ID	Details	Actions
ENV - Stockdill - Portable Toilet Overflow	19.09.2019	Closed	45726	Portable toilet tank overflowed onto ground (roadbase type material) at Stockdill Substation	Soil contaminated with wastewater scrapped and placed in bag Regular inspection of portable toilet tank levels to be conducted and request waste contractor to pump out as required

2.4 COMPLAINTS

During the 12-month period TransGrid recorded seven complaints from five landowners. The complaints were related to health concerns associated with electric magnetic fields (EMF), management of farm stock, removal of a tree and rehabilitation. The complaints were recorded in TransGrid's complaints register and for privacy reasons are only available upon request.

2.5 MONITORING RESULTS

There are no noise, water or air quality monitoring requirements. However, water testing of runoff within the detention basins at the new Stockdill Substation did occur after the detention basins were flocced after a rainfall event and before the water was discharged off-site. The following table summarises the results of water samples taken from the detention basins in the 12-month period. The results show that the water quality within the detention basins before its discharge complied with the acceptable limits of a pH between 6.5 and 8.5 and total suspended solids (TSS) less than 60 mg/l. All the results below were sent to the ACT Environment Protection Authority (EPA).

Table 5: Water Monitoring Results

Date	Front Dam		Back Dam	
	PH	Turbidity (mg/l)	PH	Turbidity (mg/l)
11/03/2020	6.74	25.3		
12/03/2020			7.30	38.9
8/04/2020			7.10	7.46
9/04/2020	7.66	9.65		
20/04/2020	7.83	7.86	8.28	42.8
6/05/2020	7.36	29.5		
8/05/2020			7.44	10.89

Fifty-three mature trees and vegetation identified within the safe approach distance of the powerlines were removed during the reporting period. An ecologist from Aurecon was on-site during the felling of Hollow Bearing Tree's within the Substation construction area, as well as a qualified zoologist from Umwelt who acted as a Wildlife Catcher during the process. This was completed in accordance with the Biodiversity and Rehabilitation Management Plan. Licence Number LT201915 under the ACT Government Nature Conservation Act 2014 was in effect permitting the activity and relocation of wildlife if found by Aurecon Staff. During the hollow bearing tree clearance, two brushtail possums were encountered. They were both uninjured and both left the trees of their own accord and relocated themselves to retained trees within the substation site.

Pink-tailed Worm Lizard surveys occurred before clearing occurred within high-potential Pink-tailed Worm Lizard habitat. A licenced ecologist from Aurecon (Licence Number LT201915 under the ACT Government Nature Conservation Act 2014) undertook the surveys on 21 August 2019, 16 October 2019 and 20 February 2020. During the survey periods the ambient temperature did not exceed 25°C and there was no heavy rainfall. The high potential habitat was marked with yellow marker paint. Every rock that could be rolled within this habitat areas was tilted and inspected for PtWL and other reptiles.

Two Pink-tailed Worm Lizards were discovered during the survey on 20 February 2020 and relocated to suitable habitat outside the construction zone that had been previously identified and mapped. No terracotta tiles were placed in the relocation zone as there was sufficient high potential habitat identified. This was advice received from Richard Milner from the ACT Parks and Conservation Service on the 7/5/2019 and 10/5/2019.

Excavated spoil at the new substation and within the 330kV easement had been pre-classified as Virgin Extracted Natural Material (VENM), except for material at Tower 1A within the Canberra substation site which was classified as potentially contaminated material. The ACT Office of the EPA provided VENM clearance for up to 5550 cubic metres of material from the new substation site and 330kV Corridor subject to conditions, which were adhered to.

2.6 NEW ENVIRONMENTAL RISKS

No new environmental risks that have become apparent during the reporting period.

APPENDIX A – CONDITIONS COMPLIANCE TABLE

Condition Number/ reference	Condition	Is the project compliant with this condition?	Evidence/Comments
Conditions of Approval under Environment Protection and Biodiversity Conservation Act 1999			
Part A - Conditions specific to the action			
1	The approval holder must:		
1(a)	Implement conditions B1, B5, B6, B7, B8, C1, C2, C5 and D2 of Part 1 of Attachment 1 of the ACT Approval Conditions and conditions B1, B5, C1, C2, C5, C6 and D2 of Part 1 of Attachment 2 of the ACT Approval Conditions where they relate to impacts to relevant protected matters.	Compliant	Compliance with the relevant ACT Approval conditions is addressed below.
1(b)	Notify the Department in writing of any proposed change to the conditions of the ACT Approval Conditions for which sub-condition 1a of this approval applies no later than 1 week after proposing a change or becoming aware of the ACT Government proposing a change.	Compliant	There have been no proposed changes to the CEMP, sub-plans or induction.
1(c)	Notify the Department in writing of any change to the ACT Government Conditions for which sub-condition 1a of this approval applies within 1 week of a change being finalised.	Compliant	There have been no changes to the CEMP, sub-plans or induction and works have been carried out in accordance with the approved CEMP including cleaning of machinery before entry onto the site and protection of trees in accordance with the Tree Management and Revegetation Plan.
Part B - Standard administrative conditions			
2	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Compliant	TransGrid notified the Australian Department of Environment and Energy of the commencement works by email on 14 June 2019.
3	If the commencement of the action does not occur within 5 years from the date of this	Not Applicable	

	approval, then the approval holder must not commence the action without the prior written agreement of the Minister.		
4	The approval holder must maintain accurate and complete compliance records.	Compliant	TransGrid and Zinfra maintained project records in Teambinder.
5	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request	Not Applicable	No request from the Department has been received during the reporting period.
6	The approval holder must:		
a.	Submit plans electronically to the Department within 10 days of ACT Planning and Land Authority approval;	Compliant	ACT Department of Environment, Planning and Sustainable advised they endorse the CEMP and sub-plans (letter dated 5 April 2019). On the 16 th April 2019 TransGrid emailed the management plans to the Australian Department of Environment and Energy.
b.	publish each plan on the website within 20 business days of the date the plan is approved by the Act Planning and Land Authority or of the date a revised action management plan is approved, unless otherwise agreed to in writing by the Minister;	Compliant	The endorsed CEMP was uploaded to the TransGrid website on the 8 th May 2019, which was on the 20 th business day taking into account Easter from the 19 th to 22 nd April and 25 th Anzac Day. Refer to https://www.TransGrid.com.au/what-we-do/projects/current-projects/Stockdill
c.	exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and	Compliant	The CEMP published on the TransGrid website has been redacted to exclude sensitive ecological data (refer to https://www.TransGrid.com.au/what-we-do/projects/current-projects/Stockdill)
d.	keep plans published on the website until the end date of this approval.	Compliant	The endorsed CEMP remains available on the TransGrid website. Refer to https://www.TransGrid.com.au/what-we-do/projects/current-projects/Stockdill
7	The approval holder must prepare a compliance report for each 12-month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. The approval holder must:	Compliant	This report satisfies the requirement.

