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NEOEN

Environmental Management Strategy

Culcairn Solar Farm

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Acronyms and abbreviations

AC	Alternating current
AES	Accommodation and Employment Strategy
APA	East Australian Pipeline Pty Ltd
APZ	Asset Protection Zone
BC Act	<i>Biodiversity Conservation Act 2016 (NSW)</i>
BCD	Biodiversity, Conservation and Science Directorate
BESS	Battery Energy Storage System
Biosecurity Act	<i>Biosecurity Act 2015 (NSW)</i>
BMP	Biodiversity Management Plan
CCS	Community Communication Strategy
CNVMP	Construction Noise and Vibration Management Plan
CoA	Conditions of Approval
Cwth	Commonwealth
DC	Direct current
DPE	Department of Planning and Environment (NSW)
EIS	Environmental impact statement
EMS	Environmental Management Strategy
EP	Emergency Plan
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPA	Environment Protection Authority
EPC	Engineering, Procurement and Construction
ESCP	Erosion and Sediment Control Plan
EWMS	Environmental Work Method Statements
FM Act	<i>Fisheries Management Act 1994 (NSW)</i>
FRNSW	Fire Rescue NSW

FTE	Full time equivalent
GHSC	Greater Hume Shire Council
GMP	Groundcover Management Plan
Ha	Hectares
HMP	Heritage Management Plan
IPC	Independent Planning Commission
ha	hectares
kL	Kilolitre
km	kilometres
kV	Kilovolts
LGA	Local Government Area
LP	Landscaping Plan
m	metres
ML	Megalitre
MW	Megawatt
MWh	Megawatt hours
NBMP	Nest Box Management Plan
NSW	New South Wales
NVMP	Noise and Vibration Management Plan
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
PV	Photovoltaic
PWMP	Pest and Weed Management Plan
RFS	Rural Fire Service
RP	Rehabilitation Plan
SAP	Sensitive Area Plans
SSD	State Significant Development
SWMP	Soil and Water Management Plan
SWMS	Safe Work Method Statements

TfNSW	Transport for NSW
TMP	Traffic Management Plan
WMP	Waste Management Plan

1. Introduction

1.1. Background

Neoen Australia Pty Ltd (Neoen) (the Proponent) have approval for the construction, operation and decommissioning of a 350 Megawatt (MW) alternating current (AC) / 402.5 MW direct current (DC), photovoltaic (PV) solar farm, referred to as Culcairn Solar Farm (the Project). The Project is located on rural land, approximately 4 kilometres (km) southwest of Culcairn, New South Wales (NSW).

The Project will assist in reducing greenhouse gas emissions from electricity generation and contribute to renewable energy targets committed to by the NSW and Federal Governments. Once constructed, the Project will provide approximately 800,000 megawatt hours (MWh) per year of renewable electricity and will save about 267,000 tonnes of greenhouse gas emissions per year compared to brown coal. In addition, the Project will provide local social and economic benefits associated with the construction and operation of the Project through employment and use of local businesses.

The Project was assessed in an Environmental Impact Statement (EIS) in accordance with Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and Schedule 2 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation). It is considered State Significant Development (SSD).

In response to submissions made during exhibition of the EIS, a Submissions Report and Amendment Report was prepared by NGH (2020). The submissions resulted in changes to the EIS proposal and some changes in safeguards and management measures outlined in the EIS.

The Proponent received approval for the Project on 25 March 2021 from the Independent Planning Commission (IPC).

Modification Report 1 (SSD-10288 – Mod 1) was prepared and submitted to the Department of Planning and Environment (DPE) October 2023 and was determined on the 22 December 2023 with consolidated Conditions of Consent issued. The modification to the Project was for the following:

- Minor alignment revision and widening of the Project's Development Footprint along Weeamera Road
- Widening of the Project's Development Footprint over two creek crossings within the Development Site
- Minor amendments to the definitions and wording of Schedule 3 Condition 2 – Transport.

The Environmental Assessment documents relevant to this Project include:

- The Project EIS (NGH, 2020)
- The Project Submissions Report (NGH, 2020)
- The Project Amendment Report (NGH, 2020)
- Modification Report 1 (NGH, 2023)
- DPE Consolidated Development Consent (determined 22 December 2023).

The environmental safeguards outlined in the Environmental Assessment documents have been incorporated into this document and associated sub-plans where relevant. The Project will be carried out generally in accordance with the EIS and the Conditions of Approval (CoA), if there is any inconsistency between the documents the conditions of the consent will prevail.

1.2. Purpose of this EMS

This Environmental Management Strategy (EMS) presents the framework for the environmental management for the Project. It has been prepared to outline and describe how Neoen and the Engineering, Procurement and Construction (EPC) Contractor will comply with the environmental assessment and approval during all stages of the Project.

The EMS has been prepared in accordance with:

- Environmental Assessment documents
- Guideline for the Preparation of Environmental Management Plans (DIPNR, 2004)
- AS/NZS ISO 14001: 2016 Environmental Management systems
- Neoen's Management System Requirements
- Applicable Federal and State Legislation
- AS/NZS ISO 31000:2009 Risk management.

The purpose of this EMS is to provide a structured approach to the management of environmental issues during all stages of the Project. The EMS outlines the requirements, controls and management procedures that direct the Project team and provides an overall approach to the Project. It also provides requirements for and directs contractors and suppliers for the Project regarding specific measures that they need to adopt for their own work for the Project. Implementing this EMS effectively will ensure that the Project team will meet regulatory and policy requirements in a systematic manner and continually improves environmental performance.

This EMS:

- Describes the Project in detail including activities to be undertaken
- States obligations, objectives and targets for issues that are important to the environmental performance of the Project
- Identifies the approvals, licences and permits that relate to the Project
- Describes the strategic framework for environmental management of the Project
- Describes the environmental management related roles and responsibilities of personnel
- Outlines training and induction requirements for employees, contractors and sub-contractors, in relation to environmental and compliance obligations with applicable policies, approvals, licences, permits, consultation agreements and legislation
- Describes the procedures that will be implemented for community consultation and notification, and complaints management
- Includes protocols for managing and reporting incidents and non-compliances with applicable policies, approvals, licences, permits, consultation agreements and legislation
- Outlines a monitoring regime and inspection program to check the adequacy of controls as they are implemented during construction.

This EMS is the overarching document in the environmental management system for the Project that includes a number of management documents as described in Section 4, and will be implemented by the Applicant once approved by the Secretary. It is applicable to all staff and sub-contractors associated with the Project.

This EMS will be reviewed and updated in accordance with Section 11.1. This includes review and update of the EMS prior to operation and decommissioning.

This EMS covers Stage 1a and 1b of the construction phase. It will be reviewed and updated as required following the revision of the Traffic Management Plan (TMP) for Stage 2.

2. Project description

2.1. Project site and location

The closest town to the Project is Walla Walla, located approximately 3.7 km to the southwest. The closest services are located in the regional centre of Albury, located approximately 38.3 km south of the Project.

The Project is bounded by Weeamera Road (east), Cummings Road (west and north), and Benambra Road (south), refer to Figure 2-1. The site is intersected by Schoffs Lane and an unnamed lane (north/south) through the centre of the site. The Olympic Highway, a regional state highway, is located approximately 4.2 km east of the Project.

The Project is located within the Greater Hume Local Government Area (LGA) and is legally identified as the following Lots:

- Lots 70-73, 86 DP753764
- Lots 45-47, 53, 54 DP753735
- Lot 1 DP575478
- Lot 1 DP171815
- Lot 1 DP945904
- Lot B DP972054
- Lot 1 DP1271852.

The site comprises several large paddocks that are generally flat, largely cleared of native vegetation, and cultivated for cropping.

There is one residence within the Project footprint (refer to Figure 2-2). There are a total of 2 associated landholders (L01, L02), 31 non-associated landholders and 4 industries within 3 km of the Project site. The Project site, along with most adjoining land, is used for agriculture, including grazing and cropping.

An existing 330 kilovolts (kV) TransGrid transmission line runs northeast to southwest across the Project site. This electricity distribution network originates at TransGrid's North Wagga Substation. The solar farm will connect directly to this transmission line.

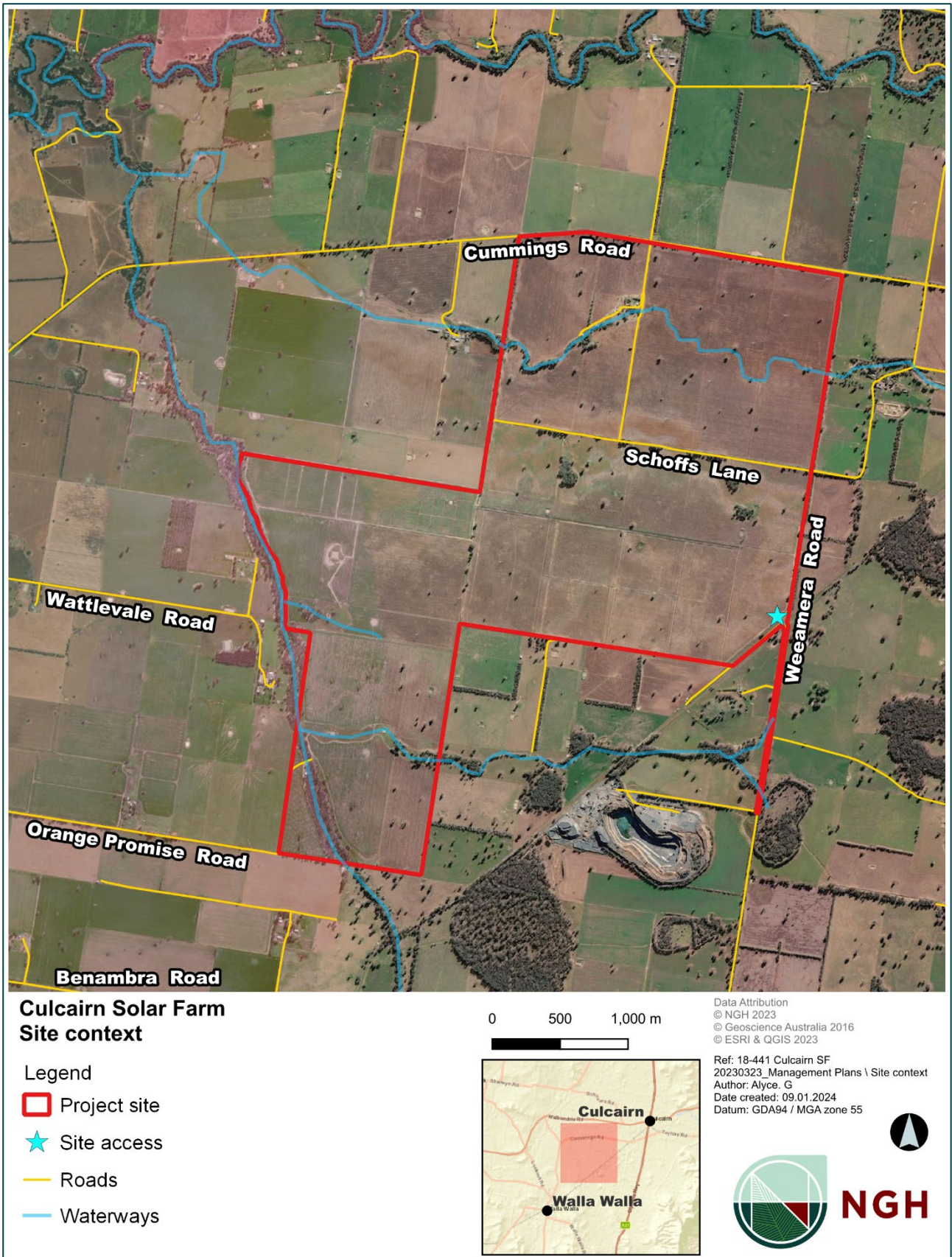


Figure 2-1 Site context and location of the approved Culcairn Solar Farm

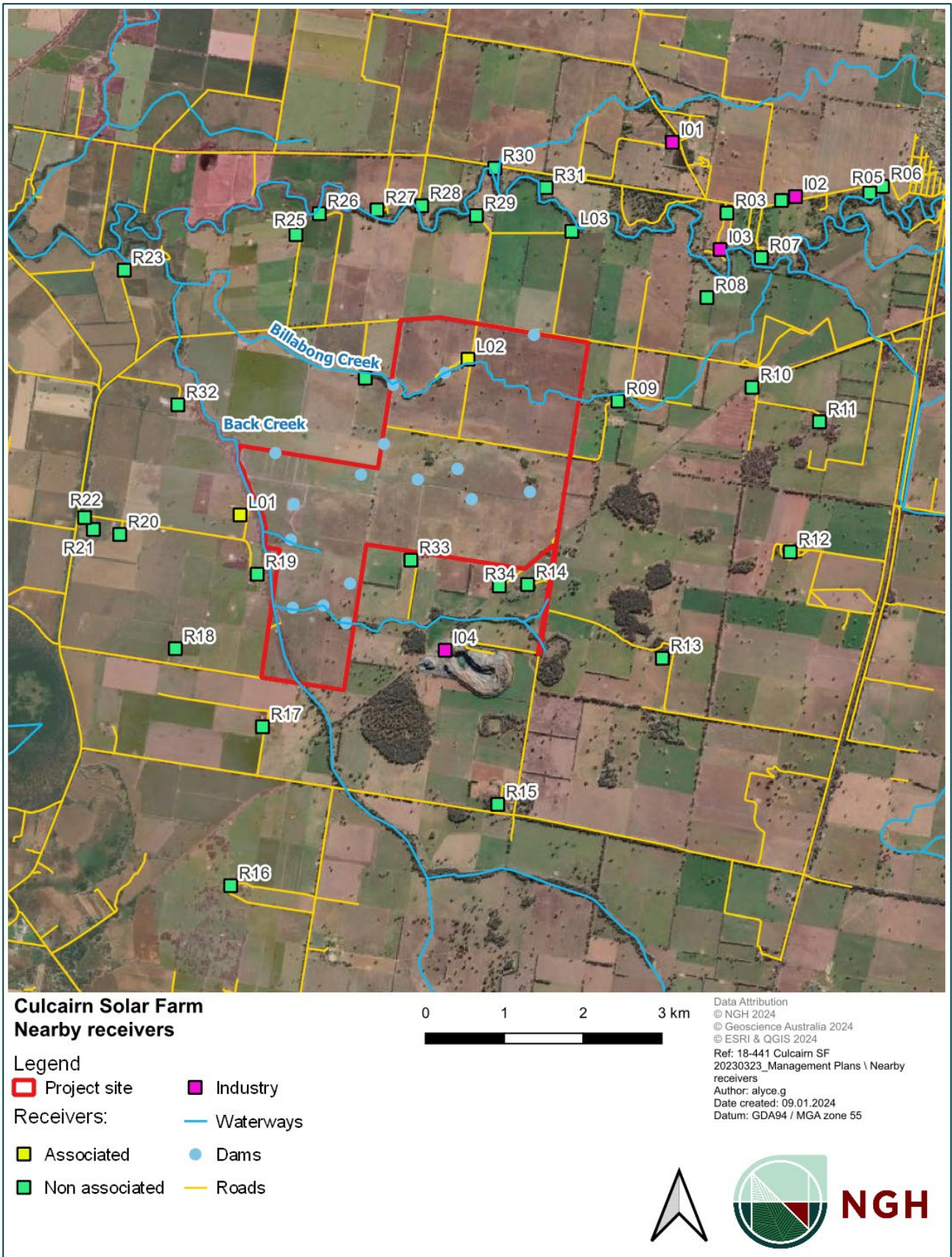


Figure 2-2 Nearby receivers

2.2. Scope of works

The Project will involve the construction and operation of a ground-mounted PV solar tracking array generating approximately 350 MW AC / 402.5 MW DC of renewable energy. The power generated will be exported to the national electricity grid. The development footprint will occupy approximately 893 hectares (ha) of the 1,351 ha Project site.

Key development and infrastructure components will include:

- Single axis tracker PV solar panels mounted on steel frames over most of the site (maximum tilt 4.2 metres in height)
- Underground and overground electrical conduits and cabling to connect the arrays to the inverters and transformers
- Systems of inverter units and voltage step-up throughout the arrays
- National Energy Market (NEM) compliant metering arrangements for all energy exported to the grid as well as internal metering to measure battery and solar output
- On site substation, connecting to the existing 330 kV TransGrid transmission line
- Site office and maintenance building, vehicle parking areas, material laydown area, internal access tracks and perimeter security fencing
- Site access track off Weeamera Road
- Road crossing and easement electrical crossing through underground and/or overhead lines, of Schoffs Lane
- Vegetative screening at impacted visual receivers and at the intersection of public roads.

The Project has been approved with the inclusion of a battery to store energy produced on site with up to 100 MW / 200 MWh capacity. Neoen are currently not proposing to construct or install the battery energy storage system (BESS) as part of the Project. Therefore the BESS hasn't been considered further in this EMS and subplans. If the BESS is to be constructed into the future, this EMS and subplans will be updated and approved prior to commencement of any works required for the battery installation. Additionally, unless the Planning Secretary agrees otherwise, the battery storage facility or system associated with the development must not exceed a total delivery capacity of 100 MW (Schedule 3 Condition 1).

The approved Project layout is provided in Figure 2-3. No native vegetation or fauna habitat will be cleared outside the approved disturbance footprint.

2.3. Project design and upgrades

In accordance with Schedule 2 Condition 7, Neoen 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 Building Code of Australia.

As per Schedule 2 Condition 6, Neoen may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, Neoen must provide revised layout plans and project details of the development to the Planning Secretary incorporating the proposed upgrades.

2.4. Subdivision

Neoen if required will subdivide the site as identified in Appendix 4 of the Conditions of Approval and in accordance with the requirements of the EP&A Act and EP&A Regulation.

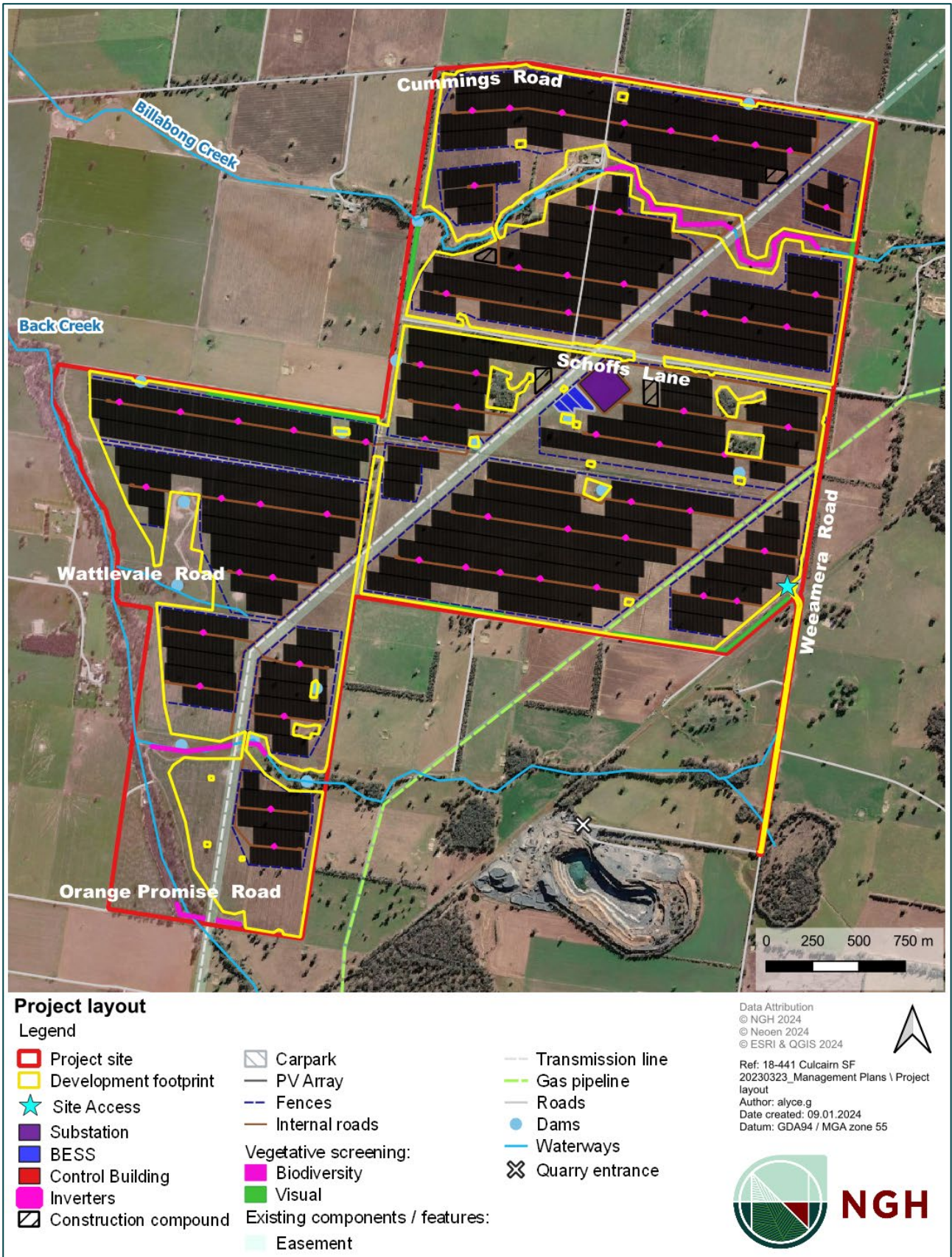


Figure 2-3 Approved Project layout

2.5. Site access

The Project will be accessed from one access point off Weeamera Road, in the south eastern corner of the site (refer to

Figure 2-3), approximately 4.1 km west of the Olympic Highway.

2.6. Offset to receivers

Neoen must ensure that the solar panels, substation and inverters within the approved Project site are not installed closer to the receivers as outlined in Table 2-1. These offset distances in Table 2-1 apply unless Neoen has a written agreement with the owner in regard to the visual impacts associated with the Project and has advised the Department of Planning and Environment (DPE) in writing of the terms of this agreement.

