



**Independent DPHI Compliance Audit**

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## **SSD-10288 – Culcairn Solar Farm**

**Trigalana Environment Pty Ltd**

**10 July 2024**



## Independent DPHI Compliance Audit

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# SSD – 10288 Culcairn Solar Farm

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### Version Control

Revision	Date	Comment
A	23 June 2024	Draft for Review
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## Executive Summary

Trigalana Environmental Pty Ltd has been engaged to undertake an independent audit of Culcairn Solar Farm, project (the Project) a 350 Megawatt (MW) alternating current (AC) / 440 MWp direct current (DC), photovoltaic (PV) solar farm, located on rural land, approximately 4 kilometres (km) southwest of Culcairn, New South Wales (NSW).

Neoen Australia Pty Ltd are the Applicant, Bouygues Construction Australia (BYCA) are the Construction Contractor.

Infrastructure Approval (SSD-10288) was granted on the 25 March 2021.

SSD-10288 covers both the construction and operational phases of the Project and requires independent audits to be undertaken in accordance with the Department of Planning, Housing and Infrastructures (DPHI) Independent Post Approval Requirements (2020).

The Audit covers the pre-construction, site establishment and early construction activities for the period from the commencement of construction until the 21st of May 2024. The Audit included a site inspection, consultation with relevant project stakeholders and a review of management plans, project documents and site -records.

The findings of the Audit are:

- Preconstruction obligations as required by the Infrastructure Approval have been completed.
- Key environmental issues are being managed effectively with key mitigations summarised below:
  - Erosion, sediment, and dust controls consisting of stabilised site access, sealed internal roads street sweeper and water cart for dust suppression.
  - Limits of disturbance, endangered ecological communities and habitat trees were clearly marked in the field to prevent unauthorised clearing.
  - Nest boxes had been installed prior to the commencement of clearing activities.
  - Site entrance, road upgrade and traffic signage has been installed.
- Preconstruction obligations have been fulfilled including:
  - DPHI approval for construction phase environmental management plans.
  - Retirement of Biodiversity Credits.
  - Salvage of aboriginal heritage items.
  - Execution of Voluntary Planning Agreement with Greater Hume Shire Council.
- Four complaints have been received to date.

No non compliances are identified by the audit, six recommendations are made aimed at strengthening existing environmental management processes and are documented in this report.

# 1 Introduction

## 1.1 Project Description

The proposed Culcairn Solar Farm will have a total installed capacity of up to 350 MW (AC) / 440 MWp (DC), and includes:

- Single axis tracker PV solar panels mounted on steel frames over most of the site (up to approximately 760,000 PV solar panels).
- Electrical conduits and transformers.
- On site substation.
- Site office, maintenance building ablution block, parking access tracks, material laydown area, parking area, waste storage area and perimeter fencing.
- Electrical transmission infrastructure and overhead transmission line to connect to the existing 330 kilovolt (kV) TransGrid transmission line.
- Internal access roads.
- Upgrade to existing public roads.

On-site vegetative screening to soften views of proposed infrastructure from residences and at the intersection of public roads. TransGrid's Jindera to Wagga Wagga 330 kV transmission line enters the development site from the southwest and continues through the site, running north along the eastern boundary. The transmission line forms part of the existing electricity distribution network that originates at TransGrid's North Wagga Wagga Substation. The solar farm will connect directly to the transmission line where it crosses the site, with a new substation required near this location. The substation would be operated by TransGrid.

The Project is accessed from Weeamera Road, via Benambra Road and the Olympic Highway. Benambra Road and the southern section of Weeamera Road is the heavy vehicle route used by the Boral Quarry, located to the south-east of the proposal. The Olympic Highway provides access to the region's transport network. The construction phase of the Project commenced on the 18<sup>th</sup> of March 2024 and is expected to take 16 to 18 months. [Figure 1](#) describes the location of the Project in regional and local settings. [Figure 2](#) provides details of the site layout.

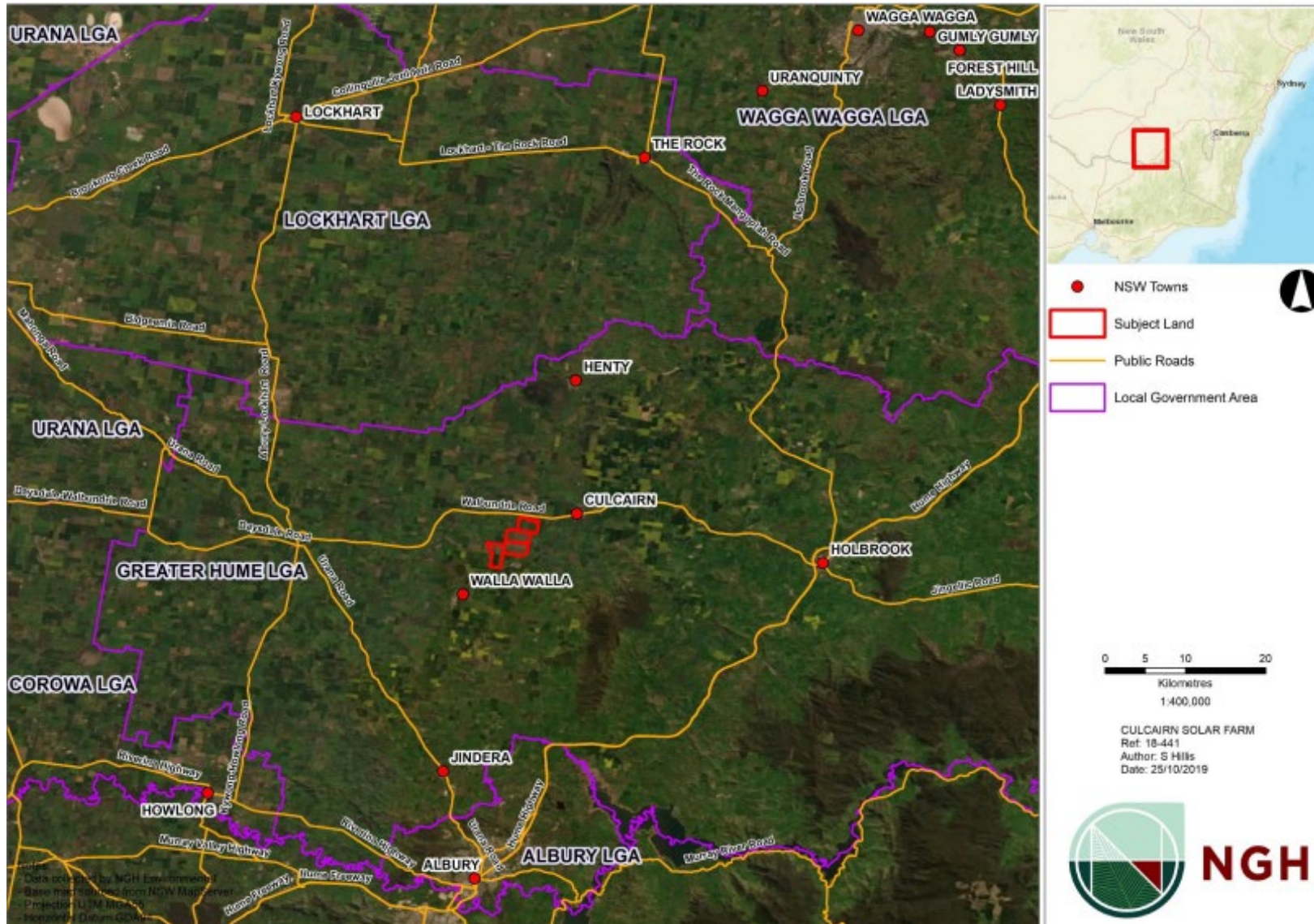


Figure 1: Project location – regional context



**Culcairn Solar Farm  
Project layout**

**Legend**

- Project site
- Development footprint
- Substation
- BESS
- Control Building
- Inverters
- Construction compound

- ★ Site Access
- Fences
- PV Array
- Internal roads
- Vegetative screening
- Visual screening

- Biodiversity supplementary screening
- Existing components / features:**
- Transmission line
- Gas pipeline
- Dams
- Waterways
- Roads



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15 March 2023  
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Ref: 16-441\_Culcairn SF 2023.026\_A01  
Project layout  
Author: slytvg  
Date created: 06/07/2023  
Date last updated: 07/07/2023



Figure 2: Site Layout

## 1.2 Auditor

Trigalana Environmental Pty Ltd has been appointed to undertake this independent environmental audit. The Auditor was approved by the Department of Planning, Housing and Infrastructure (DPHI). Details of the Auditor are provided in Table 1.

Table 1: Auditor Details

Name	Qualifications	Key Experience
Richard Peterson	B. E Civil M. Environmental Management Management Systems Auditing Leading Management Systems Audit teams Exemplar Global Auditor	25 years of environmental management experience in the infrastructure sector. Have undertaken over 100 audits including independent DPHI audits for major infrastructure projects including: <ul style="list-style-type: none"> <li>• EnergyConnect</li> <li>• Crudine Ridge Windfarm</li> <li>• Walla Walla Solar Farm</li> <li>• Sapphire Windfarm</li> <li>• Rye Park Windfarm</li> <li>• Albion Park Bypass</li> <li>• Warrell Creek to Nambucca Heads</li> <li>• Northern Road upgrade</li> <li>• Tweed Valley Hospital</li> <li>• Windsor Bridge</li> </ul>

The DPHI Letter of approval for the Auditor is provided in Appendix A.

## 1.3 Audit Objectives

The key objective of the Independent Environmental Audit was to assess compliance of the Project with the Ministers Conditions of Approval (MCoA) (SSD 10288 – MOD-1) and the implementation of management plans as outlined in the MCoA. The audit is to recognise good practices while providing practical and reasonable recommendations for improvement that can be implemented throughout the Project as construction accelerates.

## 1.4 Audit Scope and Period

This audit has been undertaken in accordance with Schedule 4, Condition 9 of the Ministers Conditions of approval as outlined below.

Table 2: Independent Audit – Requirements

Condition Reference	Condition	Comment
Sch 4 -9	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:  (a) within 3 months of commencing construction; and  (b) within 3 months of commencement of operations.	This audit was undertaken on 21st of May 2024 Construction commenced on 18 <sup>th</sup> March 2024. The audit was undertaken within 3 months of the commencement of construction.



This is the first independent audit for Culcairn Solar Farm and covers the period from the commencement of construction on 18 March 2024 to the 21st of May 2024.

## 2 Audit Methodology

### 2.1 Scope Development

The audit scope was developed in consideration of:

- The NSW Department of Environment Independent Audit Post Approval Requirements (May 2020).
- Project Conditions of Approval (SSI 10288) as modified dated 15 April 2021.
- Stakeholder feedback from relevant government stakeholders including:
  - Department of Planning, Housing and Infrastructure (DPHI).
  - Environment Protection Authority.
  - Biodiversity Conservation Division.
  - Heritage NSW.
  - Local Aboriginal Land Council.
  - Greater Hume Shire Council.
  - DPHI Water.
  - Transport for NSW.

### 2.2 Stakeholder Consultation – Key Issues

In undertaking the audit, key issues raised by the government agencies and aboriginal stakeholder groups that are relevant to the audit are provided in Appendix D.

### 2.3 Summary of Audit Processes

To complete the audit, the following was undertaken:

- Opening Meeting.
- Site inspection, noting environmental practices and controls.
- Audit interviews.
- Review of documents and records.
- Closing meeting.

### 2.4 Opening Meeting

An opening meeting was held on 9<sup>th</sup> of May 2024 where the Auditor provided an overview of the audit process and confirmed the agenda for the audit.

The opening meeting was attended by the following personnel:

- Benjamin Benfredj, Construction Manager, Neoen.
- Adam Cockayne, Environment Manager, BYCA.

### 2.5 Site Inspection

A site inspection was undertaken on the morning of Tuesday 21<sup>st</sup> May 2024. The weather was warm and dry.

The Project was in early stages of development with activities completed or underway including:

- Survey and set out.
- Establishment of construction site compound.
- Permanent drainage and culvert construction.
- Permanent boundary fencing.
- Intersection upgrade to Weeamara Road.
- Clearing, mulching and stockpiling mulch materials.
- Minor earthworks and materials management.
- Construction of internal access roads.

Environmental protection measures observed during the Audit site inspection are summarised in Table 3.

Table 3: Audit Site Inspection (Environmental Measures) Summary

Key Environmental Issues	Mitigation Measures Employed
Biodiversity	<ul style="list-style-type: none"> <li>• Nest boxes installed</li> <li>• Exclusion zone fencing</li> <li>• Exclusion Zone signage</li> <li>• Habitat trees marked and taped</li> <li>• Trees marked for clearing</li> <li>• No stockpiling or storage of materials within the dripline of trees observed</li> </ul>
Soil and Water Management	<ul style="list-style-type: none"> <li>• Permanent drainage infrastructure</li> <li>• Stabilised site access and hardstand</li> <li>• Sealed internal roads</li> <li>• Sediment fences and bunds around stockpiled material</li> <li>• Rumble grid at site entry/egress</li> <li>• Temporary vehicle washdown (permanent washdown under construction)</li> </ul>
Dust	<ul style="list-style-type: none"> <li>• Stabilised site access and internal access roads</li> <li>• Water cart</li> <li>• Speed restrictions on internal access roads</li> </ul>
Traffic and Access	<ul style="list-style-type: none"> <li>• Speed Restriction signage</li> <li>• Truck warning signage on Weeamara Road</li> <li>• Directional exclusion signage</li> </ul>
Heritage	<ul style="list-style-type: none"> <li>• Heritage items salvaged prior to commencement</li> <li>• Heritage items protected with exclusion zone fencing</li> </ul>
Waste and Chemicals	<ul style="list-style-type: none"> <li>• Bunded chemical storage container</li> <li>• Spill kits provided in accessible locations.</li> <li>• Waste and recycling storage bins</li> </ul>
Fire and Emergency	<ul style="list-style-type: none"> <li>• Mobile fire water tank</li> <li>• Buffer zone (retained)</li> <li>• Fire extinguishers</li> </ul>

## 2.6 Document Review

In undertaking the Audit, a broad range of documents were reviewed or referred to including:

- Project conditions of approval (SSD-10288).
- Project Environmental Impact Statement (EIS).
- Environmental Management Plans, developed in accordance with the Project Conditions.
- Correspondence with relevant authorities.
- Specialist reports.
- Incident and complaints registers.
- Records of implementation of the environmental management plans including checklists, inspection reports, waste records etc.

