



Independent DPHI Independent Environmental Audit - Operations

SSD-10288 – Culcairn Solar Farm

Trigalana Environment Pty Ltd
Audit Date: 18 June 2026



Independent Environmental Audit

SSD – 10288 Culcairn Solar Farm

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Version Control

Revision	Date	Comment
A	24 July 2026	Draft for Review
B	6 August 2026	Revised to address draft review comments

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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) and Equans Solar & Storage Australia (ESSA) are the Construction Contractors and have been retained for a 2 year operations and maintenance period. 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 focuses on the operational phase of the development and included a site inspection, consultation with relevant project stakeholders and a review of management plans, project documents and site records.

The site inspection was undertaken on the 18th of June 2026 with members of Neoen and BYCA present.

The findings of the audit are:

- Construction works are complete, the solar farm is fully operational
- Permanent infrastructure including solar panels, electrical systems, internal roads, drainage, culverts, maintenance facilities, offices and site boundary fencing have been installed
- Site rehabilitation is complete with effective groundcover provided to prevent erosion and dust
- Evidence of the implementation of the various specialist management plans such as emergency, biodiversity etc were observed both in the field with supporting documentation provided to the Auditor as requested
- A total of 46 construction related complaints were received and closed out. No complaints have been received since the commencement of operation. The complaints management system appears to be effective
- Eight incidents have been reported to DPHI during the Audit period relating to small spills (< 5L) and several fires.
- Housekeeping was a high standard. Waste bins and spill kits were available. Small volumes of chemicals were appropriately stored. There was no evidence of pests on site
- Rehabilitation, weeding and landscaping activities appear to be effective with specialist companies appointed to oversee the implementation of maintenance activities.

Substantial compliance with the conditions of consent has been achieved, one non compliance has been recorded by the Audit relating to the late reporting of environmental incidents. Three recommendations are made relating to the ongoing implementation of the Emergency Response Plan and the placement of environmental protection signage. One key strength has been identified relating to the provision of water supply to respond to fire events.

1 Introduction

1.1 Project Description

The Culcairn Solar Farm has 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 connects directly to the transmission line where it crosses the site, with a new substation near this location. The substation is 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 18th of March 2024 and is now complete. [Figure 1](#) describes the location of the Project in regional and local settings. [Figure 2](#) provides details of the site layout.

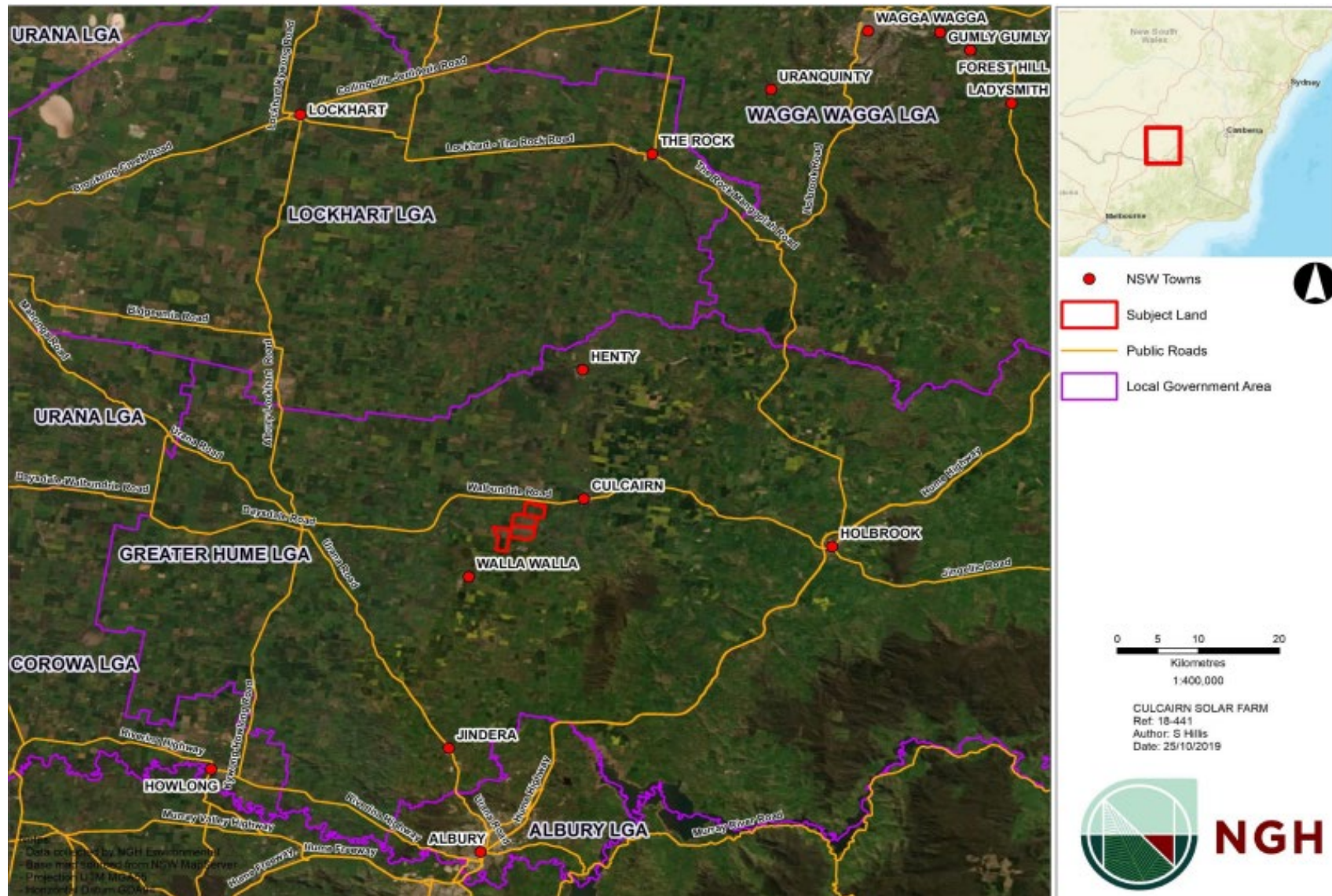


Figure 1: Project location – regional context



Culcairn Solar Farm Project layout

Legend

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

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

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



Date Published:
04/04/2025
15 March 2025
12:00pm to 12:00pm

Ref: 16-441 Culcairn SF 2023/328_A01
Project brief
Author: abt/avc
Date created: 05/07/2023
Latest: 05/04/2025



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 Systems Auditing Leading Management Systems Audit teams Exemplar Global Auditor	30 years of environmental management experience in the infrastructure sector. Have undertaken over 100 audits including independent DPHI audits for major infrastructure projects including: • EnergyConnect • Crudine Ridge Windfarm • Walla Walla Solar Farm • Limondale Solar Farm • Sapphire Windfarm • Rye Park Windfarm • Albion Park Bypass • Warrell Creek to Nambucca Heads • Northern Road upgrade • Tweed Valley Hospital • Windsor Bridge

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 18 th of June 2026 Operation commenced on 24 th March 2026. The audit was undertaken within 3 months of the commencement of operation

This is the first operational independent audit for Culcairn Solar Farm and covers the period from the previous audit on 21st of May 2024 to the date of the Audit site inspection on the 18th of June 2026.

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 (EPA)
 - Heritage NSW (OEH)
 - Local Aboriginal Land Council (LALC)
 - Greater Hume Shire Council. (GHSC)
 - DPHI Water.
 - Fire and Rescue NSW (FRNSW)
 - Rural Fire Service (RFS)
 - Transport for NSW (TFNSW)

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 9th of June 2026 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.
- Somack Zolghadr, Operations Manager, Neoen
- Mathieu Potier, Project Manager, Equans, Solar and Storage
- Galika Adhikari, Equans, Solar and Storage
- Lucas Andrieu, O&M Manager, Equans, Solar and Storage
- Arnaud Barreira, Project Director, BYCA
- Martin Howe, Environment Manager, BYCA.

