

BARNETT & MAY

EnergyConnect PEC West Project SSI 10040

March 2025 Construction Phase Independent
Environmental Audit

Prepared for
Secure Energy

Client representative
Rebecca Walker-Edwards

Date: 4 June 2025
Rev 0 Final



Contents

1.	Introduction	1
1.1	Audit and Report Program	1
1.2	Project Description and Status of Construction	1
1.3	Audit Objectives	3
1.4	Audit Scope	3
1.5	Audit Period	3
1.6	Limitations of this Report	4
2.	Definitions	5
3.	Auditor Certification	6
3.1	Audit Details	7
4.	Audit process	8
4.1	Audit Guidelines	8
4.2	Overview	10
4.3	Preliminary activities	10
4.3.1	Approval of audit teams	10
4.3.2	Consultation with Agencies	10
4.4	Information Review and Compliance Register	10
4.5	Site audit	11
4.5.1	The audit site inspections commenced on 15 September and concluded (ecology focussed inspection on) 29 October 2024.	11
4.5.2	Opening Meeting	11
4.5.3	Site Inspections	11
4.5.4	Site Interviews	12
4.5.5	Closing Meeting	12
4.5.6	Document Review	12
4.6	Reporting	13
5.	Stakeholder Consultation.....	15
6.	Statutory Compliance and Recommendations	22
6.1	Summary of Compliance Status	22
6.2	Non-Compliances and other recommendations	22
7.	Independent Audit Post Approval Requirements.....	23
7.1	Summary of Environmental Incidents	23
7.1.1	Incident Response Assessment	23
7.2	Summary of Complaints	23
7.2.1	Compliant Management System Assessment	23
7.3	Summary of Notices	23
7.4	Supplementary Approvals and Licences	24
7.5	Project Environmental Management System	24
7.6	Implementation of the Environmental Management Plan and Sub-plans	24
7.7	Status of Previous IEA Findings	24
7.8	Specialist Auditor Reports	25
7.9	Environmental Impacts	25
7.9.1	Extent of Project Operations	27
7.10	Other Matters	27

List of tables

Table 1 - Audit Details	7
<i>Table 2 - Post Approval Audit Guidelines</i>	8
Table 3 - Compliance Assessment Matrix	13
Table 4 - Risk Assessment Matrix	14
Table 5 - Summary of Stakeholder Inputs	15
Table 6 - Summary of Statutory Compliance.....	22
Table 8 – Status of previous IEA Findings.	Error! Bookmark not defined.
<i>Table 9 - Predicted vs Actual Impacts</i>	25

Appendices

Appendix A — Audit Table

Appendix B – Audit Photographs

Appendix C – Auditor Approval Letter

Appendix D – Stakeholder Consultation

Appendix E – Auditor Qualifications

Prepared by — K. Holmes		Date 4 June 2025
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Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
a	Draft for client Review	K Holmes	M Holmes	K Holmes	23 May 25
0	Final Report	K Holmes	K Holmes	K Holmes	4 June 25

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1. Introduction

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

The project consists of the construction of a 330kV from SA border to Buronga substation, then 220kV from Buronga sub to Red Cliff substation in Victoria. Transgrid is the Proponent, SecureEnergy is the Construction Contractor.

The Project is being delivered in 2 stages. Stage 1 was for early works and included the upgrade of the existing substation at Buronga, establishing the Buronga accommodation camp, construction compound, and using and accessing a water supply point. Stage 2 involved the construction of the electricity transmission lines and associated access infrastructure.

The Infrastructure Approval (SSI 10040) covers both the construction and operational phases of the Project. Condition E11 requires that *“Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary”*.

The audit was undertaken in accordance with the Barnett and May’s proposal dated 27 September 2023, and the requirements of the NSW of Planning and Environment (DPE) Independent Audit Post Approval Guidelines (May 2020). The Audit was commissioned 14 November 2023. DPPI approved the appointment of the Auditor on 21 February 2025.

1.1 Audit and Report Program

The audit was undertaken by Ken Holmes (Accredited Lead Auditor) of Barnett & May. The site inspection commenced on 28 April 2025.

1.2 Project Description and Status of Construction

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

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

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

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

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

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

This Independent Environmental Audit covers the works on the western section under SSI 10040.

The Project is being delivered in 2 stages. Stage 1 covered the early works that included the upgrade of the existing substation at Buronga, establishing the Buronga accommodation camp, construction compound, and using and accessing a water supply point. These works are complete.

At the time of this audit, the construction works were substantially complete:

- All clearing required for the project was complete;
- The construction of the transmission line was complete;
- Accommodation camps had been removed; and
- Rehabilitation works were complete.

The only works underway at the time of the site inspection was the finalisation of internal roadways, curb and gutter installation within the Buronga Substation.

1.3 Audit Objectives

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

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

1.4 Audit Scope

The audit provides an assessment of the compliance of the project with the conditions of Project Approval SSI 10040. Note that no other relevant environmental licences or approvals were identified for this development.

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

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

1.5 Audit Period

This audit of the construction phase of the project covers the period of 13 September 2024 to 28 April 2025.

1.6 Limitations of this Report

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

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


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

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

2. Definitions

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

3. Auditor Certification

Independent Audit Certification Form	
Development Name	EnergyConnect Project (NSW Western Section)
Application Number	SSI 10040
Description of Development	High Voltage Electricity Transmission Line
Development Address	Southwestern NSW
Proponent	Transgrid
Title of Audit	EnergyConnect PEC West March 2024 Independent Environmental Audit
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (May 2020).</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</i> <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <p><i>Note.</i></p> <p><i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p><i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	49 Coba Point, Berowra Waters, NSW
Email Address	ken@baeckea.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	4 June 2025

3.1 Audit Details

Table 1 - Audit Details

Audit Title:	EnergyConnect (NSW – West Section) April 2025 Construction Phase Independent Environmental Audit
Site:	EnergyConnect (NSW – West Section)
Client Contact:	Rebecca Walker-Edwards
Position:	Approvals Manager
Client:	Transgrid
Client Address:	Level 19, 83 Clarence St Sydney NSW 2000
Client Phone Number:	+61 420974540
Client Email:	Rebecca.walker-edwards@elecnor.es
Auditor Team	Ken Holmes (Certified Lead Auditor)
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baeckea.com.au
Date of Audit Commencement:	28 April 2025

4. Audit process

4.1 Audit Guidelines

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

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

Table 2 - Post Approval Audit Guidelines

Section	Independent Audit Report Requirements	Addressed
4.1	Version Control <ol style="list-style-type: none"> 1) the application number of the project; 2) each version or revision number of the report; 3) the date on which the report was prepared and issued to the Department; and 4) the title and name of the person who certified the Independent Audit Report. 	Section 3 Page iii Page iii Section 3.1
4.2	Contents	
4.2.1	Introduction – a brief overview of the audit including: <ol style="list-style-type: none"> 1) background of the project; 2) the audit team (including qualifications and experience); 3) the objectives of the audit; 4) the audit scope; and 5) the temporal period covered by the audit. 	Section 1.1 Section 4.3.1 and Appendix E Section 1.2 Section 1.3 Section 1.4
4.2.2	Audit Methodology <ol style="list-style-type: none"> 1) documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 2) how the audit scope was developed; 3) a summary of the audit process adopted to determine the compliance status and assess if documents are adequate; 4) site personnel interviewed including their name and position title (and including if access was not granted or possible with any required personnel and why); 5) details of site inspections undertaken (including any areas where access was not granted or possible and why); 6) a summary of the consultation undertaken; and 7) meanings of compliance status descriptors used, as set out in this document. 	Appendix C Section 1.3 Section 4 Section 4.5.3 Section 4.5.2 Section 5 Section 4.6
4.2.3	Audit Findings <ol style="list-style-type: none"> 1) a list of the approvals and documents audited; 2) a summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period. Graphics can be used to summarise project performance in relation to compliance requirements; 3) a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period; 	Appendix A Section 6.1 Section 7.3

Section	Independent Audit Report Requirements	Addressed
	4) exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance;	Section 6.2
	5) a brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action. Details must include the source of the action, reference (condition number), action proposed, proposed completion date, the status (date completed, if relevant) and the action complete.	Section 7.6
	6) a brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement;	Section 7.5
	7) a discussion of other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance;	Section 7.9
	8) documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation;	Section 5
	9) a summary of complaints, and the adequacy of the response to, and management of complaints;	Section 7.2
	10) details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents;	Section 7.1
	11) an assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the Environmental Planning and Assessment Act 1979;	Section 7.8
	12) evidence collected through site inspections undertaken during the audit;	Appendix A
	13) evidence to support compliance assessment provided by the personnel interviewed during the audit;	Appendix A
	14) a brief discussion of any continual environmental management improvement opportunities identified as part of the audit; and	Section 6.2
	15) key strengths of the development's environmental management and performance identified by the auditor.	Section 7.4
4.2.4	Recommendations and opportunities for Improvement	Section 6.3
4.2.5	Appendices	
	1) a completed Independent Audit Table with all relevant conditions of consent, identifying each requirement, compliance status assessed, documenting verified evidence and providing recommendations for any non-compliance that is identified;	Appendix A
	2) a copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s);	Appendix C
	3) documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee;	Appendix D
	4) completed and signed Independent Audit Declaration Form(s);	Section 3
	5) any reports prepared by the agreed technical specialist(s), as required; and	To be reported separately (refer to Section 1.1.
	6) site inspection photographs.	Appendix B

4.2 Overview

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

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

4.3 Preliminary activities

Off-site planning for the site audit comprised:

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

4.3.1 Approval of audit teams

Transgrid sought the Secretary's endorsement for the audit team to undertake this Independent Environmental Audit. The Secretary approved the appointment of the Lead Auditor (Ken Holmes) on 21 February 2025 (Appendix C).

4.3.2 Consultation with Agencies

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

4.4 Information Review and Compliance Register

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

4.5 Site audit

4.5.1 The audit site inspections commenced on 15 September and concluded (ecology focussed inspection on) 29 October 2024.

4.5.2 Opening Meeting

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

- Rebecca Walker-Edwards – Approvals Manager
- Nathan Macadam – Environmental Advisor
- Ozlem Anar – Environmental Undergraduate
- Luke Fania - Transgrid
- Ken Holmes (Lead Auditor)

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

4.5.3 Site Inspections

The site inspection included observation of:

- Buronga Substation.
- Typical Rehabilitated areas along the transmission line easement; and
- Former accommodation camp sites.

4.5.4 Site Interviews

Audit interviews comprised of a series of meetings with:

- Rebecca Walker-Edwards – Environmental Manager
- Luke Fania - Transgrid
- Ozlem Anar – Environmental Advisor
- Michael Sandall – Construction Manager (Substation)

4.5.5 Closing Meeting

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

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

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

4.5.6 Document Review

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

4.6 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix B**. A summary of the non-compliances identified during this audit are provided in Table 6. The audit criteria used to determine compliance for this audit is defined in Table 3.

Table 3 - Compliance Assessment Matrix

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

Risk levels for each non-compliance identified have been assessed in accordance with Table 4.

Table 4 - Risk Assessment Matrix

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

5. Stakeholder Consultation

The Stakeholder Consultation for both the PEC East and PEC West Independent Environmental Audits were undertaken together. Table 5 provides a summary of the Stakeholder Consultation undertaken by the Auditor.

Table 5 - Summary of Stakeholder Inputs

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	NSW Planning would like the below stakeholders to be consulted: EPA, BCS, Commonwealth DCCEE, TfNSW, Local Councils, DPI, Forestry, RFS, Fire and Rescue, Local Aboriginal Councils (RAPS), NPWS, Heritage NSW, heritage council, DPI and DPE Water, local lands service.	Please refer to Table 5.
		Areas to be focused to include: <ul style="list-style-type: none"> Evidence of compliance with commitments, reporting and monitoring in all management plans. 	Please refer to Appendix A.
		<ul style="list-style-type: none"> Evidence of any adaptive management identified/ implemented. 	The construction of the PEC west project is substantially complete. No significant issues were identified in this, or the previous audit.
		<ul style="list-style-type: none"> Evidence of compliance with approved footprint and current activities. 	The construction of the PEC west project is substantially complete. During the last IEA, a Biodiversity specialist undertook a detailed review of the project and verified that clearing works complied with the Approval requirements. No further clearing was undertaken during this audit period. The remaining works, at the Buronga substation are contained within the project boundaries.
		<ul style="list-style-type: none"> Erosion and sediment controls, management, monitoring and maintenance. 	The remaining erosion and sediment controls are isolated to Camp 6 and the Buronga substation. All required controls were observed to be in place and operational.
		<ul style="list-style-type: none"> Comparison between EA predictions and actual impacts. 	Please refer to Section 7.9

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	<ul style="list-style-type: none"> Evidence (tracking documentation/measures implemented) to ensure compliance with clearing and disturbance limits c 23. 	<p>The construction of the PEC west project is substantially complete. During the last IEA, a Biodiversity specialist undertook a detailed review of the project and verified that clearing works complied with the Approval requirements. A clearing register has been maintained.</p> <p>No further clearing was undertaken during this audit period. The remaining works, at the Buronga substation are contained within the project boundaries.</p>
		<ul style="list-style-type: none"> Road maintenance/ monitoring and management and the interface /access onto road networks. 	Road dilapidation surveys were completed during this audit period and evidence of consultation with Wentworth Council sighted.
		<ul style="list-style-type: none"> Evidence of Progressive Rehabilitation. 	With the exception of Camp 6 (still operational), Camp 7 (decommissioned but not yet rehabilitated, as a decision of the future use of that site is pending) rehabilitation works are substantially complete.
		<ul style="list-style-type: none"> Detailed assessment (evidence) of compliance with the Biodiversity Management Plan including but not limited to the reporting/checks/monitoring committed to in the Biodiversity Management Plan (BMP) Condition c 26 (a) (ix) which states 	The construction of the PEC west project is substantially complete. During the last IEA, a Biodiversity specialist undertook a detailed review of the project and verified that clearing works complied with the Approval requirements. Rehabilitation works are substantially complete. Extensive installation of nest boxes was identified.
		<ul style="list-style-type: none"> monitor the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols; 	The construction of the PEC west project is substantially complete. During the last IEA, a Biodiversity specialist undertook a detailed review of the project and verified that clearing works complied with the Approval requirements.
		<ul style="list-style-type: none"> Evidence of compliance with partial clearing, clearing commitments (how is this tracked, managed and monitored). Is the current clearing (in particular partial clearing) activity being undertaken in accordance with the commitments within BMP, EA, BDAR and description of partial clearing. 	The construction of the PEC west project is substantially complete. During the last IEA, a Biodiversity specialist undertook a detailed review of the project and verified that clearing works complied with the Approval requirements.

