Independent Environmental Audit – SSI 36656827 HumeLink East

Proponent Response to Audit Findings – 14 October 2026

Table 1 - Non compliances, observations, and recommendations

Unique Audit ID	CoA	Details of Condition	Auditor Observations	Recommendation	Proponents Proposed Actions/ Responses	Due Date
Non-Compliances – Lead Auditor						
HLE-NC-05	**A2**	The development must be carried out; a) In compliance with the conditions of this approval b) In accordance with all written directions of the of the Planning Secretary: c) Generally in accordance with the EIS; and d) Generally in accordance with the Development Layout in Appendix 1.	During the Audit period, as noted in Condition C11, five non compliances have been identified and reported to DPHI. Noting the reported non compliances, the requirements of condition A2 a) have not been met in their entirety, therefore compliance with Condition A2 has not been achieved.	Details of each non-compliance is noted below with specific recommendations provided.	The non-compliances identified and reported to DPHI have been addressed. No further action is proposed.	N/A
HLE-NC-06	**A14**	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A13, as well as the complaints register for any complaints received (on the day they are received)	On 17/5/26, Transgrid notified DPHI of a non-compliance with condition A14, noting the complaints register issued to the ER on 12/5/26 did not include a complaint that was received on 2/5/26. DPHI acknowledged receipt of the complaint on 22/5/26 noting the Department has decided to record the breach with no further enforcement action proposed.	This non-compliance appears to be an oversight and appears to have only occurred on one occasion. The ER confirmed that they have been provided with all information in order for them to perform their functions specified. No specific recommendations are made in addition to the initial corrective actions taken by Transgrid.	Corrective actions were taken by Transgrid as noted by the Auditor. No further action is proposed.	N/A
HLE-NC-07	**B1**	Preconstruction minor works, road upgrades, Enabling Works, construction (including operation of construction compounds) demolition, upgrading or decommissioning activities (excluding blasting) may only be undertaken between; a) 7am to 6pm Monday to Friday; b) 8am to 1pm Saturdays; and	During the Audit period, a non-compliance was identified and reported to DPHI noting breach of conditions B1 and B16. The non-compliance was identified following a review of the permit register and active OOH works, 10 instances across four locations were identified to have undertaken construction works outside standard construction hours without a valid Out of Hours Works (OOHW) permit. The works resulted in six receivers being potentially noise affected, which constitutes non-compliance with Conditions B1 and B16. Subsequent to the notification, an internal investigation was undertaken with corrective and preventative actions identified as follows:	Subsequent to the notification, an internal investigation was undertaken with corrective and preventative actions identified as follows: • Communications and all construction teams were reminded of the OOH process and the importance of compliance • Stop works notice to be given to any construction team for any future OOH works unless the OOH works protocol is adhered to	Appropriate corrective actions were taken by AGJV as noted by the Auditor. No further action is proposed.	N/A

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		c) At no time on Sundays and NSW public holidays; Unless the Planning Secretary agrees otherwise.	• Communications and all construction teams were reminded of the OOH process and the importance of compliance • Stop works notice to be given to any construction team for any future OOH works unless the OOH works protocol is adhered to • Targeted OOHW protocol training to specific construction teams On 18/6/26, DPHI issued a warning letter to AGJV for the breach noting non-compliance with Conditions B1 and B16	• Targeted OOHW protocol training to specific construction teams has been undertaken. AGJV noted that toolbox talks held on 11, 18 and 27 February included content on Noise and Vibration, OOHW and the OOHW protocol. The actions taken by AGJV in response to the non-compliance appear to be appropriate with no further recommendations made at this time. Should further non compliances be recorded, a review of the effectiveness of existing controls should be undertaken with additional measures implemented as required.		
HLE-NC-08	**B16**	Prior to the commencement of construction (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Noise and Vibration Management Plan to the satisfaction of the Planning Secretary... Following the Planning Secretary's approval, the Proponent must implement the Noise and Vibration Management Plan. *Note: The Noise and Vibration Management Plan must incorporate all relevant aspect of the development, including Enabling Works consistent with the requirements of condition B67.*				
HLE-NC-09	**B35**	All heavy and light vehicles associated with construction, upgrading and decommissioning of the development must travel to and from the site via the construction routes as described in the EIS and identified in the Figure 4-1 in Appendix 4, unless the Planning Secretary agrees otherwise.	Non-compliance with Conditions B35 and B39 relating to the use of an unapproved route to the Bannaby Substation was reported to DPHI. Following investigation, AGJV identified the cause of the non-compliance was due to a breakdown in communication between the supplier and their HV operator. Actions taken to prevent recurrence included the immediate reinforcement of the requirement to comply with approved routes.	The actions taken by AGJV in response to the noncompliance appears to be appropriate with no further recommendations made at this time. Should further non compliances be recorded, a review of the effectiveness of existing controls should be undertaken with additional measures implemented as required. **Auditor note:** The independent Environmental Representative has undertaken a project wide review of the TTMP at the request of DPHI, the review concluded that AGJV were implementing the TTMP actively and appropriately managing its traffic risks. The controls in place are robust and appropriate.	Appropriate corrective actions were taken by AGJV as noted by the Auditor. No further action is proposed.	N/A
	B39	Prior to commencing construction or road upgrades identified in condition B37 (whichever comes first) but excluding Enabling Works where the relevant requirements of this condition are adequately addressed in				

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		the Enabling Works Management Plan of condition B64, the Proponent must prepare a Traffic Management Plan for the development in consultation with FCNSW, TfNSW, Snowy Valleys Council, Wagga Wagga City Council, Cootamundra-Gundagai Regional Council, Yass Valley Council, Upper Lachlan Shire Council and Goulburn-Mulwaree Council, and to the satisfaction of the Planning Secretary. This plan must include..... Following the Planning Secretary's approval, the Proponent must implement the Traffic and Transport Management Plan				
Non-Compliances – Biodiversity Specialist						
HLE-NC-10	**B29**	Unless otherwise agreed by the Planning Secretary, prior to carrying out any development that would impact on the relevant biodiversity values subject to survey in the Supplementary Biodiversity Strategy in condition B28 (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Biodiversity Assessment Verification Report in consultation with BCS and to the satisfaction of the Planning Secretary. (...) Any required changes to biodiversity offset or mitigation measures arising from the Biodiversity Assessment Verification Report must be incorporated into an updated version of the Biodiversity Offset Package under condition B26 in consultation with BCS and BCT and addressed in a	The revised BAVR was due on 30 April 2026. Due to delays with finalising the FLPs and associated clearing, on 17 April 2026 Transgrid submitted an application for an extension to the due date for the revised BAVR. This application was approved by DPHI on 12 June 2026. The application for an extension to the due date was submitted prior to the due date, but approval was not granted until after the due date. This represents an administrative non-compliance with Condition B29 of the Infrastructure Approval. This was reported by Transgrid as a non-compliance on 8 May 2026 in accordance with Condition C11 of the Infrastructure Approval.	A revised BAVR is required to be submitted by 20 November 2026.	The BAVR is currently being updated and HumeLink is on track to submit a revised BAVR by 20 November 2026.	20 November 2026