2.5 Site Inspection

A site inspection was undertaken on the morning of Tuesday 18th of June 2026. The weather was cool and dry.

At the time of the Audit site inspection, all construction activities were completed, and the solar farm was fully operational. The following project features were observed by the auditor:

- Maintenance sheds and site offices
- Visual screening/permanent landscaping
- Permanent drainage and culverts
- Permanent boundary fencing
- Intersection upgrade to Benambra Rd
- Rehabilitation of exposed surfaces

- Emergency Response and fire protection systems
- Internal access roads.

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

Table 3: Audit Site Inspection (Environmental Measures) Summary

Key Environmental Issues	Mitigation Measures Employed
Biodiversity	- Nest boxes installed - Permanent chain wire boundary fencing - Biodiversity plantings - Weed management - Retained perimeter vegetation - Retained woody debris for habitat creation on site
Soil and Water Management	- Permanent drainage infrastructure - Stabilised site access and hardstand - Sealed internal roads - Stockpiles removed and rehabilitated - Rainwater and reuse tank - Permanent culverts and scour protection - Rumble grid at site entry/egress
Traffic and Access	- Speed restriction signage - Upgraded intersection - Traffic advisory signage
Heritage	- Heritage items salvaged with heritage reporting complete - Fencing provided around retained heritage items in the field
Waste and Chemicals	- Bunded chemical storage container - Spill kits provided in accessible locations. - Material Safety Data Sheets (MSDS) - Waste and recycling storage bins
Landscape and Visual	- Landscape plantings - Low level lighting (only for office and maintenance buildings) - Natural shade (green) painting of office amenities to minimise visual impacts - Visual screening provided to sensitive areas
Fire and Emergency	- Asset protection zone (road buffer around perimeter of the site) - Fire refuge area and emergency assembly point signage - Fire safety alert, emergency contact details and Emergency Plan on site notice board - Emergency plan, Fire management plan and contact details available at site entrance 10 x 45,000,000L water supply tanks

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 12th of August 2026 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	10	0	3
3	35	33	0	2
4	17	10	1	6
Total	65	53	1	11

3.2 Audit recommendations

Audit recommendations are provided in [Table 6](#).

Table 6 Key Audit Findings and Recommendations

Ref	Condition	Audit Finding	Recommendation
Sch 2 - 1	a) 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.	Observation As observed during the site inspection, sensitive no go zone signs and flagging for the construction phase of the solar farm remained in place following the completion of the works. Solid fencing surrounding the aboriginal scar tree prevents encroachment and coloured flagging is no longer necessary. Now that the construction activities have been completed, the risk of disturbing these areas is likely to be negligible, however it is noted that the BESS construction activities will result in new construction activities that will require mitigation as applicable in line with the Cultural Heritage Management Plan.	Review the likely environmental impacts associated with the construction of the BESS and amend the location of the sensitive area signage as required.
Sch 3-30	The Applicant must; a) Minimise the fire risks of the development, including managing vegetation fuel loads on site; b) Ensure that the development; 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 connection located adjacent to an internal access road; c) Assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and Notify the relevant local emergency management committee following construction of the development, and prior to the commencing of operations.	Key Strength This condition requires the provision of a single 40,000L water supply tank. Neoen have gone over and above this requirement and have installed a total of 10 water supply tanks throughout the site, each with 45,000L capacity. The water supply tanks were clearly labelled as "Fire Hydrant Water Tanks – 45,000L effective". A water level marker was placed on each of the tanks to monitor water levels. During the construction phase, RFS visited the site frequently with a full day session held on site in October 2025 with over 60 RFS volunteers attending. A video was produced to address fire mitigation risks. FRNSW also attended the site during the construction phases however indicated during the consultation for this Audit that they would like to undertake a further visit now the project is fully operational.	While this is noted as a key strength, a recommendation is made to contact the NSW Fire and Rescue Services and arrange a time for a site familiarisation visit as requested during the consultation phase. Annual Bushfire readiness reviews should also continue to be undertaken prior to each bushfire season.
31	Prior to commencing construction, the Applicant must develop and implement a comprehensive Emergency	Observation During the Audit period there have been two	The Bushfire and emergency plan is currently being reviewed, It is recommended as part of the review the systems for fire detection and

Ref	Condition	Audit Finding	Recommendation
	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; - 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); - Identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; - List works that should not be carried out during a total fire ban - Include availability of fire suppression equipment, access and water; - Include procedures for the storage and maintenance of any flammable materials; - Detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency; - Include a figure showing site infrastructure, Asset Protection zone and the on site water tank; - 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; - 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; - Include bushfire emergency management planning; and - Include details of how the RFS would be notified, and procedures that would be implemented, in the event that; - There is a fire on site or in the	fires that have been reported to DPHI as incidents. In relation to the grass fire that occurred on 29/12/25, the fire commenced on the afternoon/evening of after 5.30pm, however was not detected until 10 am the next day. While the fire did not spread off site (Neoen noted that this was attributable to effective and compliant vegetation management and the implementation of fire breaks) there was a delay in the detection of the fire which may potentially have led to a broader incident had it spread off site and the emergency services not been promptly notified.	emergency response are investigated to ensure the early detection and notification of emergency services of fires that occur when the site is unattended. This may include the application of Artificial Intelligence.

Ref	Condition	Audit Finding	Recommendation
	vicinity of the site • There are any activities on site that would have the potential to ignite surrounding vegetation; or • There are any proposed activities to be carried out during a bushfire danger period; and • Offer representatives of the local RFS brigade an opportunity to undertake a site familiarisation following construction of the development, and prior to commencing operations. Following approval the Applicant must implement the Emergency Plan.		
Sch 4-7	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.	Non Compliant During the Audit period, eight incidents were reported to DPHI as follows: • Minor oil and fuel spills (5) • Septic tank leak (2) • Fires (x2) On 3/2/26, DPHI formally responded to the fire notifying events noting that the fires occurred on the 15 and 29 of December, however the notification was not issued until the 29/1/26. This timeframe does not meet the requirement to notify the incidents immediately. Subsequently DPHI confirmed a breach of this condition has occurred. The Auditor notes that some of the incidents reported (such as minor fuel/ hydraulic spills that were contained on site with effective control and cleanup may not have triggered the definition of a reportable incident in accordance with the conditions of consent.	The following recommendations are made • Review of the incident classification and reporting incident procedure is undertaken to more clearly define incidents that “cause or threaten” material harm in accordance with the conditions of consent • All incidents that meet the definition of material harm including fires are reported to DPHI immediately.

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 7.

Table 7 Incident Summary

Incident Date	Description	Auditor Comments
9/8/24	Hydraulic oil leak (approximately 5L)	The incident report notes the spill was cleaned up with the spill kit. No evidence of the spill was observed during the Audit site inspection.
23/9/24	Fuel leak	The incident report noted that the incident was due to a hose from a fuel pod slipping from its fixture and dropped on the road. Diesel began to run on the road with actions taken to clean up the fuel. No evidence of the spill was observed during the Audit site inspection.
13/11/24	Diesel spill (approximately 5L)	The incident report notes the spill was contained within the road and away from environmental zones with corrective actions implemented. No evidence of the spill was observed during the Audit site inspection.
22/11/24	Septic tank leak	The incident report notes that the spill was approximately 100 litres of septic waste and that a sucker truck was deployed to remove the spilt material. The spilt material was on the site compound with no offsite impacts. No evidence of the spill was observed during the Audit site inspection.
3/2/25	Septic tank leak	The incident report notes that the spill was greywater with no septic material in it, The spill was localised with no apparent impact to the environment. A plumber was contacted to No evidence of the spill was observed during the Audit site inspection.
27/5/25	Oil leak (approximately 5L)	The incident report notes that the spill was approximately 5L with corrective actions implemented to clean up the material. No evidence of the spill was observed during the Audit site inspection.
15/12/25	Grass Fire	The incident report notes that a fire occurred on site which spread over four rows and was about 150 m in length The fire was caused by a faulty module. RFS and Police attended site. There was no offsite impacts. On 17/12/25, additional firefighting equipment was delivered on site.
29/12/25	Grass Fire	The incident report notes that a fire occurred on site after personnel had left the site, but before sunset. The fire extinguished itself on its own.