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	<ul style="list-style-type: none"> Implementation of ACHMP and compliance with conditions and evidence of consultation with Local RAPS. 	No heritage related incidents were identified during this IEA. All RAPs were given the opportunity to provide input to this IEA. No issues were raised by any RAP.
		Complaints management, monitoring and response.	Two complaints were received during this audit period related to excessive speed of project vehicles. Both complaints were investigated and corrective action taken. The project team implemented to complaints management procedure as documented in the CEMP.
Heritage NSW	Alison Lamond	<p>With respect to the scope of the audit for Project Energy Connect East, Heritage NSW notes the requirements under the Heritage Management Plan Energy Connect NSW (Eastern Section) Stage 1 and Stage 2, prepared by Elecnor, dated 7 February 2024. Including the requirements for management of newly identified Aboriginal sites during construction works.</p> <p>With respect to the scope of audit for Project Energy Connect West, Heritage NSW notes the requirements under the Heritage Management Plan Energy Connect (NSW - Western Section) prepared by Secure Energy dated 17 December 2021.</p> <p>It is recommended that the Department of Climate Change, Energy, the Environment and Water Compliance Team be contacted via info@environment.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.</p>	No heritage incidents were identified during this audit.
Transport for NSW	Maurice Morgan / Kyllie-Anne Pont	The RFS acknowledged receipt of the consultation request, however, did not provide any further input.	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Environment Protection Authority	Briohny Seaman	<p>The EPA understand that you are carrying out an independent audit of the NSW Eastern Section of the Project Energy Connect (Eastern and Western Sections).</p> <p>The EPA's interest in the project relates to the requirement for an Environment Protection Licence under section 43 and 48 of the Protection of the Environment Operations Act 1997 (POEO Act) for crushing, grinding or separating, clause 16 of Schedule 1 - for the upgrade of the Dinawan Substation (SSI-9172452) and the upgrade of the Buronga Substation (SS1-10040).</p> <p>The proponent should be aware that under section 120 of the POEO Act, it is an offence in NSW to pollute waters. During construction the proponent must take all necessary precautions and implement all practical measures that could be taken to prevent, control, abate or mitigate water pollution and protect human health and the environment from harm during the construction phase.</p> <p>The proponent should also be aware of the management of noise and vibration from the construction sites, ensuring that all practical measures that could be taken to prevent noise and vibration impacts on sensitive receptors are undertaken, including the scheduling of noisy activities.</p> <p>In addition, note should be taken on the management of dust from the work sites, in particular ensuring that all practical measures that could be taken to prevent dust moving from the work sites are being implemented.</p>	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
Southwest Biodiversity and Conservation Division	Simon Maffei	<p>Noting the audit scope as outlined in section 3.3 of the Independent Audit Post Approvals Requirements (2020), Southwest Regional Delivery (RD) provide the following comments for consideration in your audit.</p> <p>RD has reviewed the audit findings for EnergyConnect PEC West Project SSI 10040, September 2024 Construction Phase Independent Environmental Audit dated 21 December 2024, and the auditor's comments to the previous issues we raised.</p>	
		RD notes that audit findings indicate compliance against the requirements of the BMP has been undertaken and that they will be presented in a specialist biodiversity report, however, this report is not yet finalised. Until this specialist biodiversity report has been completed, RD is not able to provide comments on any findings or recommendations.	Noted, Transgrid Environment Manager - The PEC West Biodiversity specialist audit was submitted to DPHI via the Planning Portal on 9 May 2025 and is still awaiting assessment from DPHI. The Auditor understands that TransGrid will provide the report to RD following acceptance by DPHI.
		<p>RD has recently reviewed a Bird Impact Monitoring Plan (BIMP) for PEC West and provided comments on the BIMP method.</p> <p>RD has concerns over the effectiveness of the spiral bird diverters selected for the project. The BDAR indicated that flapper style bird diverters were most likely to be used for the project and that the spiral diverter was significantly less effective than the flappers.</p> <p>RD questions whether the use of a less effective diverter is consistent with condition D25(b) to minimise the impacts of the development on threatened birds and bats.</p>	The project has been collaborating with CSU (Condition 28(b) and WSP Consultants regarding bird impact data collection. Transgrid stated that <i>"any findings relating to the effectiveness of bird divertors will be investigated, mitigations proposed and actioned"</i> (personal communication L. Fania).
		RD requests that the audit confirm if/when the project became operational, and whether the BIMP has been implemented prior to the commencement of operation as per condition D28(c).	<p>The PEC West projected entered operational phase on 10 April 2024. Noting the minor construction works with the Buronga substation were still underway and not scheduled for completion until after this audit period.</p> <p>The BIMP was finalised and issued to RD in December 2024. The final updated revision was submitted to Transgrid on 9 March, addressing BCS comments.</p> <p>The first round of actual field surveys commenced on 1 April, prior to the project entering operations.</p>

Department	Contact	Stakeholder Comments	Auditor Comments
DCCEE Water Group	Tim Baker	<p>NSW DCCEE Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:</p> <ul style="list-style-type: none"> The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: <ul style="list-style-type: none"> Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan. The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting. <ul style="list-style-type: none"> Water supply availability is clearly defined for the project. Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018. Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant. Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from. <p>Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.</p>	<p>A Soil and Water Management Plan was prepared for the project and cover</p> <p>The Soil and Water Management Plan provides the details specified.</p> <p>Not applicable to this project.</p> <p>The Soil and Water Management Plan provides appropriate trigger action response actions for the project. The Auditor did not identify any water related compliance issues during this audit.</p>

Department	Contact	Stakeholder Comments	Auditor Comments
Local Land Services	Susie Holbery	Local Land Services did not respond to the consultation request	Noted
Crown Lands	Jarrold Smith	Crown Lands has no concerns with the project thus far. We have not received any complaints from landholders regarding this matter.	Noted
National Parkes and Wildlife Service	Jo Gorman / Simone Carmichael	The NPWS acknowledged receipt of the consultation request, however, did not provide any further input.	Noted
Rural Fire Service	Stephen Walker	The RFS acknowledged receipt of the consultation request, however, did not provide any further input.	Noted
Forestry NSW	Jarod Dashwood	Forestry did not respond to the consultation request	Noted
Wentworth Council	Jarrold Roberts	Council did not respond to the consultation request.	Noted
Department of Climate Change, Energy, the Environment and Water	Sahiba Zafrin	The Department did not respond to the consultation request.	Noted
Dareton Local Aboriginal Land Council	Pam Handy	DLALC did not respond to the consultation request	Noted
BMEC	Roland Smith	BMEC did not respond to the consultation request	Noted
Barkindji Maraura Elders Environment Team Limited	Arthur Kirby	BMEET did not respond to the consultation request	Noted

6. Statutory Compliance and Recommendations

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

6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 6 - Summary of Statutory Compliance. The number of conditions include sub-clauses within each approval document.

Table 6 - Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non- Compliant	Noted	Not Triggered
Project Approval 22338205	174	127	0	14	33

6.2 Non-Compliances and recommendations

No non-compliances against the requirements of the Planning Approval were identified during this audit. The compliance assessment, including site inspection observations, interviews and document reviews are recorded in detail in the Compliance Registers in **Appendix A**.

7. Independent Audit Post Approval Requirements

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

7.1 Summary of Environmental Incidents

No reportable environmental incidents were identified during this audit period.

7.1.1 Incident Response Assessment

The system implemented as documented in the EMS includes:

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

7.2 Summary of Complaints

No complaints were recorded by the Proponent over the Audit Period.

7.2.1 Compliant Management System Assessment

The complaints management system as documented in the EMS includes:

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

7.3 Summary of Notices

No compliance-related notices, orders, penalty notices or prosecutions were issued to the project during the audit period.

7.4 Supplementary Approvals and Licences

In addition to the Project Planning Approval, several other approvals and licences are relevant to the work. However, are not required to be held by Transgrid for this project. These include:

- Water Access Licence (WAL 7731) which is held by Western Murray Irrigation Ltd and is utilised by SEJV for the purposes of construction water for dust suppression – two bores are located at Fletchers Lake and Alcheringa Drive
- Potable Water – agreement with Council
- Environment Protection Licence (EPL 2029) held by Wentworth Shire Council for the operation of the Buronga Landfill (the disposal site for project waste generated by SEJV).

An Environment Protection Licence is not required for the construction of the Project.

7.5 Project Environmental Management System

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

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

7.6 Implementation of the Environmental Management Plan and Sub-plans

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

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

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

7.7 Status of Previous IEA Findings

No non-compliances were identified during the previous (September 2024) Independent Environmental Audit. All recommendations contained in March 2024 Independent Environmental Audit were actioned and closed out.

7.8 Specialist Auditor Reports

As part of this IEA, a specialist biodiversity specialist with Biodiversity Assessment Method accreditation, Jacob Manners was commissioned to undertake a detailed review of the implementation of the Biodiversity Management Plan and compliance with the biodiversity elements of the Conditions of Approval. Mr Jacob's findings will be reported separately in early 2025.

7.9 Environmental Impacts

The assessment of construction impacts against those predicted in the Environmental Impact Assessment, prepared by WSP (October 2020), are summarised in [Table 9](#).

Table 7 - Predicted vs Actual Impacts

Category	Predicted Impact	Actual Impacts to Date
Landuse	Private landowners may be impacted while construction activities are underway on or in proximity to their property, through the temporary loss of access to parts of their property, a potential loss of privacy and amenity (dust/noise/visual) impacts. Given the short duration of construction works, these potential impacts will be of limited duration. It is also expected that no residents would be required to relocate during the construction phase of the Project. All construction works along the transmission pipeline alignment will take place within the proposed construction footprint.	Construction impacts to date are consistent with those predicted in the EIA.
Biodiversity	The main impacts on biodiversity during construction would be: <ul style="list-style-type: none"> clearing of native vegetation removal of threatened species and/or their habitat 	The clearing to date has occurred within the approved project footprint. Clearing records indicate that the extent of vegetation removal has to date been significantly less than predicted in the EIS.
Hydrology and Flooding	Impacts to flooding from construction of the proposal are anticipated to be limited to temporary and localised impacts due to the progressive nature of the construction activities. Potential impacts would also be limited to periods of flooding, which have a low likelihood of occurring during construction on flood prone areas. Potential impacts to water quality are anticipated to be limited to temporary and localised impacts due to the progressive nature of the construction activities.	No material flooding or surface water impacts have been identified during the audit period.
Hazardous Materials	During construction, potential hazards and risks to the surrounding community or environment may be associated with: <ul style="list-style-type: none"> the on-site storage, handling and transport of dangerous and hazardous goods, contaminated soil and hazardous waste potential interaction with existing utilities potential bushfire risks 	During this audit period, no bushfire or hazardous materials related incidents were recorded.

Category	Predicted Impact	Actual Impacts to Date
	<ul style="list-style-type: none"> changes to emergency egress and excavation routes. 	
Aboriginal Heritage	<p>Impacts from the proposal have been categorised as:</p> <ul style="list-style-type: none"> direct impacts from activities requiring ground disturbance, such as transmission line structures, Buronga Substation (and asset protection zone), construction work areas, vegetation clearing and establishment of access tracks (referred to as disturbance area A) potential direct impacts due to trimming vegetation down to two metres in height within the transmission line corridor (referred to as disturbance area B). These works have the potential to impact scarred trees. 	<p>No incidents of unapproved impacts on Aboriginal Cultural Heritage sites or artifacts were identified during this audit period.</p> <p>The management of known heritage sites has been undertaken in accordance with the relevant management plans.</p>
Non-Aboriginal Heritage	No direct impacts on non-Aboriginal heritage items / sites was predicted	No impacts on heritage sites were identified during this IEA.
Visual Amenity	<p>Across all landscape character areas, construction activities would involve the temporary mobilisation of plant throughout the proposal landscape to construct the proposal and to provide ancillary infrastructure (e.g. construction compounds and access tracks). Construction activity would be most prominent around transmission line structure footings, and at the Buronga substation upgrade and expansion site.</p> <p>Vegetation removal would be required, which would mostly comprise of shrubs and groundcovers.</p> <p>Landform modification would be small and localised.</p>	No impacts relating to visual amenity were identified during this IEA.
Soils	<p>Construction of the proposal has the potential to result in soil erosion and impacts to land capability in the absence of adequate management measures. Key construction activities that present a risk to soils include excavation and other earth moving activities, vegetation removal and the movement of vehicles, plant and equipment within unsealed areas. The potential impact of these activities may include:</p> <ul style="list-style-type: none"> erosion of exposed soils and stockpiled materials dust generation from increased sediment loads entering the surrounding waterways compaction of soils leading to impacts on drainage 	No soil erosion issues were identified during the audit period. However, sediment tracking onto local roads requires on-going attention.
Contamination	Whilst areas known to be contaminated have not been identified, the assessment has identified areas of potential contamination. Construction activities potentially impacting these sites includes vegetation removal, excavation of soils, piling and dewatering activities.	To date no contamination has been encountered.
Acid Sulphate Soils	The majority of the proposal study area is identified as having a low risk of acid sulphate soils. Areas surrounding lakes and river beds are identified as	No acid sulphate soils were encountered during this audit period.

Category	Predicted Impact	Actual Impacts to Date
	potentially containing acid sulphate soils.	
Salinity	Potential impacts from salinity can occur due to disruption of the water table (i.e. when saline groundwater rises and deposits salts in upper soil layers). Disruption can result from vegetation removal, physical barriers, or the reuse of saline soils generated by the proposal.	No salinity related impacts were encountered during this audit period.
Construction Noise and Vibration	There is the potential for concurrent construction activities occurring in proximity to sensitive receivers because of the construction of the transmission line, substation and the two main construction compounds. Based on the results of the above assessment and considering the proximity of the nearest receivers to Buronga substation and main construction compound and accommodation camp sites, the risk of notable construction impacts at the nearest receivers would be low, with concurrent noise levels anticipated to be below relevant construction NMLs.	No noise or vibration related complaints have been received during the audit period.
Construction Air Quality	The assessment of air quality impacts at these identified sensitive receivers found that the impacts to sensitive receivers would be negligible.	No air quality related complaints have been received during the audit period. No air quality impacts from construction have been identified.
Traffic and access	The increase of light vehicles movements by a peak of 250 movements per day and heavy vehicle movements by a peak of 80 movements per day (or to up to an increase of around 1.65 per cent) from current traffic volume would not be expected to adversely impact the capacity and serviceability of the road network and at intersections. Heavy vehicle traffic movements would also be distributed throughout the day to minimise their impact on town centres' peak traffic activities.	No traffic impacts exceeding the predictions in the EIS have been identified. It is noted that two complaints regarding project light vehicle speeding were received during this audit period.