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		revised version of the Biodiversity Management Plan required under condition B30, in consultation with BCS and FCNSW, to the satisfaction of the Planning Secretary.				
Observations and recommendations – Lead Auditor						
HLE-Obs-015	**B19**	The Proponent must: a) Minimise erosion and control sediment generation; and b) Ensure all land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Best Practice Erosion and Sediment Control (IECA, 2008), Managing Urban Stormwater – Soils and Construction Volume 1 (Landcom, 2004), Managing Urban Stormwater – Soils and Construction Volume 2A Installation of Services (DECC, 2008) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008), or their latest versions.	AGJV have appointed an experienced CPESC to oversee the design and implementation of erosion and sediment controls. The role of the CPESC includes the preparation of standard drawings for implementation in the field as well as routine site inspections to confirm compliance with the requirements of this condition and recommend any actions to improve outcomes. Additional inspections are undertaken by the ER, Transgrid and the AGJV Environment team which includes pre and post rainfall inspections. Reasonable and practical measures were observed to be implemented to minimise erosion and sediment generation by the project. Included: • Polymer soil binder application • Sealed access points and tracks to construction sites • Sealed compound, carpark and common areas • Topsoil retention and rehabilitation • Sediment basins, clean water diversions and energy dissipators	As observed during the Audit site inspection, construction of PADs and access roads is well advanced with disturbed surfaces being temporarily stabilised with polymer to reduce risk of erosion. It is recommended that the final rehabilitation of disturbed areas is completed as soon as practical with high risk areas (steep slopes and sites near/adjacent to waterways) prioritised to provide permanent ground cover and effective erosion control and to effectively eliminate erosion hazard.	The Project is implementing temporary stabilisation solutions such as polymer application and ground cover (i.e. seeding) as soon as practical once earthworks are complete. High risk areas are prioritised in line with our ERSED principles, to minimise/ prevent erosion. Final rehabilitation, as per CoA B62, has not yet commenced.	Ongoing, as soon as practical once earthworks are complete
HLE-Obs-016	**B51**	The Proponent must: a) Minimise the fire risks of the development, including managing vegetation fuel loads on-site; …….. d) Ensure any fire trails on asset protection zones associated with the development are wholly contained within the approved disturbance area; …. e) Develop procedures to manage potential	AGJV have prepared a comprehensive Bushfire Emergency Management and evacuation plan. Refer to the Auditors response to B52 below in relation to the content of the plan Equipment and resources available on site included fire water tank, fire extinguishers (including testing tag) and trailer mounter mobile water tanks. The Bushfire and Emergency Management Plan and emergency information package was available in a readily accessible location adjacent to the site compound. It was noted in the Audit interview that: • Daily prestarts include an assessment of fire risk.	Conduct an annual pre-bushfire season readiness review to ensure all obligations and commitments relating to Fire and Emergency are implemented and are compliant. This may include but not be limited to: • Onsite preparedness Activities • Firefighting water supplies and equipment • Access and egress for emergency vehicles • Emergency Response • Communication Protocols Involve suitably qualified personnel in the review as required.	AGJV will undertake an annual pre-bushfire season readiness review through the upcoming Quarterly Independent Health and Safety Audit. Transgrid has incorporated the BFEMEP requirements and its Hot Work and Fire Risk Work procedure into the audit scope. The independent auditor conducted a desktop review in late September 2026, followed by site verification and consultation in October. The audit examined preparedness, firefighting resources, emergency access, response arrangements, communications, training and drills, with findings and actions to be recorded in the audit report. AGJV will implement any recommendations from this audit. In parallel, AGJV are implementing the pre-bushfire season requirements as per the BFEMEP.	6 November 2026

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		fires on site, in consultation with the RFS, FRNSW, FCNSW and NPWS; f) Assist the RFS, FRNSW, FCNSW, NPWS and emergency services as much as practicable if there is a fire in the vicinity of the site; and g) Notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.	• Emergency response drills are undertaken quarterly • Evacuation drills are undertaken in conjunction with the site training plan • RFS have been consulted with and have attended site • No fires have occurred during the Audit period • Fire and Rescue have attended the site and provided advice regarding Dangerous Goods. • A monthly meeting is held with fire and emergency services, with regular contact made with the RFS • Both RFS and Workcover have visited the site • 20,000 L Water tanks were available at the Yass and Adjungbilly accommodations camps.			
Observations and recommendations – Biodiversity Specialist						

HLE-Obs-17	**30**	Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:
		(a) be prepared by a suitably qualified and experienced biodiversity expert/s;
		(b) be prepared in consultation with BCS and FCNSW;
		(c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision 0, dated 21 June 2024);
		(d) include a description of the measures that would be implemented for:
			Clearing was undertaken at BY-130-19 on a weekend without supervision by the Ecologist. Clearing included areas with habitat features identified. This occurred as the site foreman failed to re-review the Clearing and Land Disturbance Permit (CLDP).
			This was considered a non-conformance (non-reportable) by AGJV.
				Reaffirm the requirement for site forepersons to review the CLDP prior to commencement of works.
				Ensure teams understand the constraints in the CLDP prior to signing.
				Reaffirm the requirement to have project Ecologists present during any clearing works.
					The clearing at BY-130-19 occurred within an approved CLDP area. There was no clearing outside the approved limits and no evidence that an identified habitat feature was removed or damaged. The site foreman did not re-review the CLDP before weekend works commenced and clearing proceeded without the required ecologist attendance.
					The event was recorded and managed as a non-conformance (non-reportable), with an E2Mi environmental impact rating (E2Mi | Enviro - Minor Impact within site).
					The following corrective actions were completed:
					• A training presentation was delivered to the Central construction team on 4 March 2026
					• A follow-up toolbox talk was conducted on 11 March 2026
					  ○ Site teams were reminded to review and understand the complete CLDP before signing and commencing work
					  ○ The requirement for ecologist attendance during clearing involving identified habitat constraints was reinforced.
					No further action is proposed.
						N/A

HLE-Obs-18	**30**		During clearing works at BY-026, a Wombat burrow was cleared without supervision of project Ecologists. This was considered a non-conformance (non-reportable) by AGJV.	Reaffirm the requirement for site forepersons to review the CLDP prior to commencement of works. Ensure teams understand the constraints in the CLDP prior to signing. Reaffirm the requirement to have project Ecologists present during any clearing works.	The pre-clearing survey identified the burrow and its location was communicated in the clearing permit; however, the permit did not clearly state the required mitigation and the construction team incorrectly understood that the feature had been cleared for removal and therefore did not arrange for an ecologist to be present during clearing. The event was recorded and managed as a non-conformance (non-reportable). Following identification of the event, the Project Ecologist inspected the feature and confirmed that it was unoccupied. No wombat or other fauna was harmed. The following corrective actions were implemented: • The non-conformance was addressed with the relevant construction personnel	N/A

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		(i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29; (ii) minimising: • the amount of vegetation clearing on site; • the loss of key fauna habitat (including tree hollows); • the impacts of fauna on site, including undertaking pre-clearance surveys; and • potential indirect impacts on threatened flora and fauna species; (iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint; (iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for: • all work in the associated location to stop to prevent further impact, and • notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; (…)			• A toolbox talk was delivered on 22 April 2026 covering the required method for managing wombat burrows ○ The requirement to install and monitor a one-way wombat gate for seven days before clearing was reinforced ○ The requirement for ecologist clearance and supervision before removal was reinforced. No further action is proposed.	
HLE-Obs-19	**30**		During clearing works within BY-069, a rock garden was cleared in BY-069 without supervision of project Ecologists. This was considered a non-conformance (non-reportable) by AGJV.	Reaffirm the requirement for site forepersons to review the CLDP prior to commencement of works. Ensure teams understand the constraints in the CLDP prior to signing. Reaffirm the requirement to have project Ecologists present during any clearing works.	The pre-clearing survey and clearing permit identified the rock garden; however, the construction team incorrectly treated its own inspection, during which no fauna was observed, as sufficient authority to proceed with removal. The event was recorded and managed as a non-conformance (non-reportable). Following identification of the event, the Project Ecologist inspected the feature and confirmed that it was unoccupied. No fauna was harmed. The following corrective actions were implemented: • The requirements for removing identified habitat features were reinforced with the relevant construction personnel; • A toolbox talk was delivered on 24 June 2026 confirming that rock gardens and other habitat features may only be cleared under ecologist supervision ○ Personnel were reminded that a construction-team inspection does not replace ecologist clearance. No further action is proposed.	N/A
HLE-Obs-20	**30**		Clearing occurred outside the CLDP area due to the placement of felled trees. This was considered a non-conformance (non-reportable) by AGJV.	The HLE project should review where log stockpiles are placed during clearing. Where stockpiles are to later be mulched and/or removed, they must be placed within TCZ clearing limits or be accounted for during CLDPs. Where timber is to be provided for re-use by landowners, storage of timber should not result in unintended impacts to biodiversity values. During Audit 2, AGJV identified opportunities for improvement in the landowner timber acceptance process, including identifying that landowner timber stockpiles are not placed in areas of biodiversity value .	The timber was placed within the broader Project boundary at a location directed by the landowner. The landowner direction, agreed location and subsequent acceptance of the timber are evidenced by the signed Timber Acceptance and Assurance Letter and its appended location map, which was included in the evidence to the responses to the audit findings. The form records the delivery location adjacent to the track to Pad 34, the acceptance of 893 m^3 of timber and the transfer to the landowner of responsibility for its ongoing maintenance, treatment, use and suitability. The non-conformance (non-reportable) relates to the signed Timber Acceptance and Assurance Letter not being obtained before the timber was placed. Going forward AGJV does not agree that the landowner's timber-receival area is required to be retrospectively included in a Clearing and Disturbance Limit Plan, Final Layout Plan or the Project's clearing-limit calculations. Although the location falls within the broader Project boundary, that boundary does not make every subsequent landowner activity part of the development. Following acceptance, the timber was under the landowner's custody and control, and the location was not established, retained or managed as an AGJV construction stockpile. AGJV acknowledges that transfer of custody does not remove its responsibility to exercise appropriate environmental due diligence when delivering material. Before placement, AGJV should confirm that the landowner-selected location would not cause pollution, affect identified habitat features or sensitive environmental areas, or otherwise create an unacceptable environmental risk. AGJV therefore accepts an opportunity for improvement requiring the Timber Acceptance and Assurance Letter to be strengthened and completed before delivery. The revised control will require: • The proposed location to be identified on a map and agreed by the landowner before placement;	30 October 2026