7(a)	publish each compliance report on the website within 60 business days following the relevant 12-month period;	Not Applicable	This report will be published on the TransGrid website at https://www.TransGrid.com.au/what-we-do/projects/current-projects/Stockdill
7(b)	notify the Department by email that a compliance report has been published on the website within five business days of the date of publication;	Not Applicable	TransGrid will notify the Australian Department of Environment and Energy that this report has been uploaded to its website.
7(c)	keep all compliance reports publicly available on the website until this approval expires;	Not Applicable	TransGrid will keep all compliance reports publicly available on the website until this approval expires.
7(d)	exclude or redact sensitive ecological data from compliance reports published on the website; and	Compliant	The published version of this report will exclude maps at Appendices C, D & E that reveal the location of: <ul style="list-style-type: none"> • Cleared Pink-tailed lizard habitat; • Compensatory Pink-tailed lizard habitat to be created at the Stockdill substation site; • Compensatory tree hollows installed on the adjoining land; and • Location of Aboriginal heritage sites
7(e)	where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.	Compliant	A copy of the maps showing the location of sensitive ecological data (including the areas of compensatory habitat) will be provided to the Australian Department of Environment and Energy.
8	The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:	Non-Compliant	No environmental incidents have occurred during the 12-month reporting period. There has been no non-compliance with the EP&BC conditions except for this condition in relation to not notifying the Department of non-compliance with the CEMP and Sub-Plans.
8(a)	the condition which is or may be in breach; and		There were six non-compliances recorded against the CEMP and Sub-Plans during the construction phase (Refer to Table 2). None of these non-compliances related to protected matters under the EP&BC Act.

8(b)	a short description of the incident and/or non-compliance.		The non-compliance recorded against the CEMP and Sub-Plans are summarised in section 2.3 above.
9	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans, relating to protected matters as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:	Compliant	No incidents or non-compliances in relation to protected matters occurred in the 12-month reporting period.
9(a)	any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;		
9(b)	the potential impacts of the incident or non-compliance; and		
9(c)	the method and timing of any remedial action that will be undertaken by the approval holder.		
10	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.	Not Applicable	The Minister has not requested any independent audits
11	For each independent audit, the approval holder must:	Not Applicable	
11(a)	provide the name and qualifications of the independent auditor and the draft audit criteria to the Department;	Not Applicable	
11(b)	only commence the independent audit once the audit criteria have been approved in writing by the Department; and	Not Applicable	
11(c)	submit an audit report to the Department within the timeframe specified in the approved audit criteria.	Not Applicable	

12	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Not Applicable	
13	Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Not Applicable	Construction is not complete yet. The proposed works are scheduled to be complete in September 2020.
ACT Government Conditions of Approval under Part 7 of the Planning and Development Act 2007			
PART 1			
A.1	Within 28 days from the date of this decision, or within such further time as may be approved in writing by the planning and land authority, the applicant must lodge with the planning and land authority for approval:	Compliant	Date of the decision was 8 November 2018. The revised drawings submitted to ACT Planning and Land Authority are dated 22 November 2018.
A.1(a)	Revised drawings, based on the relevant drawings submitted as part of the application, showing: i. electricity lines and towers to be decommissioned ii. Setbacks from the proposed towers, identified on the site plan as STR 5A, STR 6A and STR 7A, to residential block boundaries iii. Planting, in proximity of the residential estates, identified in mitigation measures in the Addendum to the EIS. iv. Details of the boundary fence for the Substation.	Compliant	On 30 May 2019 the ACT Department of Environment, Planning and Sustainable Development advised that the plans submitted by WSP on behalf of TransGrid satisfy conditions A1(a)(i)-(iv) and have been endorsed to form part of the approval.
B.1	The proponent must prepare a Construction Environmental Management Plan (CEMP) and obtain endorsement for the CEMP from the planning and land authority. The CEMP must include the commitments made in Part D of the EIS and should be incorporated, as a	Compliant	TransGrid received a letter dated 5 April from ACT Environment, Planning and Sustainable Development endorsing the CEMP. Section 19 of the CEMP includes the commitments made in Part D of the EIS.

	minimum, into the following sub-management plans:		
B.1(a)	Biodiversity and rehabilitation management plan (including site maps)	Compliant	Refer to Appendix A of the CEMP.
B.1(b)	Weed management plan	Compliant	Refer to Appendix B of the CEMP.
B.1(c)	Tree management and revegetation plan	Compliant	Refer to Appendix A of the CEMP.
B.1(d)	Construction Traffic management plan	Compliant	Refer to Appendix C of the CEMP.
B.1(e)	Construction noise and vibration management plan	Compliant	Refer to Appendix D of the CEMP.
B.1(f)	Heritage management plan	Compliant	Refer to Appendix E of the CEMP.
B.1(g)	Soil, water and contaminated land management plan	Compliant	Refer to Appendix F of the CEMP.
B.1(h)	Construction air quality management plan	Compliant	Refer to Appendix G of the CEMP.
B.1(i)	Waste and recycling management plan	Compliant	Refer to Appendix H of the CEMP.
B.1(j)	Construction emergency response plan	Compliant	Refer to Appendix I of the CEMP.
B.1(k)	Hazardous materials management plan	Compliant	Refer to Appendix J of the CEMP.
B.1(l)	Emergency management plan	Compliant	Refer to Appendix I of the CEMP.
B.2	Prior to the commencement of works:		
B.2(a)	a) Protective fencing is to be installed around Aboriginal places recorded as 'RC 1', 'RD 3', 'SD RA 1', 'SD RA2' and 'SA RA3', following demarcation of heritage boundaries by a qualified archaeologist and Representative Aboriginal Organisations (RAOs); and	Compliant	The following sites were fenced: SD RA 1, SD-RA2 and RD 3 prior to commencement of works for the 330kV line. RC1 is located at the entrance of a farm gate, which was outside of the work corridor, and therefore had been signed but not fenced. Evoenergy fenced SD-RA3 prior to commenced of works on the 132 kV line. On 25th July 2019 Archaeologist Adrian Cressey (Navin Officer Heritage Consultants) was accompanied by Wally Bell of Buru Ngunawal Aboriginal

			<p>Corporation (BNAC), as well as James Thomas (Aurecon) and multiple Zinfra representatives.</p> <p>Their findings were recorded in a report prepared by Navin Officer Heritage Consultants and dated July 2019. The report concluded that Navin Officer Heritage Consultants were satisfied that part B2 (a) and (b) of the project approval requirements were fulfilled, and construction works could proceed with caution and in accordance with the remaining project approval guidelines. A copy of the report is included at Appendix E.</p>
B.2(b)	Written notification of fence installation is to be provided to ACT Heritage.	Compliant	TransGrid sent a copy of the report prepared by Navin Officer Heritage to ACT Heritage on the 10 th July 2019.
B.3	The CEMP must identify the above Aboriginal places and management controls for their protection; and must also include the Unanticipated Discovery Protocols described in Navin Officer Heritage Consultants (June 2018)	Compliant	Figures 1 and 2 of the Heritage Management Plan (Sub-plan of the CEMP) identifies the location of Aboriginal Places and Section 8 of the Heritage Management Plan includes controls for their protection and unanticipated finds.
B.4	All project personnel are to be made aware of CEMP heritage content through the induction process	Compliant	Zinfra induction discussed heritage places within the work corridor and discussed controls for their protection and unanticipated finds.
B.5	Prior to commencement of construction, the proponent must submit as part of the CEMP:		
B.5(a)	a) a Rehabilitation Plan for the restoration of the Pink-tailed Worm-Lizard habitat to be prepared to the satisfaction of the Parks and Conservation Service	Compliant	The Rehabilitation Plan was sent via email to Richard Milner (Ecologist from ACT Parks and Conservation Service) on 10 May 2019. The Plan was accepted subject a minor change request.
B.5(b)	b) A weed management plan that also contains an ongoing commitment to the control of African Love Grass within the proposed substation locations, including the retained and restored Pink-tailed Worm-lizard habitat.	Compliant	Zinfra has prepared a Weed Management Plan that includes controls for African Love Grass in the substation.
B.5(c)	c) A Tree Management Plan that clearly shows the trees that are to be removed and which trees are hollow bearing.	Compliant	Zinfra has prepared a Biodiversity and Rehabilitation Management Plan, which includes a Tree Management Plan that shows the location of mature trees to be removed for construction and the location of hollow bearing

