

Table 1 - Response to Independent Auditor's report

Cond. no.	Condition	Finding	Recommendation	Project Response	Timeframe for implementation
A3	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this approval; b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and c) the implementation of any actions or measures contained in these documents.	Following the submission of the Biodiversity Verification Report to DPHI on 30 May 2025, DPHI, in their letter of 28 November 2025, directed the Proponent to revise and reissue the verification report and the BMP to DPHI and CPHR by 30 January 2026. Transgrid requested an extension of time for the submission of the revised report on 12 February 2026. DPHI granted an extension of time (to 20 March 2026) on 26 February 2026. That letter, issued under the signature of the Secretary's Nominee, states: <i>"The Department notes:</i> <i>• an extension ensures sufficient time for review and finalisation of the response; and</i> <i>• the Conservation Programs, Heritage and Regulation (CPHR) Group have agreed that all parties will benefit from the preparation of a thorough report.</i> <i>Accordingly, the Secretary has granted an extension of time until 20 March 2026 for the submission of the revised Verification Report."</i> Transgrid provided a written response to the Department on 20 March 2026 providing justifications for not providing all of the information requested by CPHR. That submission included the Partial Impacts Report, prepared by WSP Consultants that contained much of the information requested by the Secretary, and associated GIS data. That response, however, did not include a revision of the Verification Report. It is the Auditor's view that irrespective of the technical arguments raised by TransGrid and the addition information provided in the WSP report, that the failure to revise and reissue the Verification Report by 20 March 2026 is non-compliant with Condition A3 of the Planning Approval that requires the Proponent to comply with any requirements of the Planning Secretary arising from (sub-clause a)) the assessment	It is recommended that CPHR and the Proponent consult and agree on the scope of any additional information needed to verify the vegetation clearing impacts from construction and future vegetation maintenance for inclusion into future vegetation integrity reports.	The auditor's finding against condition A3 states that on 20 March 2026, Transgrid issued a response to the Department '<i>providing justifications for not providing the detailed information requested by CPHR</i>'. On 20 March 2026, a response was provided to both the Department and CPHR, which included the information requested, to the extent that it could be obtained given the requests made and the timeframe available. Some requests were not practicably achievable. For example, the request to evaluate the outcomes for all plant community types in all vegetation zones against all clearing methods. The project is significant in scale and an assessment of this scale would take years to undertake. Instead, representative monitoring occurred with this information provided. The response provided to the Department and CPHR on 20 March 2026 included a report, WSP report and associated data, which included the requested information. Transgrid is currently consulting with Andrew Fisher of CPHR regarding the OBMP	

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		of any strategies, plans or correspondence submitted in accordance with the Approval and sub-clause c)) the implementation of any actions or measures contained in these documents.			
A13	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A12, as well as the complaints register for any complaints received (on the day they are received).	Twenty-seven complaints were received during this audit period. The proponent provided details of each complaint in accordance with Condition A13, except for the complaint received on 23 January 2026. The ER was notified of all previous and subsequent complaints in accordance with this Condition.	The auditor is satisfied that the failure to notify the ER of one complaint was an isolated event and therefore no recommendation has been made.	This potential non-compliance was reported to the Department on 1 April 2026. The actions within this reported potential non-compliance have been implemented.	No further recommendations were made by the auditor in relation to this event as it was isolated. The actions included within the report of the potential non-compliance have been implemented.