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					• An environmental review confirming the absence of identified habitat features, protected vegetation, waterways and other sensitive areas; • Consideration of potential pollution, erosion, biosecurity and access risks; • Written acceptance and transfer of custody before delivery; and • Retention of the completed form and supporting evidence in the Project EMS. AGJV will update the timber acceptance form to address the improvements mentioned above.	
HLE-Obs-21	**A1 – Obligation to minimise harm to the environment**	In meeting the specific performance measures and criteria in this approval, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the pre-construction minor works, road upgrades, construction, operation, rehabilitation or decommissioning of the development.	Constraints mapped (Appendix J of the BMP) is used to define micrositing efforts and assess any design changes. Following changes to the FLPs for HLE and approval of revised clearing limits, updates to the BAVR are required. This will trigger updates to the BMP. This should include updates to constraints mapping.	Ensure updates to the BMP (required under Condition B29 of the Infrastructure Approval following updates to the BAVR) incorporate updated constraints mapping which reflects the FLPs and updated BAVR mapping. AGJV have advised that this action is captured within the planned BAVR and BMP update process.	Following finalisation of the revised BAVR, the BMP will be updated in accordance with Condition B29. This update will include revised Appendix J constraints mapping aligned with the current Final Layout Plans and BAVR mapping. The action is already captured within the planned BAVR and BMP update process. No further action is proposed.	N/A
HLE-Obs-22	**B22 – Riparian areas**	The Proponent must ensure all activities on waterfront land are constructed in accordance with the *Guidelines for Controlled Activities on Waterfront Land* (DPE 2022), *Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings* (NSW Fisheries 2003) and the *Policy and Guidelines for Fish Habitat and Conservation and Management* (NSW Fisheries, 2013), unless Water Group and DPIRD Fisheries agrees otherwise.	The site inspection identified that: • the culverts installed in the waterway crossing at Mantons Creek were perched at the downstream end, limiting fish passage during low flow conditions, • an aquatic assessment of Class 1 fish habitat was not undertaken at Melamalong Creek, • no culvert had been installed in a waterway crossing of a tributary of Melamalong Creek, impeding flow, and • the bed level waterway crossings at Melamalong Creek were raised above bed level, impeding flow and resulting in ponding of water.	Ensure adequate aquatic assessment is undertaken for all Class 1 key fish habitat. Ensure waterway crossings are constructed to avoid becoming perched at the upstream or downstream end. Ensure bed level crossings are constructed at bed level on the upstream and downstream extents, allowing for unimpeded flows and that they do not result in ponding upstream of the crossing. Rectification works may be required at Melamalong Creek, including: • Installation of a culvert in the first waterway crossing, and • Reconstruction of the second waterway crossing to ensure the crossing is at bed level. Other waterway crossings should be reviewed. Consider long-term inspection and maintenance requirements to ensure waterway crossings do not become obstructed.	**Melamalong Creek (BY-057)** Melamalong Creek was identified as Class 2 KFH and was assessed prior to clearing. The two existing crossings were upgraded using rocked ford designs intended to minimise disturbance to the waterway and maintain flows. Available mapping does not identify the first crossing location as KFH, although available information indicates that the location has historically held water. Hydrological assessment indicates that, during higher-flow conditions, water depths at the crossings are comparable with adjoining sections of the creek. Notwithstanding this, AGJV will review both crossings under low- and higher-flow conditions to confirm that they are constructed at appropriate bed levels, do not create perched conditions or upstream ponding, and provide for unimpeded flows and fish passage. The review will specifically consider whether a culvert is required at the first crossing and whether reconstruction of the second crossing is necessary. **Mantons Creek (BY-130-19)** The EIS, including the BDAR and Revised BDAR, did not identify Mantons Creek as Class 1 Key Fish Habitat (KFH), and the original pre-clearing ecology assessment did not classify the BY-130-19 crossings as Class 1 KFH. A potential Class 1 KFH classification was subsequently identified through a recent review of Fisheries mapping and data and has since been reflected in updated ecological advice. AGJV has engaged its aquatic ecologist to confirm the appropriate KFH classification and assess the existing crossings, including their upstream and downstream levels, culvert condition, potential for ponding or perched conditions, and ability to maintain fish passage and unimpeded flows.	15 November 2026

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					Broader aquatic assessments and waterway crossing review AGJV is undertaking a review of the aquatic assessment process to confirm that all crossings within Class 1 KFH are subject to an appropriate aquatic ecological assessment before construction or modification. This review will include the engagement of an aquatic ecologist to assess KFH classification, fish passage requirements, crossing design, upstream and downstream bed levels, potential for perched conditions or ponding, and any applicable Fisheries consultation, mitigation or approval requirements. AGJV will also review other constructed waterway crossings to identify any similar issues and determine whether rectification is required. This review will consider whether crossings maintain bed-level connectivity and unimpeded flows and whether any structures have become obstructed, perched or otherwise altered since construction. Long-term inspection and maintenance requirements will be incorporated into the project's inspection and maintenance processes for relevant waterway crossings, including periodic checks for sedimentation, scour, debris accumulation, obstruction, ponding and changes in crossing levels that could affect fish passage or waterway function. AGJV will complete the aquatic ecology and crossing review within one month. Any rectification, mitigation, consultation or maintenance actions identified through the review will be assigned implementation timeframes once their nature and extent are confirmed.	
M HLE-Obs-23	**B25 – Clearing limits**	Unless otherwise agreed with the Planning Secretary, the Proponent must: (a) ensure that the vegetation and habitat clearing limits specified in Table 2-1, Table 2-2 and Table 2-3 of Appendix 2 are not exceeded; and (b) minimise: (i) the impacts of the development on hollow-bearing trees; (ii) the impacts of the development on threatened species; and (iii) the clearing of native vegetation and key habitat; and	The Clearing Limits Tracking Dashboard provided during the audits does not separate full and partial clearing, as required by Condition B25 of the Infrastructure Approval for native vegetation. The Clearing Limits Tracking Dashboard does not predict future clearing required by the uncleared portions of the FLP, with potential for exceedances of clearing limits to inadvertently occur in future. Following approval of revised clearing limits, this dashboard will require updating to reflect revised clearing limits.	The Clearing Limits Tracking Dashboard is updated to allow tracking of full and partial clearing to ensure alignment with the revised clearing limits as approved by DPHI. This recommendation has been adopted and the Clearing Limits Tracking Dashboard has been updated. The Clearing Limits Tracking Dashboard is updated to allow for future clearing to ensure potential exceedances are identified early, or an alternative process is put in place to ensure exceedances of clearing limits do not inadvertently occur.	Recommendation has been adopted and implemented by AGJV as noted by the Auditor. No further action is proposed.	N/A