On 3/2/26, DPHI formally responded to the fire notifying events noting that the fires occurred on the 15 and 29 of December, however the notification was not issued until the 29/1/26. This timeframe does not meet the requirement for immediate notification. Subsequently DPHI confirmed a breach of this condition has occurred.

The Auditor notes that some of the incidents reported (such as minor fuel/ hydraulic spills that were contained on site with effective control and cleanup may not have triggered the definition of a reportable incident in accordance with the conditions of consent. A recommendation has been

made regarding incident classification and reporting as noted in Section 3.

3.5 Previous Audit Recommendations

Table 8 summarises the actions raised during the previous audit in November 2024 and includes information on how previous audit recommendations were addressed.

Table 8: Observations and recommendations – Construction phase Audit (2024)

Ref	Condition	Audit Finding	Recommendation	Auditor Comment and Status
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	The Traffic Management Plan (TMP) was conditionally approved by DPHI on the 22/1/24 noting the TMP must be updated: - 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; - 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 - As required in accordance with the Development Consent.	Update the Plan as required by DPHI and as noted.	The TMP was updated and resubmitted to DPHI. DPHI approved the updated TMP (Stage 2b Rev 3, dated 21 January 2025 noting that consultation has been undertaken with Transport for NSW and Greater Hume Shire Council and that the TMP contains the information required by the Development Consent. Status - Closed
Sch 3-17	The Applicant must: b) 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 c) Ensure that the noise generated by the operation of the battery storage facility during the night does not exceed 35dB(A) $L_{aeq,15min}$ to be determined in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence.	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.	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".	Targeted consultation has been undertaken with the impacted neighbours with email evidence provided to the Auditor. Construction activities have now been completed. Status - Closed
Sch 3 -18	The Applicant must minimise the dust generated by the development.	Appropriate measures to minimise dust include: Stabilised site access	Develop a "hot spot" map of high-risk areas for dust generation (i.e. closest to residents/fine material)	It was noted during the Audit interview that a strong focus of the management of dust in these areas were undertaken during the

Ref	Condition	Audit Finding	Recommendation	Auditor Comment and Status
		• Hardstand laydown areas • Rumble grid and vehicle washdown • Water carts • Speed restrictions on internal access roads 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.	and prioritise mitigation in these areas), this may include the use of dust suppression sprays.	construction phase to minimise the risk of offsite impacts with a continued focus on the implementation of existing measures including speed restrictions As observed during the site inspection, the site has been rehabilitated with groundcover and sealed compound eliminating dust generation. Status - Closed
Sch 3-24	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. <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>	Water is supplied by Greater Hume Council, accessed from standpipes and supplied to the Project under a subcontractor agreement.	Undertake an internal subcontractor audit to ensure water is being sourced in accordance with the Water Access License	It was noted during the Audit interview that surveillance of contractors activities was undertaken during the construction phase with no breaches of water access licences identified. Construction contractors have now been demobilised. Status – Closed
Sch 3 - 28	Prior to commencing construction, unless the Planning Secretary agrees otherwise, the Applicant must prepare a Safety Management Study for the development, in consultation with the owner of the gas pipeline. The study must include an assessment of potential electrical hazards and must be consistent with the Australian Standard 2885 for Pipelines – Gas and Liquid Petroleum and Australian Standard 4853-2012 – Electrical Hazards on Metallic Pipelines. Following completion of the Study, the Applicant must implement the measures described in the Safety Management Study.	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. 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"	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.	The Safety Management System (SMS) was updated and re-submitted to DPHI. DPHI acknowledged receipt of the SMS (Rev 1, dated 22/5/25 noting the SMS: • Has been prepared in consultation with the pipeline owner • Considers AS2885 and AS 4853 • Contains the information required by the conditions of approval • DPHI has no comments on the document at this time. Status - Closed

Ref	Condition	Audit Finding	Recommendation	Auditor Comment and Status
Sch 3 - 30	The Applicant must; d) Minimise the fire risks of the development, including managing vegetation fuel loads on site; e) Ensure that the development; f) Notify the relevant local emergency management committee following construction of the development, and prior to the commencing of operations.	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	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): • Onsite Preparedness Activities • Firefighting water supplies and equipment • Access and egress for emergency vehicles • Emergency Response • Communication Protocols Involve suitably qualified personnel in the review as required. A record of the review should be kept.	As noted in the Audit interview, Bushfire readiness reviews were undertaken during the construction phase and following the previous Audit. During the Audit period, several fires occurred on site on 15 and 29 of December 2025. The incident report noted the importance of preventative management and post incident response and inspection protocols. Pre-bushfire preparation and readiness will be an ongoing requirement given the incidents that have occurred and the possibility of further fire incidents. Status - Ongoing

3.6 Supplementary Approvals and Licences

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

3.7 Community Complaints

During the audit period, 46 complaints were received in relation to construction phase activities. All complaints have been closed out. Complaints were generally related to the following.

- Weed management
- Noise
- Dust
- Working Hours
- Waste management
- Transport and traffic
- Interactions with farm stock
- Water supply

No complaints have been received since the commencement of operation.

Appropriate actions are being taken to address the complaints and this is documented in the complaints register. Overall the complaints management system appears to be effective.

3.8 Adequacy of Environmental Management Plans

The management plans relevant to the operational 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 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 completed project infrastructure is generally within the disturbance area described in the EIS with boundary fencing 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
 - 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 conditions of consent require the provision of a single 40,000L water supply tank. Neoen have gone over and above this requirement and have installed a total of 10 water supply tanks throughout the site, each with 45,000L capacity. This results in a total of 450,000L of water available to respond to a fire. The water supply tanks were clearly labelled as " Fire Hydrant Water Tanks – 45,000L effective" A water level marker was placed on each of the tanks to monitor water levels.

Appendix A DPHI Auditor Approval

Department of Planning, Housing and Infrastructure

Reference: SSD-10288-PA-96
Mr Benjamin Benfredj
Construction Project Manager
NEOEN AUSTRALIA PTY. LTD.
26/05/2026

Sent via the Major Projects Portal only
Subject: Culcairn Solar - Independent Environmental Audit - Auditor Endorsement Request - Operations

Dear Mr Benfredj

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person to conduct the first Operations Independent Environmental Audit (IEA) of Culcairn Solar, submitted as required by Schedule 4, Condition 12 of SSD-10288 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (the Department) on 19 May 2026.

The Department has reviewed the independent auditor nomination and based on the information you have provided is satisfied that the proposed person is suitably qualified, experienced, and independent.

In accordance with Schedule 4, Condition 12 of the consent and the Department's *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the Richard Peterson of Trigalana Environmental Pty Ltd to undertake the Operations IEA.