Table 2-1 Development offset distance requirements to receivers

Receiver	Offset distance
R9	585 metres
R17	1,1157 metres
R19	363 metres
R24	544 metres (east) and 1,155 metres (south)
R33	249 metres

2.7. Project activities and sequence

As per the definitions in the Project's Development Consent, the construction of the Culcairn Solar Farm includes but not limited to carrying out of any earthworks on site and the construction of solar panels and any ancillary infrastructure, but excludes road upgrades or maintenance works to the public road network, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying. The Project activities and sequencing is provided in Table 2-2.

This EMS covers Stage 1a and 1b of the construction phase. It will be reviewed and updated as required following the revision of the Traffic Management Plan (TMP) for Stage 2.

Table 2-2 Project activities and sequencing

Stage	Activities	Timing and staff requirements
Pre-construction	<p>During pre-construction the following activities will be undertaken:</p> <ul style="list-style-type: none"> Undertake road dilapidation surveys for 	<p>Approximately 6 months. Work will mostly be undertaken by</p>

Stage	Activities	Timing and staff requirements
	<p>Benambra Road and Weeamera Road</p> <ul style="list-style-type: none"> • Installation of site fencing • Heritage salvage in accordance with the Heritage Management Plan (HMP) • Geotechnical surveying • Installation of safety markers along overhead powerlines • Implementation of the Landscaping Plan including ground preparation, weed control and planting of screening. 	<p>contractors or specialists.</p>
<p>Construction Stage 1a</p>	<p>The main construction activities will include:</p> <ul style="list-style-type: none"> • Construction of the site access point on Weeamara Road and the road upgrades along Weeamara Road up to the unused rail corridor. • Site establishment and preparation for construction, ground preparation, construction of the internal track system, and preliminary civil works and drainage 	<p>The development will generate around 400 direct full-time equivalent (FTE) jobs during construction, with a maximum of 350 workers at any one time onsite.</p>
<p>Construction Stage 1b</p>	<p>The main construction activities will include:</p> <ul style="list-style-type: none"> • Upgrade of Weeamara Road including the unused rail corridor. • Ongoing and preliminary civil works and drainage 	<p>The main works construction period will last for 18-21 months.</p>
<p>Construction Stage 2</p>	<p>The main construction activities will include:</p> <ul style="list-style-type: none"> • Installation of steel post and framing system for the solar panels • Installation of underground cabling (trenching) and installation of inverter stations • Installation of PV panels • Construction of operation and maintenance building and switch room • Construction of the substation and connections • Removal of temporary construction facilities and rehabilitation of disturbed areas. <p>This stage will involve the transport of oversize and overmass vehicles as per Condition 2 of Schedule 3 of the Development Consent</p>	
<p>Operation of the Solar farm – Stage 3</p>	<p>Operation activities will include:</p> <ul style="list-style-type: none"> • Routine visual inspections, general maintenance and cleaning operations of the solar arrays as required • Routine visual inspections, general 	<p>The solar farm will be monitored and operated by approximately 5 to 10 full time equivalent (FTE)</p>

Stage	Activities	Timing and staff requirements
	<p>maintenance and cleaning operations of the substation</p> <ul style="list-style-type: none"> • Vegetation management (in accordance with the Bushfire Management Plan and Groundcover Management Plan), likely using sheep to control grass growth beneath the panels. Groundcover vegetation will be maintained over the site to minimise erosion, dust and weeds (subject to climatic conditions). Groundcover will be monitored and remediation (such as reseeding, soil protection or destocking) undertaken as required • Site security response (24 hr) if required • Site operational response (24 hr) if required • Replacement of equipment and infrastructure as required • Maintenance of landscaping and screening plantings as required • Pest plant and animal control as required. <p>As per Schedule 3 Condition 34 of the development consent, Neoen must within 3 years of the commencement of operation prepare a Decommissioning and Rehabilitation Plan for the development to the satisfaction of the Secretary.</p>	
<p>Construction, commissioning and operation of the BESS – Stage 4</p>	<p>If to process this stage will the construction, commissioning, and operation of the BESS, including substation and switchyard.</p>	<p>TBC</p>
<p>Decommissioning of the solar farm at end of life – Stage 5</p>	<p>At the end of its operational life, the solar farm will be decommissioned. Key elements of decommissioning will include:</p> <ul style="list-style-type: none"> • The solar arrays will be removed, including the foundation posts. Materials will be sorted and packaged for removal from the site for recycling or reuse wherever possible • All site amenities and equipment will be removed including buildings, inverter stations and materials recycled or reused wherever possible • Posts and cabling will be removed and recycled • Fencing will be removed including small concrete footings 	<p>Approximately 6 months, commencing in Q4 2056.</p>

Stage	Activities	Timing and staff requirements
	<ul style="list-style-type: none"> Gravel pavement materials will be recovered and recycled as general fill in an appropriate location Areas subject to compaction will have the topsoil ripped to a depth suitable for seeding if appropriate Sodic soil will be treated as necessary with lime or gypsum. 	

2.8. Project program

An indicative timeline for the Project is outlined in Table 2-3. It is expected that the solar farm will be commissioned at the end of the construction period, which is anticipated to take 20 to 24 months.

Table 2-3 Indicative timeline

Phase	Approximate commencement	Approximate duration
Construction	Autumn 2024	20 to 24 months
Operation	Summer 2026	30 years
Decommissioning	Summer 2056	6 months

2.9. Project hours

As per Schedule 3 Condition 16, construction activities will be undertaken during standard daytime construction hours:

- 7.00 am - 6.00 pm Monday to Friday
- 8.00 am - 1.00 pm on Saturdays.
- No work on Sundays or NSW Public Holidays

The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary:

- The delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or
- Emergency work to avoid the loss of life, property and/or material harm to the environment.

3. Planning

3.1. Legal and other requirements

A register of legal and other requirements for the Project is contained in Appendix B. This register will be maintained as a checklist. This register will be reviewed at regular intervals e.g. during management reviews and updated with any applicable changes. Any changes made to the legal requirements register will be communicated by the EPC’s Site Environmental Advisor or delegate to the wider team where necessary through toolbox talks, specific training and other methods, detailed in Section 7 of this EMS.

3.2. Conditions of approval

The CoA relevant to this EMS are outlined in Table 3-1 below. The full list of CoA and mitigation measures from the Environmental Assessment documents are identified in Appendix A, along with where the conditions and measures have been addressed.

Table 3-1 Conditions relevant to the EMS

Condition	Requirement	Reference
Schedule 4 Environmental Management and reporting		
Condition 1 Environmental Management Strategy	<p>Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <ul style="list-style-type: none"> a) Provide the strategic framework for environmental management of the development; b) Identify the statutory approvals that apply to the development; c) Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; d) Describe the procedures that would be implemented to: <ul style="list-style-type: none"> • Keep the local community and relevant agencies informed about the operation and environmental performance of the development; • Receive, handle, respond to, and record complaints; • Resolve any disputes that may arise; • Respond to any non-compliance; • Respond to emergencies; and e) Include: <ul style="list-style-type: none"> • References to any plans approved under the conditions of this consent; and • A clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Planning Secretary’s approval, the Applicant must implement the Environmental Management Strategy.</p>	This plan
Condition 2 Revision of Strategies, Plans	<p>The Applicant must:</p> <ul style="list-style-type: none"> a) Update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any 	Section 11 and 12 of this EMS

Condition	Requirement	Reference
and Programs	<p>upgrading or decommissioning activities on site; and</p> <p>b) Review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the:</p> <ul style="list-style-type: none"> • Submission of an incident report under condition 7 of Schedule 4; • Submission of an audit report under condition 11 of Schedule 4; or • Any modification to the conditions of this consent 	
<p>Condition 3</p> <p>Updating and staging of strategies, Plans or Programs</p>	<p>With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Planning Secretary for approval.</p> <p>With the agreement of the Planning Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> • While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 	<p>Section 11 and 12 of this EMS</p>
<p>Condition 7</p> <p>Incident notification</p>	<p>The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development 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 7.</p>	<p>Section 9.5 of this EMS</p>
<p>Condition 8</p> <p>Non-compliance Notifications</p>	<p>The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.</p>	<p>Section 9.5.1 of this EMS</p>
<p>Condition 9</p> <p>Non-compliance Notifications</p>	<p>A non-compliance notification must identify the development and the application number for it, set out the condition of consent 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.</p>	<p>Section 9.5.1 of this EMS</p>
<p>Condition 10</p> <p>Non-compliance Notifications</p>	<p>A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p>	<p>Section 10.5 of this EMS</p>
<p>Condition 11</p> <p>Independent Environmental</p>	<p>Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency:</p>	<p>Section 10.3 of this EMS</p>

Condition	Requirement	Reference
Audit	<ul style="list-style-type: none"> a) Within 3 months of commencing construction; and b) Within 3 months of commencement of operations. 	
Condition 12 Independent Environmental Audit	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Section 10.3 of this EMS
Condition 13 Independent Environmental Audit	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 11 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.	Section 10.3 of this EMS
Condition 14 Independent Environmental Audit	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must:</p> <ul style="list-style-type: none"> a) Review and respond to each Independent Audit Report prepared under condition 11 of Schedule 4 of this consent, or condition 13 of Schedule 4 where notice is given by the Planning Secretary; b) Submit the response to the Planning Secretary; and c) Make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary. 	Section 10.3 of this EMS
Condition 15 Independent Environmental Audit	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.	Section 10.3 of this EMS
Condition 16 Independent Environmental Audit	Notwithstanding the requirements of the Independent Audit Post Approvals Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	Section 10.3 of this EMS
Condition 17 Access to information	<p>The Applicant must:</p> <ul style="list-style-type: none"> a) Make the following information publicly available on its website as relevant to the stage of the development: <ul style="list-style-type: none"> • The EIS; • The final layout plans for the development; • Current statutory approvals for the development; • Approved strategies, plans or programs required under the conditions of this consent; • The proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; • How complaints about the development can be made; • Provide a 24hr telephone line and instruction as to how 	Section 12.3 of this EMS

Condition	Requirement	Reference
	<p>complaints or enquiries about the development can be made;</p> <ul style="list-style-type: none"> • Any independent environmental audit, and the Applicant’s response to the recommendations in any audit; and • Any other matter required by the Planning Secretary; and <p>(b) keep this information up to date.</p>	

3.3. Approvals, permits, licensing and agreements

The Project requires the following permits and licences:

- **Oversize Overmass Permit**
An oversize overmass permit will be required from the relevant road authority (Council and/or TfNSW) for any oversized vehicles
- **Roads Act 1993, Section 138**
Any works to public or classified roads require consent under this act from the road authority. Greater Hume Shire Council is the roads authority for public roads within the Culcairn area and NSW RMS is the roads authority for Olympic Highway
- **Local Government Act 1993, Section 68**
Approval is required to operate an onsite sewage management system and to draw water from a council standpipe. Consent from Greater Hume Shire Council will be required for use of a standpipe and to operate an onsite sewage management system.
- **Water Management Act 2000**
Approval or licences required to before commencing work for the following:
 - Exceed 62 megalitres per annum for construction
 - Obtain water from a different source than approved in the EIS
 - Intercept or extract groundwater or surface water (including from onsite dams where necessary)
 - For any works which have potential to alter the flow of floodwaters or surface water flows.

If required, necessary water licences will be secured prior to commencement of construction.

Should any additional environmental or planning approvals, permits or licences be required the following procedure will be implemented:

1. Approval, licence or permit need is identified, EPC Contractor will notify Neoen (if applicable)
2. The EPC Contractor or Neoen’s Project Manager will identify impacts to the Project in relation to the approval (e.g. stop work)
3. The EPC Contractor or Neoen’s Project Manager will complete the necessary work to apply for the approval, licence or permit
4. If changes are necessary to the EMS, the procedure in Section 11 will be followed.

Further, Neon commits to enter into a voluntary planning agreement (VPA) with Greater Hume Shire Council in accordance with EP&A Act and Condition 12, Schedule 2 as listed above in Table 3-1. It also commits to developing and implementing a Community Communication Strategy, that also aligns with the VPA.

4. Environmental management system

4.1. Environmental policy

Construction will be undertaken under Neoen’s Sustainability Framework Policy and the EPC Contractor’s Environmental Policy. Neoen’s Sustainability Framework Policy describes Neoen’s commitment to managing their environmental and community impact and deliver sustainable development and investment outcomes.

This policy and the EPC Contractor’s Policy will be displayed at the site office and communicated to staff and other interested parties via induction and ongoing awareness programs.

A copy of Neoen’s Sustainability Framework Policy is provided as Appendix C of this EMS.

4.2. Objectives and targets

As a means of assessing environmental performance over the life of the Project, environmental objectives and targets have been established. These objectives and targets have been developed with consideration of key issues identified through the environmental assessment and risk assessment process. The objectives and targets are consistent with the Project environmental policy and will assist in monitoring whether the commitments of the policy are being met.

The targets are incorporated into relevant environmental management sub-plans.

The performance of the Project against the objectives and targets will be documented in the Project compliance reports and at least on an annual basis as part of the management review.

Environmental objectives and targets for the Project are provided in Table 4-1.

Table 4-1 Environmental objectives and targets

Objective	Target	Measurement Tool
Construction of the Project in accordance with environmental approvals.	<ul style="list-style-type: none"> Compliance with statutory approvals. 	Audits, construction compliance reporting, management review.
Construction of the Project in accordance with approved environmental management plans.	<ul style="list-style-type: none"> Compliance with EMS and associated Sub-plans. Compliance with relevant environmental procedures. 	Audits, construction compliance reporting, management review.
Compliance with all legal requirements.	<ul style="list-style-type: none"> No regulatory infringements (PINs or prosecutions). No formal regulatory warning. 	Audits, construction compliance reporting, management review (construction and operation).
Implement rigorous and comprehensive EMS that meets the requirements of AS/NZS ISO 14001.	<ul style="list-style-type: none"> Address non-compliances and corrective actions within specific timeframes. 	Audits, management review.
Engage with the affected and broader community, minimise complaints and respond to any complaints within a suitable timeframe	<ul style="list-style-type: none"> Disseminate regular Project updates and other information through the Project website and other tools identified in the Project’s Community Communication Strategy (CCS). Record and respond to complaints in accordance with timeframes specified in the CCS. 	Review complaints register, construction compliance report, audits
Continuously improve	<ul style="list-style-type: none"> Develop and maintain a program of ongoing 	Construction compliance report, management review,

Objective	Target	Measurement Tool
environmental performance.	environmental training. <ul style="list-style-type: none"> Capture lessons learnt from environmental incidents to minimise repeat issues. Encourage and reward innovation and effort throughout the works force. 	construction and operational audits.

4.3. Environmental management system

This EMS provides the system to manage and control the environmental aspects during Project delivery. It identifies all requirements applicable to activities described in Section 2. The EMS provides the overall framework, system and procedures to ensure the potential for environmental impacts is minimised and legislative requirements are fulfilled. The system and procedures in this EMS have been developed with consideration of the environmental assessment documents and all relevant licences, permits and approvals for the Project. This EMS establishes the system for implementation, monitoring and continuous improvement to minimise impacts from the Project on the environment.

4.4. Environmental management sub-plans and strategy

The EMS and sub-plan documents are prepared to identify requirements and processes applicable to specific impacts or aspects of the activities described in Section 2. They address the measures identified in the environmental assessment documentation and Project Approval. All management measures will be implemented as required. If there is any inconsistency between approval documents the conditions of the approval shall prevail.

The sub-plans for the Project, and their consultation approval requirements, are provided in Table 4-2.

Table 4-2 Environmental management plans, approval and consultation requirements.

Plans to be developed and implemented	Comment	Consultation Requirements	Approval requirements
EMS	This Plan		To the satisfaction of the Planning Secretary
Traffic Management Plan (TMP; CoA 9, Mitigation measure TT2)	Includes Haulage Plan (Mitigation measure TT1)	Developed in consultation with Transport for NSW (TfNSW), Greater Hume Shire Council and Hurricane Hill Quarry	To the satisfaction of the Planning Secretary
Biodiversity Management Plan (BMP; CoA 15, Mitigation measure BD1)		Developed in consultation with Biodiversity, Conservation and Science Directorate (BCD)	To the satisfaction of the Planning Secretary
Landscaping Plan (LP; CoA 11, Mitigation measure VA2)		Developed in consultation with East Australian Pipeline Pty Ltd (APA), R9, R17, R19, R24 and R33	To the satisfaction of the Planning Secretary
Heritage Management Plan (HMP; CoA 23, Mitigation measure AH1)		Developed in consultation with Heritage NSW and Aboriginal Stakeholders	To the satisfaction of the Planning Secretary

Plans to be developed and implemented	Comment	Consultation Requirements	Approval requirements
Bushfire Management and Emergency Plan (CoA 30 and CoA 31, Mitigation measure SO4, HA7 and HA8)		Developed in consultation with NSW Rural Firefighting Service, Fire and Rescue NSW and APA Group	To the satisfaction of the Fire and Rescue NSW and Rural Fire Service
Community Communication Strategy (CCS; CoA 13 and Mitigation measure SE1)			
Accommodation and Employment Strategy (AES; CoA 33)		Greater Hume Shire Council	To the satisfaction of the Planning Secretary
Construction Noise and Vibration Management Plan (CNVP; Mitigation measure NS2)		Consult with R30, R31, R29, R24, R19, R33, R34, R14 and R09 during pre-construction to develop suitable mitigation measures.	-
Soil and Water Management Plan (SWMP; Mitigation measure SO1)	Includes Spill and Contamination Response Plan (Mitigation measure S05)	DPE - Water	-
Erosion and Sediment Control Plan (ESCP; Mitigation measure SO1)	Appendix of the SWMP		-
Groundcover Management Plan (GMP, CoA 12 Mitigation measure SO2)		Soil scientists & agronomist will be engaged to develop and implement a GMP	
Waste Management Plan (WMP; Mitigation measure WM1)		Suitable consultants will be engaged to develop and implement a WMP	-
Pest and Weed Management Plan (PWMP; Mitigation measure LU4)	Appendix of BMP	Input from Agronomist If possible, integrate with adjacent landowners	-
Rehabilitation Plan (RP; Mitigation measure BD18)	Appendix of BMP	-	-
Nest Box Monitoring Plan (NBMP; B Mitigation measure D18)	Appendix of BMP	-	-

4.5. Consultation

Consultation has been completed in accordance with the requirements of the Project approvals as outlined in Table 4-2. The consultation has been summarised in the relevant plans.

4.6. Environmental Work Method Statements

Environmental work method statements (EWMS) will be prepared by the EPC Contractor for all activities that carry an inherent level of environmental risk. EWMS will be prepared prior to the commencement of relevant construction activities on site and will incorporate relevant mitigation measures and controls from management sub plans. EWMS will be prepared to identify risks, ensure sound environmental practices are implemented, and to minimise the risk of environmental incidents or system failures. EWMS are to be designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions. EWMS will be reviewed and signed off by Neoen.

EWMS will be developed for at least the following activities:

- Pre-construction activities including topsoil stripping and earthworks
- Activities that impact on environmentally sensitive areas
- Vegetation clearing and grubbing
- Working in or near waterways
- Temporary waterway crossings
- Site compound and other ancillary facilities establishment
- Dewatering
- Topsoil stripping
- Concreting activities (where required)
- Drainage works.

All Project personnel and sub-contractors undertaking a task governed by an EWMS must participate in training on the EWMS and acknowledge that they have read and understood their obligations prior to commencing work.

Regular monitoring, inspections and auditing against compliance with the EWMS will be undertaken by Project management, quality, and environmental personnel to ensure that all controls are being followed and that any non-conformances are recorded, and corrective actions implemented.

4.7. Sensitive area plans

To aid in the identification and protection of significant environmental features associated with the Project, a set of Sensitive Area Plans (SAPs) have been prepared. The SAPs are included in Appendix D.

The sensitive area plans include information relating to (for example):

- Threatened ecological communities
- Watercourses
- Heritage items
- Sensitive receivers.

The SAPs are working documents and will be updated throughout the Project, as required.

4.8. Hazardous goods transport and storage

Dangerous or hazardous materials will be transported, stored and handled in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, and the ADG Code where relevant. All potential pollutants kept on-site will be stored in accordance with relevant HAZMAT requirements and banded.

4.9. Roles and responsibilities

The key environmental management roles and responsibilities for the construction phase of the Project are described below.

Neoen is the applicant and proponent for the Culcairn Solar Farm. Neoen will engage contractors to undertake the construction activities including pre-construction, Stages 1a, 1b, 2 and 4 (if it proceeds). The contractors have not yet been selected.

The EPC Contractor shall ensure specific responsibilities are communicated to all personnel via appropriate environmental management training (part of the initial safety and environment induction).

The Neoen Project Manager will be responsible for the environmental management during Stage 3 (operation) and Stage 5 (decommissioning).

4.9.1. Environmental management team

Neoen and EPC Contractor's environmental management team is provided in Table 4-3.