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		(c) not undertake any works that result in ground disturbance within a minimum setback distance of 50 metres from PCT 637 – *Alpine and sub-alpine peatlands, damp herbfields and fens, South Eastern Highlands Bioregion and Australian Alps Bioregion* and 30 metres from known locations of *Prasophyllum bagoense, Prasophyllum keltonni* and *Pterostylis oreophila* as mapped in the BDAR.				
HLE-Obs-24	**B26 – BOP**	Prior to carrying out any development that would impact on biodiversity values requiring offset or within 3 months of the date of the Project Approval whichever is sooner, the Proponent must update the Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT and to the satisfaction of the Planning Secretary in writing. The Package must include, but not necessarily be limited to: (a) details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS; (b) the cost for each specific biodiversity offset measure, as determined in accordance with a BCF Charge Statement indexed on a monthly basis in accordance with the Biodiversity Offsets Payment Calculator Order 2022; (c) the timing and responsibilities for the implementation and delivery of the measures required in the Package;	Transgrid has flagged their intent to enter into a Strategic Offset Delivery Agreement (SODA) after all other measures have been exhausted and is currently finalising negotiations with DCCEEW. A modification to the Infrastructure Approval is required to enable a SODA between Transgrid and NSW DCCEEW.	Include the intent to enter into a SODA in the updated BOP.	The next update of the BOP will address how the SODA will contribute to the delivery of the Biodiversity Offsets for the Project. It is expected that the SODA will be established before the next update so the BOP and will confirm how entry into the SODA satisfies the requirement to have biodiversity offset measures will have been implemented and delivered no later than 13 November 2026, unless otherwise agreed with the Planning Secretary, in accordance with Condition B26(e).	13 November 2026

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		(d) a report to be provided every 6 months from the approval of the updated Package to the Planning Secretary, BCS and the BCT setting out the progress towards delivering each specific biodiversity offset measure; and (e) confirmation that the biodiversity offset measures will have been implemented and delivered no later than 13 November 2026, unless otherwise agreed with the Planning Secretary. (....)				
HLE-Obs-25	**B29 – BAVR**	Unless otherwise agreed by the Planning Secretary, prior to carrying out any development that would impact on the relevant biodiversity values subject to survey in the Supplementary Biodiversity Strategy in condition B28 (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64), the Proponent must prepare a Biodiversity Assessment Verification Report in consultation with BCS and to the satisfaction of the Planning Secretary. (...) Any required changes to biodiversity offset or mitigation measures arising from the Biodiversity Assessment Verification Report must be incorporated into an updated version of the Biodiversity Offset Package under condition B26 in consultation with BCS and BCT and addressed in a revised version of the Biodiversity Management Plan required under condition B30, in consultation with BCS and FCNSW, to the satisfaction of the Planning Secretary.	Audit 1 found that the recommendations in Section 9 of the BAVR do not include targeted measures for avoidance based on the findings of the BAVR, as required by Condition B29 (d(ii)) of the Infrastructure Approval. Some species have been recorded during the SBS outside species polygons identified in the Revised BDAR (Niche, 2024). These species, such as the Squirrel Glider, were not reported in the BAVR as they were not targeted species. Pre-clearing surveys can identify species outside the species polygon but within the known range of the species. Transgrid has advised AGJV that these are not unexpected finds. It is unclear how these species are to be treated with regard to updates to the BAVR, clearing limits and offset requirements.	Section 9 of the revised BAVR, due on 20 November 2026, should include targeted measures for avoidance based on the findings of the BAVR, as required by Condition B29 (d(ii)) of the Infrastructure Approval. Ensure the BAVR incorporates all results of the SBS, particularly where species were recorded outside of species polygons in the Revised BDAR. Confirm how records of threatened species outside the species polygon but which are not defined as unexpected finds are to be treated as part of the updates to the BAVR.	The initial BAVR was approved on 5 September 2025 following peer review by Adam Cavallero of Umwelt Australia. Approval of the BAVR confirmed that it addressed the applicable requirements of Condition B29, other than the revision required under B29(c). Accordingly, the targeted avoidance measures required by B29(d)(ii) were considered to be sufficiently addressed by the Planning Secretary, following the CPHR consultation and peer review. The upcoming BAVR Revision to incorporate the FLPs will include updates to the species polygons to include all species recorded during the supplementary biodiversity surveys, including those outside the polygons in the Revised BDAR. We understand the third recommendation to concern records from pre-clearing surveys. Transgrid discussed this with CPHR on 3 June 2026. Transgrid proposed including these records in the BAVR; however REBS advised that the BAVR should only address survey results used to revise assumed presence under B28, while pre-clearing survey records should be managed through the BMP. Therefore no updates to the BAVR for pre-clearing survey records is proposed.	21 November 2026

Unique Audit ID	CoA	Details of Condition	Auditor Observations	Recommendation	Proponents Proposed Actions/ Responses	Due Date
HLE-Obs-26	**B30 – BMP**	Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by a suitably qualified and experienced biodiversity expert/s; (b) be prepared in consultation with BCS and FCNSW; (c) be prepared generally in accordance with the Revised Biodiversity Development Assessment Report (Revision0, dated 21 June 2024); (d) include a description of the measures that would be implemented for: (i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29; (ii) minimising: • the amount of vegetation clearing on site; • the loss of key fauna habitat (including tree hollows); • the impacts of fauna on site, including undertaking pre-clearance surveys; and • potential indirect impacts on threatened flora and fauna species;	The initial BMP was prepared by suitably qualified and experienced persons. However, updates to the BMP have been undertaken by members of the Environment team at AGJV. It is unclear whether these amendments fulfil the requirement under Condition B30(a) of the Infrastructure Approval. Condition B30 (d(xiii)) of the Infrastructure Approval requires identification of specific measures to minimise impacts on entities at risk of SAII. The HLE BMP states this is included in Sections 7.3 and 7.6; however, these mitigation measures are general in nature and are considered insufficient to address the requirements of the condition.	Ensure amendments to the BMP, other than routine administrative and implementation updates, are prepared by or reviewed and endorsed by suitably qualified and experienced biodiversity experts, as required by Condition B30(a) of the Infrastructure Approval. Updates to the HLE BMP following submission of the revised BAVR should incorporate the specific measures to minimise impacts on entities at risk of SAII, as required by Condition B30 (d(xiii)) of the Infrastructure Approval.	The approved BMP was prepared by suitably qualified biodiversity specialists. Routine administrative and implementation updates may be completed by the AGJV Environment Team; however, all substantive amendments affecting biodiversity assessment, mitigation or monitoring will continue to be prepared, reviewed and endorsed by a suitably qualified biodiversity specialist. This review is documented in the BMP revision history. Revision 2.1 of the BMP was adoption of the Niche-authored Connectivity Marker Plan. Niche are a suitably qualified biodiversity specialist approved by CPHR and DPHI. Following completion of the revised BAVR, the BMP will also be updated to include specific measures for each relevant SAII entity, consistent with Condition B30(d)(xiii) and specialist ecological advice. These requirements have been incorporated into the planned BMP update process. No change to this process is proposed.	N/A
HLE-Obs-27	**B30 – Unexpected finds**		The site inspection and review of documentation in this audit identified that not all records of unexpected finds of the Yass Daisy at YG-020 were buffered by 30 m in the Pre-clearing Report. The site inspection also identified that fencing of exclusion zones had occurred across a wider area of ~50 m than was required for construction of the access track. There is an opportunity to minimise impacts to threatened species by reviewing requirements for construction and ensuring fencing is brought in to the smallest possible area.	Ensure appropriate buffers are applied to all records of unexpected finds and mitigation measures are implemented accordingly. Where feasible, to help manage unexpected finds or species requiring specific mitigation measures, reduce the width of the construction corridor and ensure exclusion fencing is installed along this reduced area. This recommendation has been adopted and implemented for YG-020.	Recommendation has been adopted and implemented by AGJV as noted by the Auditor. No further action is proposed.	N/A
HLE-Obs-28	**B30 – Erosion and sediment control**		During the site inspection, numerous areas of erosion were observed across the project area following recent heavy rains, with minor impacts to biodiversity values. An example is provided in Table 2-1for Towers 74 and 75. Erosion controls were observed to be inconsistently applied across the project. Where applied, use of coarse woody debris at the base of batter slopes was found to be most effective at controlling erosion following rainfall. In some areas this was not installed, and sediment fencing was used. In other areas, no sediment control measures were installed. Slope stabilisation had not occurred in a number of areas due to a breakdown of the polymer spraying unit.	Review need to stabilise batter slopes with polymer as soon as possible following construction. Given the effectiveness of the use of coarse woody debris as a part of erosion and sediment controls, review potential for broader use of this technique across all clearing works. Following the audit, slope stabilisation works have been completed at Tower 75.	**Batter slope stabilisation** AGJV implements polymer stabilisation as part of its progressive erosion and sediment control measures for all construction sites, with application undertaken progressively throughout the construction process. The Project Environment Team includes a CPESC who provides ongoing oversight of erosion and sediment controls. This is supplemented by an independent external CPESC who conducts fortnightly inspections. Identified controls and corrective actions are reviewed and implemented through this inspection process. No further action is proposed. **Coarse woody debris** Coarse woody debris (CWD) is currently being used below tower pads where suitable as a slope break and erosion-control measure. Its use is determined on a site-specific basis having regard to slope, erosion risk, available material and environmental constraints. Relocating CWD is not always environmentally preferable, as doing so can disturb otherwise stable ground, require additional vehicle or plant movements, increase the risk of soil disturbance or vegetation damage, and remove habitat material from locations where it is already providing ecological value.	N/A