7.9.1 Extent of Project Operations

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

7.10 Other Matters

No other issues were identified during this IEA.

Appendix A

PEC West Project

April 2025 Independent Environmental Audit

Audit Table

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A1	Minimise harm to the Environment	In meeting the specific performance measures and criteria of this approval, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation, upgrading or decommissioning of the development.		Environment Manager - No incidents with the potential to cause material harm to the environment have occurred during the audit period.	No evidence of actual or potential material environmental harm was sighted during the site inspection.	The construction of the PEC West is very near completion. No evidence of actual or potential material environmental harm was sighted during the site inspection	Complies	
S2 A2	Terms of Approval	The Development may only be carried out: a. in compliance with this approval		Environment Manager – there were no non-compliances during the audit period.		The development is being carried out in general accordance with the Approval. The assessment of compliance against each condition of the approval is presented below.	Noted	
		b. In accordance with all written directions of the Planning Secretary;		Environment Manager - No directions from DPHI were received during the audit period.			Not Triggered	
		c. Generally, in accordance with the EIS; and				No evidence was found that the works undertaken to date associated with SSD 10040 have not been undertaken in general accordance with the EIS or the approved plans.	Complies	
		d. generally, in accordance with the Development Layout in Appendix 1.	Consistency Assessments: <ul style="list-style-type: none"> 45860-HSE-CHK-D-1058_Bonnie Doon Rd Access Track Re-Alignment track changes; 45860-HSE-CHK-D-1059_Silver City Highway Access Points; 45860-HSE-CHK-D-1060_Access Point 84 Laydown; 	Environment Manager - While changes to the project compared to what was initially approved have been made, these changes have been subject to Consistency Assessments and do not represent a fundamental or significant change to what has previously been approved.		No evidence was found that the works undertaken to date associated with SSD 10040 have not been undertaken in general accordance with the EIS or the approved plans.	Complies	
S2 A3	Terms of Approval	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department’s assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this approval;	Letter from DPHI (K O’Reilly) to Transgrid (L Fania) titled “Subject: Project EnergyConnect (NSW - Western Section) - Notification – entering the Operations Phase”, dated 14 April 2025 Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) -Operations Staging”, dated 28 April 2025	Environment Manager - There were a number of items of DPHI correspondence received during this audit period. These include: <ul style="list-style-type: none"> confirmation of commencement of operations. approval of the Staging Report. The HMP was issued to the Department in February 2024 but is pending DPHI approval.		Correspondence related to the approval of the staging of operations was received, however no actions were required to be taken by the Proponent.	Not Triggered	
		b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and		Environment Manager - The only correspondence received from DPHI during the reporting period was the acceptance of the previous audit report and approval of the auditor for this audit.		Correspondence related to the Current IEA timing was received, however no actions were required to be taken by the Proponent.	Not Triggered	
		c) the implementation of any actions or measures contained in these documents.					Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A4	Terms of Approval	The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.					Noted	
S2 A5	Terms of Approval	Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This condition does not apply to the immediate written notification required in respect of an incident under condition E6.					Noted	
S2 A6	Lapse of Approval	This approval will lapse five years after the date on which it is granted unless construction has physically commenced on or before that time.					Noted	
S2 A7	Evidence of Consultation	Where conditions of this approval require consultation with an identified party, the Proponent must: a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved.				Refer to specific conditions below	Noted	
S2 A8	Protection of Public Infrastructure	Unless the Proponent and the applicable authority agree otherwise, the Proponent must: a) undertake any works on or in the vicinity of public infrastructure in consultation with the applicable authority or service provider; b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to any damage to roads caused as a result of general road usage which is expressly provided for in the conditions of this approval.	Sealed Pavement Condition Report, Pavement Condition Survey – Phase 4 Network Condition Report – Factual Report – Wentworth Shire, prepared by Pavement Management Services, dated 20 February 2025. Email from Wentworth Council (K Keighley) to Elecnor (M Hargins) titled “Remark Road”, dated 9 December 2025.	Environment Manager - There has been no consultation required during this audit period with water, electricity and/or internet providers as no works have been undertaken in the vicinity of this public infrastructure.		Evidence was available to verify that the annual road dilapidation surveys were undertaken for the roads in Wentworth Shire.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A9	Demolition	The Proponent must ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.	Safe Work Method Statement – Demolition of Lattice Tower using Cran and Controlled Felling – dated 17 January 2025. Asbestos Paint Removal Control Plan, dated 5 October 2024, prepared by Aztech Services. Safework NSW -Notice of intent to commence demolition work, dated 9 October 2024. Asbestos Clearance Inspection and Certificate, prepared by EHO Consulting, dated 7 November 2024.	Environment Manager – Demolition of OX1 structures were carried out in accordance with Australian Standard AS 2601.		Demolition of OX1 structures were carried out in accordance with Australian Standard AS 2601. Demolition plans, inspection and testing plans for those works were reviewed by the Auditor and demonstrate that the works were carried out in accordance with the relevant Australian Standards.	Complies	
S2 A10	Structure Adequacy	The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA; and where the BCA is not applicable, to the relevant Australian Standard.	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Environment Manager – The substations team has been working through the certification for the SynCon building during the audit period, however the certification hasn't been received during this audit period.		Building works associated with substation have not been completed. Certification of those works will be undertaken by SynCon and will be verified during a future IEA.	Not Triggered	
S2 A11	Compliance	The Proponent must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this approval relevant to activities they carry out in respect of the development.	EnergyConnect Environmental Induction (L1 – L4 (PowerPoint presentation) Training PowerPoint Presentations including: <ul style="list-style-type: none"> • Spill Response • Biodiversity • Heritage • Land Access • Noise and Vibration • Waste Management RE-site access induction Cultural Awareness Toolbox Meeting Minutes (Sign on sheet): <ul style="list-style-type: none"> • EWMS training records for 9 April 2025 • Biosecurity 17 April 2025 • Hose Keeping 17 April 2025 	Environment Manager – Environmental training modules are undertaken by new starters on the project, and for existing employees the training modules are to be completed at least every year.	The auditor attended the morning Pre-start meeting during the site inspection. During those meetings, critical issues covering safety and the environment were presented.	Training materials covering all elements of the approval were reviewed. Records of training from the audit period were sighted.	Complies	
S2 A12	Operation of Plant and Equipment	The Proponent must ensure that all plant and equipment used on the site is: a) maintained in a proper and efficient condition.	Extracts from the project maintenance management system were sighted, including: <ul style="list-style-type: none"> • Elecnor Daily (pre-start) check lists • Elecnor Service Job Cards • SecureEnergy Work Order Histories (maintenance records) 		Note that only Camp 6 was operating at the time of the audit inspection and is predominantly housing accommodation and maintenance operations for PEC East. The light vehicle maintenance area at Camp 6 was inspected.	Records of inspections and maintenance for the audit period were sighted.	Complies	
		b) operated in a proper and efficient manner.			Camp (accommodation, storage and maintenance areas) are well maintained and organised. No operational plant was located on the PEC West project at the time of this inspection.	All facilities (Camp 6, no works were being undertaken on PEC West), plant and equipment sighted during the audit were operational and appeared to be well maintained.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A13	Applicability oof Guidelines	References in the conditions of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.					Noted	
S2 A14	Applicability oof Guidelines	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may, when issuing directions under this approval in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.					Noted	
S2 A15	Community Communications Strategy	Prior to the commencement of construction, the Proponent must prepare a Community Communication Strategy to provide mechanisms to facilitate communication between the Proponent and the community (including adjoining affected landowners) during construction. The Community Communication Strategy must: a) identify landowners for potentially impacted receivers;	Community Communication Strategy EnergyConnect (NSW – Western Section), Rev 0, dated 15 February 2022	Environment Manager - The Community Communications Strategy was revised during the audit period, however, is still to be approved by the ER (the ER can approve minor administrative changes). The current version has been provided.		The Community Communications Strategy was revised during the audit period. However that revision has not yet been endorsed by the ER and therefore Revision 0, remains the current version. Section 6.1.4 identifies potentially impacted landowners.	Complies	
		b) ensure that the landowners identified in (a) are consulted during construction;	Community Communication Strategy EnergyConnect (NSW – Western Section), Rev 0, dated 15 February 2022	A construction notification for the August period has been provided. Updates are also provided to councils to share on their Facebook pages. All consultations with landholders is recorded on Sales Force		The Strategy identifies the mechanisms for stakeholder and landowner consultation.	Complies	
		c) set out procedures and mechanisms for the regular distribution of information to the wider community;	Community Communication Strategy EnergyConnect (NSW – Western Section), Rev 0, dated 15 February 2022			The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
		d) establish a public liaison officer(s) to engage with the local community; and	Community Communication Strategy EnergyConnect (NSW – Western Section), Rev 0, dated 15 February 2022			Section 4 of the Strategy identifies the public liaison officers.	Complies	
		e) set out procedures and mechanisms: • through which the community can discuss or provide feedback to the Proponent; • through which the Proponent will respond to enquiries or feedback from the community; and • to resolve any issues and mediate any disputes that may arise in relation to construction of the development. The Proponent must implement the Community Communication Strategy for the duration of construction.	Community Communication Strategy EnergyConnect (NSW – Western Section), Rev 0, dated 15 February 2022			The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A16	Environmental Representative	Prior to commencing the development, an environmental representative (ER) must be approved by the Secretary and engaged by the Proponent.	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller has been appointed as the Independent ER. DPE approval was provided on 15/10/21.	Complies	
S2 A17	Environmental Representative	The Secretary's approval of an ER must be sought no later than one (1) week before commencing the development.	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller has been appointed as the Independent ER. DPE approval was provided on 15/10/21.	Complies	
S2 A18	Environmental Representative	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in condition A2 and is independent from the design and construction of the development. The ER must meet only the requirements set out in sections 2.2, 2.3, 2.4 and 3 in the <i>Environmental Representative Protocol</i> (Department of Planning and Environment, October 2018).	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller has been appointed as the Independent ER. DPE approval was provided on 15/10/21.	Complies	
S2 A19	Environmental Representative	From commencing the development, until commencing operation, or as agreed with the Secretary, the approved ER must: a) review the documents identified in conditions A15, B1, B2, D3, D10, D11, D29, D37 D47, D52 and D53, and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) make a written statement to this effect before submission of such documents to the Secretary (if those documents are required to be approved by the Secretary); or (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Department for information or are not required to be submitted to the Department);				All plans covered by Condition S2 A19 were reviewed and endorsed by the ER prior to the commencement of construction (prior to this audit period).	Complies	
		b) as may be requested by the Secretary, assist the Department in the resolution of community complaints; and		Environmental Representative (telephone interview 25/9/2024) – The ER was not required to assist in the resolution of community complaints during this audit period.		The ER was not required to assist in the resolution of community complaints during this audit period.	Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A19	Environmental Representative	c) consider any minor amendments to be made to the plans / strategies in conditions A15, D11, D52, D53, E3, E4, E5, E6, E7 that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval.	Letter from the ER to DPHI (Fishburn) titled EnergyConnect (NSW – Western Section) (SSI-10040) Final Layout Plans – Minor Amendments”, dated 19 September 2024.	Environment Manager - The ER approved minor changes to the Final Layout Plans during the reporting period.		The ER reviewed and approved minor amendments to final layout plans.	Complies	
S2 A20	Environmental Representative	The Proponent must provide the ER with all documentation requested by the ER for the ER to perform their functions specified in condition A19, as well as the complaints register for any complaints received (on the day they are received)		Environmental Representative– The ER was not required to review and endorse any Out of Hours Works requests.		The ER was not required to review and endorse any Out of Hours Works requests. No complaints were received during this audit period.	Not Triggered	
S2 B1	Construction Environmental Management Plan	Prior to commencing construction, a Construction Environmental Management Plan (CEMP) must be prepared to detail how the performance outcomes, commitments and mitigation measures specified in the EIS will be implemented and achieved during construction to the satisfaction of the Planning Secretary.	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 3, dated 7 March 2024 Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) -Construction Environmental Management plan and sub-plans”, dated 27 September 2024			The ER has confirmed that the revisions to the CEMP and revised Sub-Plans are consistent with the Infrastructure Approval. The latest version of the CEMP has been approved by DPHI.	Complies	
S2 B2	Construction Environmental Management Plan	The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan in Table 1.	Refer to S2 A19 above Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) -Construction Environmental Management plan and sub-plans”, dated 27 September 2024	Environment Manager - There were no CEMP subplans submitted to the Department during this audit period.		The latest version of the CEMP has been approved by DPHI. The current versions of all plans are available on the Transgrid project website are the approved, consulted versions.	Complies	
	Table 1	Required Plan	Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan					
		Noise and Vibration	Council					
		Soil and Water	DPIE Water					
		Biodiversity	BCS / Council					
		Heritage	Heritage NSW / Aboriginal Stakeholders					
		Traffic and Transport	TfNSW / Council					
S2 B3	Construction Environmental Management Plan	Details of all information requested by an agency to be included in a CEMP Sub-plan as a result of consultation must be provided with the relevant CEMP Sub-Plan.				DPHI approval letters note that the CEMP and subplans have prepared in consultation with the relevant stakeholders and contain all the information required by the conditions of approval.	Complies	
S2 B4	Construction Environmental Management Plan	Any of the CEMP Sub-plans may be submitted along with, or subsequent to, the submission of the CEMP but in any event prior to commencing construction.					Noted	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 B5	Construction Environmental Management Plan	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, must be implemented for the duration of construction. Where construction of the development is staged, construction of a stage must not commence until the CEMP and sub-plans for that stage have been approved by the Planning Secretary.	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 2, dated 6 July 2022 Letter from DPE (D Crinnon) to Transgrid (J Fisher) titled "Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) -Stage 2 CEMP and sub-plans", dated 15 July 2022			Stage 2 Construction commenced on 18/7/22 following formal notification to DPE on the 23/6/22. The CEMP and Sub-Plans have been prepared and approved by that time.	Complies	
S3 B6	CEMP and Subplan requirements	The CEMP and CEMP Sub-plans required under this approval must be prepared by suitably qualified and experienced persons in accordance with relevant guidelines, and include where relevant: a) a summary of relevant background or baseline data;	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 3, dated 7 March 2024			Environmental Management documentation was prepared by suitably qualified and experienced individuals and contained the relevant details as required by this condition.	Complies	
		b) details of: (i) the relevant statutory requirements (including any relevant approval or licence conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 3, dated 7 March 2024			The contents of the CEMP meet all the requirements of S3 B		
		c) any relevant commitments or recommendations identified in the EIS;	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 3, dated 7 March 2024			The contents of the CEMP meet all the requirements of S3 B		
		d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 3, dated 7 March 2024			The contents of the CEMP meet all the requirements of S3 B		
		e) a program to monitor and report on the: (i) impacts and environmental performance of the development (including a table summarising all the monitoring and reporting obligations under the conditions of this approval); and (ii) effectiveness of the management measures set out pursuant to paragraph d);	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 3, dated 7 March 2024			The contents of the CEMP meet all the requirements of S3 B		
		f) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 3, dated 7 March 2024			The contents of the CEMP meet all the requirements of S3 B		
		g) a program to investigate and implement ways to improve the environmental performance of the development over time;	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 3, dated 7 March 2024			The contents of the CEMP meet all the requirements of S3 B		