## 2.7 Closing Meeting

The closing meeting was held on 9<sup>th</sup> of July 2024 where the summary of the audit findings was provided, noting areas of good practice and recommendations for improvement.

## 2.8 Compliance Descriptors

The compliance status of each condition was determined using the relevant descriptors in Table 4 and as described in the DPHI 2020 Auditing Post Approval Requirement.

Table 4 Compliance Descriptors

Status	Description
Compliant (C)	Sufficient verifiable evidence to demonstrate that all elements of the requirement have been completed
Non- Compliant (NC)	One or more specific elements of the conditions or requirements have not been complied with within the scope of the audit
Not Triggered (NT)	A requirement has an activation or timing trigger that has not been met at the time when the audit was undertaken

### 3 Audit Findings

#### 3.1 Compliance Performance

A summary of compliance performance is provided in Table 5.

Table 5: Compliance summary

Schedule	Number of Conditions	Compliant	Non-Compliant	Not Triggered
1	Not used			
2	13	8	0	5
3	35	28	0	7
4	17	7	0	10
<b>Total</b>	<b>65</b>	<b>43</b>	<b>0</b>	<b>22</b>

#### 3.2 Audit recommendations

Audit recommendations are provided in Table 6.

Table 6 Key Audit Findings and Recommendations

Ref	Condition	Audit Finding	Recommendation
Sch 3-8	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>The Traffic Management Plan (TMP) was conditionally approved by DPHI on the 22/1/24 noting the TMP must be updated:</p> <ul style="list-style-type: none"> <li>• Following consultation with Transport for NSW and Greater Hume Shire Council regarding the use heavy vehicles requiring an escort and prior to the use of heavy vehicles requiring an escort, as described in Condition 2 of Schedule 3;</li> <li>• Prior to carrying out any upgrading or decommissioning on site to detail the extent and scope of the pre and post upgrading or decommissioning phase dilapidation surveys; and</li> <li>• As required in accordance with the Development Consent.</li> </ul>	Update the Plan as required by DPHI and as noted.
Sch 3-17	<p>The Applicant must:</p> <ol style="list-style-type: none"> <li>Minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version; and</li> <li>Ensure that the noise generated by the operation of the battery storage facility during the night does not exceed 35dB(A) Laeq, 15min to be determined in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence.</li> </ol>	<p>Although the Project is in a low densely populated area and appropriate measures have been implemented to reduce noise impacts, the next phase of work will involve some impact piling for the foundations for the solar panels which will result in impulsive and tonal noise and may become a nuisance for nearby residents.</p>	<p>It is recommended the neighbours who are impacted by the work are consulted with directly so if there are any concerns they may have, then the timing of impact piling may be adjusted with appropriate respite times applied to minimise impacts. This may include the preparation of a “hotspot map”.</p>
Sch 3-18	The Applicant must minimise the dust generated by the development.	<p>Appropriate measures to minimise dust include:</p> <ul style="list-style-type: none"> <li>• Stabilised site access</li> <li>• Hardstand laydown areas</li> <li>• Rumble grid and vehicle washdown</li> <li>• Water carts</li> <li>• Speed restrictions on internal access roads</li> </ul> <p>It was noted that in some areas on site where the soil was a powdery “bulldust” material with greater potential to create nuisance where activities are occurring closer to the nearest residents.</p>	<p>Develop a “hot spot” map of high-risk areas for dust generation (i.e. closest to residents/fine material) and prioritise mitigation in these areas), this may include the use of dust suppression sprays.</p>

Ref	Condition	Audit Finding	Recommendation
<b>Sch 3-24</b>	<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.</p> <p><i>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.</i></p>	<p>Water is supplied by Greater Hume Council, accessed from standpipes and supplied to the Project under a subcontractor agreement.</p>	<p>Undertake an internal subcontractor audit to ensure water is being sourced in accordance with the Water Access License</p>
<b>Sch 3 - 28</b>	<p>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.</p> <p>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.</p> <p>Following completion of the Study, the Applicant must implement the measures described in the Safety Management Study.</p>	<p>The DPHI approved the Safety Management Study on 13/12/23 and noted “the electrical hazard study required under Australian Standard 4853-2012-Electrical Hazards on Metallic Pipelines is unable to be completed until the earthing designs are finalised.</p> <p>Accordingly, the DPHI requests Neoen submit a revised Safety Management Study which includes the electrical hazard study (prepared in accordance with AS 4853-2012) prior to commencing the construction and installation of electrical equipment within the gas pipeline easement”</p>	<p>In accordance with the DPHI letter of approval, the safety management system is to be revised and resubmitted to DPHI prior to commencing the construction and installation of electrical equipment within the gas pipeline easement. This work had not commenced at the time of the Audit site inspection.</p>
<b>Sch 3 - 30</b>	<p>The Applicant must;</p> <ol style="list-style-type: none"> <li>a) Minimise the fire risks of the development, including managing vegetation fuel loads on site;</li> <li>b) Ensure that the development;</li> <li>c) .....</li> </ol> <p>Notify the relevant local emergency management committee following construction of the development, and prior to the commencing of operations.</p>	<p>The Project is in a high-risk area for bushfire zone. Although summer is 5 months away, there is a need to ensure the Project is fully equipped to prevent and respond to any fire related incidents</p>	<p>Conduct a pre-bushfire season readiness review to ensure all obligations and commitments relating to Fire and Emergency are implemented and are compliant. It is recommended the review should focus on the activities noted in the Bushfire Management including (but not limited to):</p> <ul style="list-style-type: none"> <li>• Onsite Preparedness Activities</li> <li>• Firefighting water supplies and equipment</li> <li>• Access and egress for emergency vehicles</li> <li>• Emergency Response</li> <li>• Communication Protocols</li> </ul> <p>Involve suitably qualified personnel in the review as required. A record of the review should be kept.</p>

### 3.3 Summary of Agency Notices, Orders, Penalty Notices and Prosecutions

No agency notices, orders, penalty notices or prosecutions have been issued to the project to date.

### 3.4 Summary of Environmental Incidents

A summary of the incidents is summarised in Table 6.

Table 7 Incident Summary

Incident Date	Description	Auditor Comments
9/5/24	Minor hydraulic oil spill from 20 T excavator during tree removal.	The spill was minor and reported to have been cleaned up. No further actions are required other than the ongoing maintenance of plant and equipment to prevent recurrence.

The incident was minor in nature and did not cause or threaten any material harm. Accordingly, the incidents were not reported to DPHI or other agencies in accordance with Appendix 7 of the conditions of approval.

### 3.5 Previous Annual Review or Compliance Report Recommendations

Not applicable, as this is the first audit for the Project, there were no actions requiring completion. The conditions of approval do not require compliance reports to be prepared.

### 3.6 Supplementary Approvals and Licences

The current activities do not trigger the requirement for an Environment Protection Licence. Water is obtained via a Water Access Licence.

### 3.7 Community Complaints

During the audit period, four complaints were received in relation to the following issues:

- Availability of local labour.
- Tendering opportunities.
- Undertaking surveying activities on private property without landowner permission.
- Horses were spooked by tree lopping activities.

Appropriate actions are being taken to address the complaints and this is documented in the complaints register.

### 3.8 Adequacy of Environmental Management Plans

The management plans implemented for this construction phase have been prepared by suitably qualified personnel and approved by DPHI following consultation with relevant stakeholders. The plans are technically robust and meet the conditions of approval and other relevant legislative requirements. The management plans are adequate for the current scope of work and were observed to be implemented effectively in the field.

### 3.9 Assessment of Compliance with Predictions in the Environmental Impact Statement

Based on the observations, audit interviews and records reviews as part of the audit, it may be reasonably concluded that the environmental impacts of construction activities to date are consistent with predictions made in the Environmental Impact Statement noting that:

- It was observed on site that the ground disturbance activities undertaken are generally within the disturbance area described in the EIS with boundary fencing and “no go” signage to prevent work from occurring outside the approved disturbance area.
- There were no observed off-site impacts such as:
  - Evidence or reports of clearing outside the Project boundary.
  - Visible dust plumes or emissions.



- Dust or mud tracking on local roads.
- Excessive noise or vibration emissions, noting that current activities are at a substantial distance from residential or other sensitive receivers with no complaints received to date.
- No offsite incidents of fuel, chemical spills, unlawful waste disposal or pollution of waters or complaints received were observed or reported.

### **3.10 Key Strengths**

Key strengths are as follows:

- The Project team has appointed a dedicated team of environmental professionals who are based locally and are integrated within the environment team. The site-based team is supported by the BYCA Corporate Environment Manager who attends the site on an as required basis and provides technical and compliance management support.
- The systems and processes established to ensure compliance with the conditions of approval are well considered appear to be effectively implemented.

## Appendix A DPHI Auditor Approval

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Department of Planning and Environment



Our ref: SSD-10288-PA-22

Miss Alexis Good  
Project Manager  
NEOEN AUSTRALIA PTY. LTD.  
Level 6 / 16 Marcus Clarke Street  
Canberra ACT 2601  
02/01/2024

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Sent via the Major Projects Portal only

**Subject: Culcairn Solar Farm – 1<sup>st</sup> Independent Environmental Audit audit team approval request**

Dear Miss Good

Reference is made to your post approval matter, SSD-10288-PA-22, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct the 1<sup>st</sup> Independent Environmental Audit (IEA) and prepare the IEA report for Culcairn Solar Farm, submitted as required by Schedule 4, Condition 12 of SSD-10288 (the consent) to NSW Department of Planning and Environment (NSW Planning) on 20 December 2023.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Schedule 4, Condition 12 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements (2020)*, as nominee of the Planning Secretary, I endorse the following independent audit team:

- Mr Richard Peterson
- Mr Stuart Longman

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent/approval and the *Independent Audit Post Approval Requirements (2020)*. Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Department of Planning and Environment



Notwithstanding the endorsement of the above independent audit team for the project, each respective project approval or consent requires a request for endorsement of the independent auditor or audit team be submitted to NSW Planning, for consideration of the Planning Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact me on 0429400261 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly".

Katrina O'Reilly  
Team Leader - Compliance  
Compliance

As nominee of the Planning Secretary

## Appendix B Independent Audit Table

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**Schedule 2**  
**Part A – Administrative conditions**

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>				
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.	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> <li>• Documents reviewed as part of the audit and noted below</li> <li>• State Significant Development Consent, SSD 10288</li> <li>• Environmental Work Method Statement Site Establishment and Civil Works” dated 2/1/24</li> <li>• BYCA Compliance Tracking Register</li> </ul>	<p>Reasonable and feasible measures were observed to be implemented on site to control key environmental risks including dust, noise, heritage, water quality erosion and sedimentation and traffic. BYCA have prepared and maintain a compliance tracking schedule to manage compliance with the conditions of consent. The register includes the conditions of consent as well as specific commitments in the management plans.</p> <p>BYCA have a team of onsite Environmental Specialists to implement the Environmental Management plans and provide specialist advice to the construction team.</p>	Compliant
<b>TERMS OF CONSENT</b>				
2	<p>The Applicant must carry out the development:</p> <p>a) Generally in accordance with the EIS; and</p> <p>b) In accordance with the conditions of this consent.</p> <p><i>Note: the general layout of the development is shown in Appendix 1.</i></p>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> <li>• Documents reviewed as part of the audit and noted below</li> </ul>	Construction activities were being undertaken generally in accordance with the EIS and in accordance with the conditions of this consent. A compliance tracking program has been established and is being reviewed to ensure compliance	Compliant
3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	No inconsistencies identified by the Audit. Neoen is currently in process of preparing a modification for the construction and operation of a battery storage facility.	Compliant
4	<p>The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department’s assessment of:</p> <p>a) Any strategies, plans or correspondence that are submitted in accordance with</p>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> <li>• Documents reviewed in undertaking this audit</li> </ul>	In some instances, DPHI have noted further amendments to management plans are required. These have been noted as recommended actions in this Audit report.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>consent;</p> <p>b) Any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and</p> <p>c) The implementation of any actions or measures contained in these documents.</p>			
5	<p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> <li>Culcairn Solar Farm, Final Layout Plans, drawing number NEO-CUSF-1000PV-DWG-1</li> <li>Email from Neoen to DPHI titled "Culcairn Solar Farm – Final Layout Plans SSD-10288 – PA 36 – Request for Additional Information</li> <li>Culcairn Solar Farm SSD Post Approval document" dated 6 May 2024</li> </ul>	<p>Not triggered, the solar panels, substation and inverters have not been installed at this early Project stage. Layout drawings have been prepared and provided to DPHI.</p>	Not triggered
<b>UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE</b>				
6	<p>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.</p>	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> </ul>	<p>Solar panels have not been installed and therefore no upgrades have been undertaken at this stage in the Project.</p>	Not Triggered
<b>STRUCTURAL ADEQUACY</b>				
7	<p>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</p>	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> <li>Minor Consultancy Agreement Procort Limited dated 12 March</li> </ul>	<p>The construction of new buildings and structures has not yet commenced. Neoen and BYCA have appointed an independent certifier to review designs and ensure compliance with the BCA requirements.</p>	Not triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	the Building Code of Australia. Notes: <ul style="list-style-type: none"> <li>Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the development.</li> <li>Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</li> </ul>			
<b>DEMOLITION</b>				
8	The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> </ul>	There has been no demolition on the Project to date with no demolition required.	Not Triggered
<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>				
9	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: <ol style="list-style-type: none"> <li>Repair or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</li> <li>Relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</li> </ol> This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the condition of this consent.	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> </ul>	There was damage to public infrastructure observed during the Audit site inspection or reported.  No public infrastructure required relocation prior the commencement of construction.	Not Triggered
<b>OPERATION OF PLANT AND EQUIPMENT</b>				



Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
10	<p>The Applicant must ensure that all plant and equipment used on site, or in connection with the development is:</p> <ul style="list-style-type: none"> <li>a) Maintained in a proper and efficient condition; and</li> <li>b) Operated in a proper and efficient manner.</li> </ul>	<ul style="list-style-type: none"> <li>• Plant Onboarding process (revision 1)</li> <li>• Plant Checklist (grader verification) dated 1/5/24</li> <li>• Hygiene declaration form dated 1/2/24</li> </ul>	<p>All equipment utilised on site at the time of the Audit site inspection was observed to be operating in a proper and efficient manner with no visible exhaust or excessive noise. Equipment is maintained appropriately with records kept of onboarding and servicing activities. Weed and seed inspections are undertaken prior to the issue of an onboarding sticker, placed on machinery that has been accepted. Maintenance records were provided to the Auditor.</p>	Compliant
<b>SUBDIVISION</b>				
11	<p>The Applicant may subdivide the site as identified in Appendix 4 and in accordance with the requirements of the EP&amp;A Act and the EP&amp;A Regulation.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• <i>Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision.</i></li> <li>• <i>Division 6.4 of Part 6 of the EP&amp;A Act sets out the application requirements for the subdivision certificates.</i></li> </ul>	<ul style="list-style-type: none"> <li>• Letter from Walpole surveying to Neoen titled " Fee Estimate for Culcairn Solar Farm – 2 Lot Subdivision of Lot 54 in DP7535 and creation of access easement over adjoining lots" dated 29/4/24</li> <li>• Subdivision photograph</li> <li>• Email from Neoen to Walpole Surveying titled "Culcairn Solar Farm – Land parcel Subdivision Request" dated 10/5/24</li> </ul>	<p>The site is in the process of being subdivided and will account for the TransGrid's infrastructure. A surveyor has been appointed to facilitate the subdivision process.</p>	Compliant
<b>COMMUNITY ENHANCEMENT</b>				
12	<p>Prior to commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with;</p> <ul style="list-style-type: none"> <li>a) Division 7.1 of Part 7 of the EP&amp;A Act; and</li> <li>b) The terms of this letter of offer dated 12 November 2020, summarised in Appendix 3.</li> </ul>	<ul style="list-style-type: none"> <li>• Planning Agreement between Greater Hume Council and Neoen Australia Pty Ltd" dated 8/1/24</li> <li>• Email from Neoen to Greater Hume Shire Council titled "Culcairn Solar Farm Update and VPA" dated 8/1/24</li> </ul>	<p>The Planning Agreement was executed prior to the commencement of construction. Evidence was provided to the Auditor demonstrating that the Bank Guarantee required by the VPA has been provided to Greater Hume Shire Council.</p>	Compliant
<b>COMMUNITY COMMUNICATION STRATEGY</b>				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
13	<p>Prior to the 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> <ol style="list-style-type: none"> <li>Identify landowners for potentially impacted residences including but not limited to R09, R17, R19, R24 and R33.</li> <li>Ensure that the landowners identified in (a) are consulted during construction;</li> <li>Set out procedures and mechanisms for the regular distribution of information to wider community.</li> <li>Establish a public liaison officer(s) to engage with the local community; and</li> <li>Set out procedures and mechanisms;               <ul style="list-style-type: none"> <li>Through which the community can discuss or provide feedback to the Applicant;</li> <li>Through which the Applicant will respond to enquiries or feedback from the community; and</li> <li>To resolve any issues and mediate any disputes that may arise in relation to construction of the development.</li> </ul> </li> </ol> <p>The Applicant must implement Community Communication Strategy for the duration of construction.</p>	<ul style="list-style-type: none"> <li>Audit Interview 20/6/24</li> <li>Community Communication Strategy &amp; Benefit Sharing Plan V3 dated September 2023</li> <li>Email from DPHI titled “Culcairn Solar Farm – Community Communication Strategy” dated 16/10/23</li> <li>Complaints register dated 16/5/24.</li> <li>Culcairn General Consultation Log</li> <li>Culcairn Extension of Works Consultation Log</li> <li>Project website - Culcairnsolarfarm.com.au</li> <li>Culcairn Solar Farm, Project Newsletter March 2024</li> <li>Newspaper article – the Border Mail dated 8/3/24</li> <li>Project Newsletter – March 2024</li> <li>Community, jobseeker and Supplier Information flyer (for networking session on 7/3/24)</li> <li>Community information booklet construction</li> </ul>	<p>The Community Communication Strategy and Benefit Sharing Plan was provided to DPHI who noted they have no comments on the Plan.</p> <p>BYCA have engaged a full-time site-based Community Engagement and Social Procurement Manager to facilitate the implementation of the plan. Evidence reviewed by the Auditor included the following:</p> <ul style="list-style-type: none"> <li>Project website, with contact details, FAQ’s, Project information, community communication strategy and other Project documents</li> <li>Complaints process</li> <li>Evidence of supplier networking session, held in March 2024</li> <li>Media release, launching the construction of the Project</li> <li>Community information pack</li> <li>Community information booklet, construction</li> <li>Community Newsletters</li> <li>Project Flyers for community, and business information sessions</li> </ul>	Compliant

### Schedule 3

### Environmental Conditions – General

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>BATTERIES</b>				
<b>Battery Storage Restriction</b>				
1	<p>Unless the Planning Secretary agrees otherwise, the battery facility or system associated with the development must not exceed a total delivery capacity of 100 MW.</p> <p><i>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.</i></p>	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> </ul>	No battery until modification is approved, proposed to be near the substation site.	Not Triggered
<b>TRANSPORT</b>				
<b>Over-Dimensional and Heavy Vehicle Restrictions</b>				
2	<p>The Applicant must ensure that the;</p> <p>a) Development does not generate more than;</p> <ul style="list-style-type: none"> <li>100 heavy vehicle movements (including water carts) a day during construction, upgrading and decommissioning;</li> <li>Nine over-dimensional vehicle movements during construction, upgrading and decommissioning; and</li> <li>Five heavy vehicle movements (including water carts) a day during operations; on the public road network; and</li> </ul> <p>b) Length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 26 meters unless the Planning Secretary agrees otherwise.</p>	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> <li>Vehicle Movement log</li> </ul>	At this early stage in the Project, heavy vehicle movements to the site have been minimal. The Auditor was provided with a Heavy Vehicle tracking register which confirmed the low Heavy Vehicle numbers. There have not been any over dimensional vehicle movements to date or any trucks >26m in length.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
3	The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering or leaving the site each day for the duration of the project.	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> <li>Vehicle Movement log</li> </ul>	A vehicle movement log is kept to monitoring heavy and over dimensional movements	Compliant
<b>Access Route</b>				
4	<p>All over-dimensional and heavy vehicles associated with the development (including water carts) must travel to and from the site via Olympic Highway, Benambra Road and Weeamara Road as identified in the figure in Appendix 5.</p> <p><i>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.</i></p>	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> <li>Delivery Driver induction</li> <li>Site Induction</li> </ul>	<p>At this stage of construction there was only one site access point on Weeamara Road and the only practical route to the site is via Olympic Highway and Benambra Road.</p> <p>A site induction register is kept up to date with details of visitors, delivery drivers and short-term worker inductions</p> <p>Signage has been installed on surrounding roads identifying the correct access route. The site induction includes the approved access routes.</p> <p>No non compliances or complaints were reported during the audit period relating to site access.</p>	Compliant
<b>Site Access</b>				
5	All vehicles associated with the development must enter and exit the site via the access point of Weeamara Road, as identified in Appendix 1 and Appendix 5.	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> <li>Delivery Driver induction</li> <li>Site Induction</li> <li>Advice to suppliers</li> </ul>	<p>At this stage of construction there was only one site access point on Weeamara Road and the only practical route to the site is via Olympic Highway and Benambra Road.</p> <p>A site induction register is kept up to date with details of visitors, delivery drivers and short-term worker inductions</p> <p>Signage has been installed on surrounding roads identifying the correct access route. The site induction includes the approved access routes.</p> <p>No non compliances or complaints were reported during the audit period relating to site access.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Road Upgrades</b>				
6	<p>Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must;</p> <ul style="list-style-type: none"> <li>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;</li> <li>b) Upgrade Weeamera Road between the Access to Hurricane Hill Hardrock Quarry and the site access point to a 7m wide sealed pavement, as identified in Appendix 5;</li> </ul> <p>These upgrades must comply with the <i>Austroads Guide To Road Design</i> (as amended by TfNSW supplements) and be carried out to the satisfaction of Council.</p>	<ul style="list-style-type: none"> <li>• Letter from Greater Hume Council to Neoen titled “Flexibility granted under the Culcairn DA to allow construction works to proceed pending the securing of the UGL Construction Licence associated with the upgrade of the 40m section of the Weeamera Council Road intersecting the unused UGL Rail Corridor” dated 16/11/23</li> <li>• Letter from Neoen titled “Flexibility granted under the Culcairn DA to allow construction works to proceed securing of the UGL Construction Licence associated with the upgrade of the 40m section of the Weeamera Council Road intersecting the unused UGL Rail Corridor” dated 17/11/23</li> <li>• Letter from DPHI titled “Culcairn Solar Farm – Weeamera Road Upgrade Works Across unused Railway Easement” dated 30/11/23</li> <li>• Email from Greater Hume Council to Neoen titled “Weeamara Road upgrade- 100% design issue” dated 1/11/23</li> </ul>	<p>Construction access point on Weeamera Road has been completed. Greater Hume Council and DPHI approved an extension of 12 weeks to allow this to occur. The design was provided to Greater Hume Council who reviewed the design and confirmed it is acceptable to Council.</p>	Compliant
<b>Road Maintenance</b>				
7	<p>The Applicant must;</p> <ul style="list-style-type: none"> <li>a) Undertake an independent dilapidation survey to assess the; <ul style="list-style-type: none"> <li>• Existing condition of Benambra Road and Weeamera Road on the transport route prior to construction, upgrading or decommissioning works; and</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Pre-Construction Dilapidation Survey of Benambra Road and Weeamera Road on the transport route. Dated 10 August 2023 prepared by CRG Traffic Pty Ltd</li> <li>• Culcairn Solar Farm Dilapidation Report, Benambra and Weeamara</li> </ul>	<p>The Pre-construction Dilapidation report was prepared prior to the commencement of construction activities and was approved by DPHI on the 31/10/23.</p> <p>There have not been any disputes to date regarding the repair of Benambra Road between the Applicants of Culcairn Solar Farm and Walla Walla</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>• Condition of Benambra Road and Weamera Road on the transport route, following construction, upgrading or decommissioning works;</li> <li>b) Repair Benambra Road and Weamera Road on the Transport route if dilapidation surveys identify that the road has been damaged during construction, upgrading or decommissioning works; 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.</li> </ul> <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>	<p>Road, Walton Smith Consultants dated 9/2/24</p> <ul style="list-style-type: none"> <li>• Letter from DPHI to Neoen titled "Culcairn Solar – Road Condition Assessment (Dilapidation Report)" dated 31/10/223</li> </ul>	<p>Solar Farm.</p>	
<b>Operating Conditions</b>				
8	<p>The Applicant must ensure;</p> <ol style="list-style-type: none"> <li>a) The internal roads are constructed as all-weather roads;</li> <li>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;</li> <li>c) The capacity of existing roadside drainage network is not reduced;</li> <li>d) All vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and</li> <li>e) Development-related vehicles leaving the site are in clean condition to minimise dirt being tracked onto the sealed public road network.</li> </ol>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	<p>As observed during the Audit site inspection, the site access road and the internal access road was constructed as an all-weather road. Adequate provision was available on site for parking of all vehicles with no vehicles observed to be parked on the local road.</p> <p>A temporary vehicle washdown system was established with a vehicle rumble grid to ensure all vehicle tyres are clean and free of dirt prior to their departure from site. There was no observed mud tracking off site.</p> <p>The local roadside drainage was not observed to be impacted during the Audit site inspection</p> <p>A turning circle is proposed to be implemented as documented in the final layout plans to ensure all vehicles exit the site in a forwardly direction.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Traffic Management Plan</b>				
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> <ol style="list-style-type: none"> <li>a) Details of the transport route to be used for all development-related traffic;</li> <li>b) Details of the road upgrades required by condition 7 of Schedule 3 of this consent;</li> <li>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"> <li>• Details of the dilapidation surveys required by conditions 7 of Schedule 3 of this consent;</li> <li>• Temporary traffic controls, including detours and signage;</li> <li>• Notifying the local community about development related traffic impacts;</li> <li>• Procedures for receiving and addressing complaints from the community about development related traffic</li> <li>• Minimising potential cumulative traffic impacts with other State significant development projects in the area, including preventing queuing on the public road network</li> <li>• Minimising dirt tracked onto the public road network from development related traffic</li> <li>• Details of the employee shuttle bus service, including pick up and drop off points associated parking arrangements for construction workers and measures to encourage employee use of this service;</li> <li>• Encouraging car pooling or ride sharing by employees;</li> <li>• Scheduling of haulage vehicle movements to minimise convoy length or platoons;</li> </ul> </li> </ol>	<ul style="list-style-type: none"> <li>• Traffic Management Plan (TMP) approved 25201/2024.</li> <li>• Letter from DPHI titled “Traffic Management Plan – Culcaim Solar Farm (SSD -10288- Mod 1)” dated 22/1/24</li> <li>• CUSF truck Movement register dated 25/3/24</li> </ul>	<p>The TMP was conditionally approved by DPHI on the 22/1/24 noting the TMP must be updated:</p> <ul style="list-style-type: none"> <li>• following consultation with Transport for NSW and Greater Hume Shire Council regarding the use heavy vehicles requiring an escort and prior to the use of heavy vehicles requiring an escort, as described in Condition 2 of Schedule 3;</li> <li>• prior to carrying out any upgrading or decommissioning on site to detail the extent and scope of the pre and post upgrading or decommissioning phase dilapidation surveys; and</li> <li>• as required in accordance with the Development Consent.</li> </ul> <p>Sufficient evidence was provided to the Auditor and observed during the Audit site inspection including road directional, speed restriction signage, driver code of conduct, vehicle monitoring to demonstrate the CTMP is being implemented appropriately. BYCA advised they are currently looking at options for ride share and minibuses where there is peak demand.</p> <p><b>Recommendation</b></p> <p>Update the CTMP as required by DPHI and noted above.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>• Responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding;</li> <li>• Responding to any emergency repair or maintenance requirements; and</li> <li>• A traffic management system for managing over dimensional vehicles;</li> </ul> <p>d) A drivers code of conduct that addresses;</p> <ul style="list-style-type: none"> <li>• Driver fatigue;</li> <li>• Procedures to ensure that drivers adhere to the designated transport routes and speed limits; and</li> <li>• Procedures to ensure that drivers implement safe driving practices;</li> </ul> <p>e) A program to ensure drivers working on the development received suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan.</p> <p>Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>			
<b>LANDSCAPING</b>				
<b>Vegetation Buffer</b>				
10	<p>The Applicant must establish and maintain a vegetation buffer (landscape screening) at the location outlined in figure in Appendix 1 to the satisfaction of the Planning Secretary. The landscape screening must;</p> <ul style="list-style-type: none"> <li>a) Be planted prior to commencing construction;</li> <li>b) Be comprised of predominantly mature tube stock that are endemic to the area;</li> <li>c) Minimise views from receivers R9, R17, R19, R24 and R33 within 3 years of commencing operations;</li> <li>d) Be designed and maintained in accordance with the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent);</li> <li>e) Be properly maintained with replanting programme being undertaken where the vegetation fails to</li> </ul>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> <li>• Letter from DPHI to Neoen titled "Culcairn Solar Farm Vegetation Buffer Planting" dated 28/9/23</li> <li>• Jayfields Nursery Quote dated 21/9/23</li> </ul>	<p>At the time of the Audit site inspection, the vegetation buffer (landscape screening) had not been planted. Neoen noted they had requested an extension of time from DPHI to optimise seasonal planting conditions). DPHI have approved the request nothing that the plantings are to be completed by the end of July 2024. At the time of the Audit site inspection, preparation for the plantings had commenced with evidence provided to the Auditor demonstrating that the procurement of the plants was underway.</p>	Not triggered



Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	f) establish; and Undertake appropriate weed management. Unless the Planning Secretary agrees otherwise.			
<b>Landscaping Plan</b>				
11	<p>Prior to commencing construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with the receivers R9, R17, R24 and R33, to the satisfaction of the Planning Secretary. This plan must include:</p> <ul style="list-style-type: none"> <li>a) A description of measures that would be implemented to ensure that the vegetated buffers achieve the objectives of condition 10 (a)-(f), above;</li> <li>b) A program to monitor and report the effectiveness of these measures; and</li> <li>c) Details of who would be responsible for monitoring, reviewing and implementing the plan; and timeframes for the completion of actions.</li> </ul> <p>Following the Planning Secretary's approval, the Applicant must implement the Landscaping Plan.</p>	<ul style="list-style-type: none"> <li>• Landscape Management Plan (LMP) approved 02/12/2023.</li> <li>• Letter from DPHI to Neoen titled "Landscaping Plan, Culcairn Solar Farm (SSD -10288-Mod 1)" dated 31/1/24</li> </ul>	The LMP was approved by DPHI on the 31/1/24 noting that the landscaping plan meets the requirements of the relevant conditions of consent. During the Audit site inspection, areas where plantings are to be undertaken were observed by the Auditor as marked with green pegs in the field.	Compliant
<b>LAND MANAGEMENT</b>				
12	<p>The Applicant must maintain the agricultural land capability of the site, including;</p> <ul style="list-style-type: none"> <li>a) Establishing the ground over with appropriate perennial species and weed management and</li> <li>b) Maintaining grazing within the development footprint, where possible, unless the Planning Secretary agrees otherwise in writing.</li> </ul>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	There were no agricultural activities being undertaken during the Audit site inspection, this will occur following completion of construction and is an operational requirement.	Not triggered
<b>BIODIVERSITY</b>				
<b>Vegetation Clearance</b>				
13	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance footprint shown in Appendix 1.	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Environmental Work Method Statement Site Establishment and Civil Works" dated 2/1/24</li> </ul>	There was no observed clearing outside the Project boundary footprint. Controls to prevent unauthorised clearing included boundary fencing, "No Go" Signage and fencing.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Biodiversity Offsets</b>				
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 <i>NSW Biodiversity Offsets Scheme</i> and can be achieved by:</p> <ol style="list-style-type: none"> <li>Acquiring or retiring 'biodiversity credits' within the meaning of the <i>Biodiversity Conservation Act 2016</i>;</li> <li>Making payments into an offset fund that has been developed by the NSW Government; or</li> <li>Funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.</li> </ol>	<ul style="list-style-type: none"> <li>BCT Statement Confirming payment into the Biodiversity Conservation fund for an offset obligation, BCT Ref 657 dated 1/2/24</li> </ul>	<p>The BCT statement confirms the retirement of credits to the value of \$657,782.38</p>	Compliant
<b>Biodiversity Management Plan</b>				
15	<p>Prior to commencing construction, the Applicant must prepare a Biodiversity management plan for the development consultation with the BCS, and to the satisfaction of the Planning Secretary. This plan must;</p> <ol style="list-style-type: none"> <li>Include a description of the measures and timeframes that would be implemented for: <ul style="list-style-type: none"> <li>Protecting vegetation and fauna habitat outside the approved disturbance areas;</li> <li>Managing the remnant vegetation and fauna habitat on site;</li> <li>Minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development/</li> <li>Minimising the impacts of fauna on site and implementing fauna management protocols;</li> <li>Avoiding the removal of hollow bearing trees during spring to avoid the main breeding period for hollow dependent fauna;</li> <li>Rehabilitating and revegetating temporary disturbance areas with the species that are</li> </ul> </li> </ol>	<ul style="list-style-type: none"> <li>Biodiversity Management Plan (BMP)(Final V2, dated 16 November 2023)</li> <li>Letter from DPHI to Neoen titled "Culcairn Solar Farm, Biodiversity Management Plan" dated 23/1/23</li> <li>Letter from NGH to BYCA titled "A240034- Culcairn Solar Farm – Pre and Post Clearance Survey Report" dated 12/2/24</li> <li>Culcairn Solar Farm – Environmental Inspection Report dated 9/5/24</li> <li>BYCA Ground disturbance Permit dated 16/4/24</li> <li>EWMS for Site Establishment and Civil Works</li> <li>Toolbox talks with Environmental No Go Zones – Signed</li> <li>Clearing Vegetation Permit (CUP 1) dated 9/2/24</li> </ul>	<p>The BMP was prepared and approved by DPHI on 23/1/23. Measures implemented to minimise impacts to biodiversity include:</p> <ul style="list-style-type: none"> <li>Environmental Protection and "No Go" fencing and signage</li> <li>Appointment of ecologist to oversee the clearing process</li> <li>Pre and post clearance surveys</li> <li>Tree register</li> <li>Appointment of WIRES as the wildlife carer</li> <li>Monitoring of weeds through weekly site inspections</li> <li>Installation of nest boxes</li> <li>Environmental Work Method Statements</li> <li>Toolbox talks to communicate the requirements of the Biodiversity Management Plan, with a specific toolbox talk undertaken to communicate Environmental "No Go Zones"</li> </ul>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>• endemic to the area;</li> <li>• 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</li> <li>• Controlling weeds, feral pests and pathogens;</li> </ul> <p>b) Include a program to monitor and report on the effectiveness of mitigation measures; and</p> <p>c) Include details of those who would be responsible for monitoring, reviewing and implementing the plan.</p> <p>Following the planning secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p><i>Note: If the biodiversity credits are retired via the 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.</i></p>	<ul style="list-style-type: none"> <li>• Clearing Vegetation Permit (CUP 2) dated 20/5/24</li> <li>• Clearing Vegetation Permit (CUP 3) dated 20/5/24</li> </ul>		
<b>AMENITY</b>				
<b>Construction, Upgrading and Decommissioning Hours</b>				
16	<p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades construction, upgrading or decommissioning activities between:</p> <ul style="list-style-type: none"> <li>a) 7am to 6pm Monday to Friday</li> <li>b) 8am to 1pm Saturdays; and</li> <li>c) At no time on Saturdays and NSW public holidays.</li> </ul> <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"> <li>• The delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or</li> <li>• Emergency work to avoid the loss of life, property and/ or material harm to the environment.</li> </ul>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	<p>No Out of Hours (OOH) works have been undertaken at this stage of the Project. An application has been submitted to DPHI to allow cable pulling by hand for the hours of 1pm – 4pm on a Saturday.</p>	Compliant
<b>Noise</b>				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
17	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>c) Minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version; and</li> <li>d) Ensure that the noise generated by the operation of the battery storage facility during the night does not exceed 35dB(A) Laeq,15min to be determined in accordance with the procedures in the <i>NSW Noise Policy for Industry</i> (EPA, 2017) at any non-associated residence.</li> </ul>	<ul style="list-style-type: none"> <li>• BYCA Plant Onboarding Process</li> <li>• Construction Noise and Vibration Monitoring Plan (CNVMP)</li> </ul>	<p>The CNVMP has been prepared and was issued to DPHI. In their response dated 22/1/24, DPHI noted they do not have any comments on the plan.</p> <p><b>Recommendation</b></p> <p>The next phase of work will involve some impact piling for the foundations for the solar panels. It is recommended the neighbours who are impacted by the work are consulted with so if there are any concerns they may have, then the timing of impact piling may be adjusted with appropriate respite times applied to minimise impacts. This may include the preparation of a “Hot Spot” map</p>	Compliant
<b>Dust</b>				
18	<p>The Applicant must minimise the dust generated by the development.</p>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	<p>Measures to minimise dust include the following:</p> <ul style="list-style-type: none"> <li>• Stabilised site access</li> <li>• Hardstand laydown areas</li> <li>• Rumble grid and vehicle washdown</li> <li>• Water carts</li> <li>• Speed restrictions on internal access roads</li> </ul> <p>These measures are deemed appropriate for managing dust on site.</p> <p>No offsite dust impacts were observed during the Audit site inspection.</p> <p>It was noted that in some areas on site where the soil was a powdery “bulldust” material with greater potential to create nuisance where activities are occurring closer to the nearest residents.</p> <p><b>Recommendation</b></p> <p>Develop a “hot spot” map of high-risk areas for dust generation (i.e. closest to residents/fine material) and prioritise mitigation in these areas), this may include the use of dust suppression sprays.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Visual</b>				
19	The Applicant must; <ol style="list-style-type: none"> <li>a) Minimise the off site visual impacts of the development, including the potential for any glare or reflection;</li> <li>b) Ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and</li> <li>c) Not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.</li> </ol>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	At this stage of the development the solar panels had not been installed and there is no glare or glint generated by the current activities.  The site compound was observed be installed in a central location within the site with significant buffer distance with the nearest residents.  Provision was made to plant boundary screening trees with approval to delay the planting of trees received from DPHI.  No advertising signs or logos were observed during the Audit site inspection.	Compliant
<b>Lighting</b>				
20	The Applicant must; <ol style="list-style-type: none"> <li>a) Minimise the off site lighting impacts of the development; and</li> <li>b) Ensures that any external lighting associated with the development;               <ul style="list-style-type: none"> <li>• Is installed as low intensity lighting (except where required for safety or emergency purposes);</li> <li>• Does not shine above the horizontal; and</li> <li>• Complies with <i>Australian/ New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version.</li> </ul> </li> </ol>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	There have not been any lighting installations at the Project to date. All work is currently undertaken during standard working hours with no temporary or mobile lighting required.	Not triggered
<b>HERITAGE</b>				
<b>Protection of Heritage Items</b>				
21	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	NGH consultants have been engaged to oversee the salvage artefacts. NGH have undertaken the	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>identified in Table 1 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 <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version.</p> <p><i>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 6.</i></p>	<ul style="list-style-type: none"> <li>Aboriginal Heritage, Surface Collection Salvage Report, Culcairn Solar Farm, NGH dated 26/4/24</li> <li>Certificates of Completion (Various) – Aboriginal Cultural Session</li> </ul>	<p>salvage work and have produced a Salvage report which notes the following:</p> <ul style="list-style-type: none"> <li>Salvage, via surface collection of Aboriginal heritage items, has been sufficiently carried out in line with the CoA and HMP for the Project by NGH archaeologists with Aboriginal RAP representatives.</li> <li>It was confirmed by NGH archaeologists and the Aboriginal RAP representatives who participated in the surface collection salvage program that all reasonable measures were undertaken at each site inspected and no further mitigation was warranted.</li> <li>Aboriginal Site Impact Recording Forms (ASIRF) were completed and submitted to the AHIMs register as part of the scope of works for all sites within the approved development footprint and approved for impacts under the CoA for this Project.</li> <li>The heritage items recovered from the initial test excavation and recent surface collection salvage program were subject to long term management in line with the HMP and relocated to two separate locations.</li> <li>The initial demarcated/delineation of Aboriginal sites being avoided by the Project was completed in line with the required measures noted in the HMP for the Project.</li> <li>The initial demarcation, delineation of Aboriginal sites being avoided by the Project was being completed in line with the required mitigation measures noted in the HMP by a qualified archaeologist with representatives of the RAPs to ensure no inadvertent impacts occur to Aboriginal Objects.</li> </ul>	