Table 4-3 Environmental management team

Role	Responsibility
Neoen Project Manager	<ul style="list-style-type: none"> • Engaging with all relevant stakeholders and authorities to determine Project environmental requirements; and acquiring Project environmental approvals including relevant licensing and permits. • Fulfilling the Proponent's obligations under the Conditions of Approval for the Project works. • Providing the contractor visibility and transparency to Project environmental requirements and commitments, to enable outcomes. • Advising or enabling environmental requirements and considerations in a timely manner. • Initiating and participating in Project meetings, workshops, and consultations to facilitate outcomes throughout the Project. • Setting up and managing a Project complaint handling and resolution process, as detailed by the Project CoAs. • Making Project approvals and environmental documents publicly accessible, as detailed by the Project CoAs. • Regularly monitoring environmental performance and maintaining visibility on work sites for environmental compliance. • Advising DPE and Stakeholders on Project environmental performance • Duty to Notify and timely reporting of environmental incidents and non-compliances to the DPE, and as otherwise required. • Ensuring all Project activities are carried out in an environmentally responsible way, without environmental harm, and in compliance with the Project CoAs. • Engaging a contract Superintendent that is familiar with the Projects environmental

Role	Responsibility
	<p>requirements and that in the event of contractual ambiguity or discrepancy an informed interpretation will be made, and UGL instructed accordingly.</p> <ul style="list-style-type: none"> • Advising DPE and Stakeholders of key timeframes and dates associated with the works. • Validating the capabilities, proficiencies and performance of parties engaged for the works.
EPC Project Manager	<ul style="list-style-type: none"> • Ensure all works comply with relevant regulatory and Project requirements. • Ensure the requirements of this EMS are fully implemented, and environmental requirements are not secondary to other construction requirements. • Endorse and support the Project environmental policy attached at Appendix C. • Liaise with Neoen and Government authorities as required. • Participate and provide guidance in the regular review of this EMS and supporting documentation. • Provide adequate resources (personnel, financial and technological) to ensure effective development, implementation and maintenance of this EMS. • Ensure that all personnel receive appropriate induction training, including details of the environmental and community requirements. • Ensure that complaints are investigated to ensure effective resolution. • Stop work immediately if an unacceptable impact on the environment is likely to occur.
EPC Construction Manager	<ul style="list-style-type: none"> • Plan construction works in a manner that avoids or minimises impact to environment. • Ensure the requirements of this EMS are fully implemented. • Ensure construction personnel manage construction works in accordance with statutory and approval requirements. • Support the Site Environmental Advisor in achieving the Project environmental objectives. • Ensure environmental management procedures and protection measures are implemented. • Ensure all Project personnel attend an induction prior to commencing works. • Liaise with Neoen and other Government authorities as required. • Stop work immediately if an unacceptable impact on the environment is likely to occur.
EPC Superintendent	<ul style="list-style-type: none"> • Communicate with all personnel and sub-contractors regarding compliance with the EMS and site-specific environmental issues. • Ensure all site workers attend an environmental induction prior to the commencement of works. • Coordinate the implementation of the EMS. • Coordinate the implementation and maintenance of pollution control measures. • Identify resources required for implementation of the EMS. • Support the Site Environmental Advisor in achieving the Project environmental objectives, including on ground implementation of the EWMS. • Undertake daily inspections of the construction activities they are overseeing to ensure general compliance with the CEMP and subplans. All areas identified for improvement will be addressed directly and inspection will be recorded. • Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Site Environmental Advisor. • Coordinate action in emergency situations and allocate required resources. • Stop activities where there is an actual or immediate risk of harm to the environment and

Role	Responsibility
	advise the Construction Manager and Site Environmental Advisor.
EPC Site Environmental Advisor	<ul style="list-style-type: none"> • Control field works and implement/maintain effective environmental controls. • Ensure site activities comply with EWMS and relevant records are Ensure all site workers are site inducted prior to commencement of works kept. • Attend to any spills or environmental incidents that may occur on-site. • Ensuring that the EWMS is established, implemented and maintained in compliance with all Environmental Assessment documents and approvals, including all sub-plans, procedures and supplementary EWMS, and upgrades to these documents (as needed) to remain current with the progress of the Works • Overall responsibility for the establishment, management, monitoring and maintenance of erosion and sediment controls within the site. • Carrying out daily inspections and auditing of the works at least every fortnight to ensure that environmental safeguards are being followed. • Identifying where the implemented environmental measures are not meeting the targets set, and identifying areas where improvement can be achieved. • Preparing reports outlining the works that have been undertaken and the achievements that have been met, as well as identifying those areas where improvements were made and detailing environmental performance. Environmental performance is to include all non-compliances with the requirements of any other environmental reporting requirements. • Facilitating and developing the material for all environmental induction and toolbox talks for all site personnel. • Specific authority to stop work on any activity where the Construction Environmental Manager deems it necessary to prevent environmental non-compliances, and notification to the relevant parties of any environmental incidents. • Notify environmental incidents and reportable events immediately and submit reports.
EPC HSE Supervisor/Coordinator	<ul style="list-style-type: none"> • Support the Site Environmental Advisor on activities outlined above • Ensure that site personnel are undertaking daily inspections of the construction activities they are overseeing to ensure general compliance with the CEMP and subplans. All areas identified for improvement will be addressed directly and inspection will be recorded.
EPC Project/Site Engineers	<ul style="list-style-type: none"> • Provide input into the preparation of environmental planning documents as required. • Ensure that instructions are issued and adequate information provided to employees that relate to environmental risks on-site. • Ensure that the works are carried out in accordance with the requirements of the EMS and supporting documentation, including the implementation of all environmental controls. • Identify any environmental risks. • Identify resource needs for implementation of EMS requirements and related documents. • Ensure that complaints are investigated to ensure effective resolution. • Take action in the event of an emergency and allocate the required resources to minimise the environmental impact. • Report any activity that has resulted, or has the potential to result, in an environmental incident or reportable event immediately to the Construction Manager and Site Environmental Advisor.
EPC Foreman	<ul style="list-style-type: none"> • Undertake any environmental duties as defined by the superintendent or Project/Site Engineer. • Control field works and implement/maintain effective environmental controls.

Role	Responsibility
	<ul style="list-style-type: none"> Where required, undertake environmental risk assessment of works prior to commencement. Ensure site activities comply with EWMS and relevant records are kept. Ensure all site workers are site inducted prior to commencement of works. Attend to any spills or environmental incidents that may occur on-site. Report any activity that has resulted, or has the potential to result, in an environmental incident or reportable event immediately to the Superintendent. Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager and Site Environmental Advisor.
Wider Project team (including subcontractors)	<ul style="list-style-type: none"> Complying with the relevant requirements of the EMS, or other environmental management guidance as instructed by a member of the Project's management. Participating in the mandatory Project/site induction program. Reporting any environmental incidents to the site supervisor immediately or as soon as practicable if reasonable steps can be adopted to control the incident. Undertaking remedial action as required to ensure environmental controls are maintained in good working order. Stopping activities where there is an actual or immediate risk of harm to the environment and advise the Project Manager, Construction Manager, Superintendent or ESR.

4.9.2. Sub-Contractors and sub-contractor management

Sub-contractors and their employees will be required to comply in full with the requirements of the EMS and relevant environmental requirements as it applies to site environmental management and control. Sub-contractors' personnel are considered equivalent to Neoen Project personnel in all aspects of environmental management and control. Their responsibility in this respect mirrors those of Neoen personnel.

In accordance with the Subcontractor HSE Document Approval Process, Subcontractors will be appointed and reviewed to determine suitability. Specifically, this process ensures that subcontractors' Safe Work Method Statements (SWMS) and EWMS have been assessed and are appropriate for the tasks being conducted.

The Project Manager is responsible to ensure the subcontractor documentation, plant and equipment has been approved prior to commencing on site.

Sub-contractors working on the Project will be required to:

- Undertake environmental awareness training (refer to Section 7)
- Observe sub-contract and statutory requirements relating to environmental protection and other environmental legislation and to follow instructions issued by Neoen management and supervisory personnel
- Nominate site representatives to liaise with Neoen representatives with respect to, and take responsibility for, environmental requirements for the site activities
- Adhere to Neoen's environment management system as it applies to their operations on the site
- Undertake weekly environmental inspections of their work areas
- Co-operate fully with the site emergency incident procedures and consultative arrangements
- Follow procedures incorporated in the EMS.

All Subcontractors are monitored on site by the site supervisor and are required to work in accordance with their SWMS/EWMS at all times. All subcontractors are monitored on site for compliance in the same manner as Neoen employees. Monitoring will include but is not limited to:

- Undertaking daily checks of environmental controls in high-risk sites or in environmentally sensitive environments
- Documenting findings on daily checks
- Completing checklist as required.

Observations will be made by the Site Environmental Advisor to assess the effectiveness of environmental protective measures being used onsite by the sub-contractor and to determine compliance with the requirements of the EMS.

Internal audits will also be conducted by Neoen to assess:

- Communication with sub-contractors
- Compliance with contractual requirements
- Knowledge of and compliance with the EMS
- Work procedures and environmental management controls on site.

5. Environmental risk assessment

The management of environmental impacts for the Project will follow a risk-based approach to determine the severity and likelihood of an activity's impact on the environment and to prioritise its significance. This process considers potential regulatory and legal risks also taking into consideration the concerns of community and other stakeholders.

Risk assessments are undertaken at various stages of the Project and documented in EWMS and other Project documents. The objectives of these risk assessments are to:

- Identify activities, events or outcomes that have the potential to adversely affect the local environment and/or human health/property
- Qualitatively evaluate and categorise each risk item
- Assess whether risks can be managed by environmental protection measures
- Qualitatively evaluate residual risk with implementation of measures.

Neoen will maintain the environmental risk register to address risks specific to the scope. Risks will be required to be reviewed on a regular basis and will also be reviewed in response to incidents, changes in legal requirements, change in Project scope, findings of inspections and audits and management reviews.

6. Environmental mitigation measures

Table 6-1 outlines the environmental management and mitigations to be implemented for the Project.

Table 6-1 Project Environmental Management and mitigation measures for implementation

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference															
General																				
CEMP1	If the construction of the BESS is proposed to commence, this EMS and relevant sub-plans will be updated and required consultation undertaken. Any additional studies outlined in the Development Consent will also be undertaken prior commencement of the BESS.	CoA Consultants	Prior construction to of the BESS	Neoen Project Manager	Schedule 3 CoA 1, CoA 27															
CEMP2	<p>Prior to commencing construction, Neoen must retire biodiversity credits of a number and class specified in Table 2 and Table 3 of the Development Consent (provided below), unless the Planning Secretary agrees otherwise.</p> <p>The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by:</p> <ul style="list-style-type: none"> Acquiring or retiring 'biodiversity credits' within the meaning of the <i>Biodiversity Conservation Act 2016</i> Making payments into an offset fund that has been developed by the NSW Government Funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. <p><i>Table 2: Ecosystem Credit Requirements</i></p> <table border="1"> <thead> <tr> <th>Vegetation Community</th> <th>PCT ID</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td>River Red Gum herbaceous grassy very tall open forest wetland</td> <td>5</td> <td>1</td> </tr> <tr> <td>Western Grey Box tall grassy woodland (18 paddock trees)</td> <td>76</td> <td>17</td> </tr> <tr> <td>Blakely's Red Gum – Yellow Box grassy tall woodland</td> <td></td> <td>17</td> </tr> <tr> <td>Blakely's Red Gum – Yellow Box grassy tall woodland (46 paddock trees)</td> <td>277</td> <td>44</td> </tr> </tbody> </table>	Vegetation Community	PCT ID	Credits Required	River Red Gum herbaceous grassy very tall open forest wetland	5	1	Western Grey Box tall grassy woodland (18 paddock trees)	76	17	Blakely's Red Gum – Yellow Box grassy tall woodland		17	Blakely's Red Gum – Yellow Box grassy tall woodland (46 paddock trees)	277	44		Pre-construction	Neoen Project Manager	Schedule 3 CoA 14
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ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference																
	<p>Table 3: Species Credit Requirements</p> <table border="1"> <thead> <tr> <th>Species Credit Species</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td>Small Scurf-pea (<i>Cullen parvum</i>)</td> <td>11</td> </tr> <tr> <td>Small Purple-pea (<i>Swainsona recta</i>)</td> <td>11</td> </tr> <tr> <td>Silky Swainson-pea (<i>Swainsona sericea</i>)</td> <td>11</td> </tr> <tr> <td>Gang-gang Cockatoo (<i>Callocephalon fimbriatum</i>)</td> <td>9</td> </tr> <tr> <td>Little Eagle (<i>Hieraaetus morphnoides</i>)</td> <td>7</td> </tr> <tr> <td>Square-tailed Kite (<i>Lophoictinia isura</i>)</td> <td>7</td> </tr> <tr> <td>Superb Parrot (<i>Polytelis swainsonii</i>)</td> <td>9</td> </tr> </tbody> </table>	Species Credit Species	Credits Required	Small Scurf-pea (<i>Cullen parvum</i>)	11	Small Purple-pea (<i>Swainsona recta</i>)	11	Silky Swainson-pea (<i>Swainsona sericea</i>)	11	Gang-gang Cockatoo (<i>Callocephalon fimbriatum</i>)	9	Little Eagle (<i>Hieraaetus morphnoides</i>)	7	Square-tailed Kite (<i>Lophoictinia isura</i>)	7	Superb Parrot (<i>Polytelis swainsonii</i>)	9				
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CEMP3	<p>Prior to commencing construction, unless the Planning Secretary agrees otherwise, Neoen must prepare a Safety Management Study for the development, in consultation with the owner of the gas pipeline. The study must include an assessment of potential electrical hazards, and must be consistent with the Australian Standard 2885 for Pipelines - Gas and Liquid Petroleum and Australian Standard 4853-2012 - Electrical Hazards on Metallic Pipelines. Following completion of the Study, the Applicant must implement the measures described in the Safety Management Study.</p>		Pre-construction	Neoen Project Manager	Schedule 3 CoA 28																
CEMP4	<p>Permit and licences outlined in Section 3.3 of this EMS will be acquired where required.</p>		Pre-construction Construction	Neoen Project Manager EPC Project Manager																	
CEMP5	<p>Neoen’s Sustainability Framework Policy and the EPC Contractor’s Environmental Policy will be displayed at the site office and communicated to staff and other interested parties via induction and ongoing awareness programs.</p>		Pre-construction Construction	Neoen Project Manager EPC Project Manager																	
CEMP6	<p>Neoen must ensure that all plant and equipment used on site, or in connection with the development, is:</p> <ul style="list-style-type: none"> Maintained in a proper and efficient condition; and Operated in a proper and efficient manner. 		All stages	Neoen Project Manager	Schedule 2 CoA 10																
CEMP7	<p>Neoen must maintain the agricultural land capability of the site for the life of project, including:</p> <ul style="list-style-type: none"> Establishing the ground cover of the site within 3 months following completion of any construction or upgrading 	GMP	All stages	Neoen Project Manager	Schedule 3 CoA 12																

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
	<ul style="list-style-type: none"> Properly maintaining the ground cover with appropriate perennial species and weed management Maintaining grazing within the development footprint, where possible unless the Planning Secretary agrees otherwise in writing. 				
CEMP8	Noise generated by any construction, upgrading or decommissioning activities on site will be managed in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version	CNVMP	Pre-construction Construction	Neoen Project Manager EPC Project Manager	
Public infrastructure protection					
CEMP9	<p>Unless Neoen and the applicable authority agree otherwise, the Neoen must:</p> <ul style="list-style-type: none"> Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and Relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. <p>This applies to all stages of the Project (including operation and decommissioning). But doesn't not apply to the upgrade and maintenance of the road network, which is addressed in the Project Traffic Management Plan (TMP).</p>		All stages	Neoen Project Manager	Schedule 2 CoA 9
CEMP10	No improvements are to occur within the high-pressure gas line and easement managed by APA onsite without consent from APA.		Pre-construction Construction Operation	Neoen Project Manager EPC Project Manager	HA9
CEMP11	No structure or vegetation will be permitted that prohibit APA access to the easement for maintenance.		Pre-construction Construction Operation	Neoen Project Manager EPC Project Manager	HA9
CEMP12	<p>Prior to any works within 50 metres of the pipeline easement, a Construction Management Plan must be submitted to and approved by APA. The plan must:</p> <ul style="list-style-type: none"> Prohibit the use of rippers or horizontal directional drills unless otherwise agreed with APA Avoid significant vibration, heavy loadings stored over the pipeline, and heavy vehicle crossings 		Pre-construction	Neoen Project Manager	HA9

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
	<ul style="list-style-type: none"> Be endorsed by APA where the works are within or crossing the relevant pipeline easement. 				
CEMP13	The design will minimise encroachment on the pipeline easement. An Application for an APA permit for an easement crossing will be required to demonstrate that an alternative route is not feasible.	APA permit	Pre-construction	Neoen Project Manager	HA9
CEMP14	All plans and drawings must clearly identify the pipeline easement and have it labelled.		Pre-construction	Neoen Project Manager	HA9
CEMP15	During construction, the boundary of the easement will be clearly delineation on site and monitored weekly as part of the environmental inspections onsite (Section 10).	Weekly Environmental Inspections checklist (Appendix E)	Construction	EPC Project Manager	HA9
CEMP16	During all stages of the Project, the pipeline easement access must be maintained.		Pre-construction Construction Operation	Neoen Project Manager EPC Project Manager	HA9

7. Training, awareness and competency

To ensure that this EMS is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this EMS. The Site Environmental Advisor will coordinate the environmental training in conjunction with other training and development activities (e.g. safety).

7.1. Environmental induction

Prior to working on site, all personnel and sub-contractors will undertake an environmental induction as part of the site induction. This is done to ensure all personnel involved in the Project are aware of the requirements of the EMS and to ensure the implementation of environmental management measures.

Short-term visitors to site for purposes such as deliveries will be required to be accompanied by inducted personnel at all times.

The Project Manager is responsible to ensure that all employees and contractor employees attend an induction prior to starting work.

All staff attending site will be required to attend a health and safety, quality and environment induction prior to starting work on the Project. The environment section covers core issues including (but not limited to):

- Relevant details of the EMS including purpose and objectives
- Requirements of due diligence and duty of care
- Conditions of environmental licences, permits and approvals
- Potential environmental emergencies on site and the emergency response procedures
- Reporting and notification requirements for pollution and other environmental incidents or reportable events, including identification of contaminated land and damage and maintenance to environmental controls
- High risk activities and associated environmental safeguards
- Controls when working in or near environmentally sensitive areas
- Specific environmental management requirements and responsibilities
- Mitigation measures for the control of environmental issues
- Incident response and reporting requirements
- The existence of EWWMS for high-risk activities
- Information relating to the location of environmental constraints
- Site specific issues including:
 - Site flagging protocol
 - Erosion and sediment controls, water quality controls and sediment basin management
 - Management of contaminated material
 - Groundwater and surface water management and controls
 - Obligations under the *Biosecurity Act 2015* to prevent the spread of weeds during construction
 - Responsibilities under the following legislation and permits:
 - *National Parks and Wildlife Act 1974*, including the need to cease work immediately and report any object of potential Aboriginal heritage unearthed during clearing, grubbing and earthworks operations
 - *Protection of the Environment Operations Act 1997*
 - Noise, vibration and air quality management controls

- Requirement to maintain surrounding property access for residences, business owners, and their visitors, and to minimise disruptions to these properties for the duration of construction
- Location of refuse bins, washing, refuelling and maintenance of vehicles, plant and equipment
- Waste minimisation and disposal protocols
- Boundaries for vegetation clearing, fauna and fauna habitat management, including awareness of threatened fauna species and fauna rescue
- Incident management processes
- Environmental emergencies including pollution incidents, floods and bushfires
- Key environmental issues
- Site-specific training will be provided to personnel engaged in activities or areas of higher risk, including but not limited to:
 - Working in and near waterways
 - Construction noise management
 - Areas of Aboriginal heritage sensitivity including unexpected finds procedure, buffer zones and site boundaries.

The site induction will also include communications training including:

- How to respond to community queries
- Aware and abide by the requirements for the release of information
- Understand the identity of the community.

A record of all environment inductions will be maintained and kept on-site in hard copy or in database. The Site Environmental Advisor may authorise amendments to the induction at any time. Possible reasons for changes to the induction may be Project modifications, legislative changes or amendments to this EMS or related documentation.

An induction register is kept on site as part of Project Quality System to demonstrate compliance with EMS activities.

7.2. Toolbox talks, training and awareness

The Project Manager is responsible to ensure that all Project personnel are competent to perform tasks that affect the performance and effectiveness of the environmental management system.

Specific consideration shall be given to those personnel who are promoted or placed in supervisory positions during the course of the Project that they are provided with suitable training to manage their Environmental responsibilities.

Toolbox talks will be one method of raising awareness and educating personnel on issues related to all aspects of construction including environmental issues. The toolbox talks are used to ensure environmental awareness continues throughout construction.

Toolbox talks will include, but not be limited to:

- A description of the activity and the area
- Identification of the environmental issues and risks for the area
- Outline the mitigation measures for the works and the area
- Details of EWMS for relevant personnel.

Toolbox talks will also be tailored to specific environmental issues relevant to upcoming works.

Relevant environmental issues include (but are not limited to):

- Erosion and sedimentation controls

- Working hours
- Emergency and spill response
- Weed management
- Water management
- Construction noise management
- Working in or near waterways
- Dust control
- Vegetation trimming and clearing
- Waste storage and segregation
- Management of identified heritage items.

Toolbox attendance is mandatory, and attendees of toolbox talks are required to sign an attendance form and the records maintained.

As required, targeted environmental training will be provided for nominated personnel.

All environmental monitoring and testing is to be conducted by persons who are appropriately qualified and trained.

7.3. Environmental awareness training

Staff and sub-contractors working on site will be provided with environmental training that will be incorporated into 'toolbox' and inductions. Formal qualifications for specialist staff may be required in relation to activities such as animal handling and the design of erosion and sedimentation control plans. The aim will be to achieve a level of awareness and competence appropriate to their assigned activities.

Targeted environmental awareness training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact.

This training will generally be prepared and delivered by the Site Environmental Advisor. The target groups and suggested topics for this training are detailed in Table 7-1.

Another way to inform construction personnel will be through the development and distribution of awareness notes. These will typically take the form of a poster, booklet, or similar and will be distributed to engineers, leading hands, foreman and others with a responsibility for managing specific work locations or activities. This documentation will be used to inform the broader workforce through either daily pre-start meeting (see section below) or provision in worker crib sheds/break facilities.

Refresher environmental awareness training will be undertaken as required, but not less than 6 monthly intervals, based on environmental risks and turnover of personnel. Refresher environmental awareness training will be recorded on the Environmental Training Register.

A training register is kept on site as part of Project Quality System to demonstrate compliance with EMS and sub plans activity training records.

Table 7-1 Example environmental training schedule

Training	Senior Managers	Superintendents	Engineers	Environmental Staff	Foreman	Leading Hands	Sub-Contractors	Administrative Staff
Project Inductions	✓	✓	✓	✓	✓	✓	✓	✓
Biodiversity Awareness (Induction and Toolbox talks)	✓	✓	✓	✓	✓	✓	✓	
Heritage Awareness (Induction and toolbox talks)	✓	✓	✓	✓	✓	✓	✓	
Noise, Dust, Erosion & Sediment Control (Induction and Toolbox talks)	✓	✓	✓	✓	✓	✓	✓	
Spill Response (Induction and toolbox talks)	✓	✓	✓	✓	✓	✓		
Erosion and sedimentation controls (including leachate drainage)	✓	✓	✓	✓	✓	✓	✓	
Emergency procedures	✓	✓	✓	✓	✓	✓	✓	✓

7.4. Daily pre-start meetings

The pre-start meeting is a tool for informing the workforce of the day’s activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination issues with other trades, hazards and other information that may be relevant to the day’s work.