Unique Audit ID	CoA	Details of Condition	Auditor Observations	Recommendation	Proponents Proposed Actions/ Responses	Due Date
		(iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint; (iv) protocols for unexpected finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for: • all work in the associated location to stop to prevent further impact, and • notification to the Planning Secretary and BCS (and AG DCCEEW where relevant) in writing on any additional mitigation measures to be implemented; and • relevant agencies to be consulted and the Planning Secretary to endorse recommencement of work; (…) (xi) controlling erosion, weeds and feral pests; (xii) bushfire management; (xiii) minimising impacts on entities at risk of a serious and irreversible impact (SAII), including for Box Gum Woodland, Rice Flower (*Pimelea bracteata*) and Sooty Owl (*Tyto tenebricosa*) and other entities that are identified as requiring mitigation measures in the Biodiversity Assessment Verification Report required by condition B29 and the additional mitigation measures outlined in the additional information (Transgrid proposal dated 2 September 2024) within three years of the date of the Project Approval (over and above the relevant credit obligations); …			AGJV is also considering the use of CWD in other suitable areas beyond tower pads, including along disturbed slopes and other locations where it can provide effective surface roughness, flow dispersion or sediment-control benefits without creating additional environmental impacts. Where CWD is not suitable or its relocation would result in greater disturbance, alternative erosion and sediment controls are implemented based on site-specific conditions and CPESC advice. The suitability and effectiveness of CWD and alternative controls will continue to be considered through routine environmental inspections and CPESC review. No further action is proposed.	
HLE-Obs-29	**B30 – Vegetation clearing procedures**		Review of pre-clearing reports, where species requiring implementation of specific mitigation measures outlined in Section 2.4 and 2.5 of the Vegetation Clearing Procedure (Appendix B of the BMP) had been identified, did not make clear recommendations on how these mitigation measures should be implemented. There is potential for project teams to fail to implement these measures if they are not clearly outlined. Review of the Environmental Control Maps identified that similar colours are used in the legend of these maps, with potential for confusion by project teams in how the maps should be implemented. During Audit 1, the auditor was advised that plant operators had the clearing limits loaded into survey grade GPS to ensure inadvertent clearing outside the clearing limits did not occur. This was also a recommendation of Audit 1 (see HLE-NC-01). During the site inspection, a plant operator was found not to have access to the clearing limits due to a lack of data access. Further, the plant operator was relying on a mobile device with non-survey grade accuracy. This is somewhat mitigated by clear definition of clearing boundaries using bunting and signage, but the lack of redundant controls diminishes the effectiveness of the Swiss cheese model of risk mitigation discussed during the site inspection.	Ensure mitigation measures required by the BMP, such as hand-clearing, are clearly outlined in the pre-clearing reports. Review colours used in the Environmental Control Maps to ensure adequate contrast to avoid confusion between controls. Ensure all plant operators have access to the clearing limits loaded into survey grade GPS to ensure inadvertent clearing outside limits does not occur.	**Pre-Clearing Reports** The Vegetation Clearing Procedure, including requirements for hand clearing and plant access/egress, are specified within the Clearing and Land Disturbance Permit as these measures are developed in consultation with the Contractor and Subcontractor teams and are determined with due consideration of personnel safety, engineering constraints, and environmental requirements. AGJV does not consider it necessary to duplicate these requirements within the ecology pre-clearing reports. The applicable clearing constraints and mitigation measures, including areas requiring hand clearing or other specific clearing controls, are maintained within the project GIS and are used to prepare the ECMs and CLDPs that directly govern the works in the field. These documents provide the current, spatially accurate and construction-specific controls to the personnel undertaking and supervising the clearing works. The ecology pre-clearing reports serve a different purpose, principally documenting the ecological assessment and pre-clearing inspection outcomes that inform these controls, and are already substantial documents. Reproducing the same spatial controls within those reports would create duplication and introduce a risk that superseded information remains in circulation if construction controls are subsequently refined. AGJV considers that maintaining a single controlled spatial source and implementing those requirements through the ECM and CLDP process provides clearer and more effective field control. No further action is proposed in relation to updating the pre-clearing reports. **Environmental Control Maps** AGJV accepts the recommendations concerning ECM symbology and has reviewed and updated the ECMs accordingly. No further action is proposed in relation to the ECMs. **Plant Operator GPS** Large plant used during clearing works is equipped with survey-grade GPS, with approved clearing boundaries loaded. This measure is in addition to the GPS trackers and alarms required under Section 7.7 of the BMP. Survey-grade machine guidance (machine GPS) is used where reception and terrain allow. In dense vegetation and steep terrain, canopy and topography can make machine GPS unreliable due to a lack of data access, as observed by the auditor. The Survey and Environmental teams check topography and GPS reception prior to clearing and locations where GPS is identified as unreliable are treated as high-risk areas, and additional steps are followed to ensure clearing does not extend beyond approved limits. Higher risk areas are identified on the Clearing and Land Disturbance Permit (CLDP) and are subject to the additional controls set out in it. In these areas, clearing boundaries are established and verified through: • Survey set-out and colour-coded flagging • Bunting and instructional signage	N/A