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the Department's *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- The above auditor is approved for the current operational audit only. Additional approval must be sought from the Planning Secretary for future audits of the development.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact me on 0429400261 or email compliance@planning.nsw.gov.au

Yours sincerely

Department of Planning, Housing and Infrastructure



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Appendix B Independent Audit Table

Schedule 2

Part A – Administrative conditions

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
1	In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/ or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	- Audit Site Inspection 18/6/26 - Audit Interview 18/6/26 - Documents reviewed as part of the audit and noted below - State Significant Development Consent, SSD 10288 - BYCA Compliance Tracking Register	Reasonable and feasible measures were observed to be implemented on site to control key environmental risks. As the project is now in the operational phase there has been a significant reduction in environmental risk such as noise and dust. 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. BYCA have a team of onsite Environmental Specialists to implement the Environmental Management plans and provide specialist advice to the operations team.	Compliant
TERMS OF CONSENT				
2	The Applicant must carry out the development: a) Generally in accordance with the EIS; and b) In accordance with the conditions of this consent. <i>Note: the general layout of the development is shown in Appendix 1.</i>	- Audit Site Inspection 18/6/26 - Audit Interview 18/6/26 - Documents reviewed as part of the audit and noted below	Operational activities were being undertaken generally in accordance with the EIS and in accordance with the conditions of this consent. As noted above, 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.	- Audit Site Inspection 18/6/26 - Audit Interview 18/6/26 - Modification of development consent, dated 19/12/24 - Notice of decision, dated 19/12/24 - Letter from DPHI, titled "Notice of	No inconsistencies identified by the Audit. Modification 2 was approved during the Audit period to increase the capacity of the Battery Energy Storage to 800MWh. Further increases to the BESS capacity have been requested and approved by DPHI. Refer to Schedule 3, Condition 1 for further details.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status										
		determination” dated 19/12/24 • Development consent, dated 25/03/2021 • Notice of State Significant Development Determination Culcairn Solar Farm, dated 25/03/21 • Report titled “Statement of Reasons for Decision” dated 25/03/21 • Letter from DPHI, titled “Notice of determination – Culcairn Solar Farm – Modification 1 (SSD-10288-Mod-1)” dated 22/12/23												
4	The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department’s assessment of: a) Any strategies, plans or correspondence that are submitted in accordance with consent; b) Any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and c) The implementation of any actions or measures contained in these documents.	• Audit Site Inspection 18/6/26 • Audit Interview 18/6/26 • Documents reviewed in undertaking this audit • Letter from DPHI, titled “Culcairn Solar Farm Landscaping Plan (V8)” dated 25/02/25 • Letter from DPHI, titled “Culcairn Solar Farm – Heritage Management Plan” dated 05/03/25 • Letter from DPHI, titled “Biodiveristy Management Plan” dated 17/03/25 • Letter from DPHI, titled “Culcairn Solar Farm – Accommodation and Employment Strategy” dated 04/04/25 • Letter from DPHI, titled “Culcairn Solar Farm – Environmental Management Strategy” dated 01/05/25	The Auditor reviewed DPHI letters of approval for a range of management plans during the Audit period including: • Landscaping Management Plan • Heritage Management Plan • Biodiversity Management Plan • Accommodation and Employment Strategy • Environmental Management Strategy • Safety Management System For each of these approvals, DPHI requested the approved documents are placed on the project website. The Auditor reviewed the website and notes that the most recent version of the documents are available on the project website.	Compliant										
5	The Applicant must ensure that the solar panels, substation, inverters and battery storage within the approved development site are not installed closer to the receivers identified in column 1 of Table 1 than the offset distances identified in column 2 of Table 1. <table><tr><th>Receiver</th><th>Offset distance</th></tr><tr><td>R9</td><td>585 m</td></tr><tr><td>R17</td><td>1157m</td></tr><tr><td>R19</td><td>383m</td></tr><tr><td>R24</td><td>544m (east) and</td></tr></table>	Receiver	Offset distance	R9	585 m	R17	1157m	R19	383m	R24	544m (east) and	• Audit Site Inspection18/6/26 • Audit Interview18/6/26 • Culcairn Solar Farm, Final Layout Plans, drawing number NEO-CUSF-1000PV-DWG-1 • Email from Neoen to DPHI titled “Culcairn Solar Farm – Final Layout Plans SSD-10288 – PA 36 – Request for Additional Information • Culcairn Solar Farm SSD Post Approval document” dated 6 May 2024 • Final Layout Plans from Planning, Industry and Environment, dated 22/03/24	The Auditor was provided with a copy of the Final Layout Plans for the development as well as evidence of a post approval review undertaken by DPHI on 6th of May 2024. The plans provide details of offsets to the receivers identified by this condition.	Compliant
Receiver	Offset distance													
R9	585 m													
R17	1157m													
R19	383m													
R24	544m (east) and													