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			<p>In addition to the above, the Auditor notes the following:</p> <ul style="list-style-type: none"> <li>No unexpected finds have been encountered to date</li> <li>The Project induction includes a section on Aboriginal heritage and the unexpected finds process</li> <li>Remaining items of aboriginal heritage significance. Such as the Scar tree (refer to photo 10) were protected with "No Go Fencing"</li> <li>Project team members have received cultural awareness training</li> </ul>	
22	<p>Prior to the carrying out of 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 items 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.</p> <p>Note: The location of the Aboriginal Heritage items referred to in this condition are shown in the figure in Appendix 6</p>	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> <li>Aboriginal Heritage, Surface Collection Salvage Report, Culcairn Solar Farm, NGH dated 26/4/24</li> </ul>	Refer to Auditor's findings in relation to Condition 21 as noted above.	Compliant
<b>Heritage Management Plan</b>				
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> <ol style="list-style-type: none"> <li>Be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary;</li> <li>Be prepared in consultation with Heritage NSW and Aboriginal Stakeholders;</li> <li>Include a description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>Protecting the Aboriginal heritage items</li> </ul> </li> </ol>	<ul style="list-style-type: none"> <li>Heritage Management Plan (HMP) (V2.2, dated 27 November 2023) approved on 01/12/2023.</li> <li>Letter from DPHI to Neoen titled "Culcairn Solar Farm – Heritage Management Plan" dated 23/1/24</li> </ul>	<p>The HMP was approved by DPHI on the 23/1/24.</p> <p>Please refer to Condition 21 above for additional information and evidence demonstrating the effective implementation of the plan.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>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:</p> <ul style="list-style-type: none"> <li>• A contingency plan and reporting procedure if: <ul style="list-style-type: none"> <li>- Previously unidentified heritage items are found; or</li> <li>- Aboriginal skeletal material is discovered;</li> </ul> </li> <li>• Ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of those inductions; and</li> <li>• Ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and</li> </ul> <p>d) Include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the Planning Secretary's approval the Applicant must implement the Heritage Management Plan.</p>			
<b>SOIL AND WATER</b>				
<b>Water Supply</b>				
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.</p> <p><i>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.</i></p>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	<p>Water is supplied by Greater Hume Council, accessed from standpipes and supplied to the Project under a subcontractor agreement.</p> <p><b>Recommendation</b></p> <p>Undertake an internal subcontractor audit to ensure water is being sourced in accordance with the Water Access License</p>	Compliant



Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Water Pollution</b>				
25	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	<ul style="list-style-type: none"> <li>Audit site Inspection 21/5/24</li> <li>Audit Interview 21/5/24</li> <li>Incident Register</li> </ul>	All operating areas were inspected, and it was observed: <ul style="list-style-type: none"> <li>Erosion and Sediment controls have been installed and maintained.</li> <li>Chemicals and fuels were securely stored in bunded containers and away from drainage lines and waterways.</li> <li>There was no observed evidence of pollution, noting that only one minor incident occurred during the audit period.</li> <li>Regular site inspections are undertaken by the BYCA to ensure the risk of water pollution incidents does not occur.</li> </ul>	Compliant
<b>Operating Condition</b>				
26	The Applicant must: <ol style="list-style-type: none"> <li>Minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual, or its latest version;</li> <li>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;</li> <li>Ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and</li> <li>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.</li> </ol>	<ul style="list-style-type: none"> <li>Surface Water Management Plan (SWMP)</li> <li>Erosion and Sediment Control Plan Appendix C of the Soil and Water Management Plan - Culcairn Solar Farm. NGH Pty Ltd. NGH, 2023</li> <li>Email from DPHI to Neoen titled "Culcairn Solar Farm – Surface Water Management Plan" dated 22/1/24</li> <li>Letter from Robert Bird Group titled "Culcairn Solar Farm- Civil Design Creek Crossing Compliance" dated 1/5/24</li> </ul>	DPHI acknowledged receipt of the SWMP on the 22/1/24 and noted they did not have any comments on the plan at this time.  Appropriate erosion and sediment controls were installed included: <ul style="list-style-type: none"> <li>Perimeter sediment fence</li> <li>Stabilised site access</li> <li>Vehicle washdown and rumble grid (under construction)</li> <li>Sealed internal access roads (under construction)</li> <li>Stabilised creek crossings</li> </ul> A suitably qualified Engineer has completed a review of the 80% design of the stormwater and drainage for the main works and notes "after review of the 80% creek crossing design, we can confirm it generally complies with the Department of Planning's "Controlled Activities – Guidelines for Waterway Crossings on	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Waterfront Land" dated 1/5/24.	
<b>HAZARDS</b>				
<b>Fire Safety Study</b>				
27	<p>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:</p> <p>a) Be consistent with the:</p> <ul style="list-style-type: none"> <li>• Department's <i>Hazardous Industry Planning Advisory Paper No.2 'Fire Safety Study' guideline</i>;</li> <li>• NSW Government's <i>Best Practice Guidelines for Contaminated Water Retention and Treatment Systems</i>; and</li> </ul> <p>b) Describe the final design of the battery storage facility.</p> <p>Following completion of the Study, the Applicant must implement the measures described in the Fire Safety Study.</p>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	Not triggered, the battery storage facility has not commenced.	Not Triggered
<b>Safety Management Study</b>				
28	<p>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.</p> <p>The study must include an assessment of potential electrical hazards, and must be consistent with the <i>Australian Standard 2885 for Pipelines – Gas and Liquid Petroleum and Australian Standard 4853-2012 – Electrical Hazards on Metallic Pipelines</i>.</p> <p>Following completion of the Study, the Applicant must implement the measures described in the Safety Management Study.</p>	<ul style="list-style-type: none"> <li>• APA Licence 24 Land Use Change &amp; Encroachment Safety Management Study Rev 0 dated 22/09/2023.</li> <li>• Letter from DPHI titled "Culcairn Solar Farm Safety Management System" dated 13/12/23</li> </ul>	<p>The DPHI approved the Safety Management Study on 13/12/23 and noted "the electrical hazard study required under Australian Standard 4853-2012- Electrical Hazards on Metallic Pipelines is unable to be completed until the earthing designs are finalised.</p> <p>Accordingly, the DPHI requested Neoen to submit a revised Safety Management Study which includes the electrical hazard study (prepared in accordance with AS 4853-2012) prior to commencing the construction and installation of electrical equipment within the gas pipeline easement"</p> <p><b>Recommendation</b></p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			In accordance with the DPHI letter of approval, the safety management system is to be revised and resubmitted to DPHI prior to commencing the construction and installation of electrical equipment within the gas pipeline easement. This work had not commenced at the time of the Audit site inspection.	
<b>Storage and Handling of Dangerous Goods</b>				
29	<p>The Applicant must store and handle all chemicals, fuels and oils used on site in accordance with:</p> <ul style="list-style-type: none"> <li>a) The requirements of all relevant Australian Standards; and</li> <li>b) The NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> if the chemicals are liquids.</li> </ul> <p>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirements must prevail to the extent of the inconsistency.</p>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> </ul>	Only minor volumes of fuels and chemicals were stored on site. Fuels and chemicals were stored in appropriately bunded areas with spill kits available to clean up any spills.	Compliant
<b>Bush Fire Management</b>				
30	<p>The Applicant must;</p> <ul style="list-style-type: none"> <li>d) Minimise the fire risks of the development, including managing vegetation fuel loads on site;</li> <li>e) Ensure that the development; <ul style="list-style-type: none"> <li>• Includes at least a 10 metre defendable space around the perimeter of the solar array area that permits unobstructed vehicle access;</li> <li>• Manages the defendable space and solar array areas as an Asset Protection Zone;</li> <li>• Complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019 (or equivalent)</i> and <i>Standards for Asset Protection Zones</i>;</li> <li>• Is suitably equipped to respond to any fires on site including provision of a 40,000 litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Email from DPHI titled "Culcairn Solar Farm, Bushfire and Emergency Plan" dated 23/1/24"</li> <li>• Audit site Inspection 21/5/24</li> </ul>	<p>During the Audit site inspection, the following measures were observed to be implemented to minimise the risk of bushfire:</p> <ul style="list-style-type: none"> <li>• Mobile 40,000L fire water tank</li> <li>• Provision for 10m defendable space around the perimeter of the solar facility</li> <li>• Fire extinguishers located at both the site compound areas and within each site vehicle.</li> <li>• Other materials and equipment that may be deployed in the event of a fire such as excavators and spoil.</li> </ul> <p>The Project is in a high-risk area for bushfire. Although summer is 5 months away, there is a need to ensure the Project is fully equipped to prevent and respond to any fire related incidents</p> <p><b>Recommendation</b></p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>connection located adjacent to an internal access road;</p> <p>f) Assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>g) Notify the relevant local emergency management committee following construction of the development, and prior to the commencing of operations.</p>		<p>Conduct a pre-bushfire season readiness review to ensure all obligations and commitments relating to Fire and Emergency are implemented and are compliant. It is recommended the review should focus on the activities noted in the Bushfire Management including (but not limited to):</p> <ul style="list-style-type: none"> <li>• Onsite Preparedness Activities</li> <li>• Firefighting water supplies and equipment</li> <li>• Access and egress for emergency vehicles</li> <li>• Emergency Response</li> <li>• Communication Protocols</li> </ul> <p>Involve suitably qualified personnel in the review as required. A record of the review should be kept.</p>	
<b>Emergency Plan</b>				
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> <p>a) Be consistent with the Department's <i>Hazardous Industry Planning Advisory Paper No. 1 'Emergency Planning'</i> and RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent);</p> <p>b) Identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;</p> <p>c) List works that should not be carried out during a total fire ban</p> <p>d) Include availability of fire suppression equipment, access and water;</p> <p>e) Include procedures for the storage and maintenance of any flammable materials;</p> <p>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</p>	<ul style="list-style-type: none"> <li>• Culcairn Solar Farm, Bushfire and Emergency Plan (BEP), NGH 19/1/24</li> <li>• Email from APA to Neoen titled "APA448542 RE: Culcairn Solar Farm – Emergency Management Plan for APA comments" dated 31/10/23</li> <li>• Email from Fire and Rescue NSW titled "Culcairn Solar Farm Finalized Bushfire and Emergency Plan +ESIP"</li> <li>• Email from RFS to Neoen titled "Culcairn Solar Farm- Finalized EMP- RFS No objection"</li> </ul>	<p>The BEP was issued to the owners of the gas pipeline (APA) who confirmed they do not have any comments.</p> <p>Fire and Rescue NSW noted they are satisfied with the BEP as it relates to this stage of the Project.</p> <p>The BEP was kept on site in an easily accessible location (with the other management plans)</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>emergency;</p> <p>g) Include a figure showing site infrastructure, Asset Protection zone and the on site water tank;</p> <p>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;</p> <p>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;</p> <p>j) Include bushfire emergency management planning; and</p> <p>k) Include details of how the RFS would be notified, and procedures that would be implemented, in the event that;</p> <ul style="list-style-type: none"> <li>• There is a fire on site or in the vicinity of the site</li> <li>• There are any activities on site that would have the potential to ignite surrounding vegetation; or</li> <li>• There are any proposed activities to be carried out during a bushfire danger period; and</li> <li>• Offer representatives of the local RFS brigade an opportunity to undertake a site familiarisation following construction of the development, and prior to commencing operations.</li> </ul> <p>Following approval the Applicant must implement the Emergency Plan.</p>			
<b>WASTE</b>				
32	<p>The Applicant must;</p> <p>a) Minimise the waste generated by the development</p> <p>b) Classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version);</p> <p>c) Store and handle all waste on site in accordance with its classification;</p>	<ul style="list-style-type: none"> <li>• Audit site Inspection 21/5/24</li> <li>• Audit Interview 21/5/24</li> <li>• Waste tracking register</li> </ul>	<p>Minimal waste has been produced on the Project to date, a water tracking register has been prepared.</p> <p>Only non- hazardous waste, wastewater/sewage and office waste has been generated by the Project to date.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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 licenced waste facility for disposal.		Appropriate waste and recycling facilities have been provided on site.	
<b>ACCOMMODATION AND EMPLOYMENT STRATEGY</b>				
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"> <li>Propose measures to ensure there is sufficient accommodation for the workforce associated with the development;</li> <li>Consider the cumulative impacts associated with other State significant development projects in the area;</li> <li>Investigate options for prioritising the employment of local workers for the construction and operation of the development where feasible; and</li> <li>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.</li> </ol> <p>Following the Planning Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.</p>	<ul style="list-style-type: none"> <li>Accommodation and Employment Strategy (AES) (V4, dated September 2023)</li> <li>Letter from DPPI to Neoen titled "Culcairn Solar Farm Accommodation and Employment Strategy" dated 8/11/23</li> <li>Audit Interview 20/6/24</li> </ul>	<p>The AES has been prepared and approved by DPPI on the 8/11/24.</p> <p>At the early stages of the project, there is limited workforce requiring temporary accommodation. Project staff and visitors are accommodated in Albury, most of the workforce lives in Albury, Wagga and Culcairn. BYCA have secured some rental houses for the Project, however in the interim are utilising local hotels while more rental accommodation is being secured.</p> <p>There are no plans to establish a camp at the Project site. BYCA has appointed an experienced and local Community Engagement and Social Procurement Manager (CESP) who is responsible for the implementation of the Strategy. The CESP interacts with local businesses and attends business forums (such as Wagga Wagga Chamber of Commerce).</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			<p>Neoen have appointed an Aboriginal Liaison officer whose role is to engage with the local Aboriginal community, identify and facilitate employment opportunities. Some local aboriginal labour hire companies have been procured to date. Indigenous Participation Officer attended group meetings such as AWAHS mens and womens groups on 17th and 19th June, Mungabareena Aboriginal Corporation Womens group on 19th June and the Riverina Murray Regional Alliance community on 25th June. Attended the June meeting of the Wiradjuri Elders Dyiraamalang group and liaised with TVN on Country, Asuria, CVGT which are Indigenous Construction companies.</p>	
<b>DECOMMISSIONING AND REHABILITATION</b>				
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"> <li>a) Include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Table 4 below;</li> <li>b) Describe the measures that would be implemented to; <ul style="list-style-type: none"> <li>• Decommission the development and rehabilitate the site in accordance with the objectives in Table 4;</li> <li>• Minimise and manage the waste generated by the decommissioning of the development; and</li> <li>• Include a program to monitor and report on the implementation of these measures against the detailed completion criteria.</li> </ul> </li> </ol> <p>The Applicant must decommission and rehabilitate the site in accordance with the approved Decommissioning and Rehabilitation Plan.</p>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	Not triggered until following operation	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
35	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.	<ul style="list-style-type: none"> <li data-bbox="927 256 1016 280">• N/A</li> </ul>	Not triggered until following operation	Not Triggered