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S3 B6	CEMP and Subplan requirements (Continued)	h) a protocol for managing and reporting any: (i) incident, non-compliance or exceedance of any impact assessment criterion and performance criterion; (ii) complaint; or (iii) failure to comply with other statutory requirements;	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 3, dated 7 March 2024			The contents of the CEMP meet all the requirements of S3 B	Complies	
		i) set out the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the construction and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and	Construction Environmental Management Plan EnergyConnect (NSW-Western Section), Revision 3, dated 7 March 2024			The contents of the CEMP meet all the requirements of S3 B		
		j) a description of the roles and environmental responsibilities, authority and accountability for all relevant employees, as well as training and awareness; and				The contents of the CEMP meet all the requirements of S3 B		
		k) a protocol for periodic review of the CEMP and associated Sub-plans and programs.				The contents of the CEMP meet all the requirements of S3 B		
S2 C1	Operational Environmental Management Plan	An Operational Environmental Management Plan (OEMP) must be prepared to detail how the performance outcomes, commitments and mitigation measures made and identified in the EIS will be implemented and achieved during operation. This condition (condition C1) does not apply if condition C2 of this approval applies.	Not Triggered				Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C2	Operational Environmental Management Plan	An OEMP is not required for the development if the Proponent has an Environmental Management System (EMS) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that through the EMS: a) the performance outcomes, commitments and mitigation measures, made and identified in the EIS, and specified relevant terms of this approval can be achieved; b) issues identified through ongoing risk analysis can be managed; c) there is a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this approval; d) there is a strategic framework for environmental management of the development; e) the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development is clear; and f) procedures are in place for: <ul style="list-style-type: none">• keeping the local community and relevant agencies informed about the operation and environmental performance of the development;• receiving, handling, responding to, and recording complaints;• resolving any disputes that may arise;• responding to any non-compliance; and• responding to emergencies.	Not Triggered				Not Triggered	
S2 C3	Operational Environmental Management Plan	Prior to commencing operation, the OEMP or EMS or equivalent as agreed with the Planning Secretary must be prepared to the satisfaction of Planning Secretary.	Not Triggered				Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D1	Construction Hours	Road upgrades, construction, upgrading and decommissioning activities may only be undertaken between: a) 7 am to 6 pm Monday to Friday; b) 8 am to 1 pm Saturdays; and c) at no time on Sundays and NSW public holidays; unless the Planning Secretary agrees otherwise.	Out of Hours Works (PowerPoint training presentation) Toolbox - Out of Hours Works (PowerPoint training presentation) Complaints Register Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision 0, dated 24 January 2024	Environment Manager – There were no complaints in relation to out of hours works. There were no non-compliances that occurred during the reporting period.		The approved hours of construction are documented in the Noise and Vibration Management Plan. OOHW training is provided to supervisors and workers on the project. No complaints relating to OOHW were received during the audit period.	Complies	
S2 D2	Construction Hours	The following construction, upgrading and decommissioning activities may be carried out outside the hours specified in condition D1 above: a) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons;		Environment Manager – The subsections of this condition were not triggered during the audit period. Any works which occurred OOH, occurred in accordance with the OOHW Protocol and condition D3. No negotiated agreements were required during the audit period.		No out of hours work was required during this audit period.	Not Triggered	
		b) emergency work to avoid the loss of life, property or to prevent material harm to the environment; or		Environment Manager – No emergency OOHW were required during this audit period.		No emergency OOHW were required during this audit period.	Not Triggered	
		c) works carried out in accordance with the hours and noise limits specified in any negotiated agreements with sensitive receivers (owners and occupiers), provided the negotiated agreements are in writing and finalised before the commencement of works.		Environment Manager – No negotiated agreements were in place during this audit period.		No negotiated agreements were in place during this audit period.	Not Triggered	
S2 D3	Construction Hours	An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of works which are outside the hours defined in conditions D1, D2, and D7 The Protocol must be approved by the Planning Secretary before commencing works. The Protocol must: a) be prepared in consultation with Council;	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision 0, dated 24 January 2024	Environment Manager – The Out of Hours Works Protocol was not revised during the audit period.		The current version of the Out of Hours Works Protocol (Appendix A of the Construction Noise and Vibration Management Plan) was revised and approved during the previous audit period. The protocol was prepared in consultation with Wentworth Council.	Complies	
		b) provide a process for the consideration of out-of-hours works against the relevant noise and vibration criteria, including the determination of low and high-risk activities;	Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision I, dated 5 February 2024.			The protocol defines the process for OOHW assessment and approval.	Complies	
		c) provide a process for the identification of mitigation measures for potential impacts, including respite periods in consultation with any affected receivers;	Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision I, dated 5 February 2024.			The protocol provides a process for identification of mitigation measures to be applied to specific OOHWs.	Complies	
		d) provide a process for the identification of out-of-hours works undertaken by third parties in the vicinity of the site, and coordination of out-of-hours works with these third parties to achieve respite periods in locations where receivers may be affected by concurrent activities;	Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision I, dated 5 February 2024.			The protocol defines the process for OOHW assessment and approval for third parties.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D3	Construction Hours	e) identify an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: <ul style="list-style-type: none"> low risk activities can be undertaken without the approval of the Planning Secretary and with the approval of the ER; and high risk activities that are approved by the Planning Secretary; and 	Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision I, dated 5 February 2024.			The protocol defines the approval process that considers the risk of activities, proposed mitigation, and management.	Complies	
		f) identify Department, Council and community notification arrangements for approved out of hours work.	Out of Hours Works Protocol EnergyConnect (NSW - Western Section), Revision I, dated 5 February 2024.			The protocol identifies the Department, Council and community notification arrangements for approved out of hours work	Complies	
S2 D4	Construction and Demolition Noise	The Proponent must take all reasonable and feasible steps to minimise the construction, upgrading or decommissioning noise of the development in the locations where the noise is audible to sensitive receivers, including any associated traffic noise.		Environment Manager – No complaints received during audit period.	No construction work was undertaken during this audit site inspection, other than minor curb and guttering works at the substation.	No noise complaints were recorded during the audit period. No intensive noise generating activities were observed during the site inspection.	Complies	
S2 D5	Construction and Demolition Noise	The Proponent must implement mitigation measures: <ul style="list-style-type: none"> a) to ensure that the noise generated by any construction, upgrading or decommissioning activities is managed in accordance with the requirements for construction ‘noise affected’ management levels established in accordance with Interim Construction Noise Guideline (DECC, 2009); and b) with the aim of achieving the road traffic noise 	Complaints Register	Environment Manager - No noise monitoring occurred during the audit period.	No construction work was undertaken during this audit site inspection, other than minor curb and guttering works at the substation.	No construction work was undertaken during this audit site inspection, other than minor curb and guttering works at the substation. No high noise generating activities were observed during the audit inspection. No complaints have been received during the audit period for noisy activities.	Complies	
S2 D6	Construction and Demolition Noise	The Proponent must comply with the following vibration limits: <ul style="list-style-type: none"> a) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); b) BS 7385 Part 2-1993 “Evaluation and measurement for vibration in buildings Part 2” as they are “applicable to Australian conditions”; and c) vibration limits set out in the German Standard DIN 4150-3: Structural Vibration - effects of vibration on structures (for structural damage). 	Complaints Register	Environment Manager - No vibration monitoring occurred during the audit period.		No construction work was undertaken during this audit site inspection, other than minor curb and guttering works at the substation. No vibration generating activities were observed during the audit inspection. No vibration-related complaints have been received during the audit period.	Complies	
S2 D7	Construction and Demolition Noise	Blasting may only be carried out on the site between 9 am and 5 pm Monday to Friday and between 9 am to 1 pm on Saturday. No blasting is allowed on Sundays or public holidays.		Environment Manager - No blasting was undertaken during the audit period.		No blasting occurred during the audit period.	Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D8	Blasting Limit Conditions	The Proponent must ensure that any blasting carried out on the site does not exceed the criteria in Table 2.	All blast monitoring records covering this audit period.	Environment Manager - No blasting occurred during the audit period.		No blasting occurred during the audit period.	Not Triggered	
	Table 5	Location	Airblast overpressure	Ground Vibration				
			dB (Lin Peak)		Allowance			
		Any non-associated residence	120	10	0%			
			115	5	5% of the total number of blasts or events over a rolling period of 12 months			
S2 D9	Operational Noise	The Proponent must implement all reasonable and feasible measures with the aim of ensuring that the noise generated by the operation of the development does not exceed 40 dB(A) LAeq,15min, at the reasonably most affected point of the residence, in accordance with the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence.		Environment Manager - no noise complaints were received during this audit period.	During the site inspection no operational noise issues were identified.	No noise complaints were received during this audit period.	Complies	
S2 D10	Operational Noise	<p>Within 12 months of the date of this approval, the Proponent must prepare an Operational Noise Review to confirm noise predictions and control measures that would be implemented for the operation of the development. The Review must:</p> <p>a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary;</p> <p>b) be prepared in consultation with the landowner of impacted residences;</p> <p>c) identify residences predicted to experience noise levels that exceed 40 dB(A) LAeq,15min at the reasonably most affected point of the residence, determined in accordance with the NSW Noise Policy for Industry (EPA, 2017);</p> <p>d) detail the noise mitigation measures to achieve the noise criteria identified, including the timing of implementation;</p> <p>e) provide evidence of consultation with affected landowners;</p> <p>f) include a consultation strategy to seek feedback from directly affected landowners on the noise mitigation measures; and</p> <p>g) identify procedures for the management of operational noise complaints.</p> <p>The Proponent must implement any identified mitigation measures prior to the commencement of operation.</p>	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.			<p>Renzo Tonin have been appointed by Transgrid to prepare the ONR and have been approved by DPE.</p> <p>Operational Noise Review (ONR) was due on 28 September 2022 (12 months following date of project approval).</p> <p>DPE. Provided an extension to the preparation of the Operational Noise Review to the 28/2/23. The Operational Noise Review was completed on the 27/2/23 in accordance with this revised timeframe.</p>	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D11	Operational Noise Monitoring	Within 6 months of the commencement of operations (or the commencement of operation of a stage, if the development is to be staged), the Proponent must: a) undertake noise monitoring to determine whether the development is complying with the relevant conditions of this approval; and b) submit a copy of the monitoring results to the Department.	Not Triggered			PEC West has been operational for less than six months.	Not Triggered	
S2 D12	Operational Noise Monitoring	The Proponent must undertake further noise monitoring of the development if required by the Planning Secretary.	Not Triggered	Environment Manager – DPHI has not requested that any operational noise monitoring be undertaken at this stage.		DPHI has not requested that any operational noise monitoring be undertaken.	Not Triggered	
S2 D13	Noise and Vibration CEMP Sub-Plan	The Noise and Vibration CEMP Sub-Plan required under condition B2 must: a) ensure the requirements in conditions D1 to D12 are complied with;	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision 0, dated 24 January 2024. Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) -Construction Environmental Management plan and sub-plans”, dated 27 September 2024			The current version of the CEMP and NVMP were prepared and approved during the precious audit period. The NVMP provides a framework designed to ensure compliance with Conditions D1 to D12.	Complies	
		b) include a description of the reasonable and feasible measures that would be implemented to minimise noise and vibration impacts of the development;	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision 0, dated 24 January 2024.			Section 7.2 of the NVMP describes the noise and vibration mitigation measures to be implemented.	Complies	
		c) include a detailed description of the noise and vibration management system for the development;	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision 0, dated 24 January 2024.			Section 1.4 of the plan describes the environmental management system as it applies to noise and vibration management.	Complies	
		d) include a protocol for the identification, notification and management of works that exceed the noise management levels; and	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision 0, dated 24 January 2024.			Section 8 of the plan describes compliance management, including the notification requirements and management of works that may exceed noise criteria.	Complies	
		e) include a monitoring program that evaluates and reports on the effectiveness of the noise and vibration management system.	Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision 0, dated 24 January 2024.			Section 8.3 (Table 8.1) describes the noise and vibration monitoring program.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D14	Air Quality	In addition to the performance outcomes, commitments and mitigation measures specified in the EIS, the Proponent must take all reasonable steps to: a) minimise the off-site dust, fume, blast emissions and other air pollutants of the development; and	Incident Register Complaints Register	Environment Manager – There were no air quality incidents during the audit period.	During the site inspection water carts were observed operating at the Buronga Camp (Camp 6) and the substation construction site. No evidence of migration of dust off-site was observed.	Water carts are available and were observed to be in operation to reduce dust emissions during the site inspection.	Complies	
		b) minimise the surface disturbance of the site.			The clearing limits associated with the construction of the accommodation camps, laydown areas and the transmission line alignment are generally appropriately delineated. In all areas inspected (note that the inspection sampled rehabilitated areas and did not include the entire transmission line easement) no evidence of clearing outside of designated clearing limits was sighted. Typical rehabilitated areas are shown in Photographs 1, 2 and 3.	All vegetation clearing observed appeared to be limited to the approved construction limits. Rehabilitation has been substantially completed.	Complies	
S2 D15	Water Supply	The Proponent must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. <i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Proponent is required to obtain the necessary water licences for the development.</i>		Environment Manager – sufficient water has been available for the project during the audit period. No water licenses are required for this project.			Noted	
S2 D16	Erosion and Sediment Control	The Proponent must: a) minimise erosion and control sediment generation; and b) ensure all land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008);	Erosion and Sediment Control Strategy EnergyConnect (NSW – Western Section), Revision 0, dated 12 February 2024. Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision 2, dated 7 February 2024. Weekly environmental checklists (examples from the audit period. CEPSC inspections reports from the audit period.	Environment Manager - The details of CPESCs involved in project works during the audit period are as follows: Regional Project Consulting Adam Pullen B.Env.Mgt.M.Env.Eng(Hons). CPESC Weekly environmental inspections are undertaken by Environmental Advisors. The contract CPES undertook (and reported on ERSed inspections reports during the audit period.	During the site inspection the following observations were made: <ul style="list-style-type: none"> Surface water management (surface drains, sedimentation / retention ponds) are provided at accommodation camp 6, the associated laydown area and the Buronga Substation. Vehicle wash facilities are available at the camp. The Auditor observed the vehicle wash in operation at the Buronga Camp. No sediment tracking was evident at the exits to Camps 6. 	Appropriate erosion and sediment (surface water management) controls were in place at all sites inspected. Routine environmental inspections are undertaken (weekly) and these are recorded on standard checklists. An external ERSed specialist undertakes additional inspections and provides advice to the project. The management of erosion and sediment control is being undertaken in accordance with the approved management plan. Sediment tracking onto public roads was not observed.	Complies	