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status				
	<table><tr><td></td><td>1155m (south)</td></tr><tr><td>R33</td><td>249m</td></tr></table> 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.		1155m (south)	R33	249m	- Final Layout Plans, from Neoen, dated (undated) - Email from Neoen, titled “Culcairn Solar – Final Layout Plans SSD-10288-PA-36 – Request for Additional Information” dated 08/05/25		
	1155m (south)							
R33	249m							
UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE								
6	The Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Planning Secretary incorporating the proposed upgrades.	- Audit Site Inspection18/6/26 - Audit Interview18/6/26	Solar panels have have only recently been installed and no upgrades have been undertaken at this stage	Not Triggered				
STRUCTURAL ADEQUACY								
7	The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia. Notes: - Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development. - Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	- Audit Site Inspection18/6/26 - Audit Interview18/6/26 - Minor Consultancy Agreement Procert Limited dated 12 March 662-2023 Culcairn Solar Farm- Partical Construction Certificate 662-2023-01- Construction Certificate, Procert 662-2023-01- Construction Certificate, Procert 662-2023-02- Construction Certificate, Procert 662-2023-01- Construction Certificate, Procert 662-2023-03- Construction Certificate, Procert 662-2023-04- Construction Certificate, Procert 662-2023-05- Construction Certificate, Procert 662-2023-06- Construction Certificate, Procert	Neoen and BYCA have appointed an independent certifier (Procert) to review designs and ensure compliance with the BCA requirements And issue construction certificates as required. Construction and occupation certificates were provided to the Auditor to demonstrate compliance	Compliant				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		662-2023-07- Construction Certificate, Procert 662-2023-08- Construction Certificate, Procert 662-2023-09- Construction Certificate, Procert 662-2023-10-- Construction Certificate, Procert 662-2023-11- Construction Certificate, Procert 662-2023-12- Construction Certificate, Procert 662-2023-13- Construction Certificate, Procert 662-2023-14- Construction Certificate, Procert 662-2023-15- Construction Certificate, Procert 662-2023-16- Construction Certificate, Procert 662-2023-17- Construction Certificate, Procert 662-2023-18- Partial Occupation certificate, Procert 662-2023-19- Partial Occupation Certificate, Procert		
DEMOLITION				
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.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26	There has been no demolition on the Project	Not Triggered
PROTECTION OF PUBLIC INFRASTRUCTURE				
9	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: a) Repair or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and b) Relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the condition of this consent.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26	There was no damage to public infrastructure observed during the Audit site inspection or reported. No public infrastructure requiring relocation. As observed during the Audit site inspection, the location of the APA high pressure gas main was marked on site with signage provided to prevent damage during construction	Not Triggered
OPERATION OF PLANT AND EQUIPMENT				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
10	The Applicant must ensure that all plant and equipment used on site, or in connection with the development is: a) Maintained in a proper and efficient condition; and b) Operated in a proper and efficient manner.	- Plant on Boarding Process form, from Bouygues, (undated) - Table titled "Plant Minimum Requirements" from Bouygues (undated) - Vehicle maintenance records CAT Grader, various, dated 30/07/25 - Vehicle Maintenance records Kobelco Excavator, various, dated 27/01/22 - Vehicle maintenance records Mazda light Vehicle, various, dated 25/11/25 - Vehicle maintenance records Toyota light vehicle, various, dated 28/11/25 - Pre start forms, various - Plant prestart excel spreadsheets various	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. Maintenance records were provided to the Auditor. There is less equipment being used for the operational phase compared to the construction phase.	Compliant
SUBDIVISION				
11	The Applicant may subdivide the site as identified in Appendix 4 and in accordance with the requirements of the EP&A Act and the EP&A Regulation. <i>Notes:</i> <i>Under Part 6 of the EP&A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision.</i> <i>Division 6.4 of Part 6 of the EP&A Act sets out the application requirements for the subdivision certificates.</i>	- 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 - Subdivision photograph - Email from Neoen to Walpole Surveying titled "Culcairn Solar Farm – Land parcel Subdivision Request" dated 10/5/24 - MGA Coordinate Schedule, dated 16/08/24 - Letter from Walpole Surveying PTY LTD, dated 29/04/24 - Email from Neoen, titled "Culcairn Solar Farm – Land Parcel Subdivision Request" dated 10/05/26 - Deposited Plan Ref: DOC 1309670, Rev 17 dated 17/4/25	The site has now been subdivided by a registered surveyor. A copy of the subdivision plan was provided to the Auditor as evidence.	Compliant
COMMUNITY ENHANCEMENT				
12	Prior to commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must enter	Planning Agreement between Greater Hume Council and Neoen Australia Pty Ltd" dated	The Planning Agreement was executed prior to the commencement of construction. Evidence was	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	into a VPA with Council in accordance with; a) Division 7.1 of Part 7 of the EP&A Act; and b) The terms of this letter of offer dated 12 November 2020, summarised in Appendix 3.	8/1/24 - Email from Neoen to Greater Hume Shire Council titled "Culcairn Solar Farm Update and VPA" dated 8/1/24 - Email from Greater Hume Council, titled "Culcairn Solar Farm Update + VPA" dated 23/01/24 - Bank transfer receipt, for Neoen, dated 17/01/24 - Planning Agreement Greater Hume Council Neoen Australia PTY LTD, from Greater Hume Council, dated 08/01/24 - Greater Hume Council – Receipt for VPA Annual Payment dated 25/6/26	provided to the Auditor demonstrating that the Bank Guarantee required by the VPA has been provided to Greater Hume Shire Council. Ongoing annual payments have been made to Council with a receipt provided to the Auditor as evidence for payment on 25/6/26.	
COMMUNITY COMMUNICATION STRATEGY				
13	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. The Community Communication Strategy must; a) Identify landowners for potentially impacted residences including but not limited to R09, R17, R19, R24 and R33. b) Ensure that the landowners identified in (a) are consulted during construction; c) Set out procedures and mechanisms for the regular distribution of information to wider community. d) Establish a public liaison officer(s) to engage with the local community; and e) Set out procedures and mechanisms; - Through which the community can discuss or provide feedback to the Applicant; - Through which the Applicant will respond to enquiries or feedback from the	- Audit Interview 18/6/26 - Community Communication Strategy & Benefit Sharing Plan V3 dated September 2023 - Community Benefit Fund leaflet, dated 12/07 - Meeting Minutes for Culcairn Solar Farm Community Benefit Fund Local Advisory Committee, dated 14/05/26 - Culcairn Solar Farm Community Benefit Fund, by Bendigo Bank (undated) 2026 First Nations Benefit fund, (undated) - Email from Neoen titled "CSF CBF LAC meeting minutes & papers" dated 21/05/26 - Local Advisory Committee presentation, from Neoen, dated 14/05/26 - Mail correspondence from Culcairn Solar Farm, titled "Culcairn Solar farm – Employment Session" dated 28/02/24 - Mail correspondence from Culcairn Solar Farm, titled "Culcairn Solar farm – Employment Session" dated 28/02/24 - Culcairn General Consultation Log, dated 04/07/23	The Community Communication Strategy and Benefit Sharing Plan was provided to DPHI who noted they have no comments on the Plan. Evidence reviewed by the Auditor included the following: - Project website, with contact details, FAQ's, Project information, community communication strategy and other Project documents - Complaints process - Project newsletters - Community information pack - Community information booklet, construction - Community Newsletters - Project Flyers for community, and business information sessions	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	community; and To resolve any issues and mediate any disputes that may arise in relation to construction of the development. The Applicant must implement Community Communication Strategy for the duration of construction.	- Email from neoen, titled "Culcairn SF Project Newsletter – May 2025" dated 10/07/25 - Various information leaflets from Culcairn Solar Farm - Email from Neoen, titled "Culcairn Solar Farm Newsletter – May 2026" dated 29/05/26 - Email from Neoen titled "Culcairn Solar Farm Newsletter – Feb 2025" dated 11/02/26		

