

Table 1 - Response to Independent Auditor's report

Associated Infrastructure Approval Condition (C) or Biodiversity Management Measure (BD)	Finding	Recommendation	Project Response	Timeframe for implementation
Relates to Biodiversity Management Plan Measure No. BD3	<p>The Additional Areas Memo provided is lacking details on:</p> <ul style="list-style-type: none"> • Qualifications of personnel who completed the additional surveys. • Survey effort demonstrating compliance with BAM survey requirements. • Results of threatened species surveys for additional areas. 	<p>Where vegetation disturbance activities are required in areas that have not previously been subject to biodiversity survey, there is a requirement for additional survey to be completed by a suitably qualified ecologist, to inform detailed design and construction methodology.</p> <p>For the Project, these areas were subject to an Additional Areas Memo prepared by NGH (2022), which was reviewed and found to be lacking details on:</p> <ul style="list-style-type: none"> • Qualifications of personnel who completed the additional surveys. • Survey effort demonstrating compliance with BAM requirements. • Results of threatened species surveys. <p>It is therefore recommended that NGH are requested to provide confirmation and further information for the gaps identified above in relation to the Additional Areas Memo and if it is available, update the memo for the project records.</p>	<p>Management measure BD3 states:</p> <p><i>Where vegetation disturbance activities are required in areas that have not previously been subject to biodiversity survey, additional survey will be carried out prior to works occurring to inform detailed design and construction methodology. These surveys will be carried out by a suitably qualified ecologist.</i></p> <p>Management measure BD3 does not require that the qualifications of the person who completed the survey, be included within the survey report. It states that the person needs to be a suitably qualified ecologist. The report confirms that the assessment was undertaken by NGH ecologists.</p> <p>Management measure BD3 does not require the biodiversity survey to be undertaken in accordance with the BAM. The management measure states that the area will be subject to 'biodiversity survey' in areas not previously subject to survey.</p> <p>The Additional Areas Memo confirms on page 2 that the site assessment focused on any threatened flora, fauna or threatened ecological communities.</p> <p>Further to this, the Additional Areas Memo was prepared in May 2022. The audit and the audit report should reflect the outcomes of the audit period which is April to September 2024. The audit period is approximately two years after the Additional Areas Memo was prepared.</p>	Not applicable
Relates to Biodiversity Management Plan Measure No. BD16	The Supplementary Hollow and Nest Strategy does not identify the number of nest boxes required. Details of nest boxes required have been provided in a separate Memo, however nest box requirements have not been determined for	<ul style="list-style-type: none"> • It is recommended that the Supplementary Hollow and Nest Strategy be updated to include the size, type, number and location of nest boxes required based on the results of the ecological surveys. It is noted that the number of nest boxes is currently only identified in a separate memo and while the locations of nest boxes installed was available in shapefile format, the BMP 	<p>Revised mitigation measure (RMM) B10 from the Addendum BDAR (April 2021) states that the Supplementary Hollow and Nest Strategy (April 2022) 'will include the following requirements:</p> <ul style="list-style-type: none"> • the size, type, number and location of nest boxes required will be based on the results of the ecological surveys' 	Not applicable

Associated Infrastructure Approval Condition (C) or Biodiversity Management Measure (BD)	Finding	Recommendation	Project Response	Timeframe for implementation
	partial clearing zones (B4 and B10 disturbance areas).	<p>requires that nest box locations need to be included in the Supplementary Hollow and Nest Strategy.</p> <ul style="list-style-type: none"> It is also recommended that nest box requirements in partial clearing zones (B4 and B10 disturbance areas) and ENSPEC transmission sway and swing zones be addressed in the Supplementary Hollow and Nest Strategy. This can include a review of the actual and proposed additional clearing of hollow-bearing trees required for the Project, noting that Elecnor have identified that for the audit period the actual extent of clearing undertaken was approximately 50% of overall approved clearing for the project and much of the clearing required has been undertaken. 	<p>The Supplementary Hollow and Nest Strategy (Strategy) is therefore required to <u>include the commitment</u> that the box size, type, number and location will be based on the results of the ecological surveys. <u>The mitigation measure does not require the actual figures and details to be included within the Strategy itself.</u></p> <p>In line with this requirement, the commitment to determine box size, type, number and location based on ecological surveys, is reflected within the following of the Strategy:</p> <ul style="list-style-type: none"> Section 7.1 - includes the requirement that the survey report will include the results of field surveys, and number and characteristics of nest boxes; Section 4 - states that the surveys will identify suitable nest box installation areas based on in-principal considerations (detailed further within Section 4.1) and suitable habitat; Section 4.2 - Section 4.4 - addresses nest box size and type which are to be considered; <p>Further to the above, the Biodiversity Management Plan also includes information relating to the nest box locations, number, and size in Section 5.2.</p>	