S2 D17	Pollution of Waters	Unless otherwise authorised by an EPL, the Proponent must ensure the development does not cause any water pollution, as defined under Section 120 of the POEO Act.		Environment Manager – No water related incidents, or non-compliances have occurred during this audit period.		No water-related incidents or non-compliances were recorded during this audit period.	Complies	
S2 D18	Pollution of Waters	The Proponent must: a) ensure that appropriate components of the concrete batching plants and substation are suitably bundled; and b) minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.		Environment Manager – there are no batching plants located within the project boundaries, all concrete used on the PEC West is supplied from commercial batching plants.	Fuel and chemical storage areas were inspected at Camp 6. All fuels are stored in double-skinned, bundled tanks that comply with AS1940. All chemical storage and potentially hazardous waste storage observed were appropriately contained. Spill kits were available at those locations.	No concrete batching is undertaken on this project. All fuels and chemicals observed were stored appropriately.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D19	Pollution of Waters	The Proponent must ensure that any groundwater dewatering activities do not discharge to watercourses.	Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision 2, dated 7 February 2024	Environment Manager – no groundwater dewatering was undertaken during the audit period.	No groundwater dewatering observed during the site inspection.	No groundwater dewatering was undertaken during the audit period.	Not Triggered	
S2 D20	Riparian Areas	The Proponent must ensure: a) all activities on waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012), unless DPIE Water agrees otherwise; and b) the geomorphic condition of the major rivers and distributary channels crossed by the development is not impacted.	Incident Register	Environment Manager - No riparian zone incidents have occurred during the audit period.	The Auditor inspected works near (dry) water courses, however no construction activities were observed in riparian zones.	No riparian zone incidents have occurred during the audit period.	Not Triggered	
S2 D21	Flooding	The Proponent must ensure that the development: a) does not materially alter the flood storage capacity, flows or characteristics in the development area or off-site; and b) is designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site, unless otherwise agreed by Council.		Environment Manager - There were no flooding issues that occurred during the reporting period. Consultation with council has not been required as the project has not been designed to increase impacts on surface water, localised flooding and groundwater.		A detailed assessment of flooding and water management issues was undertaken during the previous audits. No changes in design have occurred during this audit period. No flooding impacts have occurred during this audit period.	Complies	
S2 D22	Acid Sulphate Soils	The Proponent must ensure that any construction activities in identified areas of acid sulphate soil risk are undertaken in accordance with the <i>Acid Sulphate Soil Manual</i> (Acid Sulphate Soil Management Advisory Committee, 1998).	Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision 2, dated 7 February 2024	Environment Manager - No ASS has been encountered during the audit period. If encountered PASS would be managed in accordance with the SWMP. Current activities are outside the areas of known acid sulphate soil risk areas.		Current activities are outside the areas of known acid sulphate soil risk areas.	Not Triggered	
S2 D23	Salinity	The Proponent must ensure that any construction activities in identified areas of moderate to high salinity are undertaken in accordance with the Salinity Training Manual (DPI, 2014) and Book 4 Dryland Salinity: Productive use of Saline Land and Water (NSW DECC, 2008).	Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision 2, dated 7 February 2024	Environment Manager - No works have occurred within high salinity areas during the audit period. Consequently, no salinity management activities have been undertaken.		No works have occurred within high salinity areas during the audit period.	Not Triggered	
S2 D24	Soil and Water CEMP Sub-Plan	The Soil and Water CEMP Sub-Plan required under condition B2 must include provisions for: a) ensuring the requirements in conditions D15 to D23 are complied with;	Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision 2, dated 7 February 2024. Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) -Construction Environmental Management plan and sub-plans”, dated 27 September 2024	Environment Manager - No reviews or revisions of Soil and Water Management Plan have taken place during the audit period.		The Soil and Water Management Plan provides an appropriate framework to manage compliance with the relevant conditions of the Approval. The plan was revised and approved by DPHI during this audit period.	Complies	
		b) managing flood risk during construction;				Section 5.5 of the SWMP describes the proposed flood response procedures for the project.	Complies	
		c) investigating, assessing and managing contaminated land, soils and groundwater in the development area;				Section 5.3 of the Plan describes the procedures for management of contaminated materials. Section 6.3 of the plan describes the monitoring program for soils and water.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D24	Soil and Water CEMP Sub-Plan	d) investigating, assessing and managing the potential for asbestos and other hazardous materials in the development area; and	Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision 2, dated 7 February 2024			Investigating, assessing and managing contaminated land is addressed in Section 3.4 and Table 5.1 Investigating, assessing and managing soil is addressed in Section 3.2 and Table 5.1. Investigating, assessing and managing groundwater is addressed in Section 3.3.5 and Table 5.1.	Complies	
		e) managing any unexpected and / or suspected contaminated land, asbestos and unexploded ordinance excavated, disturbed or otherwise discovered during construction.	Soil and Water Management Plan EnergyConnect (NSW – Western Section), Revision 2, dated 7 February 2024			Appendix B of the plan describes the management of unexpected finds (including hazardous materials).	Complies	
S2 D25	Biodiversity Restrictions on and Habitat	Unless otherwise agreed with the Planning Secretary, the Proponent must: a) ensure that no more than: <ul style="list-style-type: none"> • 19.6 hectares (ha) of BC Act listed Sandhill Pine Woodland in the Riverina, Murray-Darling Depression and NSW Southwestern Slopes bioregions; • 0.04 ha of habitat for BC Act listed flora species <i>Acacia acanthoclada</i> (Harrow Wattle); • 0.32 ha of habitat for BC Act and EPBC Act listed flora species <i>Atriplex infrequens</i> (A saltbush); • 1.51 ha of habitat for BC Act listed flora species <i>Austrostipa nullanulla</i> (A spear-grass); • 14 individuals of BC Act listed <i>Santalum murrayanum</i> (Bitter Quandong); and • 6.91 ha of habitat for BC Act and EPBC Act listed fauna species <i>Polytelis anthopeplus monarchoides</i> (Regent Parrot) (eastern subspecies); is cleared for the development; and	Project Energy Connect – West Biodiversity Technical Specialist Audit Report, dated April 2025.	Environment Manager - Only minor clearing occurred during the reporting period as part of the pre-energisation work and demolition of OX1.		During the previous (September 2024 Independent Environmental Audit, Transgrid commissioned a detailed biodiversity audit that was undertaken by Umwelt Consultants. The biodiversity report was finalised in April 2025 (just prior to the commencement of this IEA). The Biodiversity Auditor found that the project is complying with this condition. No Significant vegetation clearing was undertaken during this audit period, therefore this condition has been assessed as compliant.	Complies	
		b) minimise: <ul style="list-style-type: none"> • the impacts of the development on hollow-bearing trees; • the impacts of the development on threatened bird and bat populations; and • the clearing of native vegetation and key habitat. 	Project Energy Connect – West Biodiversity Technical Specialist Audit Report, dated April 2025.			The Biodiversity Auditor found that the project is complying with this condition.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 B26	Biodiversity Off-set Package	<p>Prior to carrying out any development that would impact on biodiversity values, the Proponent must prepare a Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and to the satisfaction of the Secretary in writing. The Package must include, but not necessarily be limited to:</p> <p>(a) details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS;</p> <p>(b) the cost for each specific biodiversity offset measure, which would be required to be paid into the Biodiversity Conservation Fund if the relevant measure is not implemented and delivered (as calculated in accordance with Division 6 of the Biodiversity Conservation Act 2016 (NSW) and the offsets payment calculator that was established as at 29 July 2021);</p> <p>(c) the timing and responsibilities for the implementation and delivery of the measures required in the Package; and</p> <p>(d) confirmation that the biodiversity offset measures will have been implemented and delivered no later than 31 December 2023.</p> <p>Following approval, the Proponent must implement and deliver the Biodiversity Offset Package.</p>	<p>Project Energy Connect – West Biodiversity Technical Specialist Audit Report, dated April 2025.</p> <p>Project EnergyConnect (NSW Western Section) Biodiversity Offset Package 14/3/22.</p> <p>Letter from DPHI (D Gainsford) to Commonwealth Bank of Australia, titled “Payment direction to Escrow Agent”, date 12 January 2024.</p>			<p>DPE approved the biodiversity offset package on 16/3/22, prior to this audit period.</p> <p>Ecosystem credit requirements from the EIS are documented in Table 4, species credit requirements from the EIS are documented in Table 5.</p> <p>The written approval of the Biodiversity Offset Package (V4) by the nominee of the Planning Secretary was sighted.</p> <p>The contents of the Biodiversity Package meet the requirements of this Condition.</p>	Complies	
S2 B27	Biodiversity Off-set Package	<p>Prior to carrying out any development that could impact the biodiversity values requiring offset, the Proponent must establish an escrow account and pay into that account \$48 million, in accordance with the Deed of Agreement with the Planning Secretary executed on 13 September 2021. The Proponent must comply with the terms of the Deed.</p>	<p>Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.</p> <p>Letter from DPHI (D Gainsford) to Commonwealth Bank of Australia, titled “Payment direction to Escrow Agent”, date 12 January 2024.</p>	<p>Environment Manager - The BOP was fully implemented by 31 December 2023.</p>		<p>Escrow account fund was established prior to project approval and was therefore in place prior to any development that could impact biodiversity values prior to offset such as construction or any other minor works such as local road upgrades etc.</p>	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D28	Biodiversity CEMP Subplan	<p>The Biodiversity CEMP Sub-Plan required under condition B2 must include:</p> <p>a) a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • minimising the amount of native vegetation clearing within the approved development footprint; • minimising the loss of key fauna habitat, including tree hollows; • minimising the impacts on fauna on site, including undertaking pre-clearance surveys; • minimising the potential indirect impacts on threatened flora and fauna species, migratory species and ‘at risk’ species; • rehabilitating and revegetating disturbance areas; • protecting native vegetation and key fauna habitat outside the approved disturbance area; • 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; • collecting and propagating seed (where relevant); • controlling weeds; • controlling erosion; and • bushfire management; 	<p>Biodiversity Management Plan EnergyConnect (NSW – West) Stage 2, Revision 0, dated 12 February 2024.</p> <p>Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) -Construction Environmental Management plan and sub-plans”, dated 27 September 2024</p>			<p>Biodiversity management measures are described in Section 5 of the Biodiversity Management Plan.</p> <p>The plan was revised and approved by DPHI during the previous audit period.</p>	Complies	
		<p>b) details of the Proponent’s commitment to make a one off \$150,000 funding contribution targeted at further scientific study into the impacts of electric and magnetic fields on birds in Australia;</p>	<p>Biodiversity Management Plan EnergyConnect (NSW – West) Stage 2, Revision 0, dated 12 February 2024.</p>			<p>Table 2.1 states that “<i>Transgrid will make a one off \$150,000 funding contribution targeted at further scientific study into the impact of electric and magnetic fields on birds in Australia at the commencement of operations</i>”.</p>	Complies	
		<p>c) preparation and implementation of a two-year bird impact monitoring program at the commencement of operations; and</p>	<p>Project EnergyConnect (West) BIMP Bird Impact Monitoring Program, prepared by WSP Consultants, dated 7 March 2025.</p> <p>Email from Transgrid (K Lembke) to BCD (Southwest Planning Mailbox) titled “Re:SW RDD Response RE: PECw Bird Impact Monitoring Program [Official] – past 1 as follows”, dated 13 March 2025.</p>			<p>Transgrid has prepared a Bird Impact Monitoring Report. The report has been provided to BCD. The Department has provided feedback on the Program.</p>	Complies	
		<p>d) a detailed program to monitor and report on the effectiveness of these measures</p>	<p>Biodiversity Management Plan EnergyConnect (NSW – West) Stage 2, Revision 0, dated 12 February 2024.</p>			<p>Section 6 of the plan describes the biodiversity monitoring program to be implemented.</p>	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D29	Aboriginal Cultural Heritage Strategy	Prior to commencing construction, the Proponent must provide an Aboriginal Cultural Heritage Strategy, prepared in consultation with the Aboriginal stakeholders and Heritage NSW, to the satisfaction of the Planning Secretary. The Strategy must: a) identify any additional risk zones outside the potential archaeological deposits (PADs) where construction must not commence until subsurface testing in b) and surveys in c) are complete;	EnergyConnect (NSW – Western Section) Aboriginal Cultural Heritage Management Strategy, Revision 7, dated 14 October 2022.	Environment Manager – no changes were made to the Aboriginal Cultural Heritage Management Strategy during this audit period.		The Aboriginal Cultural Heritage Management Strategy was prepared prior to the commencement of construction. The current version of the strategy was issued in October 2022. Appendix B of the strategy identifies areas that require additional investigations prior to clearing of those areas.	Complies	
		b) describe additional subsurface testing that will be undertaken to confirm the significance of the PADs that would be impacted by the final transmission infrastructure design and ancillary facilities in line with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010);	EnergyConnect (NSW – Western Section) Aboriginal Cultural Heritage Management Strategy, Revision 7, dated 14 October 2022.			Appendix C describes the test excavation methodology to be used to determine the significance of the PADs that will be impacted by the project.	Complies	
		c) describe additional Aboriginal heritage surveys that will be undertaken where ground disturbance activities are required outside of the heritage survey area;	EnergyConnect (NSW – Western Section) Aboriginal Cultural Heritage Management Strategy, Revision 7, dated 14 October 2022.			Appendix D describes the survey methodology to be to areas outside of the project that will be impacted by the project.	Complies	
		d) include details of ongoing consultation with the Aboriginal stakeholders, including any written responses and records of any meetings; and	EnergyConnect (NSW – Western Section) Aboriginal Cultural Heritage Management Strategy, Revision 7, dated 14 October 2022.			An updated ACHAR (Appendices E and F of the Strategy) has been prepared that addresses on-going stakeholder consultation, including consultation records.	Complies	
		e) include an updated Aboriginal cultural heritage assessment report, which: • is based on the findings of the subsurface testing in b) and surveys in c); • describes any potential additional impacts to heritage items; • identifies further mitigation measures, including avoidance or salvage; • includes detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and • provides an updated and consolidated list of sites that would be protected and remain in-situ throughout construction and sites that would be salvaged and relocated to suitable alternative	EnergyConnect (NSW – Western Section) Aboriginal Cultural Heritage Management Strategy, Revision 7, dated 14 October 2022.			An updated ACHAR is provided in Appendices E and F of the Strategy.	Complies	
S2 D30	Avoidance and Salvage	The Proponent must implement all reasonable and feasible measures to avoid and minimise harm to heritage items and potential archaeological deposits (PADs) identified in the EIS and the Aboriginal Cultural Heritage Strategy required by condition D29, prior to carrying out any development that could harm the items or deposits.		Environment Manager - No unexpected finds were recorded during the audit period.		No incidents or complaints related to damage to cultural heritage items were identified during this audit. No unexpected finds were recorded during the audit period.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D31	Avoidance and Salvage	The Proponent must ensure the development does not cause any harm to heritage items identified for avoidance in the approved Aboriginal Cultural Heritage Strategy or any Aboriginal heritage items located outside the approved development footprint.	.	Environment Manager - No impacts on heritage items identified for avoidance have occurred during the audit period.		No impacts on heritage items identified for avoidance have occurred during the audit period.	Complies	
S2 D32	Avoidance and Salvage	Prior to carrying out any activity that could harm heritage items, the Proponent must salvage and relocate all heritage items identified for salvage and relocation in the updated and approved Aboriginal Cultural Heritage Strategy to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010).		Environment Manager - No salvage was undertaken during this audit period. Repatriation of artefacts occurred in October 2024.		No salvage was undertaken during this audit period. Repatriation of artefacts was undertaken during October 2024.	Complies	
S2 D33	Avoidance and Salvage	The Proponent must ensure the development does not cause any harm to heritage items PEC-W-H-1 and PEC-W-SE-H1.	Incident Register	Environment Manager - Neither of these sites have been impacted by the Project during the audit period.	During the inspection of construction areas, including recently cleared areas, the Auditor observed (refer to Photograph 8) that exclusion fencing was in place and signposted in the areas inspected.	No heritage related incidents were reported during the audit period.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D34	Heritage CEMP Subplan	<p>The Heritage CEMP Sub-Plan required under condition B2 must:</p> <p>a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary;</p>	<p>Heritage Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision G, dated 24 June 2022</p> <p>Letter from DPE (D Crinnon) to Transgrid (J Fisher) titled “Subject: Project EnergyConnect (NSW - Western Section) (SSI-10040) -Stage 2 CEMP and sub-plans”, dated 15 July 2022</p>	<p>Environment Manager – no changes were made to the Aboriginal Cultural Heritage Management Strategy during this audit period.</p>		<p>No changes were made to the Heritage Management Plan during this audit period.</p> <p>DPE approved revision G of the Heritage Management Plan on 15 July 2022.</p>	Complies	