Schedule 3 Environmental Conditions – General

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
BATTERIES				
Battery Storage Restriction				
1	Unless the Planning Secretary agrees otherwise, the total battery energy storage capacity system associated with the development must not exceed a total delivery capacity of 800 MWh. <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>	• Audit site Inspection 18/6/26 • Audit Interview 18/6/26 • Letter from DPHI, titled “Culcairn Solar farm (SSD 10288) – Request for the Planning Secretary’s discretion under Condition 1 of Schedule 3” dated 30/04/25 • Letter from DPHI, titled “Culcairn Solar Farm (SSD 10288) – Request to increase BESS capacity to 963 MWh” dated 29/01/26 • Email from Neon, titled “Culcarin Mod Approved” dated 19/12/24 • Modification of development consent, dated 19/12/24 • Notice of decision, dated 19/12/24 • Letter from DPHI, titled “Notice of determination” dated 19/12/24 • Development consent, dated 25/03/2021 • Notice of State Significant Development Determination Culcairn Solar Farm, dated 25/03/21 • Report titled “Statement of Reasons for Decision” dated 25/03/21 • Letter from DPHI, titled “Notice of determination – Culcairn Solar Farm – Modification 1 (SSD-10288-Mod-1)” dated 22/12/23 • Development consent, dated	As observed during the Audit site inspection, construction of the Battery Storage Facility has not commenced. During the Audit period there have been several requests to increase the capacity of the Battery Storage Facility as summarised below: • On 5 March 2025, Neoen requested the Planning Secretarys Agreement to increase the total battery energy storage facility from 800 MWh to 904MWh. DPHI approved the request on 30/4/25 • On 1 December 2025, Neoen requested a the Planning Secretarys Agreement to increase the total battery energy storage facility from 904MWh to 963 MWh. DPHI approved the request on 29/1/26 • On 19/12/24 Modification 2 was approved by DPHI to increase the BESS to 800MWh	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		25/03/21 - Modification of Development Consent, dated 22/12/23 - Culcairn Post Approvals Status, document (undated)		
TRANSPORT				
Over-Dimensional and Heavy Vehicle Restrictions				
2	The Applicant must ensure that the; a) Development does not generate more than; 100 heavy vehicle movements (including water carts) a day during construction, upgrading and decommissioning; 11 movements of heavy vehicles requiring escort during construction, upgrading and decommissioning; and - Five heavy vehicle movements (including water carts) a day during operations; on the public road network; and b) Length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 26 meters unless the Planning Secretary agrees otherwise.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26 - Vehicle Movement log - Various Oversize and/ or Overmass (OSOM) Mass or Dimension Exception Permit, from NHVR, dated 10/12/24 - Drake Trailers Path Turning Template, from Drake, various dated 30/10/15 - Site Diary 2024, dated 18/07/24 - Site diary 2025, dated 29/10/25	The Project is now in the operational phase with no further requirement for Heavy Vehicles. The Auditor was provided with examples of oversize, overmass permits relating to the construction phases as well as records of heavy vehicle movements with no exceedences of the limits in this condition	Compliant
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.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26 - Vehicle Movement log - Site Diary 2024, dated 18/07/24 - Site diary 2025, dated 29/10/25	A vehicle movement log is kept to monitoring heavy and over dimensional movements	Compliant
Access Route				
4	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	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26	There is a single site access point on Weeamara Road and the only practical route to the site is via Olympic Highway and Benambra Road.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Road as identified in the figure in Appendix 5. <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>	- Delivery Driver induction - Site Induction	A site induction register is kept up to date with details of visitors, delivery drivers and short-term worker inductions The site induction includes the approved access routes. No non compliances were reported during the audit period relating to site access.	
Site Access				
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.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26 - Delivery Driver induction - Site Induction - Advice to suppliers	There is a single site access point on Weeamara Road and the only practical route to the site is via Olympic Highway and Benambra Road. A site induction register is kept up to date with details of visitors, delivery drivers and short-term worker inductions The site induction includes the approved access routes. No non compliances were reported during the audit period relating to site access.	Compliant
Road Upgrades				
6	Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must; - Construct the access point on Weeamara 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; - Upgrade Weeamara 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; These upgrades must comply with the <i>Austrorads Guide To Road Design</i> (as amended by TfNSW supplements) and be	- 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 Weeamara Council Road intersecting the unused UGL Rail Corridor" dated 16/11/23 - Letter from Neoen titled "Flexibility granted under the Culcairn DA to	Construction access point on Weeamara 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. Council confirmed via email that the completed works were to their satisfaction.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	carried out to the satisfaction of Council.	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 • Letter from DPHI titled "Culcairn Solar Farm – Weeamera Road Upgrade Works Across unused Railway Easement" dated 30/11/23 • Email from Greater Hume Council to Neoen titled "Weeamara Road upgrade- 100% design issue" dated 1/11/23 • Email from Bouygues Construction, titled "Completion of Weeamara Road" dated 18/03/25		
Road Maintenance				
7	The Applicant must; a) Undertake an independent dilapidation survey to assess the; • Existing condition of Benambra Road and Weeamera Road on the transport route prior to construction, upgrading or decommissioning works; and • Condition of Benambra Road and Weeamera Road on the transport route, following construction, upgrading or decommissioning works; b) Repair Benambra Road and Weeamera Road on the Transport route if dilapidation surveys identify that the road has been damaged during construction, upgrading or decommissioning works; 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.	• Pre-Construction Dilapidation Survey of Benambra Road and Weeamera Road on the transport route. Dated 10 August 2023 prepared by CRG Traffic Pty Ltd • Culcairn Solar Farm Dilapidation Report, Benambra and Weeamara Road, Walton Smith Consultants dated 9/2/24 • Letter from DPHI to Neoen titled "Culcairn Solar – Road Condition Assessment (Dilapidation Report)" dated 31/10/23 • Access Road Dilapidation report, from Neoen, dated 09/02/24 • Email from Neoen, titled "Culcairn SF – Post Construction Dilapidation Survey" dated 02/06/26 • Culcairn Closeout Dilapidation	The Pre-construction Dilapidation report was prepared prior to the commencement of construction activities and was approved by DPHI on the 31/10/23. There have not been any disputes to date regarding the repair of Benambra Road between the Applicants of Culcairn Solar Farm and Walla Walla Solar Farm. A post construction dilapidation report was prepared. The report noted the following: <i>"Based on a comparison of the 2024 and 2025 assessments, it is concluded that the project has not had a negative impact on the condition of the surrounding road network. On the contrary, the works have resulted in a net improvement to road conditions, particularly through the upgrade of Weeamera Road.</i> This is consistent with observations made by the	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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.	- Report, from WSC, dated 24/12/25 - Letter from DPHI titled "Culcairn Solar Farm – Post Constuction Dilapidation Report" dated 7/7/27	Auditor during the site inspection. A copy of the post construction dilapidation report was issued to Council on 28/5/26 and to DPHI on 29/6/26. DPHI approved the post construction dilapidation report on 7/7/26 noting the post construction dilapidation report: - has been prepared in consultation with Greater Hume Shire Council - Contains the information required by the conditions of consent	
Operating Conditions				
8	The Applicant must ensure; a) The internal roads are constructed as all-weather roads; b) There is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; c) The capacity of existing roadside drainage network is not reduced; d) All vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and e) Development-related vehicles leaving the site are in clean condition to minimise dirt being tracked onto the sealed public road network.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26	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. 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. The washdown system was not in use at the time however has been retained for the construcion of the BESS. The local roadside drainage was not observed to be impacted during the Audit site inspection	Compliant
Traffic Management Plan				
9	Prior to commencing road upgrades, the Applicant must prepare a Traffic Management Plan for the development in	Traffic Management Plan (TMP) approved 25201/2024.	The TMP was conditionally approved by DPHI on the 22/1/24 noting the TMP must be updated:	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	consultation with TfNSW, Council and Hurricane Hill Quarry, and to the satisfaction of the Planning Secretary. This plan must include; a) Details of the transport route to be used for all development-related traffic; b) Details of the road upgrades required by condition 7 of Schedule 3 of this consent; c) Details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: • Details of the dilapidation surveys required by conditions 7 of Schedule 3 of this consent; • Temporary traffic controls, including detours and signage; • Notifying the local community about development related traffic impacts; • Procedures for receiving and addressing complaints from the community about development related traffic • Minimising potential cumulative traffic impacts with other State significant development projects in the area, including preventing queuing on the public road network • Minimising dirt tracked onto the public road network from development related traffic • Details of the employee shuttle bus service, including pick up and drop off points associated parking arrangements for construction workers and measures to encourage employee use of this service; • Encouraging car pooling or ride sharing by employees; • Scheduling of haulage vehicle movements to minimise convoy length or platoons; • Responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; • Responding to any emergency repair or maintenance requirements; and	• Letter from DPHI titled "Traffic Management Plan – Culcairn Solar Farm (SSD -10288- Mod 1)" dated 22/1/24 • CUSF truck Movement register dated 25/3/24	• 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; • 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 • as required in accordance with the Development Consent. Evidence of implementation of the TMP was provided to the Auditor as noted in the relevant conditions below.	