### Schedule 4 – Environmental Management and Reporting

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>ENVIRONMENTAL MANAGEMENT</b>				
<b>Environmental Management Strategy</b>				
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> <ol style="list-style-type: none"> <li>a) Provide the strategic framework for environmental management of the development;</li> <li>b) Identify the statutory approvals that apply to the development;</li> <li>c) Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</li> <li>d) Describe the procedures that would be implemented to:               <ul style="list-style-type: none"> <li>• Keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>• Receive, handle, respond to and record complaints;</li> <li>• Resolve any disputes that may arise;</li> <li>• Respond to any non-compliance;</li> <li>• Respond to emergencies; and</li> </ul> </li> <li>e) Include;               <ul style="list-style-type: none"> <li>• References to any plans approved under the conditions of this consent; and</li> <li>• A clear plan depicting all the monitoring to be carried out in relation to the development.</li> </ul> </li> </ol>	<ul style="list-style-type: none"> <li>• Environmental Management Strategy (EMS) (Rev V5, January 2024) approved on 25/01/2024.</li> <li>• Letter from DPHI to Neoen titled “Environmental Management Strategy” dated 25/1/24</li> </ul>	<p>The EMS was approved by DPHI on the 25/1/24. Sufficient evidence was observed during the audit to demonstrate effective implementation of the plan.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.			
<b>Revision of Strategies, Plans and Programs</b>				
2	<p>The Applicant must:</p> <p>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</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"> <li>• Submission of an incident report under condition 7 of Schedule 4;</li> <li>• Submission of an audit report under condition 11 of Schedule 4; or</li> <li>• Any modification to the conditions of this consent.</li> </ul>	<ul style="list-style-type: none"> <li>• Audit interview 21/5/24</li> </ul>	No changes to the strategies or plans have been made to date. Neither an incident report, audit report or modification has been undertaken during the audit period. The plans and strategies will need to be reviewed following this audit.	Not Triggered
<b>Updating and Staging of Strategies, Plans or Programs</b>				
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.</p> <p>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</p>	<ul style="list-style-type: none"> <li>• Audit interview 21/5/24</li> <li>• Letter from DPHI to Neoen titled "Request to Stage Traffic Management Plan and Environmental Management Strategy" dated 23/11/23</li> </ul>	DPHI have approved the staged preparation of the TMP and EMS in five stages.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>condition of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• While any strategies, 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.</li> <li>• If the submission of any strategy, plan or program is to be staged then the relevant strategy, play or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any further stages, and the trigger for updating the strategy, plan or program.</li> </ul>			
<b>NOTIFICATIONS</b>				
<b>Notification of Department</b>				
4	<p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> <li>• Letter from Neoen to DPHI titled "Culcairn Solar Farm (SSD 10388)- Notice of Upgrade Commencement and expected onsite Construction Start" dated 18/1/24</li> <li>• Letter from DPHI to Neoen titled "Culcairn Solar Farm, Notice of Road Upgrade Commencement – 29 January 2024- Onsite Construction Commencement – 2 April 2024" dated 22/1/24</li> <li>• Letter from DPHI to Neoen titled "Culcairn Solar Farm, Notice of new commencement date of construction on site – 18 March" dated 14/3/24</li> </ul>	<p>Neoen provided formal notification to DPHI on 18 January 2024 stating that works would commence 24 January 2024. DPHI issued a response noting Neoen's obligations.</p> <p>A further update was provided to DPHI on 13/3 24 advising the revised construction commencement date of 18/3/24</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Final Layout Plans</b>				
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.	<ul style="list-style-type: none"> <li>• Culcairn Solar Farm, Final Layout Plans, drawing number NEO-CUSF-1000PV-DWG-1</li> <li>• Email from Neoen to DPHI titled "Culcairn Solar Farm – Final Layout Plans SSD-10288 – PA 36 – Request for Additional Information</li> <li>• Culcairn Solar Farm SSD Post Approval document" dated 6 May 2024</li> </ul>	A copy of the final layout plans are provided on the Neoen Project website and were submitted to DPHI prior to the commencement of construction. The plans were reviewed by DPHI with comments received and addressed by Neoen.	Compliant
<b>Work as Executed Plans</b>				
6	Prior to commencing operations or following upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development comparison to the approved final layout plans to the Department via the Major Projects website.	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	Condition is not triggered until the commencement of operations	Not Triggered
<b>Incident Notification</b>				
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.	<ul style="list-style-type: none"> <li>• Audit interview 21/5/24</li> <li>• Incident Register</li> </ul>	Not triggered – there have been no incidents on site to date that would trigger this requirement. The Auditor reviewed the incident register, and one minor oil spill was noted which was cleaned up and disposed of appropriately,	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Non-Compliance Notification</b>				
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	<ul style="list-style-type: none"> <li>Audit interview 21/5/24</li> </ul>	There have been no non compliances reported to date.	Not Triggered
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.	<ul style="list-style-type: none"> <li>Audit interview 21/5/24</li> </ul>	There have been no non compliances reported to date.	Not Triggered
10	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	<ul style="list-style-type: none"> <li>Audit interview 21/5/24</li> </ul>	There have been no non compliances reported to date.	Not Triggered
<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>				
11	Independent Audits of the development must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> to the following frequency: <ol style="list-style-type: none"> <li>Within 3 months of the commencing construction; and</li> <li>Within 3 months of the commencement of operations.</li> </ol>	<ul style="list-style-type: none"> <li>This Audit report</li> </ul>	This is the initial audit undertaken on the 21 <sup>st</sup> of May 2024 within 3 months of the commencement of construction.	Compliant
12	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	<ul style="list-style-type: none"> <li>DPHI letter dated 02/01/2024</li> <li>DPHI Reference: SSD-10288-PA-22</li> </ul>	Independent Auditors were approved by DPHI on 2/1/24. The letter of approval is provided in Appendix A	Compliant
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	<ul style="list-style-type: none"> <li>Audit Interview 21/5/24</li> </ul>	The Planning Secretary has not requested initial and subsequent audits to be undertaken at different times to those specified in Condition 11, Schedule 4	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	must be commenced.			
14	<p>In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements (2020)</i>, the Applicant must:</p> <ol style="list-style-type: none"> <li>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;</li> <li>b) Submit the response to the Planning Secretary; and</li> <li>c) Make each Independent Audit Report, and response to it, publicly available within 60 days of the submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.</li> </ol>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	Not triggered, however it is noted that this requirement needs to be fulfilled following completion of this audit.	Not Triggered
DREEEEEEE EEEEEEEEEE EEEEEEEEEE EEEEEEEEEE EEEEEEZ	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 <i>Independent Audit Post Approvals Requirements (2020)</i> unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	Not triggered, however it is noted that this requirement needs to be fulfilled following completion of this audit.	Not Triggered
16	Notwithstanding the requirements of the <i>Independent Audit Post Approvals Requirements (2020)</i> , 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.	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	Not triggered, condition related to the operational stage	Not Triggered
<b>ACCESS TO INFORMATION</b>				
17	The Applicant must; <ol style="list-style-type: none"> <li>a) Make the following information publicly</li> </ol>	<a href="#">Culcairn Solar Farm - Clean Energy For NSW</a>	The following plans documents were provided on the website:	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>available on its website as relevant to the stage of the development;</p> <ul style="list-style-type: none"> <li>• The EIS;</li> <li>• The final layout plans for the development;</li> <li>• Current statutory approvals for the development;</li> <li>• Approved strategies, plans or programs required under the conditions of this consent;</li> <li>• The proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;</li> <li>• How complaints about the development can be made;</li> <li>• Provide a 24hr telephone line and instruction as to how complaints or enquiries about how the development can be made;</li> <li>• Any independent environmental audit, and the Applicant's response to the recommendations in any audit; and</li> <li>• Any other matter required by the Planning Secretary; and</li> </ul> <p>b) Keep this information up to date.</p>		<ul style="list-style-type: none"> <li>• Environmental Impact Statement 2020</li> <li>• Submissions Report</li> <li>• Amendment Report</li> <li>• Accommodation and Employment Strategy</li> <li>• Biodiversity Management Plan</li> <li>• Construction &amp; Noise Vibration Management Plan</li> <li>• Environmental Management Strategy</li> <li>• Groundcover Management Plan</li> <li>• Heritage Management Plan</li> <li>• Landscape Plan</li> <li>• Soil and Water Management Plan</li> <li>• Traffic Management Plan</li> <li>• Waste Management Plan</li> <li>• Community Communication Strategy</li> <li>• Final Layout Plans</li> <li>• Link to Major Portal website</li> </ul> <p>Complaints Management:</p> <ul style="list-style-type: none"> <li>• 24hr phone line</li> <li>• Complaints process</li> <li>• Email address</li> </ul>	

## Appendix C Site Photographs

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**Photo 1:** Designated refuelling area