		<p>b) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • addressing the outcomes of the additional assessment, testing and surveys identified in condition D29; • protecting the heritage items identified in conditions D31 and D33, including fencing off the heritage items (where required) prior to carrying out any development that could harm the heritage items, and protecting any items located outside the approved development corridor; • salvaging and relocating the heritage items identified in condition D32; • minimising and managing the impacts of the development on heritage items within the development corridor, including: <ul style="list-style-type: none"> – a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works; • a contingency plan and reporting procedure if: <ul style="list-style-type: none"> – heritage items outside the approved disturbance area are damaged; – previously unidentified heritage items are found; or – Aboriginal skeletal material is discovered; • ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and • ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and 	<p>Heritage Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision G, dated 24 June 2022</p>			<p>The Heritage Management Subplan provides in the information required by Condition D34.</p>	Complies	
		<p>c) include a program to monitor and report on the effectiveness of these measures and any heritage</p>	<p>Heritage Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision G, dated 24 June 2022</p>			<p>Monitoring and reporting on Heritage compliance is covered in Sections 6.3, 6.4, 6.5, and 6.6 of the Heritage Management Plan.</p>	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D35	Traffic and Transport	All over-dimensional vehicles associated with the development must only travel to and from the site via the Primary Access Routes described in the EIS, as identified in the figure in Appendix 2, unless the Planning Secretary agrees otherwise.	Drive Code of Conduct Energy Connect, Revision3, dated 21 May 2024. Complaints Register			The Drivers' Code of Conduct contains details of all approved heavy vehicle routes. No complaints were received during the audit period relating to heavy vehicle routing.	Complies	
S2 D36	Traffic and Transport	All heavy and light vehicles associated with the development: a) must travel to and from the site via the Primary Access Route described in the EIS, as identified in the figure in Appendix 2; and b) may travel to and from the site via the Secondary Access Routes and Water Supply Routes, subject to the requirements in conditions D37 and D38, to the satisfaction of the relevant roads authority, unless the Planning Secretary agrees otherwise.	Drive Code of Conduct Energy Connect, Revision3, dated 21 May 2024. Complaints Register			The Drivers' Code of Conduct contains details of all approved vehicle routes. No complaints were received during the audit period relating to vehicle routing.	Complies	
S2 D37	Traffic Strategy	Prior to commencing construction, the Proponent must prepare a Traffic Strategy, in consultation with the relevant roads authority, to the satisfaction of the Planning Secretary, which: a) for all access routes: <ul style="list-style-type: none"> identifies the location and type of any necessary road upgrades (including roads, intersections, crossing points and access points), including consideration of relevant amenity impacts; ensures that any road upgrades comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), unless the relevant roads authority agrees otherwise; includes a detailed assessment of potential impacts of any necessary road upgrades (such as heritage and biodiversity impacts), including consideration of appropriate mitigation measures; identifies whether intersections, crossing points and access points would be permanent or temporary; and includes measures for notifying, seeking feedback from and addressing the concerns of impacted residents along the routes; 	Traffic Management Strategy EnergyConnect (NSW – Western Section) Stage 2, Revision 2, dated 25 May 2023.	Environmental Manager – the Traffic Management Strategy was not revised during this audit period.		Revision 2 of the Traffic Strategy was prepared to include the addition of Boonie Doon Road for site access during a previous audit period and was approved by DPE. The Strategy was not revised during this audit period and satisfies the requirement of Condition D37.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D37	Traffic Strategy	b) include oversize overmass requirements and management; <ul style="list-style-type: none"> • provides detailed usage of the routes, including maximum daily numbers of heavy and light vehicles and approximate durations of use; • includes an assessment of dust impacts to any residences along the routes and identifies mitigation measures to minimise any impacts; and • identifies any residences along the routes that would experience road traffic noise above the relevant assessment criteria from Table 3 in NSW Road Noise Policy (DECCW, 2011) due to project-related traffic and identifies mitigation measures to minimise impacts. 	Traffic Management Strategy EnergyConnect (NSW – Western Section) Stage 2, Revision 2, dated 25 May 2023.			The Traffic Management Strategy satisfies the requirement of Condition D37 b).	Complies	
S2 D38	Traffic Strategy	Prior to commencing construction, the proponent must implement the road upgrades and the mitigation measures identified in the Traffic Strategy in condition D37, to the satisfaction of the relevant roads authority and the Planning Secretary, respectively.	Letter from TfNSW (S Fairweather) to Transgrid (L Ryan) titled “WAD Anabranh South BAR/BAL HW22 Silver City Highway WST21/00260 - Notice of Practical Completion”, dated 24 November 2023. Condition D38 compliance statement – Silver City Highway EnergyConnect (NSW - Western Section), Revision B, dated 21 November 2023.			Compliance with this Condition was verified during the last IEA. TfNSW confirmed practical completion of the road upgrades. DPE confirmed receipt (without comment) of the Compliance Statement prepared by Elecnor in relation to compliance with this Condition.	Complies	
S2 D39	Road Maintenance	The Proponent must: <ul style="list-style-type: none"> a) undertake an independent dilapidation survey to assess the: <ul style="list-style-type: none"> • existing condition of all local roads on the transport route (including local road crossings) prior to construction, upgrading or decommissioning works; and • condition of all local roads on the transport route (including local road crossings): <ul style="list-style-type: none"> - within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed to by the relevant roads authority; - on an annual basis during construction, or within a timeframe agreed to by the relevant roads authority; b) repair (or pay the full costs associated with repairing) any damage to local roads on the transport route (including local road crossings), if dilapidation surveys identify that the road has been damaged by the development during construction, upgrading or decommissioning works; in consultation with the relevant roads authority, to the satisfaction of the Planning Secretary. 	Email from Elecnor (R Vusango) to Wentworth Council (H Baird) titled “Project Energy Connect Road Dilapidation Survey 2024 Conclusion”, dated 17 March 2025. Sealed Pavement Condition Report, Pavement Condition Survey – Phase 4 Network Condition Report – Factual Report – Wentworth Shire, prepared by Pavement Management Services, dated 20 February 2025. Unsealed Network Condition Report, Pavement Condition Survey – Phase 4 Network Condition Report – Factual Report – Wentworth Shire, prepared by Pavement Management Services, dated 6 March 2025.	Environment Manager - Road maintenance was undertaken on the following roads during the audit period, if the road became rough or following rainfall, Renmark Road, High Darling and Anabranh Road. Dilapidation reports were prepared during the audit period and have been provided. Consultation with Wentworth Shire Council was undertaken during this audit period.		Evidence was available to verify that the annual road dilapidation surveys were undertaken for the roads in Wentworth Shire.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S3 D40	Traffic and Transport CEMP Sub-Plan	The Traffic and Transport CEMP Sub-Plan required under condition B2 must include: a) details of the transport route to be used for all development-related traffic;	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 4, dated 21 May 2024.	Environment Manager – no changes were made to the Traffic and Transport Management Plan during this audit period.		Revision 3 of the Traffic Management Plan was prepared to include the addition of Boonie Doon Road for site access. DPE approved the use of Boonie Doon Road and Revision 3 of the Plan on 28 June 2023. Section 5 of the plan describes the approved traffic routes.	Complies	
		b) details of the road upgrade works required by condition D38 of this approval;	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 4, dated 21 May 2024.			Section 6.2 describes the Condition D38 upgrade works.	Complies	
		c) details of the measures that would be implemented to: <ul style="list-style-type: none"> • minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including: <ul style="list-style-type: none"> - a description of the proposed dilapidation surveys required by condition D39 of this approval; - a description of the proposed measures for managing traffic flow around the work sites, construction compounds and accommodation camps; - temporary traffic controls, including detours and signage; - procedures for stringing cables and transmission lines across roads; - notifying the local community about development-related traffic impacts; - procedures for receiving and addressing complaints from the community about development- related traffic; - minimising potential cumulative traffic impacts with other projects in the area; - minimising potential conflict between development-related traffic and rail services, stock movements and school buses, in consultation with local schools, including preventing queuing on the public road network; - implementing measures to minimise development-related traffic on the public road network outside of standard construction hours; - minimising dirt tracked onto the public road network from development-related traffic; employee use of this service; 	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 4, dated 21 May 2024.			Section 6 of the plan describes the traffic and transport management measures to be implemented.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S3 D40	Traffic and Transport CEMP Sub-Plan	The Traffic and Transport CEMP Sub-Plan required under condition B2 must include: c) details of the measures that would be implemented to: - details of the employee shuttle bus service (if proposed), including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage - encouraging car-pooling or ride sharing by employees; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; - ensuring loaded vehicles entering or leaving the site have their loads covered or contained; - responding to any emergency repair or maintenance requirements; - provisions for maintaining emergency vehicle access at all times; - a traffic management system for managing over-dimensional vehicles; and - fatigue management. • comply with the traffic conditions in this approval;	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 4, dated 21 May 2024.			Section 6 of the plan describes the traffic and transport management measures to be implemented.	Complies	
		d) include a drivers code of conduct that addresses: • travelling speeds; • procedures to ensure that drivers to and from the development adhere to the designated over-dimensional and heavy vehicle routes; • procedures to ensure that drivers to and from the development implement safe driving practices; and • include a detailed program to monitor and report on the effectiveness of these measures and the code of conduct; and	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 4, dated 21 May 2024.			The Drivers Code of Conduct is provided in Appendix A.	Complies	
		e) a flood response plan detailing procedures and options for safe access to and from the site in the event of flooding.	Traffic Management Plan Management Plan EnergyConnect (NSW – Western Section) Stage 2, Revision 4, dated 21 May 2024.			The Flood Response Plan is provided in Appendix B.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D41	Visual Impact Mitigation	<p>Unless the Planning Secretary agrees otherwise, for a period of 2 years from the commencement of operations, the owners of R1489, R2022 and R2023 may ask the Proponent to implement visual impact mitigation measures on their land to minimise the visual impacts of the development on their residence (including its curtilage).</p> <p>Upon receiving such a written request from the owner of these residences, the Proponent must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner.</p> <p>These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the transmission line and towers from the residence and its curtilage, and commensurate with the level of visual impact on the residence.</p> <p>All agreed mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise.</p> <p>If the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.</p> <p>a) To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of transmission lines and towers from any other locations on the property other than the residence and its curtilage.</p>					Not Triggered	
S2 D42	Visual Appearance	<p>The Proponent must:</p> <p>a) minimise the off-site lighting impacts of the development; and</p>	Complaints Register.		Camps 6 was inspected. No lighting issues (for example intrusive light on residential properties or road users) were identified.	<p>Site compound location is not visible from the residential areas and is unlikely to cause any visual impacts.</p> <p>The lighting provided is appropriate for the development and is unlikely to cause glare issues for road users.</p> <p>No lighting complaints were received during the audit period.</p>	Complies	
		<p>b) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.</p>			<p>Signage at site access points across the construction corridor were observed. No signage considered to be breaching this condition was observed.</p>	<p>No advertising signs or logos were observed at either site, other than for the purposes of site identification and safety.</p>	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D43	Lighting	<p>The Proponent must:</p> <p>a) take all reasonable steps to minimise the off-site lighting impacts of the development; and</p> <p>b) ensure that any external lighting associated with the development:</p> <ul style="list-style-type: none"> • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; and • complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting. 	Complaints Register.		Camps 6 and 7 were inspected. No lighting issues (for example intrusive light on residential properties or road users) were identified.	<p>Site compound location is not visible from the residential areas and is unlikely to cause any visual impacts.</p> <p>The lighting provided is appropriate for the development and is unlikely to cause glare issues for road users.</p> <p>No lighting complaints were received during the audit period.</p>	Complies	
S2 D44	Dangerous Goods	<p>The Proponent must ensure that the storage, handling, and transport of dangerous goods is undertaken in accordance with the relevant Australian Standards and guidelines, particularly AS1940 The storage and handling of flammable and combustible liquids and AS/NZS 1596:2014 The storage and handling of LP Gas, the Dangerous Goods Code, and the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.</p>	Incident Register		<p>During the site inspection, the Auditor inspected fuel and other hazardous materials storage facilities at Camp 6. All flammable and combustible materials sighted were stored in appropriately bunded containers / areas compliant with AS1940.</p> <p>Spill cleanup kits were located adjacent to storage areas.</p> <p>The storage and management of hazardous materials is of a high standard.</p> <p>No hazardous materials were located along the transmission line as construction has been completed.</p>	<p>The storage and management of hazardous materials is of a high standard and meets the requirements of the relevant Australian Standards.</p>	Complies	
S2 D45	Electrical and Magnetic Fields	<p>The Proponent must ensure that the design, construction and operation of the development is managed to comply with the applicable electric and magnetic fields (EMF) limits in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz – 100kHz) (ICNIRP, 2010).</p>	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.			<p>Three design studies have been undertaken for the transmission lines and incorporate the requirements of the (ICNIRP) Guidelines.</p> <p>Each study concludes that the power frequency electric and magnetic field levels near ground level are confirmed to be acceptable to humans, livestock and plants.</p>	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D46	Bushfire Safety	The Proponent must: a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 3, dated 27 March 2023.	Environment Manager - No bushfire incidents have occurred during the audit period.		No bushfire incidents have occurred during the audit period.	Complies	
		b) ensure that the development: • complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; • is suitably equipped to respond to any fires on site, including provision of a 20,000-litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds and accommodation camps; • incorporates the recommendations of a fire risk assessment as per TransGrid's design standards;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 5 Dated 12 October 2023.	Environment Manager - The additional accommodation modules that were installed at Camp 6 were installed in the same manner as the existing modules	Fire water tank was sighted at Camp 6	The Accommodation Camp Management Plan describes the fire control strategies and resources available.	Complies	
		c) ensure that buildings within the compounds and accommodation camps comply with Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS's Planning for Bushfire Protection 2019;				Plans for the camp buildings include specifications for compliance with the relevant fire standards and BAL specifications.	Complies	
		d) develop procedures to manage potential fires on site, in consultation with the RFS and FRNSW;	Email from NSW RFS (S Walker) to SecureEnergy (R Walker-Edwards) titled "Project EnergyConnect (NSW Western) - Emergency Plan for review", dated 10 March 2022 (Email trail evidencing SecureEnergy's attempts to seek input from the RFS). PowerPoint presentation titled "Project Overview FRNSW".	Environment Manager – RFS did not respond to our request for input into the Emergency Plan. A meeting was held with FRNSW at which we presented our fire management strategy.		SecureEnergy requested RFS input during the preparation of the Emergency Plan, however the RFS did not respond. A presentation was provided to FRNSW on the fire management strategy.	Complies	