			<p>trees. A total of 53 mature trees were removed. In addition, TransGrid also removed vegetation that was identified within the safe approach distance of the powerlines. None of this vegetation contained any hollows.</p>
B.5(d)	d) A Management Plan detailing the recovery and re-use of the hollows.	Compliant	<p>Zinfra has prepared a Biodiversity and Rehabilitation Management Plan that describes procedures for recovery and re-use of hollows.</p> <p>Twenty-seven nesting boxes were installed by arborists within the adjoining Woodstock Conservation Reserve prior to removal of trees at the new Stockdill substation and within the 330kV corridor. This satisfied the EIS requirement to install fifty percent of hollows removed prior to any clearance of hollow bearing trees.</p> <p>Two natural hollows were installed within the Trevaskis property (Wagtail) adjacent to the substation site and 14 natural hollows were installed within Woodstock Conservation Reserve. Some of the hollow bearing trees were damaged during the felling process, and an additional 15 nest boxes were installed within the Woodstock Conservation reserve to meet the minimum 1:1 replacement ratio. A total of 60 nest boxes and natural hollows were installed in the 12-month reporting period. The location of the nest boxes is identified in the attached map at Appendix D.</p>
B.6	Prior to works commencing, the contractor/builder must hold an Environmental Authorisation to enter into an Environmental Protection Agreement with the EPA in respects of the works.	Compliant	<p>EPA sent a letter dated 8 March 2019 granting consent for Zinfra to obtain environmental authorisation (Teambinder document ref. 1537-ZINFRA-GEN-000118.00)</p>
B.7	Prior to works commencing, an erosion and sediment control plan must be submitted to, and be endorsed by, the EPA.	Compliant	<p>An Erosion and Sediment Control Plan was submitted as part of the CEMP. The CEMP was signed off by multiple authorities including the EPA (Team Binder document ref. CEMP-DA2017325000-ACT-ENDORSEMENT)</p>
B.8	A site-specific unexpected finds protocol (UFP) must be prepared by a suitably qualified environmental consultant and implemented during site development works. The UFP must include, amongst other things, appropriate procedures for the identification, assessment, management, validation and disposal of potential contamination at the site and	Compliant	<p>Zinfra environmental officer prepared the CEMP. The CEMP includes procedures for unexpected finds and requires completion of G-EN-FM-50385 Unexpected Heritage, Flora or Fauna Item Form. There were no unexpected finds recorded during the reporting period.</p>

	contractor induction procedures into the use of the UFP.		
B.9	Prior to the commencement of works, a hard copy of the Preliminary Site Investigation submitted with the DA must be submitted to, and formally endorsed by, the EPA. A digital copy must be submitted to the following email ContaminatedSites@act.gov.au and a signed and bound hard copy must be submitted to the following address: Mrs Narelle Sargent, Environmental Protection Authority, GPO BOX 158, Canberra, ACT, 2601	Compliant	TransGrid received a letter dated 13 May from EPA advising it has reviewed the Preliminary Site Investigation. The Authority advised it supports the finding that the Project Study Area is suitable for development of a substation and associated transmission line network.
B.10	Prior to construction, a Letter of Design Review must be obtained for all off-site works from the Senior Manager, Development Review and Coordination, TCCS	Compliant	TCCS confirmed receipt of the design review in a letter dated 20/6/2019.
B.11	Prior to construction, a Temporary Traffic Management Plan (TTMP) must be prepared by a suitably qualified person and approved by the Manager, Traffic Management & Safety, Roads, TCCS.	Compliant	Zinfra has prepared a Traffic Management Plan as part of the CEMP. The TTMP was approved by TCCS with the CEMP.
B.12	Prior to construction, a landscape management and protection plan (LMPP) must be approved by the Senior Manager, Development Review and Coordinations, TCCS.	Compliant	Zinfra has prepared a Landscape Management Plan as part of the CEMP. TCCS supplied comments back to the CEMP which included the Landscape Management Plan for final approval. Michelle O'Hare (TransGrid) advised by email on 30 May 2019 that she received comments from EPSDD and updated plans (Team Binder document ref. CEMP-DA2017325000-ACTENDORSEMENT)
B.13	A minimum of one week prior to construction, a Notice of Commencement for Works in Unleased Territory Land must be submitted to the Senior Manager, Development Review and Coordination, TCCS. The Notice must include the confirmation of protective measures installed in accordance with the approved LMPP and the programmed implementation of the TTMP.	Not Applicable	No works have occurred on unleased Territory land.

B.14	Landowners must be consulted regarding the schedule of works prior to the commencement of works at their property and ongoing through the construction program. Seven day's notice should be provided before commencement at new work areas to allow landowners to plan any stock movements or other activities on their land which may conflict with the construction works.	Compliant	<p>TransGrid have consulted with property owners regarding the schedule of works.</p> <p>During March 2019 TransGrid arranged meetings with landowners who were directly affected by construction works and letters of introduction where sent to landowners on adjoining properties. TransGrid also hung signage for the project on fences where works were to be undertaken.</p> <p>During April 2019 TransGrid meet with Graeme and Glenis Trevaskis (Wagtail), Jenny Campbell (Pine Ridge) and Dave Ramage (Belconnen Golf Course).</p> <p>During May 2019 TransGrid had further discussions with Graeme and Glenis Trevaskis (Wagtail) and Dave Ramage (Belconnen Golf Course). TransGrid also contracted SLA.</p>
C.1	All workers must be inducted to the CEMP (including maps and any sub-management plans), site environmental conditions and sensitivities identified in the Revised EIS, and receive training as appropriate. All workers must be advised of any changes to work scope, environmental site conditions or management plans.	Compliant	All workers were inducted to the CEMP. The induction included an overview of key environmental issues (such as noise, dust, erosion control, aboriginal heritage, tree removal, Pink-tailed worm lizard habitat) and relevant mitigation measures.
C.2	All works must be in accordance with the endorsed CEMP and sub-plans.	Non-Compliant	<p>Compliance could only occur if no issues were raised throughout the project.</p> <p>All works occurred generally in accordance with the CEMP. The Principal Contractor and the independent environmental inspector appointed by TransGrid undertook regular compliance inspections of the site. The independent environmental inspector undertook 17 inspections during the 12-month reporting period and raised 49 issues, including 6 noncompliance issues with the CEMP. Where issues were raised corrective actions were implemented to rectify the issue.</p>
C.3	In the event that additional Aboriginal places and objects are encountered during construction works, the Unanticipated Discovery Protocols described in Navin Officer	Not Applicable	No unexpected finds were recorded during the 12-month reporting period.