The Foreman will conduct a daily pre-start meeting with the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. Daily pre-start meetings are generally succinct in nature and take about 10–15 minutes.

The environmental component of pre-starts will be determined by relevant foreman and environmental personnel and will include any environmental issues that could potentially be impacted by, or impact on, the day’s activities. All attendees will be required to sign on to the pre-start and acknowledge their understanding of the issues explained.

Pre-start topics, dates delivered and a register of attendees will be recorded and kept on site as part of Project Quality System to demonstrate compliance with EMS activities.

8. Communication

8.1. Internal communication

Clear lines of communication through all levels and functions (e.g. management, staff and sub-contractors), is key to minimise environmental impacts and achieving continual improvements in environmental performance.

The methods of communication on site will include:

- Pre-start meetings
- Inductions
- Toolbox talks
- Alerts, bulletins and / or initiatives
- EWMS.

The Site Environmental Advisor will meet as part of Project meetings to discuss any issues with environmental management onsite, any amendments to plans that may be required or any new/ changes to Project activities.

Fortnightly environmental inspections will be scheduled with the Site Environmental Advisor and relevant Project staff. The purpose of these inspections will be to communicate ongoing environmental performance and to identify any issues to be addressed.

In addition, the Site Environmental Advisor will participate in toolbox talks on at least a weekly basis. This forum will provide an opportunity for the environment team members to communicate on environmental performance, to advise on any upcoming sensitive environmental matters for future work areas and receive feedback from onsite personnel.

Further internal communication regarding environmental issues and aspects will be through awareness training as described in Section 7.3 of the EMS.

8.2. External communication

8.2.1. Agencies and authorities

The Neoen Project Manager has the responsibility to report on the ongoing environmental performance of the Project to DPE and any other relevant authorities. The Site Environmental Advisor will report regularly to Neoen on progress and any key environmental matters. Neoen Project Manager will report to DPE through the monitoring and reporting requirements listed in Section 10.4.

The Project Manager, and the Site Environmental Advisor are the two 24-hour contacts. They have the authority to halt the progress of the works if necessary. They are the key emergency response personnel during an environmental site emergency.

The Site Environmental Advisor is the authorised contact person for communications with Neoen, DPE, EPA and any other relevant authorities on environmental matters. Neoen will be included in all correspondence with any regulatory Authorities, unless agreed otherwise.

A report will be prepared on each occasion the site is visited by EPA and any other relevant authorities, and Neoen will be immediately notified. The Report will be provided to Neoen within 1 working day of the visit.

Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, Neoen must notify DPE in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be

staged, then the Applicant must notify the DPE in writing prior to commencing the relevant stage, and clearly identify the development that will be carried out during the relevant stage.

It is noted, that Neoen must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:

- Any strategies, plans or correspondence that are submitted in accordance with this consent
- Any reports, reviews or audits commissioned by the Department regarding compliance with this consent
- The implementation of any actions or measures contained in these documents.

8.2.2. Community and stakeholders

A Community Communication Strategy (CCS) in accordance with Schedule 2 CoA 13 has been developed and will be implemented as part of the Project. The CCS identifies the Project stakeholders, outlines the community benefit sharing program and community engagement plan. Table 8-1 outlines the identified Project stakeholders and engagement activities that will be implemented for the Project. Neoen has assigned a Community Liaison Officer to undertake the consultation.

Project updates during all stages of the Project will be undertaken via newsletters, Project website and media releases. The community will be able to provide feedback and ask questions to Neoen via the Project website, email address and phone number. Which will be provided with the Project updates and published on the Project website. Refer to Section 8.3 of this EMS for details on the Complaints Procedure.

Table 8-1 Project stakeholders and engagement activities.

Stakeholder Group	Overview	Objectives – Needs based approach	Activities
Host Landowners	Residents who are hosting solar infrastructure on their land.	Ongoing communication and discussions as project progresses. Contribution to the project's progress, ability to provide local knowledge, advice and input. Involvement in development of Community Benefit Sharing Scheme.	One-on-one meetings Landowner updates & dinners Letterbox drops Invitations & involvement in community events
Near neighbours	Residents owning land adjacent to the project site have the potential to be affected by the visual impact of the solar, the noise and heavy vehicle traffic associated with the construction phase	To create and maintain a close connection with direct adjacent neighbours of Culcairn Solar Farm. To keep neighbours informed about the project from early in the project planning process and provide opportunities to raise issues and provide feedback. To ensure that neighbours share in the benefits of the project.	Benefit-sharing: One-on-one engagement Invitation to be provided a private photomontage Letterbox drop project updates Community Information Sessions Invitation to community events Adjacent landholders to be offered a Construction Disruption Payment to mitigate potential impacts associated with the construction phase.
Neighbourhood (Culcairn and Walla Walla)	The local community / people living within the Culcairn township adjacent to the project.	To keep neighbours informed about the project from early in the project planning phase. To provide opportunities to raise issues and provide feedback.	Letterbox drop project updates Community information sessions Invitation to community events
Council including Councillors, CEO Planning Team	We will work with the Greater Hume Shire Council to shape the Community Engagement	To ensure a positive and collaborative relationship with the LGA that can support the	One-on-one engagement Project briefings & updates Community information sessions

Stakeholder Group	Overview	Objectives – Needs based approach	Activities
	Strategy and Benefit Sharing Program.	long-term goals of the community. Evidence of compliance with DA conditions.	Regular meetings
State MP	Justin Clancy	To ensure the local member is kept updated about the project and its progress. To seek input and advice in relation to community priorities	Project briefing in person by Head of Development Invitation to community events
Federal MP	Sussan Ley	To ensure the local member is kept updated about the project and its progress. To seek input and advice in relation to community priorities.	Project update in person by Head of Development Invitation to community events
Traditional Owners – Indigenous community	Registered Traditional Owners and identified indigenous representatives from the local community.	To ensure Neoen is engaging with local Aboriginal groups beyond planning requirements, such as employment, training and opportunities to work on country.	Invitation to co-design Industry and Aboriginal Participation Plan Invitation to community events
RFS	Local volunteers representing the Country Fire Authority	To ensure project activities abide by safety and regulatory requirements.	Provide indicative design plans and updates on the project to prepare for any local fire and emergency safety requirements
Schools, TAFEs and Universities	Culcairn Public School Billabong High School St Joseph’s Primary Walla Walla Public School St Paul’s College Albury TAFE	To ensure organisations are updated on education and vocational opportunities associated with the project. To use the opportunity of a local renewable project to dovetail relevant & practical educational content into the syllabus.	Information and project updates provided and invitation to future networking engagement Opportunities for site visits for local schools.
Business groups / industry stakeholders	We will seek to engage and collaborate with local businesses and business networks around what opportunities may be available such as sourcing for the solar farm development.	To ensure Neoen is creating opportunities for local businesses to participate in the development of local renewable energy projects.	Pre-construction local business expression of interest Invitation to Local Employment & Supplier Networking session
Solar farm opponents	We will seek to identify those issues that are of concern to local solar farm opponents.	To be accessible, help to address concerns proactively, and to have a best practice complaints system in place.	Complaints process implemented and transparent.
Advocacy groups	Sustainability Groups Community Energy Groups	Discussion on community energy and zero emissions targets. Potential for partnerships.	Update / presentation on project Invitations to community events
Community organisations	Culcairn & Walla Walla Development Committees	To understand the Project and be able to update their members. To participate in / benefit from Community Benefit Sharing Scheme.	Update/presentation on project Invitations to community events

Stakeholder Group	Overview	Objectives – Needs based approach	Activities
Employment providers	For detailed plan see Industry and Aboriginal Participation Plan	To ensure Neoen is creating opportunities for local businesses to participate in the development of local renewable energy projects.	Pre-construction local business expression of interest Invitation to Local Employment & Supplier Networking session
Natural resource management groups	Landcare and other local groups that are involved in local conservation projects	To ensure local NRM knowledge and resourcing is available to the project. To distribute information to members	Update/presentation on project Invitations to community events
Media	Local and regional print, electronic and social media	To understand the Project and be able to update their readers / viewers.	Project

8.3. Complaint procedure

External complaints are defined as complaints received from parties outside of the normal lines of communication.

This complaint procedures applies to all workers and impacted public or communities and is to be compliant with the CCS.

Complaints and enquiries regarding the works will be received through the contact details provided on the Project website, as outlined in Table 8-2. All complaints received are reportable incidents and shall be immediately reported to Neoen.

Table 8-2 Complaint lodging contact details

Project website	culcairnsolarfarm.com.au
Telephone number (toll-free)	1800 966 122
E-mail	contact@culcairnsolarfarm.com.au
Mail	GPO Box 1950 Canberra, ACT 2601

The contact details in the above table will be published on the project’s public website, alongside an outline of the complaints and investigation process. This information will also be made available in community consultations that occur in the lead up to construction commencement, and at any community consultation that is held during the construction period.

Step 1 Receive and register a complaint

Contact is received from community members and may be received through the following methods: verbally either in person or via telephone or in written form via electronic mail and/or via the website.

It may be an inquiry, a concern or a complaint. If it is an inquiry or a concern we will respond directly to this and simply record this interaction in the stakeholder register.

If it is a complaint then the following procedure is followed:

Upon the receipt of a complaint, a set of standardised information will be collected, recorded and filed to ensure an efficient and standardised process.

The following information will be collected from community members:

- The complainant’s name and address
- A unique reference number is to be communicated to the complainant

- Any applicable turbine or monitoring mast reference number
- The complainant's concerns including date, time, prevailing conditions and description of the complaint.

This information must then be recorded in the relevant Project's Complaints Register.

Step 2 Acknowledging complaints

A non-urgent complaint will be acknowledged by the responsible Neoen Project Manager within 3 business days of the complaint being submitted. If it's an urgent complaint then a response will be provided within 24 hours. This acknowledgement will be made via phone or email with any written correspondence dated and kept on file.

The acknowledgement will include:

- A summary of the complaint, with a reference number provided
- The opportunity to clarify issues or a request for further information if required
- The proposed investigation approach
- An estimated timeframe in which the stakeholder can expect to receive a response.

Where a complaint can be easily resolved or is better categorised as a request by a stakeholder for additional information, it may be appropriate for the Neoen Project Manager to immediately respond to the stakeholder.

Step 3: Investigating complaints

The Neoen Project Manager is responsible for ensuring all complaints are investigated and that all reasonable attempts to seek a resolution are made. The investigation may be delegated to an appropriate Neoen staff member. Accurate records of the investigation must be maintained including records of meetings, discussions and activities.

The investigation may involve:

- Site visits, particularly in the instance of reported property damage
- Consultation with Neoen staff or contractors, including senior management when required
- Acquiring monitoring data and evidence (e.g. for noise or dust complaints)
- Contacting external stakeholders.

Step 4: Responding to stakeholder/complainant

Following the investigation, the results, including details of the findings and proposed resolution, will be clearly explained to the complainant. In most circumstances, it will be at this stage that the complainant will determine if the resolution is satisfactory.

Step 5: Closing the complaint

If the process has been concluded appropriately then the Neoen Project Manager will close the complaint and make a file-note to this effect in the Complaints Register. Formal written correspondence must also be issued to the complainant confirming that the complaint has been closed.

If the complainant is not satisfied with the investigation and resolution then the complainant has a right of review. This will be undertaken by the Neoen Project Manager to ensure that the complaint process has been properly followed.

If a complainant is not satisfied with Neoen's investigation and proposed resolution, the complainant will be advised by Neoen that they have the right to contact a number of other bodies such as Greater Hume Shire

or the Australian Energy Infrastructure Commissioner or seek legal advice. Neoen will provide complainants with the relevant contact details, as seen in Table 8-3 below.

Table 8-3 Alternative complaint contacts

Alternative Contact	Email / number
Greater Hume Shire Council	mail@greaterhume.nsw.gov.au
Australian Energy Infrastructure Commissioner	aeic@aeic.gov.au
LegalAid NSW (Riverina Murray - Albury)	02 6020 7200

Step 6: Recording and registering the complaint

Upon the closing of a complaint, the following information will be updated in the Complaints Register with the additional following details:

- The process of investigation that was undertaken to resolve the complaint
- What the proposed resolution was
- Whether this was accepted and how it was implemented
- Whether or not the complaint has been resolved to the satisfaction of the complainant
- The reason why the complaint was closed.

8.4. Dispute resolution

Any disputes that may arise during the Project, will be handled by the Neoen Project Manager in accordance with the complaint procedure outlined in Section 8.3 above.

9. Incidents and emergencies

9.1. Emergency contact details

Emergency contact details for key Project personnel and emergency services are listed in Table 9-1.

Table 9-1 Emergency contact details for the Project

Name / organisation	Contact
Project Manager	TBC
Supervisor	TBC
Site Environmental Advisor	TBC
Emergency (Police, Fire, Ambulance)	000
NSW SES	132 500
NSW Fire and Rescue Culcairn	02 6029 8202
Albury Wodonga Hospital	02 6058 4444
RSPCA NSW	1300 278 358
WIRES NSW	1300 094 737
Greater Hume Council	02 6036 0100

9.2. Emergency and incident preparedness

The following plans relating to emergency and incident response have been prepared for the Project:

- Bushfire and Emergency Response Plan
- Soil and Water Management Plan - Spill and Contamination Response Plan.

During the course of the Project, the following preventative strategies will be implemented onsite:

- Daily inspections of active work sites
- Completion of Environmental Inspection Checklist (weekly)
- Issue and quick close-out of non-compliance notices (as required)
- Prompt maintenance and repairs
- Ongoing environmental training
- Access for emergency services vehicles will be maintained throughout the site at all times
- Environmental audits of worksites, subcontractors and general compliance.

Spill kits will be available at the main site office and where liquid substances are to be stored. Spill kits and other emergency supplies (e.g. silt fences, pumps) will also be located at site compounds, machinery park up areas and on refuelling vehicles.

Personnel involved in emergency response activities will be provided with specific training. As a minimum for environmental response, all light vehicles and light trucks/heavy vehicles shall carry a vehicle spill kit to

provide immediate response to an event. Hydrocarbon spills are noted as the most likely type of occurrence on the works.

Consulting with emergency services and NSW Police as required throughout construction to ensure that any potential impacts to emergency services are identified and appropriately managed.

An up-to-date list of emergency response personnel and relevant organisations (emergency services, EPA, etc.) will be maintained at the main office and site compounds.

All staff will be trained on what to do and how to respond to an emergency onsite during the site induction and throughout the life of the Project via ongoing safety training and toolboxes.

9.3. Bushfire Management and Emergency Plan

A Bushfire Management and Emergency Plan has been prepared in consultation with Fire Rescue NSW (FRNSW) and Rural Fire Service (RFS) and will be implemented for the Project in accordance with Condition 30 Schedule 3 of the development consent. The Plan outlines how Neoen will minimise the fire risks of the Development, including managing vegetation fuel loads on-site as well as ensure the Development:

- Includes at least a 10 metre defendable space around the perimeter of the solar array area that permits unobstructed vehicle access.
- Manages the defendable space and solar array areas as an Asset Protection Zone (APZ).
- 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 40,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road.

The APZs and location of the water supply tanks and their capacity can be seen in Figure 9-1.

Neoen and EPC contractor will assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site. Neoen will also notify the relevant local emergency management committee following construction of the Development, and prior to commencing operations.

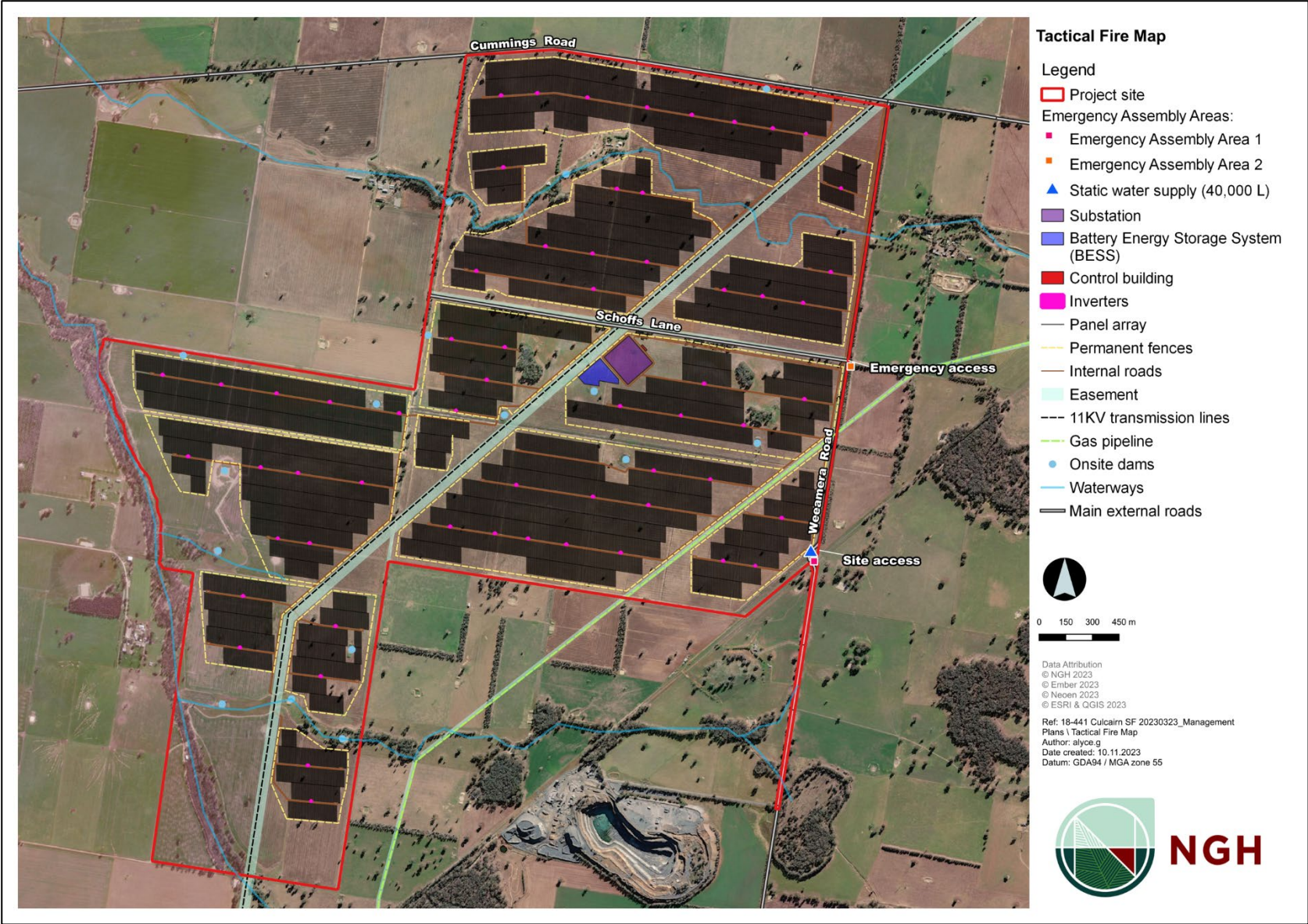


Figure 9-1 Tactical fire map

9.4. Environmental incidents

An Environmental Incident is defined as an unplanned event impacting or potentially impacting the environment with consequences.

Various environmental incidents may have the potential to occur on site, which may include but not be limited to the following:

- Spills of fuels, oils, chemicals and other hazardous materials
- Unauthorised discharge from sediment basins or other containment devices
- Unauthorised clearing or clearing beyond the extent of the Project boundary or premises
- Inadequate installation and subsequent failure of temporary erosion and sediment controls
- Unauthorised damage or interference to threatened species, threatened ecological communities or critical habitat
- Unauthorised harm or desecration to Aboriginal objects and Aboriginal places
- Unauthorised damage or destruction to any State or locally significant relic or Heritage item
- Unauthorised dredging or reclamation works within a watercourse
- Potential contamination of waterways or land
- Accidental starting of a fire or a fire breaking out of containment
- Any potential breach of legislation, including a potential breach of a condition of: An environment protection licence, approval, or any agency permit condition
- Works done that are not covered by the Project approval, or not found to be consistent with the approval, or done without a modification of the approval
- Works undertaken that are not in accordance with the Environmental Assessment documents
- Unauthorised dumping of waste.

Should an incident occur, the Supervisor will ensure that work ceases in that area and that the site is not disturbed until the appropriate level of investigation is conducted to ensure that any potential evidence is preserved.

9.5. Incident reporting

All workers (employees and contractors) are responsible for ensuring timely and effective initial internal reporting of Incidents that they are involved with or witness.

Neoen are to be informed of any environmental incidents immediately verbally and within 24 hours in writing. Incident reports will include lessons learnt from each environmental incident occurring. Including lessons learnt from each environmental incident and proposed measures to prevent the occurrence of a similar incident. All efforts will be undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place. Incidents will be closed out as quickly as possible, taking all required action to resolve each environmental incident.

The EPC Contractor must liaise with Neoen prior to notifying any agencies of any incident on site (i.e. EPA). Within 7 days of the date of the incident, the EPC Contractor must provide Neoen and/or any relevant agencies with a detailed report on the incident, and such further reports as may be requested.

Where an incident involves an Aboriginal site, relevant authorities such Heritage NSW and Registered Aboriginal Parties will be notified, and their input sought in closing out the incident.

9.5.1. Incident reporting in accordance with the conditions

The EPC Contractor will immediately notify Neoen of an incident which arises through the Infrastructure Approval.

In accordance with Condition 7 of Schedule 4 of the Development Consent, the Planning Secretary must be notified in writing via the Major Projects website immediately after Neoen becomes aware of an incident. A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after Neoen becomes aware of an incident. Notification is required to be given under this condition even if Neoen fails to give the notification required under Condition 7 of Schedule 4 (immediately) or, having given such notification, subsequently forms the view that an incident has not occurred.