		e) assist the RFS, FRNSW and emergency services as much as practicable if there is a fire in the vicinity of the site; and		Environment Manager - No bushfire incidents have occurred during the audit period.		No bushfire incidents have occurred during the audit period.	Not Triggered	
		f) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.					Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D47	Emergency Plan	<p>Prior to commencing construction, the proponent must develop and implement and comprehensive Emergency Plan and detailed emergency procedures for the development, in consultation with the local Fire Control Centre, and provide a copy of the plan to the local Fire Control Centre. The Proponent must keep two copies of the plan on-site in a prominent position adjacent to the site entry point(s) to the Buronga Substation at all times. The plan must:</p> <p>a) be consistent with:</p> <ul style="list-style-type: none"> • RFS's Planning for Bushfire Protection 2019 (or equivalent); • RFS's Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan; • the Fire and Rescue NSW Act 1989; • the Work Health and Safety (WHS) Act 2011; 	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.		Hard Copies of the plan were located at each of the Camps visited.	<p>The Emergency Plan has been prepared. Hard Copies of the plan were located at Camp 6 visited during this IEA.</p> <p>The plan was revised during the last audit period.</p> <p>The Emergency Plan was reviewed and found to be consistent with the requirements of the relevant guidelines.</p> <p>SecureEnergy provided the RFS with a copy of the plan and requested input from the RFS.</p>	Complies	
		b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Section 4 of the plan identifies fire hazards and risks.	Complies	
		c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Section 8 (Emergency Response) describes the procedures to be implemented to address a fire on or near the site(s).	Complies	
		d) list works that should not be carried out during a total fire ban;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Section 6.3.1 describes the activities that must not be carried out during a total fire ban.	Complies	
		e) include availability of fire suppression equipment, access and water;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Section 7.4 describes the location and availability of fire fighting water supplies.	Complies	
		f) include procedures for the storage and maintenance of any flammable materials	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Section 6.4 describes the management of flammable materials.	Complies	
		g) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Section 7.5 describes site access for emergency vehicles and Section 9.1 provides emergency contact information.	Complies	
		h) include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank(s);	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Appendix B, titled “Asset protection zone”, of the Emergency Plan provides aerial photographs of Camps 6 and 7. The asset protection zones are shaded (pink) and the relevant plans show the location of the fire water tanks.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D47	Emergency Plan	i) include location of hazards (physical, chemical and electrical) that may impact on fire fighting activities and procedures to manage identified hazards during fire fighting activities;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Appendix A provides details of the location of fire hazards.	Complies	
		j) include details of the location, management and maintenance of any Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Appendix B and Section 6.1 address the asset protection zones.	Complies	
		k) include bushfire emergency management planning;	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Section 7 describes bushfire preparedness.	Complies	
		l) include details of the how RFS would be notified, and procedures that would be implemented, in the event that: <ul style="list-style-type: none">• there is a fire on-site or in the vicinity of the site;• there are any activities on site that would have the potential to ignite surrounding vegetation; or• there are any proposed activities to be carried out during a bushfire danger period that have the potential to ignite surrounding vegetation; and	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Section 9 describes emergency communications procedures.	Complies	
		m) include details on how live transmission infrastructure can be safely isolated in an emergency.	Emergency Plan EnergyConnect (NSW – Western Section), Revision 4, dated 10 July 2024.			Table 2.1 in Section 2.2 states “Site personnel should not attempt fire control activities near energized lines. In the event there is a fire near powerlines, early notification will be communicated to TransGrid or the respective electricity company / transmission line asset owner to allow an assessment of risks associated with deenergising the powerline”.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D48	Waste	<p>Waste generated during construction, operation, upgrading and decommissioning must be dealt with in accordance with the following priorities:</p> <p>a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced;</p> <p>b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and</p> <p>c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.</p>	Waste Management Plan EnergyConnect (NSW - Western Section) Revision C, dated 27 February 2024.		<p>Recycling facilities (skip bins) are available at Camp 6 for both general waste and recyclable waste.</p> <p>As construction of the transmission line has been completed, no waste storage is required on the transmission line easement.</p>	<p>A waste management plan has been prepared and implemented for the project.</p> <p>Facilities for collections, segregation and storage of wastes are provided at each camp. Waste that is unable to be recycled are disposed of at the Buronga Waste Disposal Facility.</p> <p>Waste tracking register includes general waste, sanitary bin waste, concrete, contaminated soil, hydrocarbon waste and timber.</p>	Complies	
S2 D49	Waste	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the Protection of the Environment Operations Act 1997, the Protection of the Environment Operations (Waste) Regulation 2014, and orders or exemptions under the regulation.		Environment Manager - No waste has been imported onto any site by the Project during the audit period.	No evidence of the importation of waste materials was sighted during the site inspections.	No importation of waste onto the project site was reported for this audit period.	Not Triggered	
S2 D50	Waste	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	Cleanaway waste collection invoices covering the audit period.	Environment Manager – Cleanaway is contracted to provide waste and recycling bins, and to collect wastes for processing (recycling) or disposal.		Waste records from Cleanaway covering the audit period were sighted. The records indicate that all wastes collected by Cleanaway were managed in accordance with this Condition.	Complies	
S2 D51	Waste	All waste that is removed from site must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	<p>Project Energy Connect (NSW – Western Section Waste Classification Reports</p> <p>ALS Chain of Custody Records</p> <p>Laboratory (ALS) Test Certificates.</p>			Contaminated soils were stored in waste bins at Camps 6 and 7. Waste classification reports (including laboratory certificates) for those soils that were removed from the project for disposal were sighted.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D52	Accommodation Camp	Prior to establishing the accommodation camps, the Proponent must prepare an Accommodation Camp Management Plan to the satisfaction of Council, unless the Planning Secretary agrees otherwise. The plan must: a) ensure utilities at the accommodation camps, including water, wastewater, waste and electricity, are designed and located in accordance with Council specifications and relevant standards, in consultation with Council;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 6 Dated 4 June 2024.	Environment Manager – no amendments to the Accommodation Plan during this audit period.		The Accommodation Management Plan has been prepared and implemented. Section 2.4 of the plan references the standards and guidelines used to develop the plan.	Complies	
		b) ensure the accommodation camp complies with conditions D21 and D46;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 6 Dated 4 June 2024.			The Accommodation Management Plan provides an appropriate framework for compliance against the condition of approval.	Complies	
		c) ensure any treated wastewater from the accommodation camps used for dust suppression during construction: • complies with the Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) guidelines for irrigation water quality; • meets the requirements of the Public Health Act 2010;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 6 Dated 4 June 2024.			The reuse of treated wastewater is described in Section 7.4 and 7.5 of the Accommodation Management Plan.	Complies	
		d) include measure for dust suppression within the accommodation camps;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 6 Dated 4 June 2024.			Dust management is described in Section 7.5 of the Plan.	Complies	
		e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 6 Dated 4 June 2024.			Site layout plans are provided in Section 4.1 (Figures 4.1 and 4.2).	Complies	
		f) include measures to support local suppliers in servicing the camp where possible.	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 6 Dated 4 June 2024.			Engagement of local suppliers is covered in Section 8.3.	Complies	
		Following approval, the Proponent must implement the Accommodation Camp Management Plan.	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) Stage 1 and Stage 2 Revision 6 Dated 4 June 2024.		Camps 6 and 7 were inspected and appeared to be set out and operated in general accordance with the Accommodation Management Plan.	Camps 6 was being operated in general accordance with the Accommodation Management Plan at the time of this audit.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D53	Local Business and Employment Strategy	Prior to commencing construction, the Proponent must prepare a Local Business and Employment Strategy for the development in consultation with Council. This strategy must investigate options for prioritising the employment of local and Aboriginal workforce and suppliers for the construction of the development, where feasible. The Proponent must implement the Accommodation and Employment Strategy.	Agency Consultation Report EnergyConnect (NSW – Western Section) Local Business and Employment Strategy, Revision A Dated 11 March 2022. Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.			The Local Business and Employment Strategy has been prepared and implemented. A Local Industry Participation Manager (LIPM) has been appointed to identify opportunities for local goods and services and facilitate their procurement. The Local industry and indigenous participation is monitored and reported internally on a monthly basis.	Complies	
S2 D54	Rehabilitation	Within 6 months of the completion of construction, upgrading or decommissioning, unless the Planning Secretary agrees otherwise, the Proponent must rehabilitate the areas where ancillary facilities, accommodation camps and earthwork material sites are located, to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3.			Rehabilitation works along the power line easement were inspected. Photographs 1,2 and 3	The power line easement has been rehabilitated in accordance with the rehabilitation management plans.	Complies	
S2 E1	Revision of Strategies, Plans and Programs.	The Proponent must review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 month of the: • submission of an incident report under condition E6;		Environment Manager - No reportable incidents occurred during the audit period.		No reportable incidents were recorded during this audit period.	Not Triggered	
		• submission of an audit report under condition E11; or	EnergyConnect PEC West Project SSI 10040 September 2024, Construction Phase Independent Environmental Audit Report.	Environment Manager - No plans were required to be revised as a result of the last audit.		No non-compliances against the conditions of consent were reported in either the Independent Audit Report or the Specialist Biodiversity Report. Two non-conformances were recorded against the Biodiversity Management Plan and subsequent recommendations for improvement were provided by the Biodiversity Specialist. A review of those non-conformances by the Auditor, has found that a modification of the BMP is not warranted.	Complies	
		• any modification to the conditions of this approval.				No Modifications to the Approval occurred during this audit period.	Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 E2	Staging, combining or revision of Strategies, Plans and Programs.	With the approval of the Planning Secretary, the Proponent may: a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);	Letter from DPHI (N Brewer) to Transgrid (L Fania) titled “Project EnergyConnect (NSW - Western) - Operations Staging”, dated 28 October 2024. Staging Report EnergyConnect (NSW – Western Section), Revision G, dated 30 April 2025.	Environment Manager – A staging report was prepared and issued to DPHI relating to the staged commencement of construction.		All required construction plans and strategies were submitted prior to this audit period. DPHI approved the stage of operations in October 2024.	Complies	
		b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Environment Manager – No approval has been sought for the combining of any plans, programs, or similar documents.		No approval has been sought for the combining of any plans, programs, or similar documents.	Not Triggered	
		c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this approval. If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program. If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this approval if those requirements are not applicable to the particular stage.		Environment Manager - The Secretary did not request a review of any post approval documents during this audit period.		The Secretary did not request the review of any post approval documents during this audit period.	Not Triggered	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 E3	Notification	<p>Prior to commencing construction, operations, upgrading or decommissioning of the development or, the Proponent must notify the Department in writing via the Major Projects website portal of the date of commencing the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Proponent must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>	<p>Letter from Transgrid (L Fania) to DPHI (Ms. Fishburn) titled “EnergyConnect (NSW – Western Section) (SSI-10040) – Notification – Condition E3 – Decommissioning of OX1”, dated 18 September 2024.</p> <p>Letter from Transgrid (L Fania) to DPHI (Ms. Fishburn) titled “EnergyConnect (NSW – Western Section) (SSI-10040) – – Energisation of new circuit – Line 4”, dated 23 September 2024.</p> <p>Letter from Transgrid (K Henry) to DPHI (Ms. Fishburn) titled “EnergyConnect (NSW – Western Section) (SSI-10400) – Carrying out of approved purpose of development – Entering Operations phase – Condition E3”, dated 10 April 2025.</p> <p>Letter from DPHI (K O’Reilly) to Transgrid (L Fania) titled “EnergyConnect (NSW – Western Section) - Notification – entering the Operations Phase 2025”, dated 14 April 2025.</p> <p>Letter from Transgrid (S Troughton) to DPE (Planning Secretary) titled “EnergyConnect (NSW – Western Section) (SSI-10400) – Notification of Commencement Construction for Stage 1 (Condition E3)”, dated 18 July 2022.</p>	<p>Environment Manager - During this audit period, the staging of commencement of operations, decommissioning of OX1 and energisation of Line 4 were approved by DPHI.</p>		<p>Notification of the commencement of works (both Stages 1 and 2) were issued to the Planning Secretary prior to the commencement of those works. Notifications of the demolition of OX1, energisation of Line 4 and the commencement of staged operations have sighted.</p>	Complies	
S2 E4	Final Layout Plans	<p>Prior to commencing construction, the Proponent must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including:</p> <p>a) details on siting of transmission towers, ancillary infrastructure and / or ancillary facilities; and</p> <p>b) showing comparison to the approved layout.</p> <p>The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans.</p>	<p>Final Layout Plans (as issued to the Department)</p> <p>Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.</p>	<p>Environment Manager - Updates have been made to the Final Layout Plans subsequent to the previous audit period to reflect changes made during detailed design.</p>		<p>Final layout plans were submitted to the Department prior to the commencement of construction.</p> <p>DPE confirmed receipt of the final layout plans for stages 1 and 2.</p> <p>Updates have been made to the Final Layout Plans subsequent to the previous audit period to reflect changes made during detailed design.</p> <p>The ER (personal communication) verified that revised plans are currently being reviewed.</p>	Complies	
S2 E5	Work as Executed Plans	<p>Prior to commencing operations, the Proponent must submit plans that confirm the constructed layout of the development and showing a comparison to the final layout plans to the Planning Secretary, via the Major Projects website.</p>	<p>Post Approval Form_20250219001146 (receipt of Work as Executed Plans).</p>			<p>Work as Executed Plans, post approval receipt sighted.</p>	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 E6	Incident Notification, Reporting and Response	The Department must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.		Environment Manager - No reportable incidents occurred during the audit period.		No reportable incident occurred during the audit period.	Not Triggered	
S2 E7	Non-compliance Notification	The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.		Environment Manager - No known non-compliances against the Planning Approval occurred during the audit period.		The proponent was not aware of any non-compliances against the approval occurred during the audit period.	Not Triggered	
S2 E8	Non-compliance Notification	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.		Environment Manager - No known non-compliances against the Planning Approval occurred during the audit period.		The proponent was not aware of any non-compliances against the approval occurred during the audit period.	Not Triggered	
S2 E9	Non-compliance Notification	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.		Environment Manager - No known non-compliances against the Planning Approval occurred during the audit period.		The proponent was not aware of any non-compliances against the approval occurred during the audit period.	Not Triggered	
S2 E10	Notification to Landholders	Prior to the commencement of construction, the Proponent must notify the owners of the owners of R1489, R2022 and R2023 of their rights under condition D41.	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.			Landowners of R2022, R149, R2023 were formally notified in accordance with this condition.	Complies	
S2 E11	Independent Environmental Audit	Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.	EnergyConnect PEC West Project SSI 10040 September 2024, Construction Phase Independent Environmental Audit Report., dated 21 December 2024, prepared by Barnett and May.			Initial audit undertaken on 17 and 18 August 2022, within 3 months of construction commencement. Subsequent two audits were undertaken 6 monthly and in compliance with this condition, or as approved by DPE / DPHI.	Complies	