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	- A traffic management system for managing over dimensional vehicles; d) A drivers code of conduct that addresses; - Driver fatigue; - Procedures to ensure that drivers adhere to the designated transport routes and speed limits; and - Procedures to ensure that drivers implement safe driving practices; e) A program to ensure drivers working on the development received suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan. Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.			
LANDSCAPING				
Vegetation Buffer				
10	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; - Be planted prior to commencing construction; - Be comprised of predominantly mature tube stock that are endemic to the area; - Minimise views from receivers R9, R17, R19, R24 and R33 within 3 years of commencing operations; - Be designed and maintained in accordance with the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent); - Be properly maintained with replanting programme being undertaken where the vegetation fails to establish; and - Undertake appropriate weed management. Unless the Planning Secretary agrees otherwise.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26 - Letter from DPHI to Neoen titled "Culcairn Solar Farm Vegetation Buffer Planting" dated 28/9/23 - Jayfields Nursery Quote dated 21/9/23 241025 October 24 GMC Culcairn SP Monthly Report 241127 November 24 GMC Culcairn SP Monthly Report 241226 January 25 GMC Culcairn SP Monthly Report 240228 February 25 GMC Culcairn SP Monthly Report 250430 April 25 GMC Culcairn SP Monthly Report 250430 April 25 GMC Culcairn SP Monthly Report	As observed during the Audit site inspection, landscape plantings have been completed. The location of the landscape plantings are provided on the "As Built Drawings" and are consistent with Appendix 1. A contractor has been appointed to maintain with monthly maintenance reports provided to the Auditor as evidence. Monthly reports include details of rainfall, soil moisture site plant numbers, tree replacements, maintenance works undertaken, works undertaken (e.g weeding, brush cutting etc).	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		250531 May 25 GMC Culcairn SP Monthly Report 250630 June 25 GMC Culcairn SP Monthly Report 250631 July 25 GMC Culcairn SP Monthly Report 250831 August 25 GMC Culcairn SP Monthly Report 250930 September 25 GMC Culcairn SP Monthly Report 251104 October 25 GMC Culcairn SP Monthly Report 250430 April 25 GMC Culcairn SP Monthly Report 250930 September 25 GMC Culcairn SP Monthly Report 251130 November 25 GMC Culcairn SP Monthly Report 260131 January 26 GMC Culcairn SP Monthly Report		
Landscaping Plan				
11	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: - A description of measures that would be implemented to ensure that the vegetated buffers achieve the objectives of condition 10 (a)-(f), above; - A program to monitor and report the effectiveness of these measures; and - Details of who would be responsible for monitoring, reviewing and implementing the plan; and timeframes for the completion of actions. Following the Planning Secretary's approval, the Applicant must implement the Landscaping Plan.	- Landscape Management Plan (LMP) approved 02/12/2023. - Letter from DPHI to Neoen titled "Landscaping Plan, Culcairn Solar Farm (SSD -10288-Mod 1)" dated 31/1/24 241025 October 24 GMC Culcairn SP Monthly Report 241127 November 24 GMC Culcairn SP Monthly Report 241226 January 25 GMC Culcairn SP Monthly Report 240228 February 25 GMC Culcairn SP Monthly Report 250430 April 25 GMC Culcairn SP Monthly Report 250430 April 25 GMC Culcairn SP	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. As observed during the Audit site inspection, landscape plantings have been completed. A contractor has been appointed to maintain with monthly maintenance reports provided to the Auditor as evidence. Monthly reports include details of rainfall, soil moisture site plant numbers, tree replacements, maintenance works undertaken, works undertaken (e.g weeding, brush cutting etc).	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		Monthly Report 250531 May 25 GMC Culcairn SP Monthly Report 250630 June 25 GMC Culcairn SP Monthly Report 250631 July 25 GMC Culcairn SP Monthly Report 250831 August 25 GMC Culcairn SP Monthly Report 250930 September 25 GMC Culcairn SP Monthly Report 251104 October 25 GMC Culcairn SP Monthly Report 250430 April 25 GMC Culcairn SP Monthly Report 250930 September 25 GMC Culcairn SP Monthly Report 251130 November 25 GMC Culcairn SP Monthly Report 260131 January 26 GMC Culcairn SP Monthly Report		
LAND MANAGEMENT				
12	The Applicant must maintain the agricultural land capability of the site, including; a) Establishing the ground over with appropriate perennial species and weed management and b) Maintaining grazing within the development footprint, where possible, unless the Planning Secretary agrees otherwise in writing.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26 - Culcairn Solar Park Weed and Pest Report, from GMC, dated August 2025 - Agronomic Advice report from Advance Ag, Solar Farm Vegetation establishment	At the time of the Audit site inspection, agricultural activities had not commenced. Adequate groundcover has been established and was being maintained with maintenance reports provided to the Auditor as evidence. An agronomist has been appointed to advise NeoEn regarding agricultural activities	Compliant
BIODIVERSITY				
Vegetation Clearance				
13	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance footprint	- Audit site Inspection 18/6/26 - Environmental Work Method Statement	There was no observed clearing outside the Project boundary footprint. Controls to prevent unauthorised	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	shown in Appendix 1.	Site Establishment and Civil Works" dated 2/1/24	clearing included boundary fencing, "No Go" Signage and fencing.	
Biodiversity Offsets				
14	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. The retirement of these credits must be carried out in accordance with the <i>NSW Biodiversity Offsets Scheme</i> and can be achieved by: a) Acquiring or retiring 'biodiversity credits' within the meaning of the <i>Biodiversity Conservation Act 2016</i>; b) Making payments into an offset fund that has been developed by the NSW Government; or c) Funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.	• BCT Statement Confirming payment into the Biodiversity Conservation fund for an offset obligation, BCT Ref 657 dated 1/2/24	The BCT statement confirms the retirement of credits to the value of \$657,782.38	Compliant
Biodiversity Management Plan				
15	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; a) Include a description of the measures and timeframes that would be implemented for: • Protecting vegetation and fauna habitat outside the approved disturbance areas; • Managing the remnant vegetation and fauna habitat on site; • Minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development/ • Minimising the impacts of fauna on site and implementing fauna management protocols; • Avoiding the removal of hollow bearing trees during spring to avoid the main breeding	• Biodiversity Management Plan (BMP)(Final V2, dated 16 November 2023) • Letter from DPHI to Neoen titled "Culcairn Solar Farm, Biodiversity Management Plan" dated 23/1/23 • Letter from NGH to BYCA titled "A240034- Culcairn Solar Farm – Pre and Post Clearance Survey Report" dated 12/2/24 • Culcairn Solar Farm – Environmental Inspection Report dated 9/5/24 • BYCA Ground disturbance Permit dated 16/4/24 • EWMS for Site Establishment and Civil Works • Toolbox talks with Environmental	The BMP was prepared and approved by DPHI on 23/1/23. Measures implemented to minimise impacts to biodiversity include: • Environmental Protection and "No Go" fencing and signage • Appointment of ecologist to oversee the clearing process • Pre and post clearance surveys • Tree register • Appointment of WIRES as the wildlife carer • Monitoring of weeds through weekly site inspections • Installation of nest boxes • Environmental Work Method Statements • Toolbox talks to communicate the requirements of the Biodiversity Management Plan, with a specific toolbox talk undertaken to communicate	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	- period for hollow dependent fauna; - Rehabilitating and revegetating temporary disturbance areas with the species that are endemic to the area; - Maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and - Controlling weeds, feral pests and pathogens; b) Include a program to monitor and report on the effectiveness of mitigation measures; and c) Include details of those who would be responsible for monitoring, reviewing and implementing the plan. Following the planning secretary's approval, the Applicant must implement the Biodiversity Management Plan. <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>	No Go Zones – Signed - Clearing Vegetation Permit (CUP 1) dated 9/2/24 - Clearing Vegetation Permit (CUP 2) dated 20/5/24 - Clearing Vegetation Permit (CUP 3) dated 20/5/24 - Culcairn Solar Farm Pre and Post Clearance Report, NGH, dated June 2024	Environmental "No Go Zones" Following the completion of clearing activities, NGH were engaged to prepare a pre and post clearing report. The report provides details of the clearing process and mitigation measures, site preparation, set up and training, nestboxes and unexpected finds procedure. The report also provides detailed results of the clearing activities. Evidence of the implementation of the plan was observed during the site inspection including nestboxes and retained habitat. Weeding records were provided to the Auditor	
AMENITY				
Construction, Upgrading and Decommissioning Hours				
16	Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades construction, upgrading or decommissioning activities between: 7am to 6pm Monday to Friday 8am to 1pm Saturdays; and - At no time on Saturdays and NSW public holidays. The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary; - The delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or - Emergency work to avoid the loss of life, property and/ or material harm to the environment.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26 - Letter from NEoen titled "Culcairn Solar Farm (SSD 10288) – PA – 52 – Application to extend approved working hours – Bouygues" dated 18/02/25 - Environmental Noise Assessment Report, from DDEG, dated 17/02/25 - Letter from DPHI titled "Culcairn Solar – Working out of hours request (Bouygues)" dated 07/02/25 - Letter from DPHI titled "Request to Temporarily Extend Construction	Some out of hours works have been undertaken during the Audit period, these were for cable pulling and the oil filling of transformers undertaken on a 24 hour per day basis for 8 consecutive days between 14th and 22nd of March 2025. A noise assessment was undertaken for these activities which demonstrated compliance with the ICNG would be achieved. DPHI approved the OOH works on 4/3/25. Community notifications were issued for the works. All other works were noted to be within the approved hours.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		Hours to complete road upgrade" dated 10/12/24 - Email from Neoen, titled "Transgrid out of hours Saturday 29/03 and Sunday 30/03" dated 28/03/25 - Email from Neoen, titled "Works on Saturday afternoons in the substation area" dated 23/04/35		
Noise				
17	The Applicant must: - 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 - 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.	- BYCA Plant Onboarding Process - Construction Noise and Vibration Monitoring Plan (CNVMP) - Email from Neoen, titled "Fence and Shed" dated 22/07/24 - Email from Neoen, titled Piling occurring close to R14 Boundary", dated 20/08/24	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. At the time of the Audit site inspection, all construction activities were completed with operational activities inaudible when observed from the site boundary. As recommended by the previous Audit, targeted consultation was undertaken prior to impact piling to minimise impacts to the residents. As recommended by the previous audit, targeted consultation was undertaken with sensitive receivers prior to impact piling to minimise impacts.	Compliant
Dust				
18	The Applicant must minimise the dust generated by the development.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26	At the time of the Audit site inspection, construction works have been completed with all dust generating activities such as excavation and spoil management completed. Internal site roads and hardstand areas were sealed with vegetative groundcover provided throughout the solar farm to prevent dust generation. No offsite dust impacts were observed during the Audit site inspection.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
Visual				
19	The Applicant must; a) Minimise the off site visual impacts of the development, including the potential for any glare or reflection; b) Ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and c) Not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	• Audit site Inspection 18/6/26 • Audit Interview 18/6/26	The site compound was observed be installed in a central location within the site with significant buffer distance with the nearest residents. Plant boundary screening trees were installed to minimise visual impacts. No advertising signs or logos were observed during the Audit site inspection.	Compliant
Lighting				
20	The Applicant must; a) Minimise the off site lighting impacts of the development; and b) Ensures that any external lighting associated with the development; • Is installed as low intensity lighting (except where required for safety or emergency purposes); • Does not shine above the horizontal; and • Complies with <i>Australian/ New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version.	• Audit site Inspection 18/6/26 • Audit Interview 18/6/26	There were no lights observed at the premises that would result in off site impacts. Lights installed in the office and amenities area were low level lighting and were directed downwards.	Compliant
HERITAGE				
Protection of Heritage Items				
21	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6, 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>	• Audit site Inspection 18/6/26 • Audit Interview 18/6/26 • Aboriginal Heritage, Surface Collection Salvage Report, Culcairn Solar Farm, NGH dated 26/4/24 • Certificates of Completion (Various)	NGH consultants have been engaged to oversee the salvage artefacts. NGH have undertaken the salvage work and have produced a Salvage report which notes the following: • Salvage, via surface collection of Aboriginal	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	(DECCW, 2010), or its latest version. <i>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 6.</i>	– Aboriginal Cultural Session	heritage items, has been sufficiently carried out in line with the CoA and HMP for the Project by NGH archaeologists with Aboriginal RAP representatives. - 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. - 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. - 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. - 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. - 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. In addition to the above, the Auditor notes the following: - No unexpected finds have been encountered to date - The Project induction includes a section on Aboriginal heritage and the unexpected finds process - Remaining items of aboriginal heritage	