Unique Audit ID	CoA	Details of Condition	Auditor Observations	Recommendation	Proponents Proposed Actions/ Responses	Due Date
					• ECMs and shapefiles issued to the clearing team • Leading-hand supervision • Arborist marking and supervision • An ecologist with hand-held survey-grade GPS onsite. These controls provide independent and visible confirmation of the approved limits where machine guidance is unavailable or unreliable. Mobile devices are used for reference and are not relied upon to survey or establish clearing boundaries. These preventative measures and steps have been reflected in the latest update of the Vegetation Clearing Procedure (BMP Rev 02.3) in alignment with the content of the CLDP. AGJV notes that no clearing outside the approved limits has been identified during ECZ clearing. No further action is proposed in relation to plant operator GPS.	
HLE-Obs-30	**B25 – Clearing limits** **B30 – Vegetation Clearing**	Unless otherwise agreed with the Planning Secretary, the Proponent must: (a) ensure that the vegetation and habitat clearing limits specified in Table 2-1, Table 2-2 and Table 2-3 of Appendix 2 are not exceeded; and (b) minimise: (i) the impacts of the development on hollow-bearing trees; (ii) the impacts of the development on threatened species; and (iii) the clearing of native vegetation and key habitat; and (c) not undertake any works that result in ground disturbance within a minimum setback distance of 50 metres from PCT 637 – *Alpine and sub-alpine peatlands, damp herbfields and fens, South Eastern Highlands Bioregion and Australian Alps Bioregion* and 30 metres from known locations of *Prasophyllum bagoense, Prasophyllum keltonni* and *Pterostylis oreophila* as mapped in the BDAR.	During clearing works, logs and coarse woody debris are stockpiled for: • use by the landowner (where requested),or • for mulching at a later stage. Where logs are to be used by the landowner, the location of log stockpiles is identified in consultation with the landowner via a Timber Acceptance Form, with the location for stockpiles identified in this agreement. The location of log stockpiles has the potential to result in inadvertent impacts on biodiversity values (see HLE-Obs-20, Lucidity ID 48197 above). Further, in some instances stockpiling of material is occurring outside the clearing limits. This stockpiling of material can also create secondary habitat with animals recolonising this habitat post the initial clearing event. Later disturbance of these stockpiles could result in inadvertent impacts to animals if they have relocated into these stockpiles. The Environment team advised that the disturbance of these stockpiles required supervision of the project Ecologists, but the process for ensuring this occurs is not clear.	Ensure clearing limits are clearly flagged and all impacts, including stockpiling of material and deposition of coarse woody debris, are retained within clearing limits. Review how log stockpile locations are identified in the Timber Acceptance Form and ensure PCT mapping is included in the agreement, and that log stockpiles are placed in areas of PCT 0 to ensure inadvertent and unintended impacts to biodiversity values are not occurring. Review the procedure for removal of log piles to ensure inadvertent impacts do not occur. During Audit 2, AGJV identified opportunities for improvement in the landowner timber acceptance process, including identifying that landowner timber stockpiles are not placed in areas of biodiversity value.	AGJV clarifies that two different timber-management arrangements apply: • Project-controlled stockpiles • Timber transferred to a landowner. Project-controlled stockpiles retained for processing or mulching are located within approved clearing limits. Their coordinates are recorded by the Project Ecologist and maintained in a spatial layer. The stockpile spatial layer identifies each stockpile requiring ecologist supervision before processing or removal. Fauna observations and interactions are recorded through the ecologist's data system and ecologist supervision records. These controls address both the initial placement risk and the potential for fauna to recolonise Project-controlled stockpiles before later processing. No further action is proposed. Timber transferred to a landowner is managed through the Timber Acceptance Form. This form records the landowner-selected location and transfers responsibility for ongoing management of the timber upon acceptance. These locations are not Project-controlled stockpiles and will not be allocated as Project clearing where pre-placement checks confirm that no additional Project-related clearing or biodiversity impact is required. The Timber Acceptance Form will be strengthened to require, before placement: • A mapped and agreed location • Review of PCT and habitat-feature mapping • Confirmation that sensitive areas will not be affected • Environmental Manager signoff of the proposed location • Landowner acceptance and transfer of responsibility.	30 October 2026

Unique Audit ID	CoA	Details of Condition	Auditor Observations	Recommendation	Proponents Proposed Actions/ Responses	Due Date
HLE-Obs-31	**B30 – Flora and fauna monitoring**	Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (d) include a description of the measures that would be implemented for: (i) meeting the biodiversity mitigation requirements in condition B25 and as required by condition B29; (ii) minimising: • the amount of vegetation clearing on site; • the loss of key fauna habitat (including tree hollows); • the impacts of fauna on site, including undertaking pre-clearance surveys; and • potential indirect impacts on threatened flora and fauna species; (iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint; (…)(viii) progressively monitoring the areas of partial clearance following the commencement of construction and provision of a verification report every three months during construction to confirm the assumptions made in the BDAR regarding partial clearance within the Easement Clearing Zone and whether any changes are required to this plan;	AGJV have undertaken further analysis of partial clearing area in the ECZ using LiDAR and input from project Arborists, to reduce clearing in the ECZ. This is commendable and demonstrates minimisation of harm to the environment in accordance with Condition A1 of the Infrastructure Approval. However, some BAM plots are located within areas which will no longer be cleared. There is potential that the location of these plots will misrepresent the outcomes which are achieved by partial clearing with regards to future vegetation integrity scores.	Review the location of BAM monitoring plots to ensure they are representative of partial clearing.	The reduction in clearing has resulted in smaller and less uniform partial clearing areas, meaning that some existing 50 m × 20 m BAM plots are no longer wholly contained within the areas proposed for partial clearing. This does not necessarily invalidate those plots, provided the monitoring method accounts for the proportion of each plot affected and remains capable of measuring the vegetation-integrity outcomes attributable to partial clearing. AGJV engaged its ecology subcontractor on 8 September 2026 to review the suitability of the monitoring plots. Based on the ecological advice received, plots affected by the revised clearing extent will be assessed using the following approach: • Overlay each BAM plot against the latest approved partial-clearing extent • Determine the proportion and type of clearing occurring within each plot • Retain plots where the affected portion remains representative, with an appropriate proportional adjustment applied to the assessment • Relocate or replace any plot where the affected area is too small or irregular to provide a representative monitoring result • Document the assessment, adjustment and justification for each retained or relocated plot. This review will ensure that the monitoring program continues to accurately assess the effects of partial clearing and supports the verification reporting required by Condition B30(d)(viii) and the monitoring and evaluation requirements of Condition B30(e). This is an ongoing process as easement clearing progresses but an initial assessment will be completed by the end of October 2026.	06 November 2026
HLE-Obs-32	**30 - Biosecurity**		During the site inspection, it was identified that the use of washdown bays as required by the Biosecurity Management Plan (Appendix D of the BMP) and Property Management Plans cannot be reviewed to ensure compliance. No usage log or auditable mechanism is in place to ensure usage.	Ensure controls are implemented to identify who is using washdown bays and the frequency of use to ensure project personnel are implementing biosecurity controls in accordance with the Biosecurity Management Plan (Appendix D of the BMP) and Property Management Plans. This recommendation has been adopted and implemented with evidence provided following the audit.	Recommendation has been adopted and implemented by AGJV as noted by the Auditor. No further action is proposed.	N/A

Unique Audit ID	CoA	Details of Condition	Auditor Observations	Recommendation	Proponents Proposed Actions/ Responses	Due Date
		(ix) maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and revegetation of the site; (x) collecting and propagating seed (where relevant); (xi) controlling erosion, weeds and feral pests; …				

Table 2- Status of Recommendations from Previous Audit (IEA #1) (IEA #2 Report Section 3.5 items not closed by the Auditors)