SSI 10040								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 E12	Access to Information	<p>Before the commencement of construction until the completion of all rehabilitation required under this approval, the Proponent must:</p> <p>a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this approval) publicly available on its website:</p> <p>(i) the EIS;</p> <p>(ii) current statutory approvals for the development;</p> <p>(iii) approved strategies, plans or programs required under the conditions of this approval;</p> <p>(iv) the proposed staging plans for the development if the construction, decommissioning and/or operation of the development is to be staged;</p> <p>(v) a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents various plans and programs approved under the conditions of this approval;</p> <p>(vi) a record of complaints, which is to be updated on a monthly basis;</p> <p>(vii) any independent environmental audit, and the Proponent's response to the recommendations in any audit; and</p> <p>(viii) any other matter required by the Planning Secretary; and</p>	https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents			All approved plans were available on the Transgrid Website at the time of preparation of this audit report.	Complies	
S2 E12	Access to Information	b) keep such information up to date, to the satisfaction of the Secretary.	https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents			The information contained on the website was up to date.	Complies	

Audit Photographs

PEC West March 2025 Independent Environmental
Audit

Appendix B



Photograph 1 – Completed Transmission Line and Access Track (PEC West)



Photograph 2 – Rehabilitation Works (PEC West)



Photograph 3 – Rehabilitation Works (PEC West)



Photograph 4 – Bird Box installed on PEC West





Photograph 5 – Bird Box installed on PEC West



Photograph 6 – Permanent Groundwater Monitoring Well

DPE Auditor Approval

Appendix C

NSW Planning ref: SSI-9172452-PA-81

Mr Luke Fania
Environment and Sustainability Manager
NSW Electricity Networks Operations Pty Limited
180 Thomas Street
HAYMARKET, NSW 2000
21/02/2025

Sent via the Major Projects Portal only

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

Dear Mr Fania

I refer to your letter dated 20 February 2025, seeking the agreement of the Planning Secretary of the Department of Planning, Housing and Infrastructure ("NSW Planning") of the suitability of the auditor's qualifications, experience and independence to undertake an independent audit of the Project EnergyConnect (NSW – Eastern Section) ("the project"), in accordance with Condition D11 of State significant infrastructure approval SSI 9172452, as modified ("the approval").

Having considered the qualifications and experience of Mr Ken Holmes of Barnet & May Pty Ltd, as nominee of the Planning Secretary, I endorse the appointment of Mr Holmes, in accordance with Condition D11 of the approval. This approval is conditional on Mr Holmes being independent of the project and maintaining Exemplar Global certification. NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Please ensure this correspondence is appended to the Audit Report.

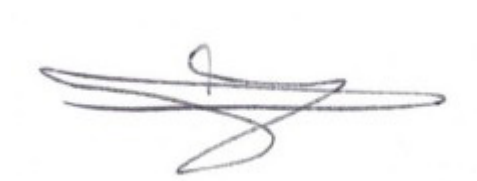
The audit is to be conducted in accordance with the conditions of approval and the Independent Audit Post Approval Requirements (May 2020). A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>. Auditor may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

Audit Report, including the response to any recommendations contained in the audit report and a timetable to implement the recommendations is to be submitted to the Planning Secretary, with the Audit Report.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Should you have any enquiries in relation to this matter, please contact me on (02) 42471852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Georgia Dragicevic".

Georgia Dragicevic
A/Team Leader Compliance
Compliance

As nominee of the Planning Secretary

Stakeholder Consultation

Appendix D

From: [Katrina O'Reilly](#)
To: [Ken Holmes](#)
Subject: Re: Project Energy Connect PEC East / PEC West - Independent Environmental Audit - Consultation Request DPHI
Date: Friday, 4 April 2025 1:28:26 PM

Thank you for your email requesting input into the upcoming audits of Project Energy Connect eastern and western sections. It is noted that you intend to undertake site inspections in the coming week. NSW Planning requests in future that you provide ample time for agency's consultation and their feedback prior to going on site to conduct the audit site component. It is further noted you were approved as the auditor in early August 2024.

NSW Planning would like the below stakeholders to be consulted:

EPA, BCS, Commonwealth DCCEE, TfNSW, Local Councils, DPI, Forestry, RFS, Fire and Rescue, Local Aboriginal Councils (RAPS), NPWS, Heritage NSW, heritage council, DPI and DPE Water, local lands service.

I'm also assuming there will also be the BAM accredited ecologist as part of the audit team.

Areas to be focused to include:

Evidence of compliance with commitments, reporting and monitoring in all management plans.

Evidence of any adaptive management identified/ implemented.

Evidence of compliance with approved footprint and current activities.

Erosion and sediment controls, management, monitoring and maintenance.

Comparison between EA predictions and actual impacts.

Evidence (tracking documentation/measures implemented) to ensure compliance with clearing and disturbance limits c 23.

Road maintenance/ monitoring and management and the interface /access onto road networks.

Evidence of Progressive Rehabilitation.

Detailed assessment (evidence) of compliance with the Biodiversity Management Plan including but not limited to the reporting/checks/monitoring committed to in the Biodiversity Management Plan (BMP) Condition c 26 (a) (ix) which states

monitor the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols;

Evidence of compliance with partial clearing, clearing commitments (how is this tracked, managed and monitored). Is the current clearing (in particular partial clearing) activity being undertaken in accordance with the commitments within BMP, EA, BDAR and description of partial clearing.

Implementation of ACHMP and compliance with conditions and evidence of consultation with Local RAPS.

Complaints management, monitoring and response.

Regards
Katrina

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

Sent: Sunday, March 16, 2025 12:34:05 PM

To: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>

Subject: Project Energy Connect PEC East / PEC West - Independent Environmental Audit - Consultation Request DPHI

Katrina,

The NSW planning approvals SSI 9172452 and SSI 10040 for the Project Energy Connect Eastern Section and Western Sections respectively and requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six-monthly audit as required under these approvals. The audit is scheduled for to commence in late April and will be undertaken concurrently, although separate reports will be prepared for each section. The Audits will be undertaken accordance with the Project Approval Conditions that require:

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

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

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

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

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 [0]438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

Our ref: OUT25/3107

Ken Holmes
Barnett & May
Email: Ken@baeckea.com.au

17/03/2025

Subject: Project Energy Connect Eastern section and Western Sections - Independent Environmental Audit – (SSI-9172452 and SSI-10040)

Dear Ken,

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

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

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

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

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

- Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEE - Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,

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

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

From: [Mon Carmichael](#)
To: [Ken Holmes](#)
Subject: Automatic reply: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request NPWS
Date: Sunday, 16 March 2025 12:53:01 PM

Thanks for your email. I am away and will be back in the office on Tuesday 18 March.

You can direct enquiries to npws.lowerdarling@environment.nsw.gov.au or call the Lower Darling Area office on 03 5021 8900. Otherwise I will attend to your message when I return.

-
Thanks

Mon Carmichael

Manager
Lower Darling National Park,
/ National Parks & Wildlife Service
Barrington 2715

T 0350 218 988
M 0488 499 931
W nationalparks.nsw.gov.au

From: [Stephen Walker](#)
To: [Ken Holmes](#)
Subject: Automatic reply: Project Energy Connect PEC East / West - Independent Environmental Audits - Consultation Request RFS
Date: Sunday, 16 March 2025 12:51:32 PM

Thank you for your email, I will be away from the office on deployment until Tuesday 25th March. I will be checking emails periodically. If the matter is urgent, please contact the Lower Western Office on 0350 274 422. Cheers Steve

From: [South West Planning Mailbox](#)
To: [Ken Holmes](#)
Cc: [Adam Vey](#); [Simon Maffei](#); [Leigh Maloney](#); [Miranda Kerr](#); [Michael Todd](#)
Subject: RD Response RE: Project Energy Connect PEC West - Independent Environmental Audit - Consultation Request
Date: Monday, 7 April 2025 12:36:06 PM
Attachments: [image001.png](#)

Hi Ken,

Thank you for the opportunity to provide input into the upcoming Independent Environmental Audits for PEC West CSSI.

Noting the audit scope as outlined in section 3.3 of the *Independent Audit Post Approvals Requirements (2020)*, South West Regional Delivery (RD) provide the following comments for consideration in your audit.

RD has reviewed the audit findings for *EnergyConnect PEC West Project SSI 10040, September 2024 Construction Phase Independent Environmental Audit dated 21 December 2024*, and the auditor's comments to the previous issues we raised.

RD notes that audit findings indicate compliance against the requirements of the BMP has been undertaken and that they will be presented in a specialist biodiversity report, however, this report is not yet finalised. Until this specialist biodiversity report has been completed, RD is not able to provide comments on any findings or recommendations.

RD has recently reviewed a Bird Impact Monitoring Plan (BIMP) for PEC West and provided comments on the BIMP method. RD has concerns over the effectiveness of the spiral bird diverters selected for the project. The BDAR indicated that flapper style bird diverters were most likely to be used for the project and that the spiral diverter was significantly less effective than the flappers. RD questions whether the use of a less effective diverter is consistent with condition D25(b) to minimise the impacts of the development on threatened birds and bats. RD requests that the audit confirm if/when the project became operational, and whether the BIMP has been implemented prior to the commencement of operation as per condition D28(c).

If you have any questions please contact Simon Maffei, Senior Project Officer via planning.southwest@environment.nsw.gov.au or 02 6022 0646.

Regards

Andrew Fisher

Senior Team Leader, Planning - South West

Regional Delivery

Conservation Programs, Heritage and Regulation Group

Department of Climate Change, Energy, the Environment and Water

T 02 6022 0623 M 0427 562 844 E andrew.fisher@environment.nsw.gov.au

620 Macauley St, Albury NSW 2640

www.environment.nsw.gov.au



Contact the South West Planning Team about biodiversity and flood management planning in south-western NSW by emailing planning.southwest@environment.nsw.gov.au

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

Sent: Sunday, 16 March 2025 12:36 PM

To: Andrew Fisher <Andrew.Fisher@environment.nsw.gov.au>

Subject: CM Record: Project Energy Connect PEC East / PEC West- Independent Environmental Audit - Consultation Request DPHI -BCD

Andrew,

The NSW planning approvals SSI 9172452 and SSI 10040 for the Project Energy Connect Eastern Section and Western Sections respectively and requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. DPHI has recently approved the change in audit timing to allow both audits to be run concurrently.

I have been commissioned by the to undertake the next six-monthly audit as required under these approvals. The audit is scheduled for to commence in **late April**. The Audits will be undertaken accordance with the Project Approval Conditions that require:

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

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

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

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

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

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

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Lead Auditor CV

Appendix E

KEN HOLMES

Senior Principal Environmental Consultant



Contact

Email ken@baeckea.com.au

Mobile +61 0438 046 261

Qualifications & professional affiliations

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

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

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

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

Project experience

Environmental Auditing (Audits completed in the recent years)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Environment Protection Licence.

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

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

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

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

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

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

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

Environment Protection Licence; and all Mining Leases.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Coal Mine (2018, 2021 and 2024)

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

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

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

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

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

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

The independent environmental audit was undertaken in

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Department of Planning and NSW EPA audit guidelines.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Project Approvals

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

including ecological survey, tree reports, and pre-construction vegetation clearance reports.

- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Other relevant Infrastructure Projects led by Ken include:

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

Investigative / Expert Roles

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

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

of buried construction and demolition wastes.

Environment Protection Authority — Expert Reports Illegal Land Clearing and Waste Disposal Activities (2018)

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

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

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

In doing this, the audit Assessed the:

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

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

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

Other

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

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

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

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

Waste Management

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

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

Shredder Waste Disposal Assessment – Sims Metal

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