Written notification of an incident must:

- a) Identify the development and application number
- b) Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident)
- c) Identify how the incident was detected
- d) Identify when the applicant became aware of the incident
- e) Identify any actual or potential non-compliance with conditions of consent
- f) Describe what immediate steps were taken in relation to the incident
- g) Identify further action(s) that will be taken in relation to the incident
- h) Identify a project contact for further communication regarding the incident.

As per Appendix 7 of the CoA (Incident Notification and Reporting Requirements), within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.

The Incident Report must also include:

- a) A summary of the incident
- b) Outcomes of an incident investigation, including identification of the cause of the incident
- c) Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence
- d) Details of any communication with other stakeholders regarding the incident.

Non-compliances will be reported in accordance with Section 10.4 of this Strategy.

All written requirements of the Planning Secretary or relevant public authority, which may be given at any point in time, to address the cause or impact of an incident must be complied with, within any timeframe specified by the Planning Secretary or relevant public authority.

9.5.2. Incident reporting in accordance with the POEO Act

Neoen will notify the EPA of any environmental incidents or pollution incidents on or around the site via the EPA Environment Line (telephone 131 555) in accordance with Part 5.7 of the *Protection of the Environment Operations Act 1997* (NSW) (POEO Act). The circumstances where this will take place include:

- a) If the actual or potential harm to the health or safety of human beings or ecosystems is not trivial.
- b) If actual or potential loss or property damage (including clean-up costs) associated with an environmental incident exceeds \$10,000 (Material Harm).

Pollution incidents posing material harm to the environment shall be notified by Neoen to each 'relevant authority' as defined in Section 148 (8) of the POEO Act. 'Relevant authority' means:

- NSW EPA as the appropriate regulatory authority (ARA) on **131 555 or (02) 9995 5555**.

- Safe Work NSW (formerly WorkCover) on **13 10 50**.
- Fire and Rescue NSW on **000** or for Mobiles Only **112**.

10. Inspections, monitoring and auditing

10.1. Environmental inspections

Throughout the Project, the Site Environmental Advisor will be responsible for carrying out weekly environmental and rainfall inspections using standard forms, refer to Table 10-1.

The sub-contractors will attend inspections in relevant areas as required. The Site Environmental Advisor will attend debriefing session following inspections.

At completion of the inspection, the Site Environmental Advisor will prepare the following:

- A site inspection report.
- A site inspection action plan listing deficiencies and corrective actions required.
- Sub-contractor notices for major/ serious deficiencies.

All deficiencies must be promptly issued to the applicable parties, actioned, verified and closed out within an appropriate time frame based on the risk score associated with each deficiency. Actions listed will be identified and an appropriate time frame to close out will take into consideration risks (e.g. location, weather).

Other environmental specialists may be engaged to enter site for the purposes of surveillance or inspection, to liaison with Project personnel, and to attend site meetings to discuss aspects of the work.

Table 10-1 Inspection schedule

Activity	Frequency	Responsibility	Record
Environmental site inspection	Weekly	Site Environmental Advisor	Site inspection checklist (Appendix E)
Joint Environmental site inspection	Fortnightly	Neoen Representative Site Environmental Advisor	Site inspection checklist (Appendix E)
Pre-rainfall inspection	Within 3 hours of the start of a rainfall event during work hours Within 24 hours of the start of a rainfall event (or on the following working day) Rainfall event being greater than 80% potential for 10mm or more with 24 hours	Site Environmental Advisor	Pre-rainfall inspection checklist (Appendix F)
Post-rainfall inspection	Within 24 hours of rainfall event occurring	Site Environmental Advisor	Post-rainfall inspection checklist (Appendix F)

10.2. Environmental monitoring

The objective of the monitoring and reporting will be to validate the impacts predicted for the Project, to measure the effectiveness of environmental controls and implementation of this EMS, and to address specific requirements. The monitoring requirements for required aspects are included in the relevant environmental management sub plans.

Table 10-2 Summary of monitoring requirements

Aspect	Addressed	Monitoring parameters	Frequency	Reporting
Heritage	HMP	Monitoring the performance of mitigation measures in the HMP Protection (fencing and signage) of heritage items not approved to be impacted No work continuing if heritage is found Heritage management measures fully implemented and no heritage incidents.	Weekly during construction Annually post construction At completion of works	Site inspection checklist Post works report
Aboriginal heritage salvaged items	HMP	Monitoring of salvaged items	Post salvage to outline the effectiveness of the program, Fortnightly to inspect items are still protected during construction 6 monthly post construction	Salvage report Site inspection checklist
Traffic	TMP	Monitoring of vehicle movements and deliveries including heavy vehicles and over-dimensional Monitoring of vehicle movements and delivery times to avoid school hours Monitoring of vehicle movements and delivery times to avoid local events	Daily	Recording sheets
		Monitoring of weather and onsite conditions	Daily	Recording sheets
		Monitoring the number of incidents, accidents and near misses	Daily	Incident reports
		Monitoring of local road conditions for damage and site exit points for dirt transferred to public roads.	Daily	Inspection sheets
		Monitoring the performance and effectiveness of traffic controls and mitigation	Weekly	Inspection sheets

Aspect	Addressed	Monitoring parameters	Frequency	Reporting
		measures in the TMP		
Biodiversity	BMP	Monitoring the performance of mitigation measures in the BMP and strategies	Refer to the BMP monitoring program	Refer to the BMP monitoring program
Landscaping	LP	Monitoring the performance of plantings, screening and mitigation measures in the LP.	Refer to the LP monitoring program	Refer to the LP monitoring program
Noise & Vibration	CNVMP	A one-off noise validation monitoring assessment will be undertaken during construction to quantify emissions and confirm emissions meet relevant criteria.	During Operation	Validation report
		Attended noise or vibration monitoring	In response to a compliant or an identified concern of potential exceedance. During approved out of hours work	Noise or vibration report/recording forms
		Monitoring the performance of mitigation measures in the NVMP	Weekly	Site inspection checklist
Soil and water	SWMP ESCP	Regular visual monitoring for the following: <ul style="list-style-type: none"> Any visible signs of erosion Drainage and erosion & sediment controls are in place and in good working order Soil stockpiles and excavations are being protected Sediment has been removed following large storm events and controls maintained For indications of sediment-laden waters, waste waters or pollution 	Weekly	Site inspection checklist

Aspect	Addressed	Monitoring parameters	Frequency	Reporting
		(e.g., grease/oil, effluent) due to a spill or that have left site		
Air Quality	SWMP ESCP	Visual exhaust from machinery, Observation of odours	Weekly	Site inspection checklist
		Visible dust in air	Daily – implement mitigation as required (cease dust generating activities and water down surfaces)	Site supervisor diary Site inspection checklist
Waste	WMP	Waste tracking for materials taken to a licenced facility	When waste taken offsite. Waste Register to be updated regularly.	Waste Register
			When waste taken offsite to a waste facility.	Waste docketts
			When EPA 'Trackable' waste taken offsite.	Transportation docketts
		Inspections for litter, materials management, unauthorised disposal of construction waste streams and adequacy of capacity of waste receptacles	Weekly	Environmental Inspection Form
Groundcover	GMP	Monitoring the performance of groundcover and mitigation measures in the GMP.	Refer to the GMP monitoring program	Refer to the GMP monitoring program

10.3. Auditing

10.3.1. Internal audits

Internal audits are to be carried out within three (3) months of commencing work onsite and then at least every six (6) months after that (refer to Table 10-3) during construction. These audits will be risk-based and verify that the work under the contract complies with the EMS, sub-plans and approval requirements. More frequent auditing may occur if environmental checks indicate major deficiencies with environmental management of the site.

Internal audits will be conducted in accordance with ISO 19011:2014 - Guidelines for Quality and/or Environmental Management Systems Auditing, however where a specific issue arises internally, this will not necessarily follow this standard.

Internal audit reports will be submitted to Neoen within ten (10) working days of the audit. A final audit report will be submitted to the principal within five working days of the contract completion date.

An audit checklist will be developed and amended as necessary to reflect changes to this EMS, subsequent approvals and changes to Acts, regulations or guidelines.

10.3.2. Independent external audits

External auditing will be undertaken by an independent environment auditor in accordance with ISO 19011:2014 - Guidelines for Quality and/or Environmental Management Systems Auditing.

In accordance with Condition 11-15 of Schedule 4 of the Development Consent, Independent Audits of the Project must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency:

- Within 3 months of commencing construction; and
- Within 3 months of commencement of operations.

The proposed independent auditor for the Project must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.

The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above (within 3 month of commencing construction and within 3 months of commencement of operations) upon giving at least 4 weeks' notice to Neoen of the date upon which the audit must be commenced.

In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), Neoen must:

- Review and respond to each Independent Audit Report prepared under Condition 11 of Schedule 4 of this consent, or Condition 15 of Schedule 4 where notice is given by the Planning Secretary.
- Submit the response to the Planning Secretary.
- Make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. Unless otherwise agreed by the Planning Secretary.

Independent Audit Reports and Neoen's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.

The Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.

Table 10-3 presents auditing requirements that are applicable to the Project.

Table 10-3 Audit summary table

No.	Audit	Requirement	Timing	Responsibility	Recipient
1	Internal Audit.	Verify compliance with legal requirements, specifications and construction documentation.	The first audit within 3 months of commencement of construction and then at six monthly intervals thereafter. The final submitted within five working days of construction contract completion date.	Site Environmental Advisor	Neoen
2	External independent audit	Verify compliance with approval and legal requirements, construction documentation and any other commitments.	Within 3 months of commencing construction; and Within 3 months of commencement of operations.	Neoen	DPE

10.4. Reporting

Table 10-4 sets out the reporting requirements applicable to the Project, timing of the reporting, who is responsible for managing preparation of the reports, and the intended recipient(s).

Additional reporting may be necessary as the works progress. In such a circumstance, Table 10-4 will be amended to reflect these changes.

Table 10-4 Reporting requirements

No.	Report	Requirement	Timing	Responsibility	Recipient
1	Monthly environmental report. Formalised in meeting minutes with client.	For incorporation in Project Monthly Reports including environmental statistics (i.e. incidents, regulatory action, complaints on environmental issues), regulatory and authority considerations, monitoring program performance, key environmental issues, environmental controls implemented, details of any non-compliances and actions undertaken to address the non-compliance, and any predicted environmental impacts for the following month.	Monthly	Project Manger, Site Environmental Advisor	Neoen
2	Neoen environmental inspection report	Response to matter raised in Neoen site inspections.	As required. Typically, every two weeks for Neoen inspection reports.	Site Environmental Advisor	Neoen
3	Compliance Tracking Report	Prepared on a 6-monthly basis, commencing prior to any works being carried out on the construction site, compliance tracking reports providing the following details for the six months: (a) compliance with the relevant, licences/permits approval conditions, Environmental Assessment document safeguards and management measures; (b) environmental performance for environmental issues including air quality, noise, soil and water, biodiversity, traffic, vibration, heritage, waste, incidents and community; (c) copies of environmental records and monitoring results; (d) record of inspections; (e) record of any internal audits; (f) evidence of any approval or permits obtained for works during the reporting period; (g) complaint register and complaints resolution; and (h) summary of non-compliances for the reporting period.	Prepared on a 6-monthly basis, commencing prior to any works being carried out. The final compliance tracking report must be submitted within 20 days of the date of Construction Completion of the Contractor's Work.	Site Environmental Advisor	Neoen/DPE

No.	Report	Requirement	Timing	Responsibility	Recipient
		The final compliance tracking report must be submitted within 20 days of the date of Construction Completion of the Contractor's Work. The final compliance tracking report must also provide details of how the relevant Environmental Assessment document requirements have been closed out.			
4	Waste Avoidance and Resource Recovery Report.	Information relating to wastes generated or recycled.	Annual within one month from 1 July and at actual completion date.	Site Environmental Advisor	Neoen

10.5. Non-compliance, corrective and preventative actions

Any member of the Project team may raise a non-compliance or improvement opportunity. Environmental non-compliances might include:

- Failing to comply with the environmental regulations or license/ permit conditions
- A serious breach of EMS requirements
- Carrying out an unsafe work practice that has the potential to cause harm to the environment (i.e. near misses)
- Activities that have caused actual harm to the environment not permitted by the Project or covered in the environmental assessment documentation
- Deficiencies or concerns raised by client representatives and/or by state and local authorities or agencies.

Environmental non-compliances will be dealt with through the Incident Management Procedures detailed in Section 9.5.

For each non-compliance identified a corrective/preventative action (or actions) must be implemented. In addition, any environmental management improvement opportunities can be initiated as a result of incidents or emergencies, monitoring and measurement, audit findings or other reviews. Improvement opportunities may also result in the implementation of corrective/preventative actions.

Corrective/preventative actions and improvement opportunities will be entered into the contractor's incident management system database and include detail of the issue, action required and timing and responsibilities. The record will be updated with date of close out and any necessary notes. The database will be reviewed regularly to ensure actions are closed out as required.

Non-compliance activities may be stopped, if necessary, by the Site Environmental Advisor following consultation with the Construction Manager or delegate. The works will not commence until a corrective/preventative action has been closed out. Neoen may also stop works in these circumstances. In such circumstances a non-compliance report must be prepared in accordance with the Incident Management Procedure.

In accordance with Condition 8 of Schedule 4 of the Development Consent, DPE must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The 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 done, or will be, undertaken to address the non-compliance.

In accordance with Condition 10 of Schedule 4, a non-compliance that has been notified as an incident does not need to also be notified as a non-compliance.

11. Review and improvement

11.1. Revision

A document review process ensures that environmental documentation including this EMS is updated as appropriate for the specific works that are occurring on-site. Reviews of the EMS are expected to be triggered by:

- Independent Environmental Audit
- Internal audits
- Additional environmental aspects and risks
- Environmental near misses and incidents
- Project stage change as outlined in Section 2.7 (Stages 1-5).

Should the document review process identify any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the Neoen Project Manager or delegate to prepare the revised documents.

In accordance with Condition 2 of Schedule 4 of the Development Consent, within 1 month, unless otherwise agreed with the Planning Secretary, of:

- The submission of an incident report under Condition 7 of Schedule 4
- The submission of an audit report under Condition 11 of Schedule 4
- Any modification to the conditions of this consent.

The Neoen Project Manager or delegate must review, and if necessary revise the strategies, plans, and programs required under the Development Consent to the satisfaction of the Planning Secretary.

Where this review leads to revisions in any such document, then within four weeks of the review, the revised document will be submitted to the Planning Secretary for review and approval, unless otherwise agreed with the Planning Secretary.

In accordance with Condition 3 of Schedule 4 and agreement of the Planning Secretary, revised strategies, plan or programs may be prepared without undertaking consultation with all parties nominated under the applicable condition in this approval.

Only the Neoen Project Manager, or delegate, has the authority to change any of the environmental management documentation.

Should the EMS or management plans not require review or revision under Condition 2, then they will be reviewed at least annually by Neoen Project Manager.

The approved EMS will be held in the site office and be available upon request.

11.2. Continuous improvement

Continuous improvement of this Strategy will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance
- Determine the cause or causes of non-conformances and deficiencies
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies

- Document any changes in procedures resulting from process improvement
- Make comparisons with objectives and targets.

12. Documentation

12.1. Environmental records

The Site Environmental Advisor is responsible for maintaining all environmental management documents as current at the point of use. Types of records include:

- All monitoring, inspection and compliance reports/records
- Correspondence with public authorities
- Induction and training records
- Reports on environmental incidents, other environmental incidents, non-compliance, complaints and follow-up action
- Environmental events and Investigation reports, and trends
- Environmental monitoring data
- Waste quantity reports and regulated waste documentation where required
- Weed Hygiene Checklists
- Community engagement information.

All environmental management documents are subject to ongoing review and continual improvement. This includes times of change to scheduled activities or to legislative or licensing requirements.

12.2. Document control

Neoen will coordinate the preparation, review and distribution, as appropriate, of the environmental management plans as well as the conditions of approval, and environmental assessment documents. During the Project, the environmental documents will be stored at the main site compound.

Neoen will implement a document control procedure to control the flow of documents within and between stakeholders and sub-contractors.

The procedure will also ensure that documentation is:

- Developed, reviewed and approved prior to issue
- Issued for use
- Controlled and stored for the legally required timeframe
- Removed from use when superseded or obsolete
- Archived.

A register and distribution list will identify the current revision of particular documents or data.

12.3. Access to information

As per Schedule 4 Condition 17 of the Development Consent, Neoen must make the following information publicly available on its website as relevant to the stage of the development and update to date:

- The EIS
- The final layout plans for the development
- Current statutory approvals for the development
- Approved strategies, plans or programs required under the conditions of this consent
- The proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged
- How complaints about the development can be made
- Provide a 24hr telephone line and instruction as to how complaints or enquiries about the development can be made

- Any independent environmental audit, and Neoen's response to the recommendations in any audit
- Any other matter required by the Planning Secretary.

13. References

DIPNR. (2004). *Guideline for the Preparation of Environmental Management Plans*. Department of Infrastructure, Planning and Natural Resources.

NGH. (2020). *Amendment Report - Culcairn Solar Farm*. NGH Pty Ltd.

NGH. (2020). *Environmental Impact Statement - Culcairn Solar Farm*. NGH Pty Ltd.

NGH. (2020). *Response to Submissions - Culcairn Solar Farm*. NGH Pty Ltd.

Appendix A Project conditions of approval

Condition No.	Condition	Where addressed?												
Schedule 2 Administrative Conditions														
Obligation to minimise harm to the environment														
1	In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	EMS and sub plans												
Terms of consent														
2	The Applicant must carry out the development: <ul style="list-style-type: none"> a) generally in accordance with the EIS; and b) in accordance with the conditions of this consent. Note: The general layout of the development is shown in Appendix 1.	Section 1.1 of the EMS												
3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	Section 1.1 of the EMS												
4	The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: <ul style="list-style-type: none"> a) any strategies, plans or correspondence that are submitted in accordance with this consent; b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and c) the implementation of any actions or measures contained in these documents. 	Section 8.2.1 of the EMS												
5	The Applicant must ensure that the solar panels, substation, inverters and battery storage within the approved development site are not installed closer to the receivers identified in column 1 of Table 1 than the offset distances identified in column 2 of Table 1. Offset distances in Table 1 apply unless the Applicant has a written agreement with the owner in regard to the visual impacts associated with the project, and the Applicant has advised the Department in writing of the terms of this agreement.	Section 2.6 of the EMS												
<p>Table 1: Development Offset Distance Requirements</p> <p><i>Table 1: Development Offset Distance Requirements</i></p> <table border="1"> <thead> <tr> <th>Receiver</th> <th>Offset Distance</th> </tr> </thead> <tbody> <tr> <td>R9</td> <td>585m</td> </tr> <tr> <td>R17</td> <td>1157 m</td> </tr> <tr> <td>R19</td> <td>363m</td> </tr> <tr> <td>R24</td> <td>544 m (east) and 1,155 m (south)</td> </tr> <tr> <td>R33</td> <td>249m</td> </tr> </tbody> </table>			Receiver	Offset Distance	R9	585m	R17	1157 m	R19	363m	R24	544 m (east) and 1,155 m (south)	R33	249m
Receiver	Offset Distance													
R9	585m													
R17	1157 m													
R19	363m													
R24	544 m (east) and 1,155 m (south)													
R33	249m													
Upgrading of solar and ancillary infrastructure														

Condition No.	Condition	Where addressed?
6	The Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Planning Secretary incorporating the proposed upgrades.	Section 2.3 of this EMS
7	The Applicant 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 Building Code of Australia. Notes: Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development. Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	Section 2.3 of this EMS
Demolition		
8	The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Noted – No demolition proposed
Protection of public infrastructure		
9	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and b) 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 the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.	Section 6 of this EMS
Operation of plant and equipment		
10	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Section 6 of this EMS CNVMP
Subdivision		
11	The Applicant may subdivide the site as identified in Appendix 4 and in accordance with the requirements of the EP&A Act and EP&A Regulation. Notes: Under Part 6 of the EP&A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision. Division 6.4 of Part 6 of the EP&A Act sets out the application requirements for subdivision certificates.	Section 2.4 of the EMS.
Community enhancement		
12	Prior to commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with: a) Division 7.1 of Part 7 of the EP&A Act; and b) the terms of the letter of offer dated 12 November 2020, summarised in Appendix 3.	Section 3.3 of the EMS

Condition No.	Condition	Where addressed?
Community Communication Strategy		
13	<p>Prior to commencement of construction, the Applicant must prepare a Community Communication Strategy to provide mechanisms to facilitate communication between the Applicant, and the community (including adjoining affected landowners) during construction.</p> <p>The Community Communication Strategy must:</p> <ul style="list-style-type: none"> a) identify landowners for potentially impacted residences including but not limited to R09, R17, R19, R24 and R33. b) ensure that the landowners identified in (a) are consulted during construction; c) set out procedures and mechanisms for the regular distribution of information to wider community. d) establish a public liaison officer(s) to engage with the local community; and e) set out procedures and mechanisms: <ul style="list-style-type: none"> • through which the community can discuss or provide feedback to the Applicant; • through which the Applicant 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. <p>The Applicant must implement the Community Communication Strategy for the duration of construction.</p>	Section 8.2.2 of the EMS CCS
Schedule 3 Environmental Conditions – General		
Batteries Battery storage restriction		
1	<p>Unless the Planning Secretary agrees otherwise, the battery storage facility or system associated with the development must not exceed a total delivery capacity of 100 MW.</p> <p>Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage facility or system in the future.</p>	Battery currently not proposed to be constructed.
Transport		
Heavy Vehicles Requiring Escort and heavy vehicle restrictions		
2	<p>The Applicant must ensure that the:</p> <ul style="list-style-type: none"> a) development does not generate more than: <ul style="list-style-type: none"> • 100 heavy vehicle movements a day during construction, upgrading and decommissioning; • Nine movements of heavy vehicles requiring escort during construction, upgrading and decommissioning; and • Five heavy vehicle movements a day during operations; on the public road network; and b) length of any vehicles (excluding heavy vehicles requiring an escort) used for the development does not exceed 26 metres, <p>unless the Planning Secretary agrees otherwise.</p>	TMP
3	<p>The Applicant must keep accurate records of the number of heavy vehicles requiring escort and heavy vehicles entering or leaving the site each day for the duration of the project.</p>	TMP
Access route		