	Heritage Consultants (June 2018) are to be implemented.		
C.4	Following completion of works, protective fencing is to be removed and written notification of this is to be provided to ACT Heritage.	Not Applicable	Works are not complete yet.
C.5	All vehicles, machinery and equipment must be washed down prior to entering the site to reduce the risk of weed spread.	Compliant	The independent environmental inspector observed and recorded in his reports that machinery brought on site appeared to be generally clean. Zinfra required completion of an equipment checklist which recorded whether equipment brought on site is clear of soil and weeds.
C.6	Any Red Gum hollow bearing tree located within the proposed asset protection zone for the substation must be retained, unless identified for removal in the Tree management and revegetation plan in the approved CEMP.	Compliant	Two Red-Gums were recorded on the new Stockdill Substation site and were retained.
C.7	Construction and development works must be carried out in accordance with Environmental Protection Guidelines for Construction and Land Development in the ACT, March 2011.	Non-Compliant	Compliance could only occur if no issues were raised throughout the project. Works occurred largely in accordance with the Environmental Protection Guidelines for Construction and Land Development. The Guidelines were considered when preparing the CEMP. As noted above in response to Condition C.2 some compliance issues were raised during inspections by the Principal Contractor and the independent environmental inspector.
C.8	During construction, the site and surrounds must be managed in accordance with the approved Temporary Traffic Management Plan (TTMP)	Compliant	Construction works were managed in accordance with the approved Temporary Traffic Management Plan.
C.9	During construction, all works must be in accordance with the approved landscape management and protection plan (LMPP)	Compliant	Construction is not yet complete. However, disturbed areas have been progressively rehabilitated where possible and no non-compliances have been raised against the approved Landscape Management and Protection Plan.
C.10	All efforts must be made to minimise temporary impacts to the respective	Compliant	Landowners were regularly consulted about construction works on their land. TransGrid and Zinfra have responded to all issues raised by

	landowners and affected land must be rehabilitated (where applicable) at the completion of construction activities progressively along the route.		landowners to date. Disturbed areas have been progressively rehabilitated where possible and as of 14 June 2020, rehabilitation works on Belconnen Golf Course were almost complete.
C.11	All complaints received during the activity must be recorded within a complaints register. Any environmental incidents must be registered in TransGrid's Asset and Risk Management System and managed in accordance with TransGrid and Evoenergy's relevant procedures. The register of complaints must be made available for inspections by the planning and land authority on request.	Compliant	Environmental incidents recorded on TransGrid's Asset and Risk Management System are summarised in section 2.3 above. Environmental complaints recorded on the TransGrid Complaints register are summarised in section 2.4 above.
C.12	A suitably qualified, independent environmental inspector must be appointed by TransGrid and Evoenergy to regularly audit the work activities to ensure that all mitigation measures are being effectively applied and that the works is being carried out in compliance with all environmental approvals and legislative requirements. Anytime during construction, the proponent must make audit reports available to the planning and land authority on request.	Compliant	TransGrid appointed Stuart Wilmot from Urban Perspectives as the independent environmental inspector. The independent environmental inspector undertook 17 inspections during the 12-month reporting period.
C.13	All incidents and near misses must be reported to TransGrid/Evoenergy (as relevant to the scope of works). All pollution incidents that threaten or harm the environment must be reported immediately to the EPA, and TransGrid/Evoenergy, in accordance with the Environment Protection Act 1997.	Compliant	There are four environmental issues recorded in TransGrid's incident and near misses register (refer to section 2.3 above). None of the environmental issues were pollution incidents that threatened or harmed the environment.
C.14	External lighting must be in accordance with Australian Standard AS1158.3.1 - Pedestrian Lighting and AS4285 - Control of the Obstrusive Effects of Outdoor Lighting.	Not Applicable	
D.1	Upon completion of all works on or within proximity of unleased land, a Certificate of Operational Acceptance must be obtained	Not Applicable	

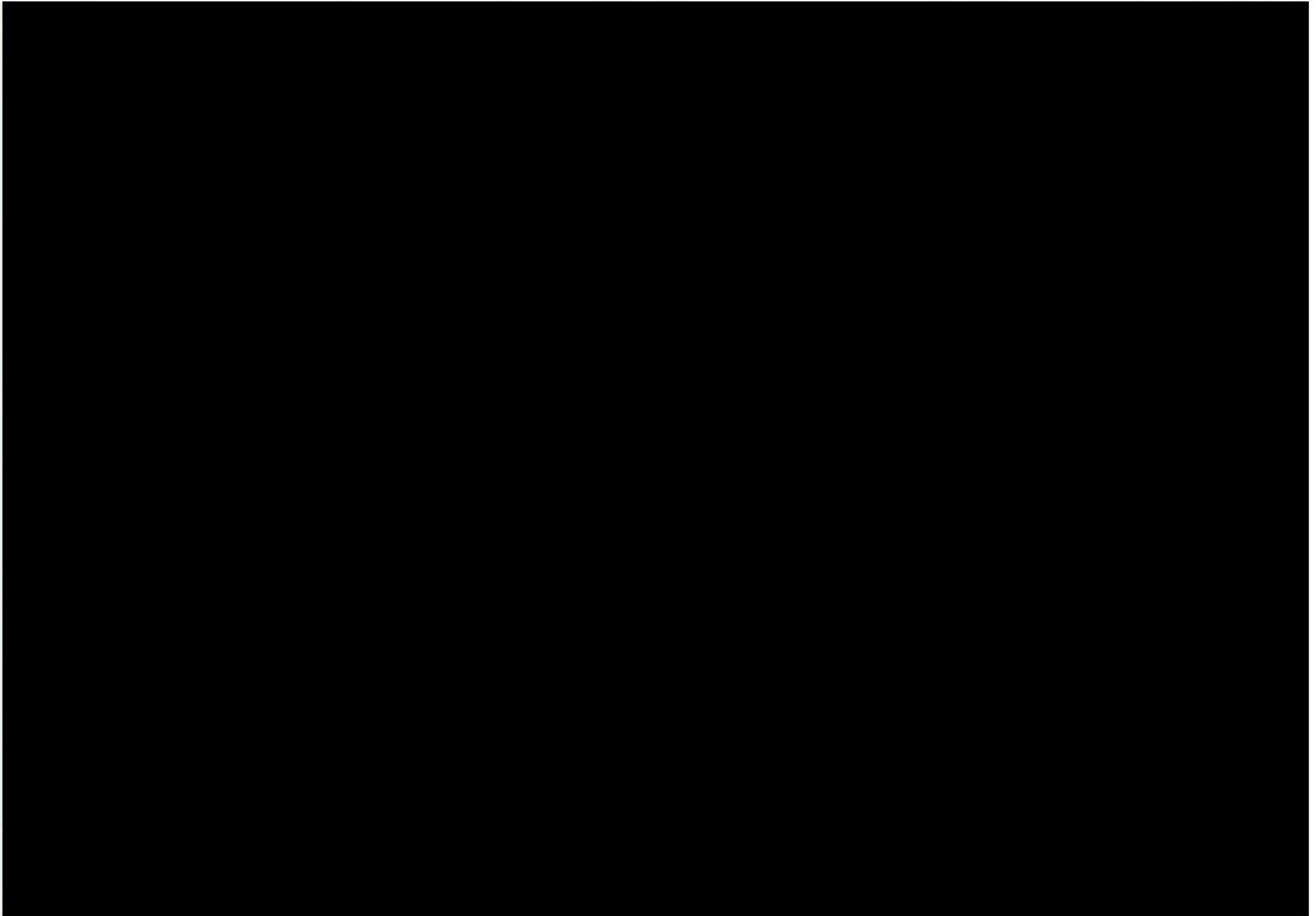
	from the Senior Manager, Development Review and Coordination, TCCS.		
D.2	The proponent must prepare an Operating Phase Environmental and Sustainability Plan prior to operation of the proposal. The Operational Management Plan must include the commitments made in the EIS, such as commitments to amend existing TransGrid/Evoenergy operational management procedures, the inclusion of updated environmental maps and other environmental management plans. The plan must also detail adequate procedures to maintain/replace planting intended for visual mitigation through the life of the project.	Not Applicable	
E.1	The design and construction of all water bodies must minimise the potential to become a local mosquito nuisance.	Compliant	The new Stockdill substation consists of two raingardens However, construction of the raingardens was not complete during reporting period. TransGrid is considering management options to include in its Substation Management Plan such as spraying or stocking the rainwater gardens with fish to manage mosquito larvae.
E.2	All relevant matter raised in the advice from ESA should be addressed accordingly (see Entity Advice)	Compliant	TransGrid advise all ESA requirements for fire brigade access and bushfire management were addressed during the detail design phase of the project.
E.3	Noise from equipment which may be installed or used at the site, including air conditioning units, must comply with the noise standard at the block boundary at all times as per the Environmental Protection Regulation 2005. Please consider the type and location of noise generating equipment prior to installation. Assurance should be sought from the supplier/installer of the equipment that it complies with the Noise Zone Standard as per the Environmental Protection Regulation 2005.	Not Applicable	The new Stockdill Substation includes noise walls around Transformers to ensure the substation complies with the noise standard at the block boundary.
E.4	All rain water that enter the site and pools in excavations during a rain storm event will be		Three detention basins were constructed at the new Stockdill Substation site. Initial plans were to construct two detention basins on the Stockdill