**Photo 2:** Waste storage bins



**Photo 3:** Temporary Vehicle washdown and rumble grid construction



**Photo 4:** Stabilised site access



**Photo 5:** Firewater truck



**Photo 6:** Spill kit and self-bunded generators



**Photo 7:** Mobile spill kit in site vehicle



**Photo 8:** Mobile fire extinguisher in site vehicle



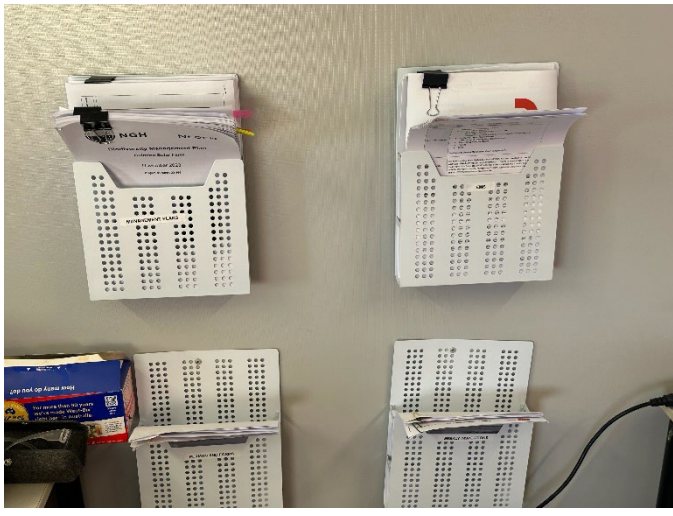
**Photo 9:**



**Photo 10:** Aboriginal scar tree protected by "No Go" fencing



**Photo 11:** Watercart utilised for dust suppression



**Photo 12:** Management plans on site in accessible location



**Photo 13:** Site access, intersection signage



**Photo 14:** Speed restriction signage



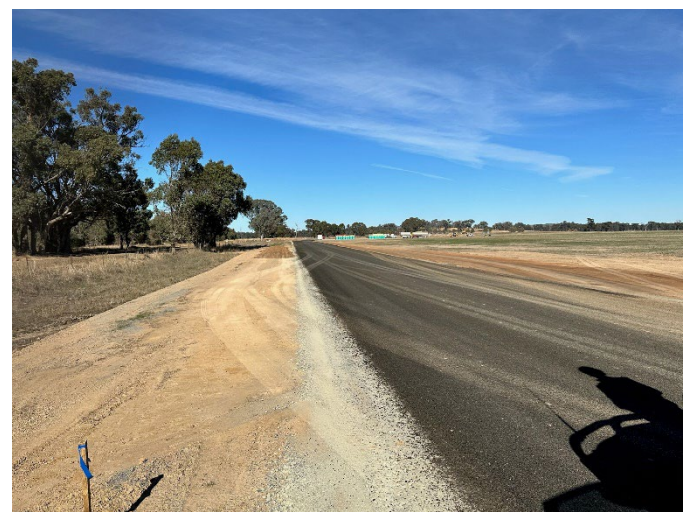
**Photo 15:** Completed road upgrade



**Photo 16:** Traffic restriction signage and upgraded road



**Photo 17:** Stockpiled materials and sediment controls



**Photo 18:** Internal sealed access road



**Photo 19:** Restricted access, no go fencing and signage for APA zone



**Photo 20:** Site boundary fencing and survey marker



**Photo 21:** Temporary creek crossing, scour protection



**Photo 22:** Nest box installation



**Photo 23:** Drainage culverts, internal access road



**Photo 24:** Cleared vegetation retained

## Appendix D Stakeholder Consultation

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## Appendix D-1 Consultation Summary

Organisation	Key Issues/Comments	Auditor Response
DPHI	<ul style="list-style-type: none"> <li>Road upgrades undertaken to the satisfaction</li> </ul> <hr/> <ul style="list-style-type: none"> <li>Compliance with management plans commitments;</li> </ul> <hr/> <ul style="list-style-type: none"> <li>Compliance vegetation clearance (condition 13)</li> </ul> <hr/> <ul style="list-style-type: none"> <li>Protection of heritage items (conditions 20 and 21)</li> </ul> <hr/> <ul style="list-style-type: none"> <li>Landscaping prior to commencement (condition 10)</li> </ul>	<ul style="list-style-type: none"> <li>The construction access point on Weeamera Road has been completed. Greater Hume Council and DPHI approved an extension of 12 weeks to allow this to occur. The design was provided to Greater Hume Council who reviewed the design and confirmed it is acceptable to Council.</li> </ul> <hr/> <ul style="list-style-type: none"> <li>Sufficient evidence was provided to the Auditor and as observed during the Audit site inspection to demonstrate the effective implementation of the management plans.</li> </ul> <hr/> <ul style="list-style-type: none"> <li>Clearing activities have been undertaken under the supervision of a suitably qualified ecologist. Key mitigations observed during the audit included preclearance inspections, environmental exclusion fencing and the installation of nestboxes.</li> </ul> <hr/> <ul style="list-style-type: none"> <li>NGH consultants have been engaged to oversee the salvage artefacts. NGH have undertaken the salvage work and have produced a report which notes compliance with Conditions 20 and 21. Refer to the Auditor's findings to Condition 20 for further information.</li> </ul> <hr/> <ul style="list-style-type: none"> <li>At the time of the Audit site inspection, the vegetation buffer (landscape screening) had not been planted. Neoen noted they had requested an extension of time from DPHI to optimise seasonal planting conditions). DPHI have approved the request nothing that the plantings are to be completed by the end of July 2024. At the time of the Audit site inspection, preparation for the plantings had commenced with evidence provided to the Auditor demonstrating that the procurement of the plants was underway.</li> </ul>

Organisation	Key Issues/Comments	Auditor Response
	<ul style="list-style-type: none"> <li>Dust and noise controls and management;</li> </ul>	<ul style="list-style-type: none"> <li>Both dust and noise are being managed effectively through erosion and sediment controls, stockpile management, water carts, sealed internal roads, compliance with working hours and effective operations and maintenance of equipment. Two recommendations for improvement have been made in relation to dust and noise management (refer to Section 3.2).</li> </ul>
	<ul style="list-style-type: none"> <li>Erosion and Sediment controls and management;</li> </ul>	<ul style="list-style-type: none"> <li>Appropriate erosion and sediment controls have been installed as evidenced by the Auditor during the Audit site inspection.</li> </ul>
	<ul style="list-style-type: none"> <li>Assessment of predicated vs actual impacts;</li> </ul>	<ul style="list-style-type: none"> <li>An assessment of predicted vs actual impacts is provided in Section 3.9 of the Audit report.</li> </ul>
	<ul style="list-style-type: none"> <li>Community Communication Strategy</li> </ul>	<ul style="list-style-type: none"> <li>BYCA have engaged a full-time site-based Community Engagement and Social Procurement Manager to facilitate the implementation of the plan. Sufficient evidence was provided to the Auditor to demonstrate the effective implementation of the plan. Refer to the Auditor's finding in relation to Schedule 2 Condition 13 for further information.</li> </ul>
	<ul style="list-style-type: none"> <li>Complaints register and management thereof</li> </ul>	<ul style="list-style-type: none"> <li>A complaints register has been developed and is kept up to date.</li> </ul>
NSW EPA	<ul style="list-style-type: none"> <li>The EPA has responsibilities for pollution control and environmental management for scheduled activities under the Protection of the Environment Operations Act 1997 (POEO Act). Solar Farms are not scheduled under the POEO Act and therefore Greater Hume Shire Council is the appropriate regulatory authority for matters relating to the POEO Act for that project. We recommend you consult with Greater Hume Shire Council for comments.</li> </ul>	<ul style="list-style-type: none"> <li>Noted, Greater Hume Council were consulted, and no comments were received. In any case there have been no incidents that would result in pollution. Appropriate pollution controls were implemented as observed during the Audit site inspection.</li> </ul>
	<p><b>Schedule 3, Condition 10 – Vegetation Buffer</b></p> <ul style="list-style-type: none"> <li>Have the landscape screenings been planted prior to construction as required?</li> <li>Are the landscape screenings comprised of predominantly mature tube stock that are endemic to the area as required?</li> </ul>	<ul style="list-style-type: none"> <li>At the time of the Audit site inspection, the vegetation buffer (landscape screening) had not been planted. An extension of time was granted by DPHI to allow completion of the planting by the end of July 2024. At the time of the Audit site inspection, preparation for the plantings had commenced with evidence provided to the Auditor demonstrating that the procurement of the plants was underway. Refer to the Auditor's finding in relation to Schedule 3 Condition 10 for further information</li> </ul>



Organisation	Key Issues/Comments	Auditor Response
	<p><b>Schedule 3, Condition 13 – Vegetation Clearance</b></p> <ul style="list-style-type: none"> <li>Has any clearing of native vegetation or fauna habitat occurred outside of the approved development footprint shown in Appendix 1 of the Approval?</li> </ul>	<ul style="list-style-type: none"> <li>There have not been any clearing activities outside approved development footprint during the Audit period. Refer to the Auditor’s finding in relation to Schedule 3 Condition 13 for further information.</li> </ul>
	<p><b>Schedule 3, Condition 14 – Biodiversity Offsets</b></p> <ul style="list-style-type: none"> <li>Have all biodiversity credits been retired prior to construction as required?</li> </ul>	<ul style="list-style-type: none"> <li>Biodiversity offsets were retired prior to construction. Refer to the Auditor’s finding in relation to Schedule 3 Condition 14 for further information</li> </ul>
	<p><b>Schedule 3, Condition 15 – Biodiversity Management Plan</b></p> <ul style="list-style-type: none"> <li>Are the mitigation measures outlined in Table 6-4 of the Biodiversity Management Plan dated January 2024 (Final v3NS) being implemented?</li> <li>Are the habitat and vegetation protection measures listed under section 6.3 of the Biodiversity Management Plan being implemented? Such as: <ul style="list-style-type: none"> <li>No stockpiling or storage occurring within the dripline of any native trees</li> <li>Permanently fencing sensitive environmental areas</li> </ul> </li> <li>Are the guidelines for the removal of hollow bearing trees being followed?</li> <li>Are the clearing protocols being followed?</li> <li>Were baseline weed surveys completed prior to clearing?</li> <li>Have nest boxes been installed prior to clearing?</li> </ul>	<ul style="list-style-type: none"> <li>The Auditor was provided with sufficient evidence to demonstrate the effective implementation of Table 6-4 of the Biodiversity Management Plan, noting the following: <ul style="list-style-type: none"> <li>No stockpiling or materials were stored beneath the driplines of trees</li> <li>Temporary fencing has been installed around sensitive environmental areas</li> <li>Sufficient evidence was provided to the Auditor to demonstrate the clearing protocols and the guidelines for the removal of hollowing bearing trees are being followed</li> <li>Baseline weed surveys were completed prior to clearing and are included in the Pest and Weed Management Plan, provided in Appendix H of the Biodiversity Management Plan</li> <li>Nestboxes were installed prior to clearing as observed during the Audit site inspection</li> </ul> </li> <li>Refer to the Auditor’s findings to Schedule 3, Condition 15 for further information.</li> </ul>
<p>Fire and Rescue NSW</p>	<ul style="list-style-type: none"> <li>A draft Fire Management Plan (FMP) shall be prepared for the proposed facility and provided to the local NSW RFS District Office for comment. Any return comment from the District shall be adopted into an amended FMP.</li> <li>The entire solar array development footprint shall be managed as an asset protection zone as outlined within section 4.1.3 of Planning for</li> </ul>	<p>The RFS response to the Auditor was the information provided to the Applicant during the Environmental Assessment phase, however the Auditor notes the following:</p> <ul style="list-style-type: none"> <li>The fire management plan has been prepared and submitted to RFS</li> <li>Provision has been made for the asset protection zone as</li> </ul>

Organisation	Key Issues/Comments	Auditor Response
	<p>Bush Fire Protection 2006 and the NSW RFS document Standards for asset protection zones.</p> <ul style="list-style-type: none"> <li>To allow for emergency service personnel to undertake property protection activities, a minimum 10-metre defendable space, managed as an asset protection zone, shall be provided around the buildings, substation, battery storage units, around the outside perimeter of the solar array, and around all areas of unmanaged vegetation being retained within the site.</li> <li>An access road designed and constructed to comply with the specifications outlined in section 4.1.3(3) of</li> <li>Planning for Bush Fire Protection 2006 shall be provided along the property boundary/fence line and around all areas of unmanaged vegetation being retained within the site.</li> <li>A minimum 20,000-litre water supply (tank) fitted with a 65mm Storz fitting shall be located adjoining the internal property access road within the required asset protection zone.</li> </ul>	<p>observed during the Audit site inspection</p> <ul style="list-style-type: none"> <li>Internal access roads were properly sealed and were in the process of construction</li> <li>A temporary water supply tank was provided on site, with the procurement of the permanent tank underway.</li> <li>A recommendation is made to conduct a pre-fire season preparedness review</li> </ul>
Heritage NSW	<ul style="list-style-type: none"> <li>No response received</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
Local Aboriginal Land Council	<ul style="list-style-type: none"> <li>No response received</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
DPHI (Water)	<ul style="list-style-type: none"> <li>The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: <ul style="list-style-type: none"> <li>Water Management Plans and related sub-plans e.g. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.</li> <li>Extraction Plans and related sub-plans e.g. Water Management Plan, Subsidence Management Plan.</li> </ul> </li> <li>The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.</li> <li>Water supply availability is clearly defined for the Project.</li> <li>Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.</li> <li>Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.</li> </ul>	<ul style="list-style-type: none"> <li>Although not required by the conditions of approval, the following management Plans have been prepared with sufficient evidence provided to the Auditor and observed during the Audit site inspection: <ul style="list-style-type: none"> <li>Soil and Water Management Plan</li> <li>Spill response procedure</li> <li>Erosion and Sediment Control Plan</li> </ul> </li> <li>Minimal water has been consumed by the Project to date, an agreement with Greater Hume Council has been entered into to supply water from an existing Council Borehole</li> <li>The works will not result in impacts to groundwater (groundwater depths are &gt;100m) and this is addressed in the Soil and Water Management Plan.</li> </ul>

Organisation	Key Issues/Comments	Auditor Response
	<ul style="list-style-type: none"> <li>Water Access Licence/s used to account for water take by the Project nominates the work where the water is being taken from.</li> <li>Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.</li> </ul>	
Transport for NSW	<ul style="list-style-type: none"> <li>No response received</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
Greater Hume Council	<ul style="list-style-type: none"> <li>No response received</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>

## Appendix D-2 Correspondence Issued

**From:** Richard Peterson <richard.peterson-trigalana@outlook.com>  
**Sent:** Monday, 22 April 2024 3:12 PM  
**To:** Richard Peterson; Katrina O'Reilly  
**Cc:** DPE PSVC Compliance Mailbox  
**Subject:** RE: SSD10288 - Culcairn Solar Independent Environmental Audit - Consultation

Hi Katrina,

I am sure you are aware, I have been engaged to undertake the initial construction audit of the Culcairn Solar Farm, (SSD 10288).