Condition No.	Condition	Where addressed?
4	<p>All heavy vehicles and heavy vehicles requiring escort associated with the development (including water carts) must travel to and from the site via Olympic Highway, Benambra Road and Weeamera Road as identified in the figure in Appendix 5.</p> <p>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of heavy vehicles requiring escort on the road network.</p>	TMP
Site access		
5	<p>All vehicles associated with the development must enter and exit the site via the access point off Weeamera Road, as identified in Appendix 1 and Appendix 5.</p>	TMP
Road upgrades		
6	<p>Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must:</p> <ul style="list-style-type: none"> a) construct the access point on Weeamera Road, as identified in Appendix 1 and Appendix 5, with a Rural Property Access type treatment and to cater for the largest vehicle accessing the site; b) upgrade Weeamera Road between the access to Hurricane Hill Hardrock Quarry and the site access point to a 7 metres wide sealed pavement. as identified in Appendix 5; <p>These upgrades must comply with the Austroads Guide to Road Design (as amended by TfNSW supplements) and be carried out to the satisfaction of Council.</p>	TMP
Road maintenance		
7	<p>The Applicant must:</p> <ul style="list-style-type: none"> a) undertake an independent dilapidation survey to assess the: <ul style="list-style-type: none"> • existing condition of Benambra Road and Weeamera Road on the transport route prior to construction, upgrading or decommissioning works; and • condition of Benambra Road and Weeamera Road on the transport route, following construction, upgrading or decommissioning works; b) repair Benambra Road and Weeamera Road on the transport route if dilapidation surveys identify that the road has been damaged during construction, upgrading or decommissioning works; in consultation with the relevant roads authority, to the satisfaction of the Planning Secretary. <p>If there is a dispute about the repair of Benambra Road between the applicant and the applicant of the Walla Walla Solar Farm, then either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's decision on the matter must be final and binding on both parties.</p>	TMP
Operating conditions		
8	<p>The Applicant must ensure:</p> <ul style="list-style-type: none"> a) the internal roads are constructed as all-weather roads; b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; c) the capacity of the existing roadside drainage network is not reduced; d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and e) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the sealed public road network. 	TMP

Condition No.	Condition	Where addressed?
Traffic Management Plan		
9	<p>Prior to commencing road upgrades, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW, Council and Hurricane Hill Quarry, and to the satisfaction of the Planning Secretary. This plan must include:</p> <ul style="list-style-type: none"> a) details of the transport route to be used for all development-related traffic; b) details of the road upgrade works required by condition 6 of Schedule 3 of this consent; c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: <ul style="list-style-type: none"> • details of the dilapidation surveys required by condition 7 of Schedule 3 of this consent; • temporary traffic controls, including detours and signage; • 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 State significant development projects in the area, including other nearby solar farms and Hurricane Hill Quarry; • minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network; • minimising dirt tracked onto the public road network from development-related traffic; • details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; • 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; • responding to any emergency repair or maintenance requirements; and • a traffic management system for managing heavy vehicles requiring escort; d) a driver's code of conduct that addresses: <ul style="list-style-type: none"> • driver fatigue; • procedures to ensure that drivers adhere to the designated transport routes and speed limits; and • procedures to ensure that drivers implement safe driving practices; e) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan. <p>Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>	TMP
Landscaping		
Vegetation buffer		

Condition No.	Condition	Where addressed?
10	<p>The Applicant must establish and maintain a vegetation buffer (landscape screening) at the locations outlined in the figure in Appendix 1 to the satisfaction of the Planning Secretary. The landscape screening must:</p> <ul style="list-style-type: none"> a) be planted prior to commencing construction; b) be comprised of predominantly mature tube stock that are endemic to the area; c) minimise views from receivers R9, R17, R19, R24 and R33 within 3 years of commencing operations; d) be designed and maintained in accordance with RFS's Planning for Bushfire Protection 2019 (or equivalent); e) be properly maintained with a replanting programme being undertaken where the vegetation fails to establish; and f) undertake appropriate weed management. unless the Planning Secretary agrees otherwise. 	LP
Landscaping Plan		
11	<p>Prior to commencing construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with receivers R9, R17, R19, R24 and R33, to the satisfaction of the Planning Secretary. This plan must include:</p> <ul style="list-style-type: none"> a) a description of measures that would be implemented to ensure that the vegetated buffers achieve the objectives of condition 10 (a)-(f), above; b) a program to monitor and report the effectiveness of these measures; and c) details of who would be responsible for monitoring, reviewing and implementing the plan; and timeframes for the completion of actions. <p>Following the Planning Secretary's approval, the Applicant must implement the Landscaping Plan.</p>	LP
Land management		
12	<p>The Applicant must maintain the agricultural land capability of the site, including:</p> <ul style="list-style-type: none"> a) establishing the ground cover of the site within 3 months following completion of any construction or upgrading; b) properly maintaining the ground cover with appropriate perennial species and weed management; and c) maintaining grazing within the development footprint, where possible, <p>unless the Planning Secretary agrees otherwise in writing.</p>	Section 6 of this EMS GMP
Biodiversity		
Vegetation clearance		
13	<p>The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance footprint shown in Appendix 1.</p>	BMP
Biodiversity offsets		

Condition No.	Condition	Where addressed?																														
14	<p>Prior to commencing construction, the Applicant must retire biodiversity credits of a number and class specified in Table 2 and Table 3 below, unless the Planning Secretary agrees otherwise.</p> <p>The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by:</p> <ul style="list-style-type: none"> a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; b) making payments into an offset fund that has been developed by the NSW Government; or c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. <p>Table 2: Ecosystem Credit Requirements</p> <table border="1" data-bbox="316 645 1181 788"> <thead> <tr> <th>Vegetation Community</th> <th>PCT ID</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td>River Red Gum herbaceous grassy very tall open forest wetland</td> <td>5</td> <td>1</td> </tr> <tr> <td>Western Grey Box tall grassy woodland (18 paddock trees)</td> <td>76</td> <td>17</td> </tr> <tr> <td>Blakely's Red Gum – Yellow Box grassy tall woodland</td> <td rowspan="2">277</td> <td>17</td> </tr> <tr> <td>Blakely's Red Gum – Yellow Box grassy tall woodland (46 paddock trees)</td> <td>44</td> </tr> </tbody> </table> <p>Table 3: Species Credit Requirements</p> <table border="1" data-bbox="316 833 1177 1034"> <thead> <tr> <th>Species Credit Species</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td>Small Scurf-pea (<i>Cullen parvum</i>)</td> <td>11</td> </tr> <tr> <td>Small Purple-pea (<i>Swainsona recta</i>)</td> <td>11</td> </tr> <tr> <td>Silky Swainson-pea (<i>Swainsona sericea</i>)</td> <td>11</td> </tr> <tr> <td>Gang-gang Cockatoo (<i>Callocephalon fimbriatum</i>)</td> <td>9</td> </tr> <tr> <td>Little Eagle (<i>Hieraaetus morphnoides</i>)</td> <td>7</td> </tr> <tr> <td>Square-tailed Kite (<i>Lophoictinia isura</i>)</td> <td>7</td> </tr> <tr> <td>Superb Parrot (<i>Polytelis swainsonii</i>)</td> <td>9</td> </tr> </tbody> </table>	Vegetation Community	PCT ID	Credits Required	River Red Gum herbaceous grassy very tall open forest wetland	5	1	Western Grey Box tall grassy woodland (18 paddock trees)	76	17	Blakely's Red Gum – Yellow Box grassy tall woodland	277	17	Blakely's Red Gum – Yellow Box grassy tall woodland (46 paddock trees)	44	Species Credit Species	Credits Required	Small Scurf-pea (<i>Cullen parvum</i>)	11	Small Purple-pea (<i>Swainsona recta</i>)	11	Silky Swainson-pea (<i>Swainsona sericea</i>)	11	Gang-gang Cockatoo (<i>Callocephalon fimbriatum</i>)	9	Little Eagle (<i>Hieraaetus morphnoides</i>)	7	Square-tailed Kite (<i>Lophoictinia isura</i>)	7	Superb Parrot (<i>Polytelis swainsonii</i>)	9	Section 6 of the EMS
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Condition No.	Condition	Where addressed?
15	<p>Prior to commencing construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:</p> <ol style="list-style-type: none"> a) include a description of the measures and timeframes that would be implemented for: <ul style="list-style-type: none"> • protecting vegetation and fauna habitat outside the approved disturbance areas; • managing the remnant vegetation and fauna habitat on site; • minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; • minimising the impacts to fauna on site and implementing fauna management protocols; • avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna; • rehabilitating and revegetating temporary disturbance areas with species that are endemic to the area; • maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and • controlling weeds, feral pests and pathogens; b) include a program to monitor and report on the effectiveness of mitigation measures; and c) include details of who would be responsible for monitoring, reviewing and implementing the plan. <p>Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biodiversity Stewardship Agreement.</p>	BMP
Amenity		
Construction, upgrading and decommissioning hours		
16	<p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <ol style="list-style-type: none"> 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. <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary:</p> <ul style="list-style-type: none"> • the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or • emergency work to avoid the loss of life, property and/or material harm to the environment. 	Section 2.9 of the EMS
Noise		

Condition No.	Condition	Where addressed?
17	The Applicant must: <ul style="list-style-type: none"> a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version; and b) ensure that the noise generated by the operation of the battery storage facility during the night does not exceed 35 dB(A) LA₉₀ to be determined in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence. 	CNVMP
Dust		
18	The Applicant must minimise the dust generated by the development.	Section 6.5 of the SWMP ESCP
Visual		
19	The Applicant must: <ul style="list-style-type: none"> a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection (including on the Culcairn to Cowra railway corridor); b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes. 	LP
Lighting		
20	The Applicant must: <ul style="list-style-type: none"> a) minimise the off-site lighting impacts of the development (including on the Culcairn to Cowra railway corridor); and b) ensure that any external lighting associated with the development: <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, or its latest version. 	LP
Heritage		
Protection of heritage items		
21	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint.	HMP
22	Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version. Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 6.	HMP
Heritage Management Plan		

Condition No.	Condition	Where addressed?
23	<p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary; b) be prepared in consultation with Heritage NSW and Aboriginal Stakeholders; c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> • protecting the Aboriginal heritage items identified in Table 1 of Appendix 6 or items located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6; • salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 6; • a contingency plan and reporting procedure if: 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 d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. <p>Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	HMP
Soil and water		
Water supply		
24	<p>The Applicant 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. Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.</p>	SWMP ESCP
Water pollution		
25	<p>The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.</p>	SWMP
Operating conditions		

Condition No.	Condition	Where addressed?
26	The Applicant must: <ol style="list-style-type: none"> a) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version; b) ensure the solar panels and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site; c) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and d) ensure all works are undertaken in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018), or its latest version, unless DPIE Water agrees otherwise. 	SWMP Section 6.8 of the SWMP ESCP Section 2.1.2 of the SWMP
Hazards		
Fire Safety Study		
27	Prior to commencing construction of the battery storage facility, the Applicant must prepare a Fire Safety Study for the development, in consultation with FRNSW and RFS. The study must: <ol style="list-style-type: none"> a) be consistent with the: <ul style="list-style-type: none"> • Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline; • NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and b) describe the final design of the battery storage facility. Following completion of the Study, the Applicant must implement the measures described in the Fire Safety Study. 	NA – Battery currently not proposed to be constructed.
Safety Management Study		
28	Prior to commencing construction, unless the Planning Secretary agrees otherwise, the Applicant must prepare a Safety Management Study for the development, in consultation with the owner of the gas pipeline. The study must include an assessment of potential electrical hazards, and must be consistent with the Australian Standard 2885 for Pipelines - Gas and Liquid Petroleum and Australian Standard 4853-2012 - Electrical Hazards on Metallic Pipelines. Following completion of the Study, the Applicant must implement the measures described in the Safety Management Study.	Section 6 of this EMS
Storage and handling of dangerous goods		
29	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: <ol style="list-style-type: none"> (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection- Participants Handbook if the chemicals are liquids. In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.	Section 5.8 of the SWMP
Bush Fire Management		

Condition No.	Condition	Where addressed?
30	The Applicant must: <ol style="list-style-type: none"> a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; b) ensure that the development: <ul style="list-style-type: none"> • includes at least a 10 metre defendable space around the perimeter of the solar array area that permits unobstructed vehicle access; • manages the defendable space and solar array areas as an Asset Protection Zone; • 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 40,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road; c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and d) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations. 	Bushfire Management and Emergency Plan Section 9.3
Emergency Plan		

Condition No.	Condition	Where addressed?
31	<p>Prior to commencing construction, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development in consultation with the owner of the gas pipeline, to the satisfaction of FRNSW and the RFS. The Applicant must keep two copies of the plan on site in a prominent position adjacent to the site entry point at all times. The plan must:</p> <ol style="list-style-type: none"> a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent); b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; c) list works that should not be carried out during a total fire ban d) include availability of fire suppression equipment, access and water; e) include procedures for the storage and maintenance of any flammable materials; f) 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; g) include a figure showing site infrastructure, Asset Protection Zone and the on-site water supply tank; h) include location of hazards (physical, chemical and electrical) that may impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations; i) include details of the location, management and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone; j) include bushfire emergency management planning; and k) 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; and • offer representatives of the local RFS brigade an opportunity to undertake a site familiarisation following construction of the development, and prior to commencing operations. <p>Following approval, the Applicant must implement the Emergency Plan.</p>	Bushfire Management and Emergency Plan
Waste		
32	<p>The Applicant must:</p> <ol style="list-style-type: none"> a) minimise the waste generated by the development; b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version); c) store and handle all waste on site in accordance with its classification; d) not receive or dispose of any waste on site; and e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal. 	WMP
Accommodation and Employment Strategy		

Condition No.	Condition	Where addressed?										
33	<p>Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Planning Secretary.</p> <p>This strategy must:</p> <ol style="list-style-type: none"> propose measures to ensure there is sufficient accommodation for the workforce associated with the development; consider the cumulative impacts associated with other State significant development projects in the area; investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction. <p>Following the Planning Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.</p>	Accommodation and Employment Strategy										
Decommissioning and rehabilitation												
34	<p>Within 3 years of the commencement of operation, the Applicant must prepare a Decommissioning and Rehabilitation Plan for the development which shall be reviewed by the Applicant prior to the cessation of operations, to the satisfaction of the Secretary. The Plan must:</p> <ol style="list-style-type: none"> include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Table 4 below; describe the measures that would be implemented to: <ul style="list-style-type: none"> decommission the development and rehabilitate the site in accordance with the objectives in Table 4; minimise and manage the waste generated by the decommissioning of the development; and include a program to monitor and report on the implementation of these measures against the detailed completion criteria. <p>The Applicant must decommission and rehabilitate the site in accordance with the approved Decommissioning and Rehabilitation Plan.</p> <p><i>Table 4: Rehabilitation Objectives</i></p> <table border="1" data-bbox="300 1279 1177 1621"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>Site</td> <td> <ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use </td> </tr> <tr> <td>Solar farm surface and sub-surface infrastructure</td> <td> <ul style="list-style-type: none"> All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise; and All underground cabling is to be removed, unless the Planning Secretary agrees otherwise </td> </tr> <tr> <td>Land use</td> <td> <ul style="list-style-type: none"> Restore land capability to pre-existing use (at least Class 4 Land Capability) </td> </tr> <tr> <td>Community</td> <td> <ul style="list-style-type: none"> Ensure public safety at all times </td> </tr> </tbody> </table>	Feature	Objective	Site	<ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use 	Solar farm surface and sub-surface infrastructure	<ul style="list-style-type: none"> All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise; and All underground cabling is to be removed, unless the Planning Secretary agrees otherwise 	Land use	<ul style="list-style-type: none"> Restore land capability to pre-existing use (at least Class 4 Land Capability) 	Community	<ul style="list-style-type: none"> Ensure public safety at all times 	NA – Operational
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Land use	<ul style="list-style-type: none"> Restore land capability to pre-existing use (at least Class 4 Land Capability) 											
Community	<ul style="list-style-type: none"> Ensure public safety at all times 											
35	<p>Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3.</p>	Decommissioning and Rehabilitation Plan										
Environmental Management												
Environmental Management Strategy												

Condition No.	Condition	Where addressed?
1	<p>Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <ul style="list-style-type: none"> a) provide the strategic framework for environmental management of the development; b) identify the statutory approvals that apply to the development; c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise; • respond to any non-compliance; • respond to emergencies; and e) include: <ul style="list-style-type: none"> • references to any plans approved under the conditions of this consent; and • a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>	EMS
Revision of strategies, plans and programs		
2	<p>The Applicant must:</p> <ul style="list-style-type: none"> a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the: <ul style="list-style-type: none"> • submission of an incident report under condition 7 of Schedule 4; • submission of an audit report under condition 11 of Schedule 4; or • any modification to the conditions of this consent. 	Section 11 of this EMS
Updating and staging of strategies, plans or programs		
3	<p>With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Planning Secretary for approval. With the agreement of the Planning Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> • While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 	Section 11 of this EMS

Condition No.	Condition	Where addressed?
Notification of Department		
4	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant 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.	Section 8.2.1 of this EMS
Final Layout Plans		
5	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, showing comparison to the approved layout and including details on the siting of solar panels and ancillary infrastructure, via the Major Projects website.	Detailed Design plans
Work as executed plans		
6	Prior to commencing operations or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development showing comparison to the approved final layout plans to the Department via the Major Projects website.	Final design plans
Incident notification		
7	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development 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 7.	Section 9.5 of the EMS
Non-compliance notification		
8	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	Section 10.5 of the EMS
9	A non-compliance notification must identify the development and the application number for it, set out the condition of consent 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.	Section 10.5 of the EMS
10	A non-compliance which has been notified as an incident does not need to also be notified as a non compliance.	Section 10.5 of the EMS
Independent environmental audit		

Condition No.	Condition	Where addressed?
11	<p>Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency:</p> <ul style="list-style-type: none"> a) Within 3 months of commencing construction; and b) Within 3 months of commencement of operations. 	Section 10.3 of the EMS
12	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Section 10.3 of the EMS
13	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 11 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.	Section 10.3 of the EMS
14	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must:</p> <ul style="list-style-type: none"> a) Review and respond to each Independent Audit Report prepared under condition 11 of Schedule 4 of this consent, or condition 13 of Schedule 4 where notice is given by the Planning Secretary; b) Submit the response to the Planning Secretary; and <p>Make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.</p>	Section 10.3 of the EMS
15	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.	Section 10.3 of the EMS
16	Notwithstanding the requirements of the Independent Audit Post Approvals Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	Section 10.3 of the EMS
Access to information		

Condition No.	Condition	Where addressed?
17	<p>The Applicant must:</p> <p>a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> • the EIS; • the final layout plans for the development; • current statutory approvals for the development; • approved strategies, plans or programs required under the conditions of this consent; • the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; • how complaints about the development can be made; • provide a 24hr telephone line and instruction as to how complaints or enquiries about the development can be made; • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Planning Secretary; and <p>b) keep this information up to date.</p>	Section 12.3 of the EMS