	considered as a sediment control pond, and must meet the following requirements:		Substation site. However, the depth of the detention basin for the northern catchment could not be achieved due to rock onsite and two smaller basins were created within the northern catchment.
E.4(a)	No discharge from the pond unless the sediment level is less than 60mg/Litre. If sediment level is greater than this amount, then prior to discharge, the pond must be dosed with Alum or Gypsum and allowed to settle until the sediment is less than 60mg/litre.	Compliant	Water testing occurred after the detention basins were flocced and before the water was discharged off-site. The results are summarised in section 2.5 of this report. Records indicate sediment in the water was less than 60mg/litre before discharge.
E.5	All relevant matters raised in the advice from Icon Water must be addressed (see Entity Advice)	Compliant	ICON required that their assets be protected for the duration of the construction works from short term load shedding from construction machinery or vibration and groundwater ingress or infiltration. TransGrid is not aware of any damage occurring to ICON's assets as a result of construction activity during the reporting period.
E.6	In accordance with the Public Unleased Land Act 2013, road verges and other unleased Territory land must not be used for carrying out works, including storage of materials or waste, without prior approval of the Territory. Such approval can be obtained from Licensing and Compliance, City Services, Parks and Territory Services, TCCS.	Not Applicable	No road verges and other unleased Territory land were used for carrying out of works, including storage of materials or waste.
E.7	The applicant/lessee are held responsible for all damage to ACT Government assets (including footpaths) caused by the development and must properly repair and damage to those assets. Before works commences, the applicant/lessee should notify TCCS of any existing damage to public facilities.	Not Applicable	No damage occurred to ACT Government assets.

APPENDIX B – SCHEDULE OF PLANS

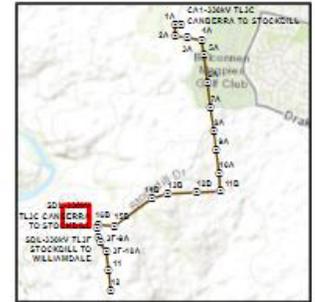
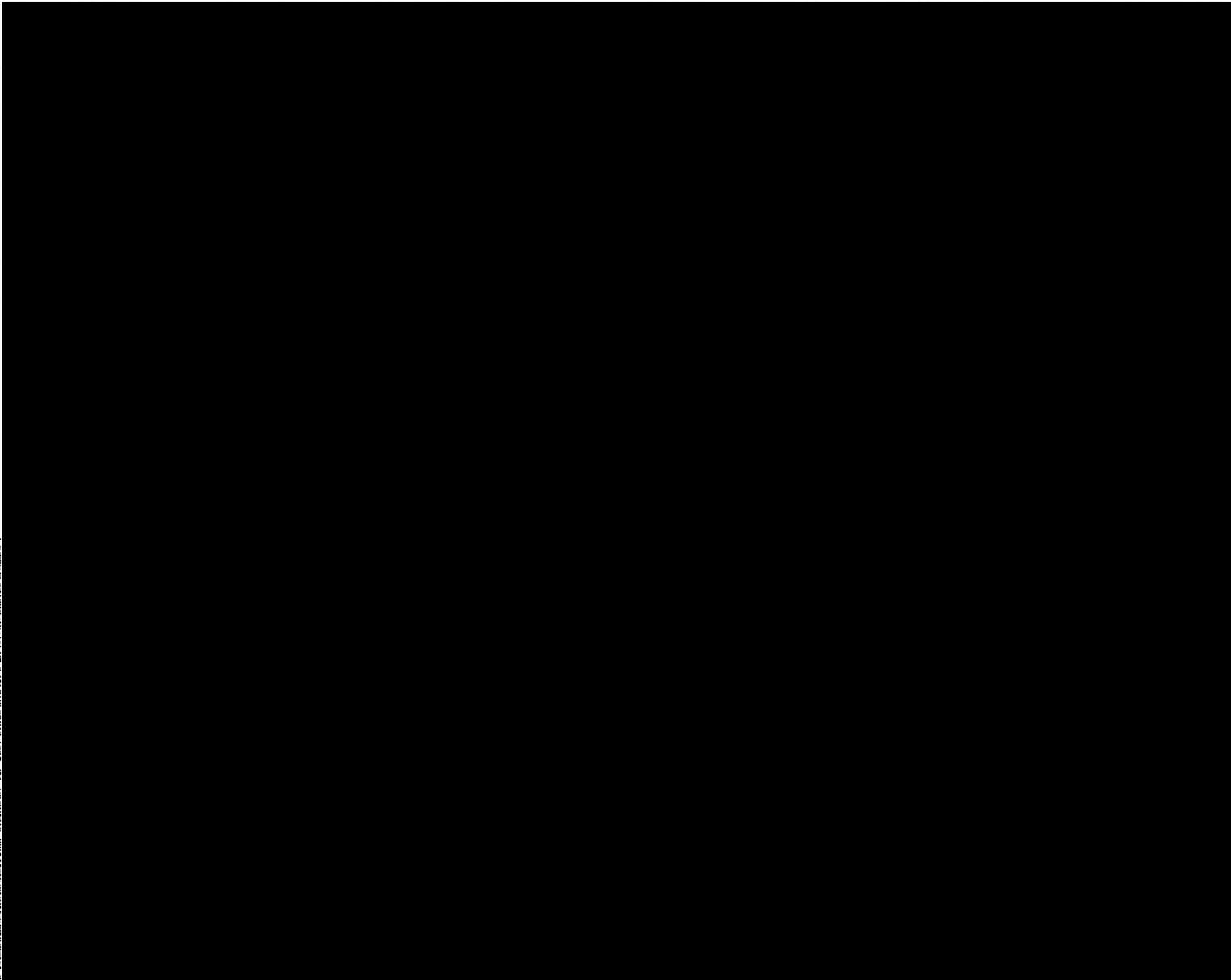
#	Plan	Revision	Date	Comment
1	Construction Environmental Management Plan	0	3/4/2019	CEMP approved on 5 April 2019
2	Biodiversity and rehabilitation management subplan and Tree management and revegetation subplan	0	3/4/2019	Sub-plan approved on 5 April 2019
3	Weed management subplan	0	3/4/2019	Sub-plan approved on 5 April 2019
4	Construction Traffic management subplan	0		Sub-plan approved on 5 April 2019
5	Construction noise and vibration management subplan	0	3/4/2019	Sub-plan approved on 5 April 2019
6	Heritage management subplan	0	3/4/2019	Sub-plan approved on 5 April 2019
7	Soil, water and contaminated land management subplan	0	3/4/2019	Sub-plan approved on 5 April 2019
8	Erosion and Sediment Control Plan – Stockdill Substation	3	19/2/2019	Plan prepared by SEEC
9	Erosion and Sediment Control Plan – Stockdill Substation	4	2/7/2019	Revised plan due to creation of two smaller detention basins for the northern catchment during construction of Stockdill Substation
10	Erosion and Sediment Control Plan – Stockdill Substation	5	3/7/2019	Final revised plan submitted to the EPA for construction of Stockdill Substation
11	Construction air quality management subplan	0	3/4/2019	Sub-plan approved on 5 April 2019
12	Waste and recycling management subplan	0	3/4/2019	Sub-plan approved on 5 April 2019
13	Construction emergency response subplan	0	3/4/2019	Sub-plan approved on 5 April 2019
14	Hazardous materials management subplan	0	3/4/2019	Sub-plan approved on 5 April 2019
15	Landscape Management and Protection Plan	0	3/4/2019	Sub-plan approved on 5 April 2019