Unique ID	CoA	Auditor Observations (IEA #1)	Recommendation (IEA #1)	Actions taken and status (IEA #2)	Proponents Proposed Actions/ Responses	Due Date
Non-Compliances						
HLE-NC-01	**A2/B30**	**Lead Auditor Observations** On 28/11/25 DPHI were notified of four instances where access track construction resulted in impacts outside the project boundary and potential for non-compliance with Conditions A2 (d) and B30. Following the identification and reporting of the non compliance, a number of preventative actions were undertaken as noted below: **Procedural Controls** • Implement controls that have since been developed and documented in the Biodiversity Management Plan (BMP), specifically BD6, BD11 and BD16 • Flagging intervals to be reviewed based on terrain and track alignment and amended accordingly • Re-brief all site staff on boundaries and the process to follow for delineating the boundary. **Boundary Communication** • Provide physical signage and fencing to delineate boundaries • Reinforce boundary rules at toolbox/pre-start, with site crews. **Organisational / Resource Allocation:** • Ensure sufficient resources for survey team to delineate project boundaries for future works • Ensure that all machine controls are uploaded and ready for use. At the time of the Audit, the recommended actions were noted as complete. Please also refer to observations by the Biodiversity Specialist below and the specialist biodiversity report (Appendix F). **Biodiversity Specialist Observations** On 28 November 2025 DPHI were notified of four instances where access track construction resulted in impacts outside the project boundary (Lucidity ID 47487). The access tracks identified include AT 299 and AT 301 within property YG-027A, as well as AT 446-448 and AT 451 within property MA-051. This was considered a potential for non compliance with Conditions A2 (d) and B30.	**Lead Auditor Recommendation** The Auditor reviewed the actions taken in response to the noncompliance and considers them to be appropriate. However, should any breaches of the boundary disturbance protocols, or further boundary exceedances (or near misses) occur, a detailed review of the effectiveness of the relevant protocols are undertaken and revised with the objective of identifying and eliminating any systemic weaknesses to prevent further non compliance. **Biodiversity Specialist Recommendation** Ensure survey grade equipment is used to delineate clearing boundaries. GPS devices with less accurate positioning (e.g. mobile devices supporting FieldMaps) should not be used to delineate boundaries. Ensure flagging is at appropriate intervals to clearly delineate clearing boundaries, Intervals should be adapted to the alignment, with a lower interval on curves for example, and more flagging on steep terrain. AGJV should review use of flagging to determine whether this is appropriate and easily observed by all. As advised by AGJV during the site inspection, large plant used during clearing works should be equipped with survey grade GPS with the clearing boundaries loaded to ensure clearing does not extend outside approved limits. The impacts should be incorporated into the updates to condition B25 currently being sought by Transgrid.	**Lead Auditor Comments** As noted in IEA#1, the actions taken in response to the noncompliance are considered appropriate. AGJV confirmed that the actions have been completed. There have been no further breaches of the project boundary during This Audit period. **STATUS - CLOSED** **Biodiversity Specialist Comments** The site inspection for Audit 2 found this recommendation was not being consistently implemented: • A plant operator undertaking partial clearing within the ECZ at BY-109 did not have the clearing limits loaded into a device and was using a mobile device with non-survey grade accuracy. However, flagging of clearing limits was found to be significantly improved, with use of bunting across the majority of the project clearly delineating clearing limits. **STATUS - OPEN**	The surveyor provides the relevant shapefile directly to the clearing subcontractor for installation on the excavator GPS unit. However, GPS accuracy and connectivity can be affected in some locations by dense canopy cover and challenging topography, such as at BY-019, which was inspected during the audit (BY-109 was not inspected in the framework of Audit 2). To address these limitations, AGJV implements multiple controls to ensure clearing boundaries are clearly identified and maintained before and during clearing works, as described in detail in the response to **HLE-Obs-29** in Table 1, including: • Surveyor-installed flagging, using different colours to delineate project boundaries, hand-clearing areas and heritage exclusion zones • Boundary and exclusion zone signage • Supervision by the AGJV Leading Hand • Tree marking and supervision by the Arborist • On-site oversight by the Ecologist, including use of GPS • Provision of ECMs to both the clearing contractor and AGJV supervisors These controls provide multiple layers of verification and boundary identification in circumstances where GPS performance may be constrained and were positively observed at the time of the audit. As part of the standard process, the CLDP is signed off by the surveyor, who is responsible for uploading the approved clearing boundary shapefile to the excavator GPS system prior to the commencement of works. Further, a recent update to the CLDP form included a final step to check that the GPS file has been uploaded to the machine prior to works. Going forward, the environmental team will check that the relevant files are correctly uploaded to the machines as part of the CLDP process before clearing occurs. The environmental manager needs to ensure the GPS shapefile is uploaded to the machine and working properly before the permit can be signed off. A copy of the addition to the CLPD form has been provided as evidence of this improvement.	15 November 2026

Unique ID	CoA	Auditor Observations (IEA #1)	Recommendation (IEA #1)	Actions taken and status (IEA #2)	Proponents Proposed Actions/ Responses	Due Date
		This incident arose due to boundary flagging being in the wrong position as well as the spacing between flagging being insufficient. For one site (AT446-448 in MA-051) insufficient sediment controls were in place and sediment spread outside the clearing boundary and development of a boghole led to construction of an alternate access for the landowner outside the project boundary. Clearing in MA-051 and YG-027A occurred in areas mapped as PCT 316 and PCT 1330. PCT 1330 is considered with White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland critically endangered ecological community (CEEC) The BAVR identifies AT 301 in YG-027A as habitat for the Striped Legless Lizard *(Delma impar)*, Yass Daisy *(Ammobium craspedioides)*, Hoary Sunray *(Leucochrysum albicans subsp. tricolor)* and Austral Toadflax *(Thesium australe)* noting none were observed during pre-clearing surveys. The BAVR identifies AT 299 in in YG-027A as habitat for Southern Myotis *(Myotis macropus)*, Yass Daisy *(Ammobium craspedioides)*, Hoary Sunray *(Leucochrysum albicans subsp. tricolor)* and Austral Toadflax *(Thesium australe)* noting none were observed during pre-clearing surveys. No threatened species habitat is mapped in MA-051. This incident has resulted in unintended impacts to biodiversity values.				
HLE-NC-02	**B64**	**Lead Auditor Observations (HLE-NC-02)** On 10/9/25 Transgrid Notified DPHI of a potential non-compliance with Condition B64. The post construction review of as-built drone imagery identified two areas of an access track within property MA-099 breaching the project boundary by a maximum of 6.5m. The works were associated with Minor Impact Checklist (MIC) # 15, which was approved by the ER. Following the identification and reporting of the non compliance, an internal investigation was undertaken which recommended a number of actions to be undertaken as follows: **Immediate Actions** • Review of all current project boundaries with survey/foreman • Site-wide re-briefing on boundary rules and delineation requirements • Requirement that machine controls are confirmed as being operational prior to works commencement.	**Lead Auditor Recommendation** The Auditor reviewed the actions taken in response to the noncompliance and considers them to be appropriate. However, should any breaches of the boundary disturbance protocols, or further boundary exceedances (or near misses) occur, a detailed review of the effectiveness of the relevant protocols are undertaken and revised with the objective of identifying and eliminating any systemic weaknesses to prevent further non compliance. **Biodiversity Specialist Recommendation** Ensure survey grade equipment is used to delineate clearing boundaries. GPS devices with less accurate positioning (e.g. mobile devices supporting FieldMaps) should not be used to delineate boundaries.	**Lead Auditor Comments** As noted in IEA#1, the actions taken in response to the noncompliance are considered appropriate. AGJV confirmed that the actions have been completed. There have been no further breaches of the project boundary during This Audit period. **STATUS - CLOSED** **Biodiversity Specialist Comments** The site inspection for Audit 2 found this recommendation was not being consistently implemented: A plant operator undertaking partial clearing within the ECZ at BY-109 did not have the clearing limits loaded into a device and was using a mobile device with non-survey grade accuracy. However, flagging of clearing limits was found to be significantly improved, with use of bunting across the majority of the project clearly delineating clearing limits. **STATUS - OPEN**	Noted. Please refer to **NC-01**	Please refer to **NC-01**