Appendix B Environmental legislation

Act	Activity / aspect	Requirement	Reference	Applicability
General				
<i>Protection of the Environment Operations Act 1997.</i>	Harming the environment.	Do not risk harming the environment by wilfully or negligently: disposing of waste unlawfully causing any substance to leak, spill or otherwise escape (whether or not from a container); or emitting an ozone depleting substance. The works do not trigger the requirement of Environmental Protection Licence under schedule 1.	S115 S116 S117	Yes
<i>Protection of the Environment Operations Act 1997.</i>	Notification of Pollution incidents.	Notify the EPA, NSW Ministry of Health via local Public Health Unit, Safe Work NSW, Local authority and Fire and Rescue NSW immediately of pollution incidents where material harm to the environment is caused or threatened.	S148	Yes
<i>Dangerous Goods (Road and Rail Transport) Act 2008.</i>	Hazards and risks.	Ensure that dangerous goods are transported in a safe manner.	S9	Yes
<i>Pesticides Act 1999.</i>	Hazards and risks.	Use pesticides in an environmentally sensitive manner. Do not use an unregistered pesticide without a permit. Read the label or permit for the pesticide. Use registered pesticides in accordance with instructions on the label. Do not use any restricted pesticide unless authorised by a certificate of competency or a pesticide control order under the Act. Compliance with pesticide codes of practice is required.	S12 S13 S14 S15 S17	Yes
<i>National Greenhouse and Energy Reporting Act, 2007 and Regulations 2008.</i>	Greenhouse gas emissions.	Accounting and reporting of greenhouse gases produced and energy consumed during construction. Applicability dependent on thresholds.	-	Yes
<i>Privacy and Personal</i>	Community Liaison.	Legislation relevant to community liaison.	-	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
<i>Information Protection Act 1998 (NSW).</i>				
<i>Environmental Planning and Assessment Act 1979.</i>	All	Comply with approved conditions.	Part 4, s4.10	Yes
Water				
<i>Water Management Act 2000.</i> With the exception of controlled activity approvals, the Water Management Act 2000 (WM Act) only applies in relation to those water sources covered by operational water sharing plans – these areas cover most of the State's major regulated river systems.	Water access and use.	Do not take water from a water source (a lake, river or estuary or place where water occurs naturally on or below the surface of the ground and includes coastal waters) without an access licence. Do not use of water on land (unless supplied by a water utility, irrigation corporation etc. or in accordance with basic landholder rights) without a water use approval.	S56 S60A S89 S 89 S91A	The EIS identify that controlled activity approvals are not required as most Projects are exempt as the work is being undertaken by or on behalf of a public authority.
<i>Protection of the Environment Operations Act 1997.</i>	Water pollution	Do not cause water pollution.	S120 S122	Yes
Noise				
<i>Protection of the Environment Operations Act 1997.</i>	Plant maintenance and operation.	Do not operate plant if it emits noise caused by poor maintenance or operation.	S139	Yes
<i>Protection of the Environment Operations Act 1997.</i>	Materials management.	Do not cause noise by failing to properly and efficiently deal with materials.	S140	Yes
Contaminated soil				
<i>Protection of the Environment</i>	Land pollution.	Do not cause or permit land pollution other than under authority of a	S142A – S142E	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
<i>Operations Act 1997.</i>		licence or regulation (However it is not a land pollution offence to place virgin excavated natural material or lawful pesticides and fertilisers on land, or by placing matter on land that has been notified to the EPA as an unlicensed landfill and which is operated in accordance with the regulations.)		
<i>Contaminated Land Management Act 1997.</i>	Reporting contamination.	Notify the EPA if contaminants exceed thresholds contained in guidelines or the regulations where contamination has entered or will foreseeably enter neighbouring land, the atmosphere, groundwater or surface water. Contaminants in soil are equal to or exceed guideline levels with respect to the current or approved use of the land. Contamination meets other criteria that may be prescribed by the regulations.	S60	Yes
Biodiversity				
<i>Biosecurity Act 2015.</i>	Weed, pest and disease control.	The duty to prevent, eliminate and minimise biosecurity risks posed by biosecurity matters as defined by the Act.	s22 Schedule 1	Yes
<i>Biosecurity Regulation 2017.</i>	Pests and diseases.	Notify the presence any pest or disease listed in Schedule 1 of the Biosecurity Regulation 2014, within 1 working day after suspecting or becoming aware of the pest or disease.	cl. 7, Schedule 1	Yes
<i>Biodiversity Conservation Act 2016.</i>	Threatened flora and fauna.	Do not harm any animal that is; of a threatened species, that is part of a threatened ecological community or is a protected animal, unless authorised under other legislation (e.g. planning approval). Do not damage habitat of a threatened species or ecological community unless authorised under other legislation (e.g. planning approval). Do not damage declared areas of outstanding biodiversity value unless authorised under other legislation (e.g. planning approval). Do not pick a plant that is; of a threatened species, that is part of a threatened ecological community or is a protected plant, unless	S2.1-2.4 S2.8	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
		authorised under other legislation (e.g. planning approval).		
<i>Fisheries Management Act 1994.</i>	Mangroves, seagrasses and marine vegetation.	Do not harm any mangroves, seagrasses or other marine vegetation on public water land protected by the regulations without a permit.	S205	No
<i>Fisheries Management Act 1994.</i>	Fish passage.	Do not block fish passage without a permit.	S219	No, Project is exempt
<i>Environment Protection Biodiversity Conservation Act 1999 (Commonwealth).</i>	Flora and fauna conservation.	Comply with the terms of any EPBC Act approval for the Project.	N/A	Not applicable to this Project as EPBC Approval not required to be obtained.
Waste				
<i>Protection of the Environment Operations Act 1997.</i>	Littering.	Do not litter in a public place or an open private place. Do not litter from a vehicle. Only deposit advertising material in receptacles provided for mail or newspapers or under the door of the premises. Do not deposit advertising material on or in vehicles.	Part 5.6A	Yes
<i>Protection of the Environment Operations Act 1997.</i>	Waste and transportation.	Do not undertake a scheduled waste activity unless in accordance with an environment protection licence. Refer also to the Resource Recovery Exemptions.	Part 3.2 Schedule 1	Yes
		Only transport waste to a facility that can lawfully accept the waste within 150 km from Project.	S143	Yes
		Do not dispose of waste in a manner that harms or is likely to harm the environment.	S115	Yes
<i>Protection of the Environment Operations (Waste) Regulation 2014.</i>	Waste and transportation.	Comply with general requirements for the transport of waste. For example, any vehicle used by the person to transport waste must be kept in a clean condition and be maintained so as to prevent spillage of waste. For some wastes only licensed transporters can be used.	Regulation cl.49	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
	Comply with record keeping requirements in relation to the transport of certain types of waste.	Regulation Part 3.	Yes	Comply with record keeping requirements in relation to the transport of certain types of waste.
Heritage				
<i>Heritage Act 1977.</i>	Heritage.	Do not undertake an activity that will affect a place, building, work, relic, moveable object or precinct which is subject to an Interim Heritage Order or is listed on the State Heritage Register without approval from the Heritage Council.	S56-57	Yes
		Do not disturb or excavate land with knowledge or reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed; or Do not disturb or excavate land on where a relic has been discovered or exposed unless an excavation permit in place.	S139	No
		Notify the heritage Council on discovery of a relic.	S146	Yes
		Give the Heritage Council at least 14 days' notice before removing or demolishing any item listed in a section 170 register.	S170A	Yes
<i>National Parks and Wildlife Act 1974.</i>	Aboriginal places and objects.	Do not harm or desecrate an Aboriginal object or Aboriginal place without consent.	S86 S90	Yes
	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.	S89A	Yes	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.

Act	Activity / aspect	Requirement	Reference	Applicability
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth).</i>	Protection of areas and objects.	Report any discovery of Aboriginal remains to the Federal Minister for the Environment and Heritage.	S20	Yes
	Comply with the provisions of any declaration in relation to a significant Aboriginal area or object.		S22	Yes Comply with the provisions of any declaration in relation to a significant Aboriginal area or object.

Appendix C Sustainability Framework

NEOEN

SUSTAINABILITY FRAMEWORK

Spreading our wings





Neoen is dedicated to the energy transition



As a company entirely dedicated to renewable energy, we have sustainability hardwired into our DNA. Everyday, we are contributing towards global efforts to combat climate change.

Now we believe it is time for us to spread our wings and go beyond the obvious. To this end we are adopting a more ambitious and wide-ranging «Sustainability Framework». It will be our common point of reference, helping to harmonise our efforts and taking us to the next level. We are ready for it!

“ We produce the most competitive renewable electricity, sustainably and on a large scale ”

Xavier BARBARO
Chairman and Chief Executive Officer



DELIVERING CLEAN ENERGY TO REDUCE EMISSIONS

Neoen works to combat climate change through developing, owning and operating large scale wind, solar and battery storage projects around the world. The size of these projects and the scope of our ambition is helping to speed up the pace of transition.



PROMOTING ACCESS TO AFFORDABLE AND CLEAN ENERGY

Neoen’s wind and solar projects deliver competitively priced energy, exerting downward pressure on electricity prices. In Mexico, for example, the El Llano solar plant provides energy at the extremely competitive price of 19 USD/MWh.

Battery storage plays its part in cost reduction by providing solutions to network problems. In Australia, the Hornsdale Power Reserve saved consumers over 115 million USD in its first two years¹.

(1) Source: <https://www.aurecgroup.com/markets/energy/hornsdale-power-reserve-impact-study>

Embracing our broader responsibility

Beyond our core business of owning and operating high quality renewable power plants, we are also interested in advancing responsible and sustainable practices in terms of how we do business, how we engage with our communities and how we manage our environmental footprint.

This first iteration of our Sustainability Framework outlines our broader ambitions and priorities as they relate to and are expressed by our people, our projects and our interactions with communities. It seeks to combine top-down with bottom-up approaches to encourage good ideas and innovation to bubble up across our various projects and countries.

“ Strengthening a culture of integrity, accelerating progress and setting the stage for long-term success ”



Grounded in global principles and goals

Our framework acknowledges and references a number of abiding principles as well as the United Nation's Sustainable Development Goals.

TEN PRINCIPLES

The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

- | | |
|--|--|
| <p>1 Human rights: Support and respect the protection of internationally proclaimed human rights</p> | <p>6 Labour: The elimination of discrimination in respect of employment and occupation</p> |
| <p>2 Human rights: Ensure the business is not complicit in human rights abuses</p> | <p>7 Environment: Support a precautionary approach to environmental challenges</p> |
| <p>3 Labour: Uphold the freedom of association and the effective recognition of the right to collective bargaining</p> | <p>8 Environment: Undertake initiatives to promote greater environmental responsibility</p> |
| <p>4 Labour: Elimination of all forms of forced and compulsory labour</p> | <p>9 Environment: Encourage the development and diffusion of environmentally friendly technologies</p> |
| <p>5 Labour: The effective abolition of child labour</p> | <p>10 Anti-corruption: Work against corruption in all its forms, including extortion and bribery</p> |



The United Nation's Sustainable Development Goals are a collection of 17 interlinked global objectives designed as a blueprint to achieve a better and more sustainable future for all. The goals were set in 2015 by the United Nations General Assembly and are intended to be achieved by 2030. We have a responsibility and a role to play in achieving these targets.



Our framework is anchored by 3 foundational pillars

Our people

“ Speeding up the transition to a more sustainable future ”

Our projects

“ Striving to deliver excellence in sustainability ”

Our communities

“ Participating in the transition alongside us ”



Our people

We are a company of 255 people working across 15 countries on over a hundred projects, from those in development, to those under construction and our 86 operating power plants.

We are a small but rapidly growing team bound by a commitment to renewable energy and to accelerating the energy transition.

“ Speeding up the transition to a more sustainable future ”



WORKING ETHICALLY

Our work ethic is sustained by our values, integrity in particular, which live and breathe in myriad ways through the actions of board members, managers and employees. They manifest in a vibrant workplace culture and orient our respectful approach to doing business.

ACTIONS

- 100% of our employees formally commit to Neoen's Code of Conduct
- 100% of our employees formally commit to Neoen's Anti Corruption code and are trained in the fight against corruption

ENCOURAGING DIVERSITY

Diversity is a source of pride and dynamism for Neoen, with over 32 nationalities represented amongst our team. Our recruitment process is open to all, upholds the principles of fairness and non-discrimination, and our workplace has zero tolerance to harassment.

At the global level, our main priority is addressing gender imbalance in the workforce. Currently 31% of our employees¹ are women and 28% of our management positions held by women.

ACTIONS

- Exceed industry benchmark of 32% women working at Neoen, in each of our regions
- Increase annually the percentage of management positions held by women

Local Initiatives

In addition, each country will choose a specific local initiative in relation to workplace diversity and/or its environmental footprint.



(1) As at 31/12/2020



REDUCING EMISSIONS

As a French company, the Paris Agreement continues to be an important reference point and we are committed to taking steps towards reducing our emissions.

“Greener Neoen²” was established by a group of passionate employees to assess the company’s own emissions and environmental impacts and to propose detailed action plans to avoid or offset them.

Early wins have included a mobility package for employees commuting by bike, ‘zero paper’ initiatives, the reduction of office waste and recycling of computer equipment at a global level.

ACTIONS

- Calculate our global carbon footprint (including scope 1, 2, 3)
- Support roll-out of at least one additional “Greener Neoen²” initiative each year. In 2021 - 100% offset of the company’s travel emissions

(2) “Greener Neoen” is an internal think tank formed spontaneously by a group of employees. Their objective is to drive Neoen to go “above and beyond” on the aspects of our business that relate to emissions reductions and the environment

Our projects

Our project sites are where we work hand-in-hand with consultants, contractors and subcontractors to develop, build, own and operate our renewable energy power plants.

As well as generating clean electrons our projects are the crucible for a range of different and emerging sustainable initiatives and outcomes

“ Striving to deliver excellence in sustainability ”



PRIORITISING SAFETY

Neoen is committed to ensuring the health and safety of its employees and of all those working on its project sites. Identifying risks has led to strict mitigation, control and reporting processes.

The company maintains a strong Health, Safety & Environment (HSE) culture on site, ensuring that contractors uphold Neoen's expectations and comply with the health and safety legislation and requirements. A Construction Manager may exercise the right to stop work when it is considered that an issue could endanger the health or safety of employees, contractor or subcontractor staff or members of the local community.

ACTIONS

- Collate & report frequency and severity of accident and incident rates of our contractors
- Conduct HSE compliance audit on 100% of construction sites, monthly on sites over 20 MW in size, every 2 months on smaller sites

PROTECTING BIODIVERSITY

Beyond our commitment to addressing climate change through renewable energy, Neoen's environmental stewardship is evident at the project level. We undertake detailed environmental impact assessments during the development phase and offset any unavoidable biodiversity impacts once operational.

ACTIONS

- Conduct environmental impact assessment by expert ecologists on 100% of sites during development
- Offset any unavoidable environmental impact in accordance with local requirements

Local Initiatives

Each project will select one "above and beyond" biodiversity¹ initiative.



(1) In terms of biodiversity, land-use or co-location of agriculture



INTEGRATING RECYCLING

We are committed to returning the land to the state it was in before our assets were installed. Every project has a decommissioning plan and funds that will be set aside for this purpose in the project's later years.

We are also committed to exploring recycling channels for all materials across the three technologies of solar, wind and batteries.

ACTIONS

- Identify recycling channels for all our activities
- Integrate a recycling commitment clause into all new supply agreements, in countries with a mature recycling industry

Our communities

Our projects occupy significant footprints of land in regional areas and as long-term owner operators we are privileged to become long-term neighbours to the communities surrounding our sites.

We work in consultation and cooperation with local stakeholders, contribute to local and regional economic development, and seek to share the benefits of the transition with our communities.

“ Participating in the transition alongside us ”



CONSULTING & ENGAGING

Neoen understands that the success of a project is dependent to a large extent on developing genuine, open and ongoing relationships with key stakeholders and members of the local community. We recognise the importance of ensuring a ‘no surprises’ dynamic and are committed to engagement that starts early, is tailored to the local context and provides opportunities for the community to participate.

ACTIONS

- Conduct community consultation and information-sharing on all projects even if not mandated
- Develop a Community Engagement Plan* for 100% of our new projects over 50 MW in scale

**Community Engagement Plan is a comprehensive internal tool which guides and maps our consultation and engagement across a project's lifecycle from early stages of assessing feasibility through until decommissioning.*

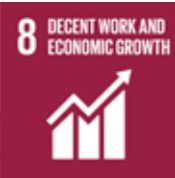
ECONOMIC DEVELOPMENT

The construction and operation of our projects has the potential to deliver significant local and regional economic development through (i) the creation of direct and indirect jobs (ii) supply chain outcomes and (iii) opportunities for skills development, training and apprentices. There is also a multiplier effect as income and spending circulates through the wider economy.

ACTIONS

- Engage with local business and employment networks, prioritising local suppliers and jobseekers where possible
- Local Participation Plan* developed for projects over 100 MW in scale

**Local Participation Plan is a sister document to the Community Engagement Plan which identifies and maps potential local and regional economic development outcomes.*



BENEFIT-SHARING

Neoen is dedicated to ensuring that the benefits of the energy transition are shared with local communities. The term benefit-sharing includes many and varied community initiatives that are a product of a country's traditions, a community's need, people's ideas and are usually tailored to the local context.

Some examples are:

- Establishing a Community Benefit Fund which provides annual grants to local projects like in El Salvador, where 3% of the revenues are donated to a Social Investment Fund dedicated to local community development

- Developing education activities to promote energy literacy & environmental awareness
- Rolling out agricultural training to local communities in Mozambique to improve awareness and share good practices

ACTIONS

- Develop a benefit-sharing initiative for each new project over 50 MW
- Create an artwork that celebrates renewable energy and local culture for each new project over 50 MW

NEOEN

6, rue Ménars
75002 Paris
France

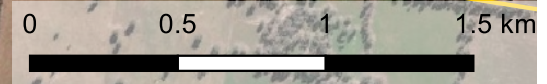
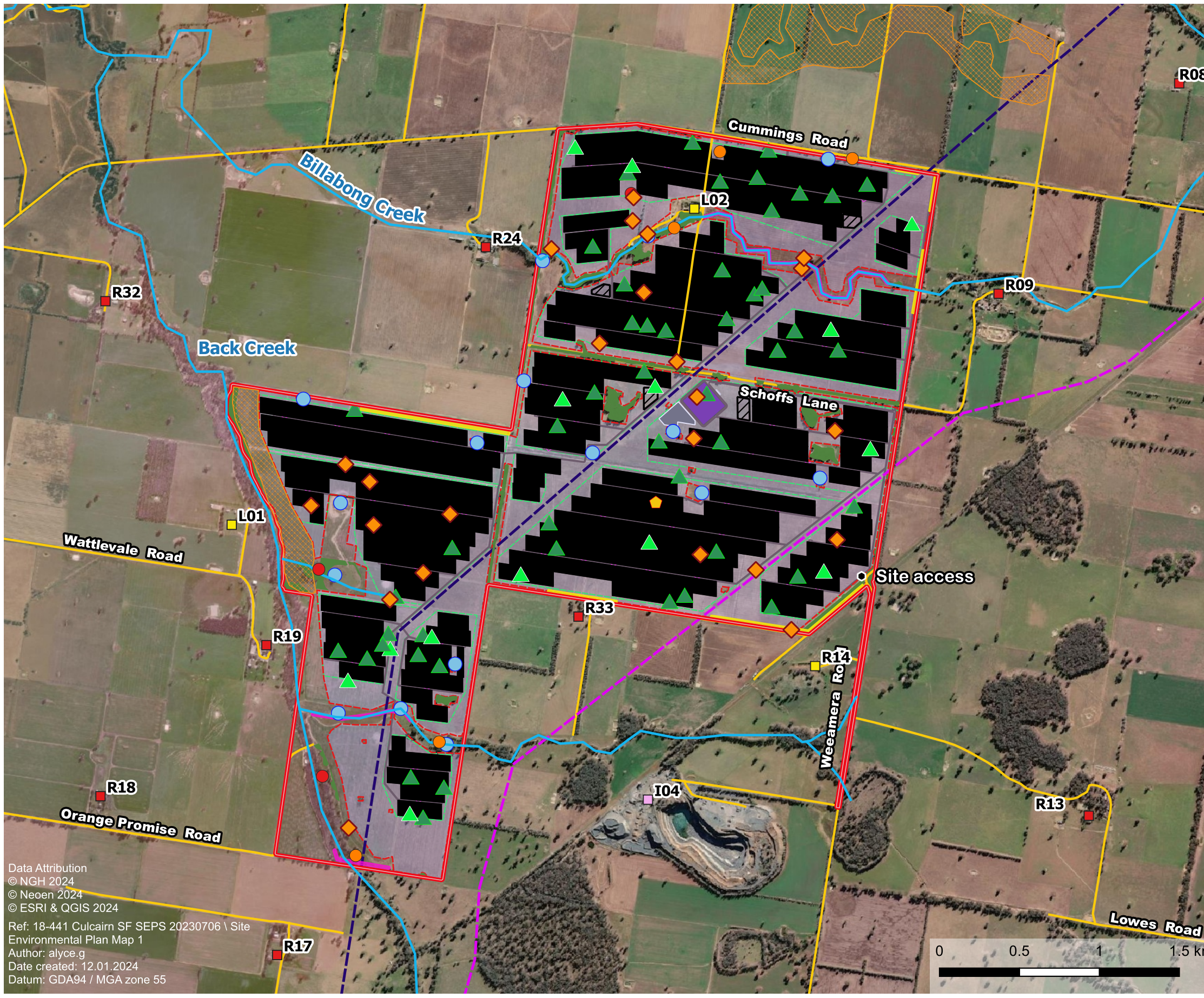


Appendix D Sensitive Area Plans (SAPs)

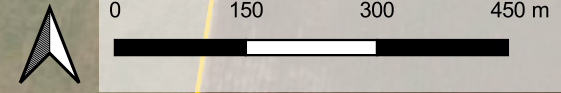
Culcairn Solar Farm Site Environmental Plans Map 1 of 5

Legend

- Project features:**
- Project site
 - Development Footprint
 - Clearing boundary
 - Site access
 - Panel arrays
 - Battery
 - Control building
 - Substation
 - Inverters
 - Compounds
 - Fences
 - Internal roads
- Sensitive receivers:**
- Associated
 - Non associated
 - Industry
- Biodiversity:**
- Threatened Ecological Communities (TECs)
- Hollow bearing trees:**
- ▲ Retain
 - ▲ Remove
- Vegetative screening**
- Visual screening
 - Biodiversity supplementary screening
- Heritage:**
- ◆ Isolated Finds
 - ◆ Cultural object
 - Potential Archaeological Deposits (PADs)
- Scarred Trees:**
- Cultural Tree
 - Modified Tree
- Hydrological features:**
- Dams
 - Waterways
- Infrastructure:**
- Transmission line
 - Gas pipeline
 - Roads



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 Environmental Plan Map 1
 Author: alyce.g
 Date created: 12.01.2024
 Datum: GDA94 / MGA zone 55