APPENDIX C – PINK-TAILED WORM LIZARD HABITAT LOSS AND OFFSET AREAS



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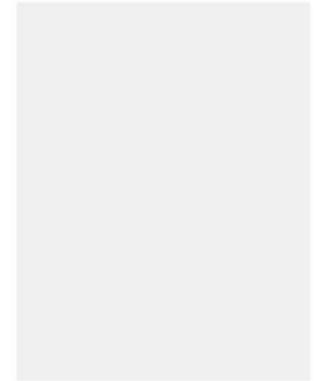
APPENDIX D – LOCATION OF NEST BOXES



Legend

-  Nest boxes
-  Proposed Stockdill 300kV substation

Source: Aurecon, Nearmap, Esri Topo



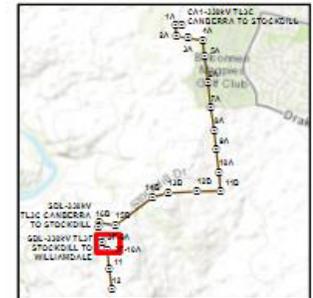
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Project No.: 505990
Projection: GDA 1994 MGA Zone 55

ACT Secondary Electricity Supply Project Stockdill Drive

FIGURE: Nest Boxes - Woodstock Conservation Area

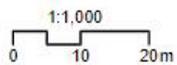
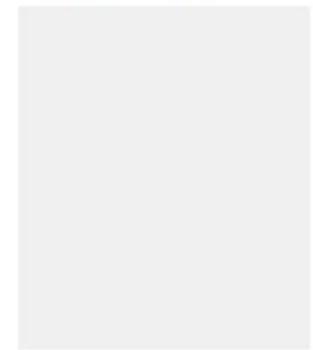
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Legend

-  Additional nest box site
-  Poles
-  330kV lines
-  Proposed Stockdill 300kV substation