Unique ID	CoA	Auditor Observations (IEA #1)	Recommendation (IEA #1)	Actions taken and status (IEA #2)	Proponents Proposed Actions/ Responses	Due Date
		Short Term Actions • Targeted re-training for all delivery teams on appropriate use of GIS vs GPS tools • Toolbox talks rolled out to reinforce correct boundary delineation processes • Improved base station deployment planning to avoid future delays. **Medium Term Actions** • Additional survey resources allocated to boundary • Survey team to sign off all Clearing and Land Disturbance Permits as an additional control • Risk-based requirement for survey delineation of all access track works outside 200m corridor or near environmental constraints. At the time of the Audit, the recommended actions were noted as complete. **Biodiversity Specialist Observation** On 4 September 2025 Transgrid Notified DPHI of a potential non compliance with Condition B64 (Lucidity ID 47912). The post construction review of as built drone imagery identified two areas of an access track within property MA-099 breaching the project boundary by a maximum of 6.5 m. The works were undertaken as a part of Enabling Works and were associated with Minor Impact Checklist (MIC) # 15, which was approved by the Environmental Representative. This incident arose due to the use of ArcGIS FieldMaps to delineate the clearing boundary with accuracy of >5 m. Further, spacing between was insufficient due to alignment of the track and terrain. The Response to Request for Information identified that although the project boundary was exceeded, the total disturbance was less than the approved disturbance (13,272 m^2 vs 23,587 m^2). This document also states that a review by the Project Ecologist indicated the area was low conservation value grassland and *"would have resulted on a negligible impact to biodiversity "* (p.2). This conclusion does not draw on the data from the BDAR or BAVR.	Ensure flagging is at appropriate intervals to clearly delineate clearing boundaries, Intervals should be adapted to the alignment, with a lower interval on curves for example, and more flagging on steep terrain. AGJV should review use of flagging to determine whether this is appropriate and easily observed by all. As advised by AGJV during the site inspection, large plant used during clearing works should be equipped with survey grade GPS with the clearing boundaries loaded to ensure clearing does not extend outside approved limits. The impacts should be incorporated into the updates to condition B25 currently being sought by Transgrid.			

Unique ID	CoA	Auditor Observations (IEA #1)	Recommendation (IEA #1)	Actions taken and status (IEA #2)	Proponents Proposed Actions/ Responses	Due Date
		• Clearing occurred in areas mapped as a mix of PCT 280 and PCT 2774. PCT 277 is considered with White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland critically endangered ecological community (CEEC). Land adjacent is mapped as Category 1 Land • The BDAR identifies these areas as habitat for a variety of threatened fauna species Key's Matchstick Grasshopper (Keyacris scurra), Yass Daisy (Ammobium craspedioides), Small Purple-pea (Swainsona recta), Silky Swainson-pea (Swainsona sericea) and Striped Legless Lizard (Delma impar) Given the total disturbance was less than the approved disturbance, and occurred in areas contiguous with the approved disturbance boundary, it is considered likely that impacts to biodiversity are consistent with or even less than the predicted impacts.				
Observations and Recommendations – Lead Auditor						
HLE-Obs-03	B30	A colour coding system for boundary flagging and the delineation of project boundary and environmentally sensitive areas has been implemented at the Bannaby substation site. The colour of the flagging is inconsistent with the advisory signage at the site compound and it appears that a similar system has not been implemented on other parts of the project	Review the colour coding system for the identification and delineation of environmental protection fencing across the project. The review should also include mechanisms for communicating colour coding systems to ensure consistency including: • Visual signage (e.g. Bannaby Substation) • Site inductions • EWMS/ECMS and Workpacks.	The site wide review has been completed with corrective actions implemented at Bannaby. There were some isolated instances where colour coding for fencing was inconsistent with the coding system. It is therefore recommended that the implementation is continually checked through routine site inspections. **STATUS – OPEN and ONGOING**	The project GIS has been updated to help identify habitat features, improving the symbology associated to each feature. Flagging audit undertaken and actions implemented across the zones to update flagging to be consistent including the purchase of new environmental specific flagging. No further action is proposed	N/A
Observations and Recommendations – Biodiversity Specialist						
HLE-Obs-06	A1	Revised constraints mapping, updated following completion of the Biodiversity Assessment Verification Report (BAVR), is not included in the current version of the BMP.	The BMP is updated to include revised constraints mapping.	This is yet to be implemented. AGJV have advised that this be included in the updates to the BMP required by Condition B29 of the Infrastructure Approval following revisions to the BAVR. **STATUS - OPEN**	Noted. Please refer to **HLE-Obs-21** and **HLE-Obs 26** in Table 1	Please refer to **HLE-Obs-21** and **HLE-Obs-26**

Unique ID	CoA	Auditor Observations (IEA #1)	Recommendation (IEA #1)	Actions taken and status (IEA #2)	Proponents Proposed Actions/ Responses	Due Date
HLE-Obs-07	B30 / Unexpected Finds Protocol	During the site inspection, a daily ecology checklist from the 10 February 2026 potential unexpected find (see Table 2-1). This had not been reported through to project personnel, No clear process for reporting and resolving potential unexpected finds was evident. To ensure compliance with the requirements of the BMP a clear process is required.	AGJV and their Project Ecologist develop a process to report, track and resolve potential unexpected finds and that this procedure be incorporated into an updated Unexpected Finds Protocol.	AGJV advised that the Unexpected Finds Procedure was updated in the latest revision of the BMP (Rev 02.2) to include a process for reporting when an unexpected find is confirmed during pre-clearing surveys or any other survey. Whilst these changes make responsibilities clearer, the recommendation related to a potential unexpected find of the Striped Legless Lizard during pre-clearing surveys, which was recorded on a daily ecologist checklist, but no clear record of resolution of this was documented. The amendments to the BMP will not resolve this issue. It is recommended that a system be established requiring the project Ecologists to report potential unexpected finds to the Environment team, flagging these for resolution within a certain timeframe (e.g. 24 hours). This issue is partially resolved. **STATUS - OPEN**	The ecology subcontractor undertakes daily debriefs with site and project ecologists, during which potential unexpected findings can be flagged for immediate communication and action, in accordance with the Unexpected Finds Procedure. Subcontractor, site and project ecologists have received training on the management of unexpected finds. In the event that an unexpected find is documented on an ecologist checklist, site ecologists would flag find with project ecologist and the site environmental team. The site environmental team would implement a stop work with the site construction team to ensure no ecological impact. Project ecologist would review information and provide applicable controls/ mitigation and provide them to the environmental manager. The environmental manager would communicate to engineering/ construction leads and ensure that controls were implemented (i.e., flagging, additional works closure, supervision). They would then provide this information to TransGrid and regulator as required. Depending on the reporting requirements, works would be resumed with additional ecology controls, or would continue to be stopped until an endorsed plan was provided. Further, a Senior Environmental Advisor has been appointed to support the management of project ecology resources. The Senior Environmental Advisor or delegate acts as the interface between site ecology/ environmental crew, Project/ lead ecologists, and TG biodiversity experts. They manage the unexpected finds in support with environmental manager and assist with updating required plans and environmental controls. . No further action is proposed.	N/A
HLE-Obs-09	B30 / Vegetation Clearing Procedure / Biosecurity Management Plan	Two different procedures are provided in the Vegetation Clearing Procedure and Biosecurity Management Plan regarding documenting weed species within a property. The pre-clearing report for BY-040 did not adequately document occurrence and distribution of priority weed species to allow management to occur. There is a lack of consistency between the two procedures, along with very onerous requirements in the Vegetation Clearing Procedure. It is likely that this is leading to inadequate mapping of weed species as a part of the pre-clearing surveys. The intent of weed mapping should be focused on understanding baseline conditions and control of priority weeds during construction, to prevent spread and ensure compliance is achieved.	AGJV engage with CPHR with a view to simplifying baseline data collection for weed species. This could include: • noting priority weeds occurring at low densities which teams need to be aware of, and • undertaking detailed mapping of weed infestations which will need to be managed during construction. This information should be spatial in nature.	AGJV advised that the process for documenting weeds was amended in the latest revision of the BMP (Rev 02.2). A revised process for documenting weed species in pre-clearing reports for baseline monitoring was also included to ensure consistency between the Vegetation Clearing Procedure and the Biosecurity Management Plan. Review of this process indicates a more simplified process, but there is still a lack of nexus between weeds occurring at low densities, which project teams need to just be aware of, and those occurring at higher densities, which will need to be managed during construction. Further amendments are recommended. This issue is partially resolved. **STATUS - OPEN**	Weeds are identified by qualified ecologists during pre-clearing surveys. Priority weeds are managed in accordance with the BMP. Weed management requirements are communicated through ECMs, pre-start toolbox talks for new work areas, and species identification cards with photographs and management information. Further clarification on this process, as it relates to weed density, will be included in the next BMP review.	30 October 2026

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