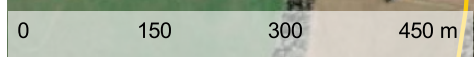
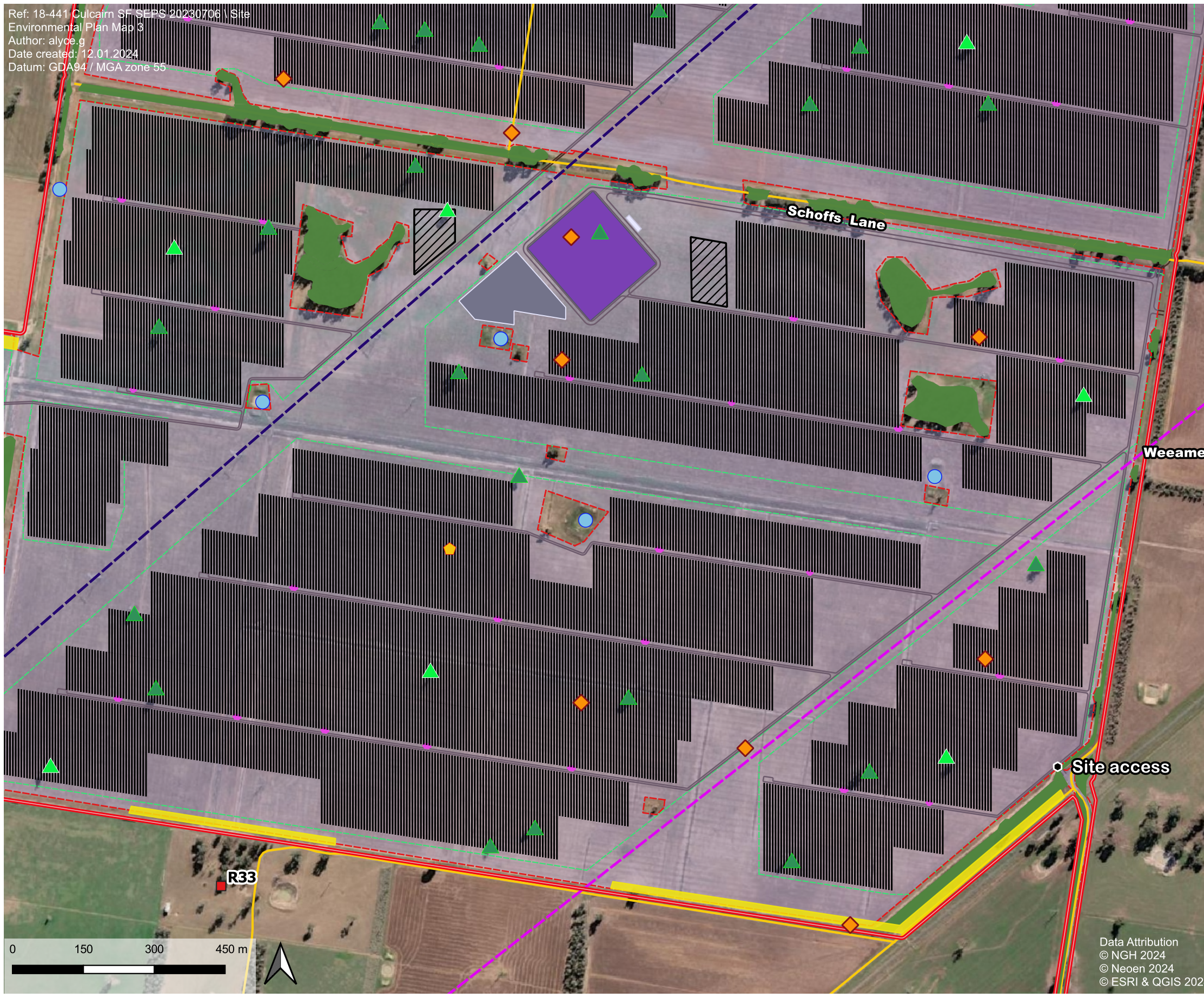
Culcairn Solar Farm Site Environmental Plans Map 2 of 5

- ### Legend
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 - Clearing boundary
 - Panel arrays
 - Battery
 - Control building
 - Substation
 - Inverters
 - Compounds
 - Fences
 - Internal roads
- Sensitive receivers:**
- Associated
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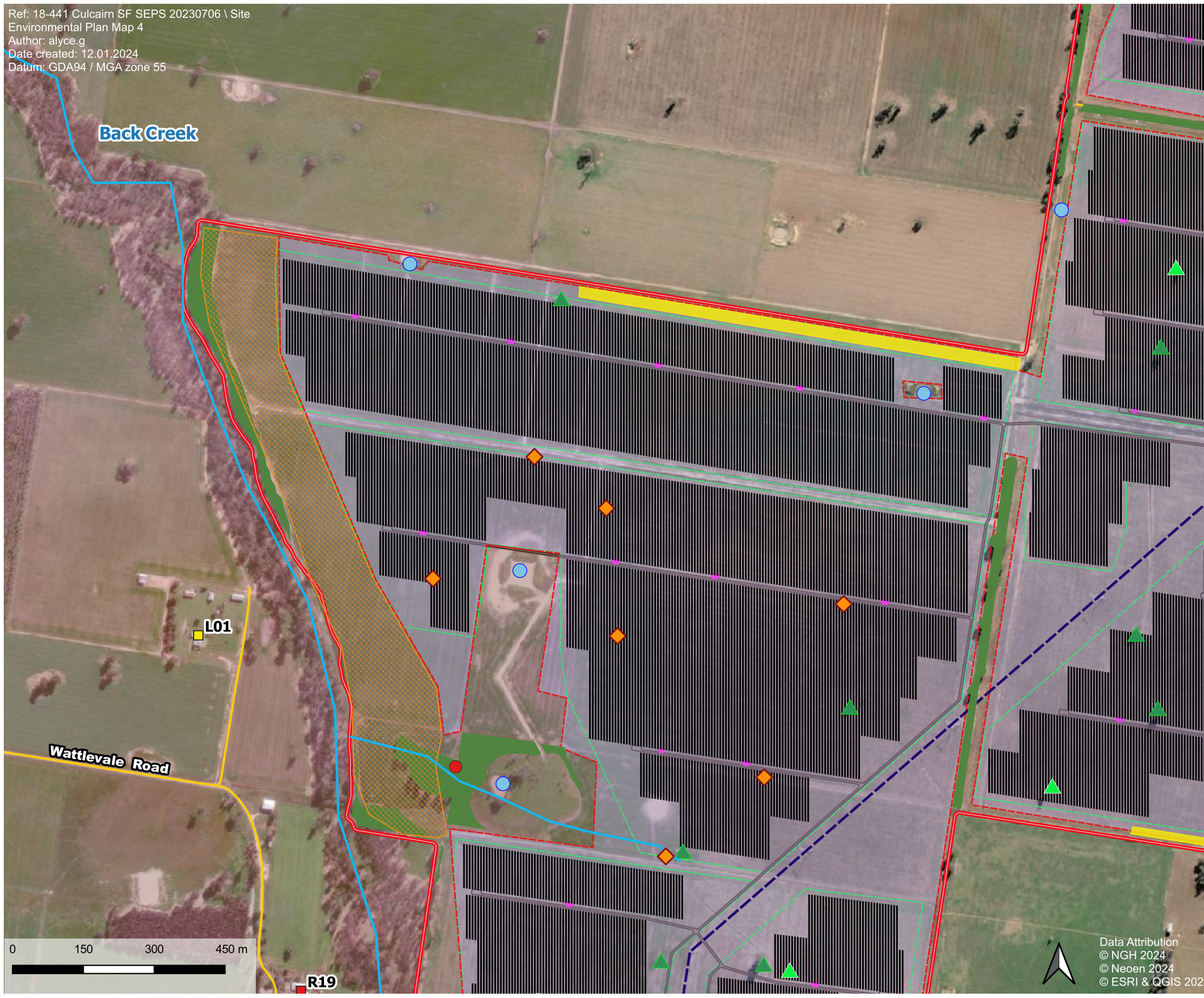


Culcairn Solar Farm Site Environmental Plans Map 3 of 5

- ### Legend
- Project features:**
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 - Development Footprint
 - Clearing boundary
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 - Battery
 - Control building
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 - Remove
- Vegetative screening**
- Visual screening
- Heritage:**
- Isolated Finds
 - Cultural object
- Hydrological features:**
- Dams
- Infrastructure:**
- Transmission line
 - Gas pipeline
 - Roads



Culcairn Solar Farm Site Environmental Plans Map 4 of 5



- ### Legend
- Project features:**
- Project site
 - Development Footprint
 - Clearing boundary
 - Panel arrays
 - Inverters
 - Fences
 - Internal roads
- Sensitive receivers:**
- Associated
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- Biodiversity:**
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- Visual screening
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- Scarred Trees:**
- Modified Tree
- Hydrological features:**
- Dams
 - Waterways
- Infrastructure:**
- Transmission line
 - Roads

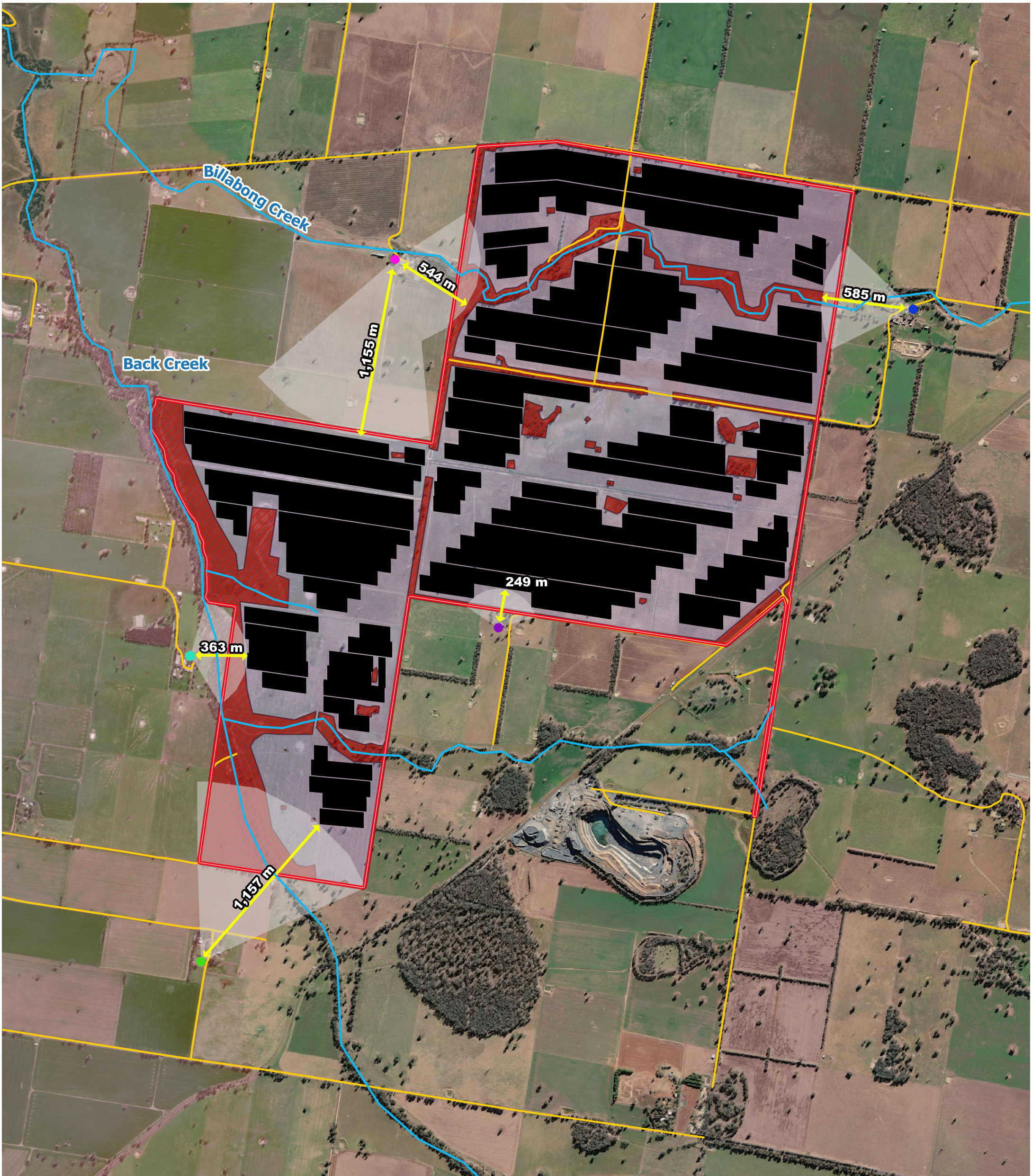


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Culcairn Solar Farm Site Environmental Plans Map 5 of 5

- ### Legend
- Project features:**
- Project site
 - Development Footprint
 - Clearing boundary
 - Panel arrays
 - Inverters
 - Fences
 - Internal roads
- Sensitive receivers:**
- Non associated
- Biodiversity:**
- Threatened Ecological Communities (TECs)
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- Retain
 - Remove
- Vegetative screening**
- Biodiversity supplementary screening
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- Hydrological features:**
- Dams
 - Waterways
- Infrastructure:**
- Transmission line
 - Gas pipeline
 - Roads





Culcairn Solar Farm
No-go zones
Map 1 of 3

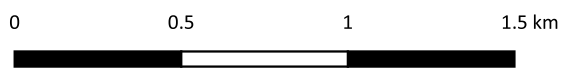
Legend

- Project site
- Development Footprint
- Panel Arrays
- No-go zones

Receivers requiring a development offset:

- R09
- R17
- R19
- R24
- R33

- Development offset distance requirements
- Waterways
- Roads

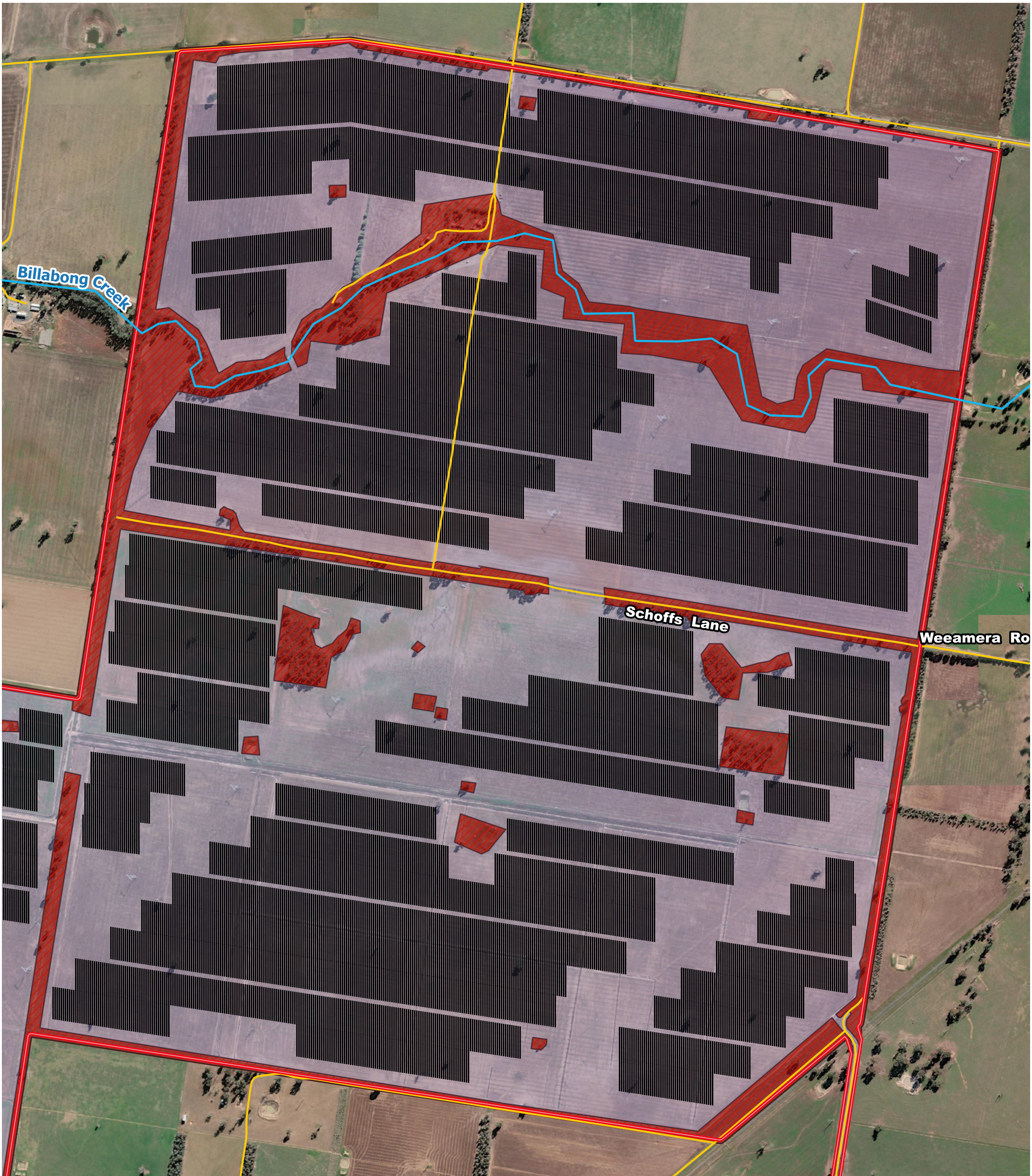


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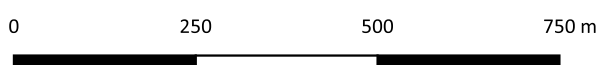
Culcairn Solar Farm
No-go zones
Map 2 of 3

Legend

-  Project site
-  Development footprint
-  No-go zones
-  Waterways
-  Roads

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**Culcairn Solar Farm
No-go zones
Map 3 of 3**

Legend

-  Project site
-  Development Footprint
-  No-go zones
-  Waterways
-  Roads



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go zones Map 3
Author: alyce.g
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NGH

Appendix E Weekly Environmental Inspection Checklist template

Inspected by:

Inspection Date:

Inspection Time:

Attendees:

Previous Rainfall	
Weather conditions	

ITEM	COMPLIANCE			COMMENTS / ACTIONS	ACTION RISK RATING (1,2,3,4)	BY WHO	DUE DATE	DATE DONE
	Y	N	N/A					
GENERAL								
The site is generally in a tidy condition?								
All materials and equipment are contained within the site boundary?								
All works are undertaken within the site boundary?								

ITEM	COMPLIANCE			COMMENTS / ACTIONS	ACTION RISK RATING (1,2,3,4)	BY WHO	DUE DATE	DATE DONE
	Y	N	N/A					
Designated haulage routes and access points are being used?								
The gas pipeline easement flagging is in place?								
SOIL AND WATER MANAGEMENT								
All clean water is being diverted away from disturbed areas								
All clean water diversion drains are stable								
Sediment fence is installed correctly and there are no gaps								
Disturbed areas where no works are undertaken are properly covered or stabilised								
Areas of localised soil erosion have been identified and appropriate preventative measures implemented								
There are no areas of potential or acygal concentrated flow that do not flow to sediment basins/traps.								
Slope lengths are maintained at appropriate lengths to slow flows down and minimise erosion								

ITEM	COMPLIANCE			COMMENTS / ACTIONS	ACTION RISK RATING (1,2,3,4)	BY WHO	DUE DATE	DATE DONE
	Y	N	N/A					
Check dams are used within diversion drains where required to slow flows down and minimise erosion within drains								
Geotextile linings (or similar) are used to provide temporary surface protection in areas where appropriate (e.g. batter drains, culvert construction)								
Stockpiles are sited in low hazard areas clear of watercourses and flood prone land.								
Stockpiles are protected.								
Stockpiles are less than 2m in height.								
Sediment control measures are constructed as close to the possible source of sediment as possible.								
Shakers, rubble pads or wash down areas have been installed								
There is no mud on the roads outside of the site boundary.								
Sediment fencing or equivalent is provided downslope of disturbed areas that can't be directed into a designated area.								
All discharges are undertaken in accordance with Dewatering Permits.								

ITEM	COMPLIANCE			COMMENTS / ACTIONS	ACTION RISK RATING (1,2,3,4)	BY WHO	DUE DATE	DATE DONE
	Y	N	N/A					
Concrete washouts are in good order and have been emptied as required.								
AIR QUALITY								
No visible dust leaving the site.								
Dust control being used to minimise dust emissions.								
Plant or equipment are not generating excessive dust or smoke.								
Loads are covered when leaving site.								
NOISE & VIBRATION								
Plant and equipment are not generating excessive noise or vibration.								
Works are within approved hours.								
WASTE MANAGEMENT								
Designated site recycling bins being used properly (steel, timber, concrete, paper etc.).								
No litter around site, site cleaned up at the end of the day.								

ITEM	COMPLIANCE			COMMENTS / ACTIONS	ACTION RISK RATING (1,2,3,4)	BY WHO	DUE DATE	DATE DONE
	Y	N	N/A					
Waste being taken off site is being recorded.								
HAZARDOUS MATERIALS AND SPILLS								
Hazardous materials are not being stored onsite								
Refuelling is being undertaken in designated areas.								
Hazardous materials correctly labelled.								
Spill clean-up kits onsite and fully stocked.								
FLORA AND FAUNA								
Sensitive areas are fenced adequately signposted.								
No disturbance outside site or clearing limits.								
Weeds and pests are being managed								
Clearing ins being undertaken in accordance with a clearing permit.								
HERITAGE								
Exclusion fencing around heritage sites is intact.								

ITEM	COMPLIANCE			COMMENTS / ACTIONS	ACTION RISK RATING (1,2,3,4)	BY WHO	DUE DATE	DATE DONE
	Y	N	N/A					
Protected heritage sites are adequately signposted.								
Bushfire								
Are bushfire control measures adequate and have been implemented.								

Appendix F Pre and Post Rainfall Inspection Checklists

PRE-RAIN CHECKLIST (Significant rain forecast, refer to Project rain event trigger criteria)				
Inspection Date/Time:		Rainfall forecast (24 hour):		Location:
Rain forecast (week ahead):				
No.	Control Measure	Yes/No/N/A	Comments	Corrective Action and Close-Out (incl nominated person)
1	Have the ERSED controls been implemented in accordance with the ESCP?			
2	Do any of the erosion and sediment controls require immediate maintenance / remedial action? including: <ul style="list-style-type: none"> ▪ Silt fences / rock logs ▪ Dirty water drainage directed into sediment controls ▪ Dirty water drains effective ▪ Fabric protection in place ▪ Mulch/ earth bunds effective 		Locations to be rectified:	
3	Clean water protected and diverted through and around the site?			

4	Have stockpiles been stabilised and/or protected to prevent erosion and sediment run-off.			
5	Is contaminated waste covered with tarp or similar and secured?			
6	Have hazardous substances been stored correctly?			
7	Have relevant site personnel been notified of forthcoming rain event?			
8	Any other issues?			
Completed By:				
Signature :				

RAIN AND POST-RAIN CHECKLIST				
Inspection Date/Time:		Rainfall forecast (24 hour):		
Rain (mm) since last inspection:		Rain forecast (48 hour):		
No.	Control Measure	Yes/No/N/A	Comments	Corrective Action and Close-Out (Incl nominated person)
1	Do any of the erosion and sediment controls require immediate maintenance / remedial action? including: <ul style="list-style-type: none"> ▪ Silt fences/ rock logs ▪ Waterway controls ▪ Dirty water is being channelled into controls ▪ Dirty water drains effective /clear of blockages ▪ Fabric protection in place ▪ Mulch/ earth bunds effective ▪ Stabilisation of stockpiles 		Locations to be rectified:	
2	Clean water protected and diverted through and around the site?			
3	Visual checks for any discharge of (sediment laden) water outside of sediment controls (eg. offsite).		Locations to be rectified:	
4	Any other issues?			
Completed By				
Signature :				