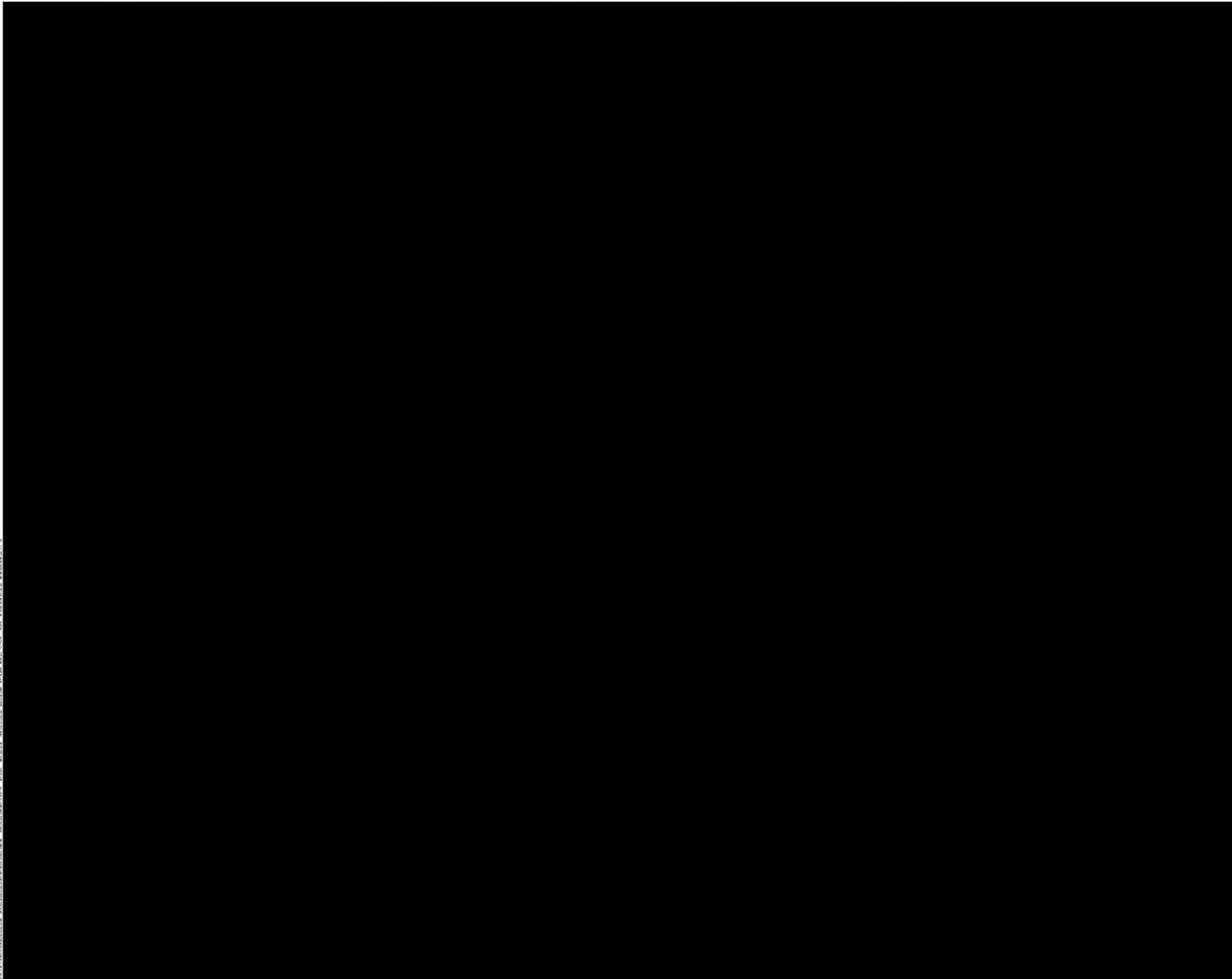
Source: Aurecon, Nearmap, Esri Topo



Project No.: 505990
Projection: GDA 1994 MGA Zone 55

ACT Secondary Electricity Supply Project Stockdill Drive

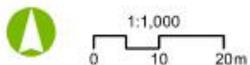
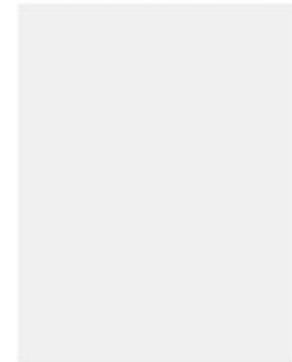
FIGURE: Nest Boxes - Northwest Substation



Legend

-  Nest boxes
-  Poles
-  330kV lines

Source: Aurecon, Nearmap, Esri Topo



Project No.: 505990
 Projection: GDA 1994 MGA Zone 55

ACT Secondary Electricity Supply Project Stockdill Drive

FIGURE: Nest Boxes - T12B Area

APPENDIX E – NAVIN OFFICER HERITAGE CONSULTANTS REPORT (JULY 2019)



ACT- Canberra Second Electricity Site Fencing Inspection Report

A Report to Zinfra and ACT Heritage

Navin Officer Heritage Consultants Pty Ltd

July 2019

The Project Brief

The following is required as part of the project approval:

B2 Prior to the commencement of works:

- a) Protective fencing is to be installed around Aboriginal places recorded as 'RC 1', 'RD 3', 'SD RA 1', 'SD RA2' and 'SA RA3', following demarcation of heritage boundaries by a qualified archaeologist and Representative Aboriginal Organisations (RAOs); and
- b) Written notification of fence installation is to be provided to ACT Heritage.

This report outlines the results of the site fencing inspections and will be provided to ACT Heritage in order fulfil notification requirements for the project approval.

Personnel

All sites listed in approval requirement B2 (a) were inspected on the 25th of July 2019. All Registered Aboriginal Organisations (RAOs) were invited to attend the site inspection. Archaeologist Adrian Cressey (NOHC) was accompanied by Wally Bell of Buru Ngunawal Aboriginal Corporation (BNAC), as well as James Thomas (Aurecon) and multiple Zinfra representatives.

Site Fencing Inspection

SDRA2 – Artefact Scatter

████████████████████

Site SDRA2 was recorded within the southern portion of the Project study area. The site was originally recorded (May 2017) as a scatter of two artefacts located adjacent to the north side of a creek bank/gully over an area of 2 x 2 metres. The site is located mid slope. The exposure incidence across the site was 90% and visibility within the exposures was 90%.

During the current inspection one quartz flaked piece was observed at the site. Ground exposure and visibility is analogous to the original site assessment.

A No-Go Zone has been installed around the site with orange high visibility bunting, inclusive of signage. All parties agreed that the site demarcation area was inclusive of an appropriate buffer around the site, with temporary fencing to be installed around the existing bunting including on the southern side of the dry creek.

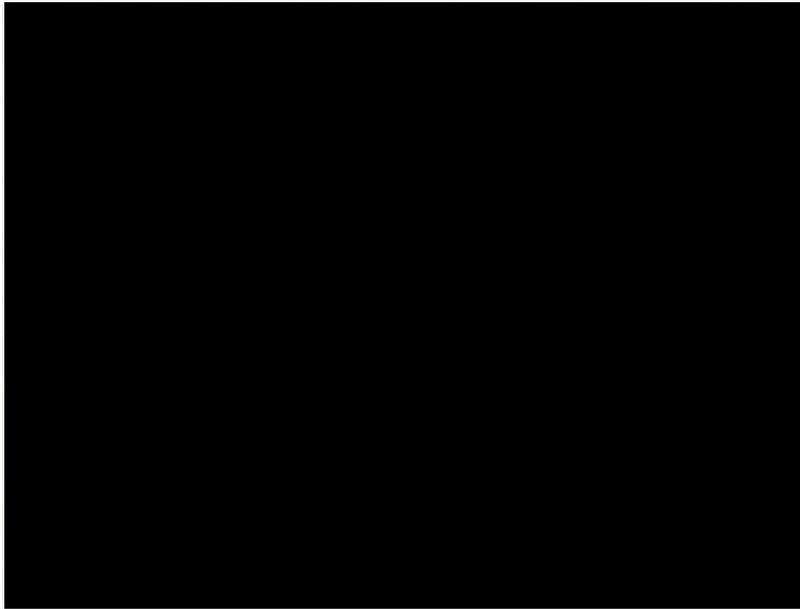


Figure 1 Site SDRA2 facing south

SDRA3 – Artefact Scatter

Site SDRA3 was recorded within the southern portion of the Project study area, proximate to the new proposed east west transmission line easement. The site was originally recorded (May 2017) as a scatter of two artefacts located on a stock track. The site is located mid slope. The two artefacts were located approximately 55 metres apart.

Access to this site was not possible on the day due to landowner issues, however the site location could be observed from the roadside. The site is currently encompassed by a broader No-Go Zone associated with endangered earless lizard habitat and is demarcated by high visibility orange silt fencing and signage. Wally Bell and the attending Archaeologist discussed the current environmental controls associated with the lizard habitat as well as procedures implemented by Zinfra for construction vehicles across the project (e.g. keeping to existing formed tracks and area of slashed grass only), and were satisfied that any impacts to Aboriginal site SDRA3 are mitigated with the sites inclusion within the existing No-Go Zone associated with endangered earless lizard habitat.

SDRA1 – Artefact Scatter

Site SDRA1 was recorded within the north western portion of the Project study area. This site is a scatter of four artefacts located on an erosion scour. The site was originally recorded (May 2017) located within a drainage line, mid-way up the drainage line. Visibility within the scald was 90% and outside was 5%. The scald measured 4 x 4 metres.

No artefacts were observed at the site during this inspection. Ground exposure and visibility is analogous to the original site assessment.

A No-Go Zone has been installed around the site with orange high visibility bunting, inclusive of signage. All parties agreed that the site demarcation area was inclusive of an appropriate buffer around the site. No construction is occurring near this site and it is also over 70 meters from the area



of slashed grass associated with construction vehicles. Given the vehicle movement controls implemented by Zinfra for construction vehicles across the project (e.g. keeping to existing formed tracks and area of slashed grass only), all parties were satisfied that the existing demarcation of the site is adequate for mitigating project related impacts to site SDRA1.