At this stage, the audit site inspection is planned for the 21<sup>st</sup> of May 2024.

The audit will be undertaken in accordance with the DPHI Independent Post Approval Requirements (PAR) (2020)

The purpose of this email is to:

- Formally consult with the Department in relation to any matters or focus areas the Department considers relevant to the audit
- Confirm with the Department the details of the parties to be consulted with in relation to the audit

If you could please advise in relation to the above, that would be greatly appreciated. I would appreciate a response by 11/5/24

If any questions, please call me on the number below

Many thanks and regards



**Richard Peterson | Director**  
**Trigalana Environmental Pty Ltd**

**M:** 0429 227 775

**E:** [Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

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**From:** Richard Peterson  
**Sent:** Monday, 6 May 2024 2:45 PM  
**To:** Richard Peterson; [andrew.fisher@environment.nsw.gov.au](mailto:andrew.fisher@environment.nsw.gov.au)  
**Cc:** Simon Maffei; Michael Todd  
**Subject:** SD10288 - Culcairn Solar Independent Environmental Audit - Consultation

Hi Andrew

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. This link [Culcairn Solar Farm - Clean Energy For NSW](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 21st of May 2024 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with BCD so that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 May 2024 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



**Richard Peterson | Director**  
**Trigalana Environmental Pty Ltd**  
**M:** 0429 227 775  
**E:** [Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

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**From:** Richard Peterson  
**Sent:** Monday, 6 May 2024 2:39 PM  
**To:** Richard Peterson; DPIE Water Assessments Mailbox  
**Cc:** Timothy Baker  
**Subject:** SD10288 - Culcairn Solar Independent Environmental Audit - Consultation

To the DPE Water assessments team

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. This link [Culcairn Solar Farm - Clean Energy For NSW](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 21st of May 2024 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with DPHI Water so that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 May 2024 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



**Richard Peterson | Director**  
**Trigalana Environmental Pty Ltd**  
**M:** 0429 227 775  
**E:** [Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

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**From:** Richard Peterson  
**Sent:** Monday, 6 May 2024 2:32 PM  
**To:** Richard Peterson; info@epa.nsw.gov.au  
**Subject:** SD10288 - Culcairn Solar Independent Environmental Audit - Consultation

To the EPA

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. This link [Culcairn Solar Farm - Clean Energy For NSW](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 21<sup>th</sup> May 2024 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with EPA so any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 May 2024 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



**Richard Peterson | Director**  
**Trigalana Environmental Pty Ltd**

**M:** 0429 227 775

**E:** [Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

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**From:** Richard Peterson  
**Sent:** Monday, 6 May 2024 2:27 PM  
**To:** Richard Peterson; mail@greaterhume.nsw.gov.au <mail@greaterhume.nsw.gov.au>  
**Subject:** SSD10288 - Culcairn Solar Independent Environmental Audit - Consultation

Hi there

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. This link [Culcairn Solar Farm - Clean Energy For NSW](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 21<sup>th</sup> May 2024 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with Council so any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 May 2024 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



**Richard Peterson** | Director  
**Trigalana Environmental Pty Ltd**  
**M:** 0429 227 775  
**E:** [Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

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**From:** Richard Peterson  
**Sent:** Monday, 13 May 2024 6:17 PM  
**To:** Mark Saddler  
**Subject:** Culcairn Solar Farm - Independent Environmental Audit

Hi Mark

You may remember we have spoken before regarding various projects (Walla Walla Solar Farm and Energy connect)

I have another audit coming up in the next few weeks for Culcairn Solar Farm and would like to get your feedback regarding any issues you would like me to look at for the audit.

Let me know if you want to do this on the phone and when suits you.



**Richard Peterson** | Director

**Trigalana Environmental Pty Ltd**

**M:** 0429 227 775

**E:** [Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

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**From:** Richard Peterson  
**Sent:** Monday, 6 May 2024 3:02 PM  
**To:** info@fire.nsw.gov.au  
**Subject:** SSD10288 - Culcairn Solar Independent Environmental Audit - Consultation

To NSW Fire and Rescue

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. This link [Culcairn Solar Farm - Clean Energy For NSW](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 21st of May 2024 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with NSW Fire and Rescue so that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 May 2024 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



**Richard Peterson** | Director  
**Trigalana Environmental Pty Ltd**  
**M:** 0429 227 775  
**E:** [Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

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**From:** Richard Peterson  
**Sent:** Monday, 6 May 2024 2:41 PM  
**To:** OEH HD Heritage Mailbox  
**Subject:** SD10288 - Culcairn Solar Independent Environmental Audit - Consultation

To NSW Heritage team

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. This link [Culcairn Solar Farm - Clean Energy For NSW](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 21st of May 2024 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with Heritage NSW so that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 May 2024 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



**Richard Peterson | Director**  
**Trigalana Environmental Pty Ltd**

**M:** 0429 227 775

**E:** [Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

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**From:** Richard Peterson  
**Sent:** Monday, 13 May 2024 6:23 PM  
**To:** andom.rendell1975@gmail.com  
**Subject:** Culcairn Solar Farm

Hi Andom,

Your contact details were provided to me by Neoen, in relation to the Culcairn Solar Farm.

I am doing an independent environmental audit for the project in the next few weeks and would like to consult with you in regards to the project and to understand any issues you may have for me to include in the audit.

Let me know if you have time for a chat on the phone and the best number to call you on.

If you need more information, i am happy to provide before we talk

All the best

Richard Peterson

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**From:** Richard Peterson  
**Sent:** Monday, 6 May 2024 3:07 PM  
**To:** webmaster@rfs.nsw.gov.au  
**Subject:** RE: SSD10288 - Culcairn Solar Independent Environmental Audit - Consultation

To NSW Rural Fire Service

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. This link [Culcairn Solar Farm - Clean Energy For NSW](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 21st of May 2024 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with NSW Rural Fire Service so that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 May 2024 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



**Richard Peterson | Director**

**Trigalana Environmental Pty Ltd**

**M:** 0429 227 775

**E:** [Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

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**From:** Richard Peterson  
**Sent:** Monday, 6 May 2024 3:21 PM  
**To:** Kylie-Anne.PONT@transport.nsw.gov.au  
**Subject:** SSD10288 - Culcairn Solar Independent Environmental Audit - Consultation

Hi Kylie

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. This link [Culcairn Solar Farm - Clean Energy For NSW](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 21st of May 2024 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with TfNSW so that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 May 2024 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



**Richard Peterson** | Director  
**Trigalana Environmental Pty Ltd**  
**M:** 0429 227 775  
**E:** [Richard.peterson-trigalana@outlook.com](mailto:Richard.peterson-trigalana@outlook.com)

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## Appendix D-3 Correspondence Received



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**From:** Katrina O'Reilly  
**Sent:** Thursday, 2 May 2024 10:10 AM  
**To:** Richard Peterson  
**Cc:** DPE PSVC Compliance Mailbox  
**Subject:** RE: SSD10288 - Culcairn Solar Independent Environmental Audit - Consultation

Good morning Richard,

NSW Planning would like areas focused on:

- Road upgrades undertaken to the satisfaction;
- Compliance with management plans commitments;
- Compliance vegetation clearance (condition 13)
- Protection of heritage items (conditions 20 and 21)
- Landscaping prior to commencement (condition 10)
- Dust and noise controls and management;
- Erosion and Sediment controls and management;
- Assessment of predicated vs actual impacts;
- Community Communication Strategy
- Complaints register and management thereof .

Other agencies to be consulted include:

- Biodiversity Conservation Division
- DPIE Water
- Fire and Rescue NSW
- Rural Fire Service
- TfNSW
- Great Hume Council
- Relevant Aboriginal Land Councils
- NSW Heritage.

Regards  
Katrina

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**From:** South West Planning Mailbox  
**Sent:** Monday, 20 May 2024 9:55 AM  
**To:** Richard Peterson  
**Cc:** Simon Maffei; Michael Todd; Adam Vey  
**Subject:** BCS Response RE: SD10288 - Culcairn Solar Independent Environmental Audit - Consultation

Hi Richard,

Thank you for seeking our input on the Independent Audit of the Culcairn Solar Farm.

Noting the project only recently commenced construction, please consider the following conditions in your audit:

**Schedule 3, Condition 10 – Vegetation Buffer**

- Have the landscape screenings been planted prior to construction as required?
- Are the landscape screenings comprised of predominantly mature tube stock that are endemic to the area as required?

Details of the vegetation buffer and its location can be found in the Landscaping Plan here

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachmentRef=RFI-64504496%2120231120T090036.341%20GMT>.

**Schedule 3, Condition 13 – Vegetation Clearance**

- Has any clearing of native vegetation or fauna habitat occurred outside of the approved development footprint shown in Appendix 1 of the Approval?

**Schedule 3, Condition 14 – Biodiversity Offsets**

- Have all biodiversity credits been retired prior to construction as required?

**Schedule 3, Condition 15 – Biodiversity Management Plan**

- Are the mitigation measures outlined in Table 6-4 of the Biodiversity Management Plan dated January 2024 (Final v3NS) being implemented?
- Are the habitat and vegetation protection measures listed under section 6.3 of the Biodiversity Management Plan being implemented? Such as:
  - No stockpiling or storage occurring within the dripline of any native trees
  - Permanently fencing sensitive environmental areas
- Are the guidelines for the removal of hollow bearing trees being followed?
- Are the clearing protocols being followed?
- Were baseline weed surveys completed prior to clearing?
- Have nest boxes been installed prior to clearing?

The Biodiversity Management Plan can be found here

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachmentRef=SSD-10288-PA-25%2120240115T013627.039%20GMT>.

Please advise us of the results of the audit when it is completed.

Regards

**Andrew Fisher**

Senior Team Leader, Planning - South West  
Biodiversity, Conservation and Science  
Department of Climate Change, Energy, the Environment and Water  
T 02 6022 0623 M 0427 562 844 E [andrew.fisher@environment.nsw.gov.au](mailto:andrew.fisher@environment.nsw.gov.au)  
620 Macauley St, Albury NSW 2640  
[www.environment.nsw.gov.au](http://www.environment.nsw.gov.au)

*Contact the South West Planning Team about biodiversity and flood management planning matters by emailing [planning.southwest@environment.nsw.gov.au](mailto:planning.southwest@environment.nsw.gov.au)*



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Our ref: OUT24/6329

Richard Peterson  
Trigalana Environmental Pty Ltd  
Email: [Richard.peterson-trigalana@outlook.com.au](mailto:Richard.peterson-trigalana@outlook.com.au)

Date: 7 May 2024

---

Subject: Culcairn Solar Farm - Independent Environmental Audit (SSD-10288)

Dear Richard,

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

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

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

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

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

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

Should you have any further queries in relation to this submission please do not hesitate to contact NSW DCCEEW - Water Assessments at [water.assessments@dpie.nsw.gov.au](mailto:water.assessments@dpie.nsw.gov.au)

Yours sincerely,



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

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**From:** Jessica Creed <Jessica.Creed@epa.nsw.gov.au>  
**Sent:** Wednesday, 8 May 2024 3:06 PM  
**To:** richard.peterson-trigalana@outlook.com  
**Cc:** Nick Van Lijf  
**Subject:** FW: SD10288 - Culcairn Solar Independent Environmental Audit - Consultation [ ref: 00D7F06iTix.!500GA01ShkxV:ref ]  
**Attachments:** image001.png

Hi Richard,

Thank you for your email.

The EPA has responsibilities for pollution control and environmental management for scheduled activities under the *Protection of the Environment Operations Act 1997* (POEO Act). Solar Farms are not scheduled under the POEO Act and therefore Greater Hume Shire Council is the appropriate regulatory authority for matters relating to the POEO Act for that project. We recommend you consult with Greater Hume Shire Council for comments.

Regards

**Jessica Creed**  
Regional Manager - Operations  
NSW Environment Protection Authority  
D: 02 6983 4931 M: 0409 831 040



[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au) @NSW\_EPA

*The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.*

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

NSW is banning certain **single-use plastics** from 1 November

<b>From 1 November</b> Plastic straws, stirrers, cutlery	<b>From 1 November</b> Plastic plates and bowls	<b>From 1 November</b> Expanded polystyrene foodware	<b>From 1 November</b> Cotton buds, microbeads in rinse-off products

NSW

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## Appendix E Auditor Declaration

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<b>Project name</b>	<b>Culcairn Solar Farm</b>
<b>Consent Number</b>	SSD-10288
<b>Description of Project</b>	Construction and operation of a 350-megawatt (MW) AC/440 MWp (DC) photovoltaic (PV) solar farm, located approximately 6 km southwest of Culcairn in southern NSW
<b>Applicant</b>	Neoen Australia Pty Ltd
<b>Date</b>	10 July 2024

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:


*I declare that*

- (i) the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- (ii) the findings of the audit are reported truthfully, accurately and completely;
- (iii) I have exercised due diligence and professional judgement in conducting the audit;
- (iv) I have acted professionally, objectively and in an unbiased manner;
- (v) I am not related to any Applicant, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- (vi) I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- (vii) neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- (viii) I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any Applicant, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so

Notes:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit. If the person knows that the information is false or misleading in a material respect. The Applicant of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to the false and misleading information; section 307Bv (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

**Name of Auditor**                      **Richard Peterson**

**Signature**                                      

**Qualification**                              BE Civil, M Environmental Management

**Company:**                                      Trigalana Environmental Pty Ltd