Figure 2 View of site SDRA1 facing south

RC1 – Artefact Scatter



Site RC1 is located on the north western boundary of the Project study area. This site was recorded by BIOSIS in 2015 (b) as a small artefact scatter, located in an open highly eroded creek line on the southern bank of an un-named creek. Four artefacts were found: one silcrete blade, one quartz flake and two chert flakes.

During initial field survey for this project (May 2017) silcrete flake was recorded at this location.

During the current investigation, the location of this site was observed through fencing associated with the project. The entire riparian corridor has been fenced off to prevent construction vehicles accessing the area associated with site RC1, with clear signage outlining the broad area as a No-Go Zone due to Aboriginal heritage. All parties were satisfied that the existing fencing was adequate for mitigating project related impacts to site RC1.

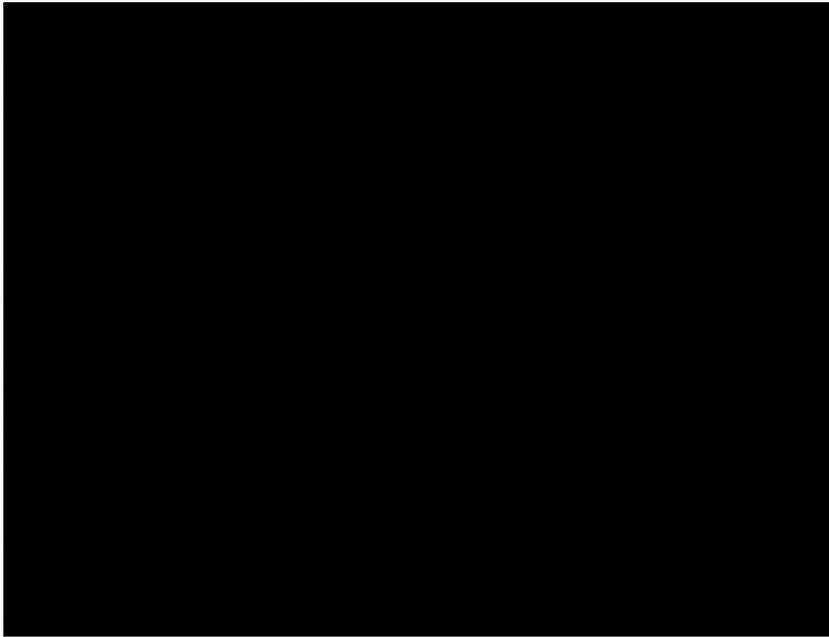


Figure 3 View towards RC1 facing south

Site RD3 - Artefact Scatter



Site RD3 is located on the north western boundary of the Project study area. This site was recorded by BIOSIS in 2015 (b) as a small scatter of artefacts on a well-used farm road. The site is located within a relatively level landscape at the intersection of two gates.

During initial field survey for this project (May 2017) one quartz flaked piece was recorded at this location.

This site is located well away from construction works and project related vehicle movements. The site is currently demarcated by signage warning construction vehicles that the area is a No-Go Zone due to the presence of an Aboriginal heritage site. This signage is located either side of the two farm tracks that lead to the gate. The local farmer is the only person who has access to these gates and fencing of the site would prevent access between paddocks. Wally Bell's view was that given the farming access was a continuation of existing land use practices and did not represent an increase in traffic impacts at this site, and that the existing demarcation of the site was the most appropriate mitigation measure available. All parties agreed.



Figure 4 Site RD3 facing northwest



Figure 5 Signage demarcating No-Go Zone for construction vehicles

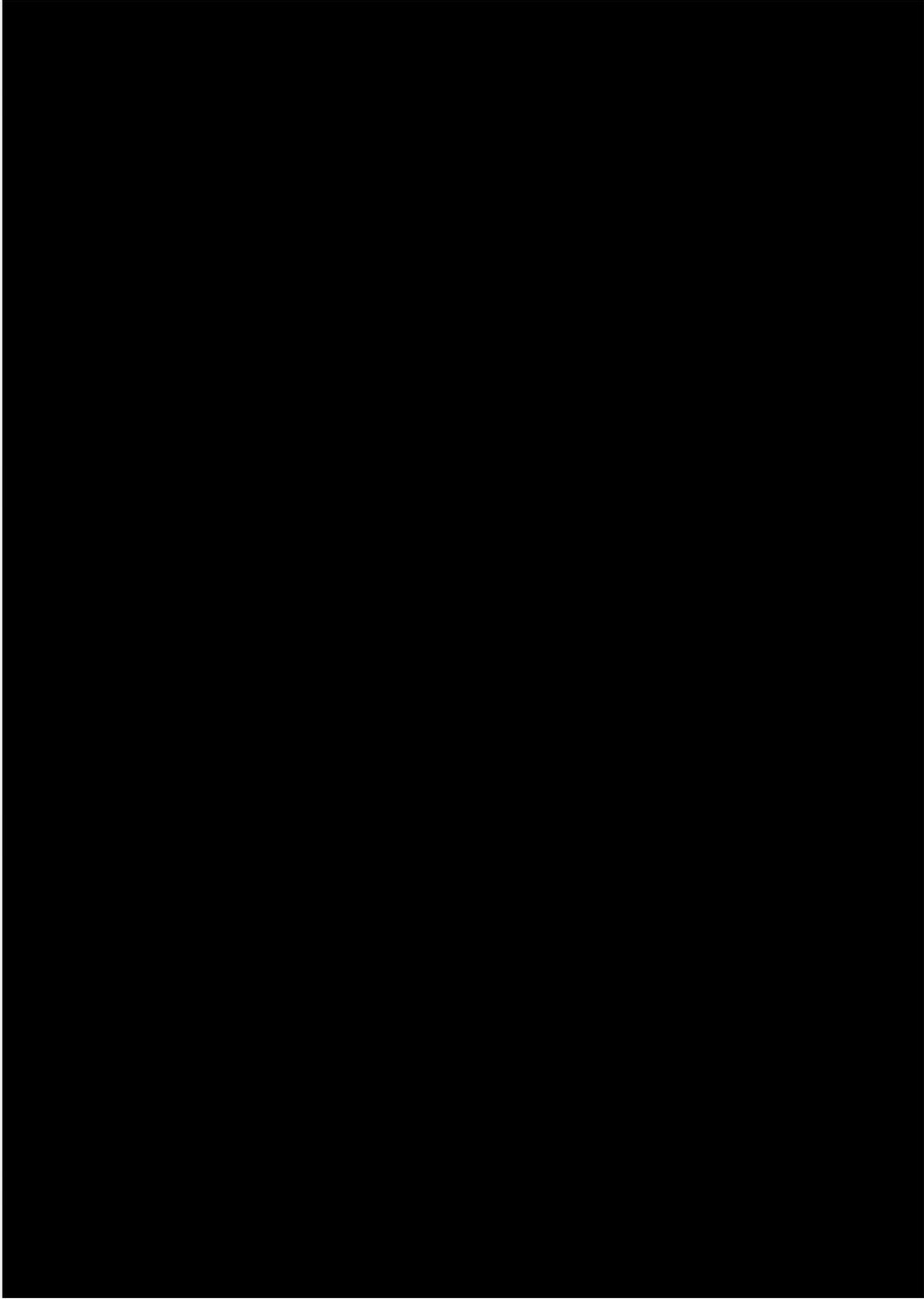


Figure 6 Location of Aboriginal sites in and around study area