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			significance. Such as the Scar tree were protected with "No Go Fencing" Project team members have received cultural awareness training	
22	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. Note: The location of the Aboriginal Heritage items referred to in this condition are shown in the figure in Appendix 6	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26 - Aboriginal Heritage, Surface Collection Salvage Report, Culcairn Solar Farm, NGH dated 26/4/24	Refer to Auditor's findings in relation to Condition 21 as noted above.	Compliant
Heritage Management Plan				
23	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: - Be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary; - Be prepared in consultation with Heritage NSW and Aboriginal Stakeholders; - Include a description of the measures that would be implemented for: - Protecting the Aboriginal heritage items identified in Table 1 of Appendix 6 or items located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6; - A contingency plan and reporting procedure if: - Previously unidentified heritage	- Heritage Management Plan (HMP) (V2.2, dated 27 November 2023) approved on 01/12/2023. - Letter from DPHI to Neoen titled "Culcairn Solar Farm – Heritage Management Plan" dated 23/1/24	The HMP was approved by DPHI on the 23/1/24. Please refer to Condition 21 above for additional information and evidence demonstrating the effective implementation of the plan.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	items are found; or - Aboriginal skeletal material is discovered; • Ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of those inductions; and • Ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and d) Include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. Following the Planning Secretary's approval the Applicant must implement the Heritage Management Plan.			
SOIL AND WATER				
Water Supply				
24	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. <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>	• Audit site Inspection 18/6/26 • Audit Interview 18/6/26 • Water Filling Station and Overhead Standpipe Information and Application, from Greater Hume Council, dated 02/05/24 • Water Filling Station and Overhead Standpipe Information and Application, from Greater Hume Council, dated 06/05/24	Minimal water is required for the operational phase, mostly for office and domestic purposes as well as firefighting. A water tanks is available on site to collect roof runoff so it may be reused for domestic purposes. Additional water is supplied by Greater Hume Council, accessed from standpipes and supplied to the Project under a subcontractor agreement.	Compliant
Water Pollution				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
25	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26 - Incident Register	All operating areas were inspected, and it was observed: - The site is sealed with adequate ground cover provided to prevent erosion - Chemicals and fuels were securely stored in bunded containers and away from drainage lines and waterways. - There was no observed evidence of pollution, - Regular site inspections are undertaken by the BYCA to ensure the risk of water pollution incidents does not occur.	Compliant
Operating Condition				
26	The Applicant must: - 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; - 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; - Ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and - 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.	- Surface Water Management Plan (SWMP) - Erosion and Sediment Control Plan Appendix C of the Soil and Water Management Plan - Culcairn Solar Farm. NGH Pty Ltd. NGH, 2023 - Email from DPHI to Neoen titled "Culcairn Solar Farm – Surface Water Management Plan" dated 22/1/24 - Letter from Robert Bird Group titled "Culcairn Solar Farm- Civil Design Creek Crossing Compliance" dated 1/5/24	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. No erosion and sediment control issues were identified by the Audit. All construction activities have been completed with ground cover established and permanent drainage installed. 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 Waterfront Land" dated 1/5/24.	Compliant
HAZARDS				
Fire Safety Study				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
27	Prior to commencing construction of the battery storage facility, the Applicant must prepare a Fire Safety Study for the development, in consultation with FRNSW and RFS. The study must: a) be consistent with the: • Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline and FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations; • NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and b) describe the final design of the battery storage facility; c) include reasonable worst-case fire scenario to and from the battery storage and the associated fire management; and d) identify measures to eliminate the expansion of any fire incident including: • adequate fire safety systems and appropriate water supply; • separation and / or compartmentalisation of battery units; and • strategies and incident control measures specific to the battery storage design. Following completion of the Study, the Applicant must implement the measures described in the Fire Safety Study.	• Audit site Inspection 18/6/26 • Audit Interview 18/6/26 • Letter from Fire & Rescue, titled "Review of Fire and Safety Study (FSS) – Culcairn BESS – Weeamera Road, Culcairn" dated 18/05/26	The Fire Safety Study has been completed and reviewed by Fire and Rescue, NSW. In their correspondence, FRNSW noted the following "FRNSW have reviewed the updated FSS prepared by Planager Pty Ltd. The current version of the FSS (Document Number B-689 Rev 1.0 Dated: 01/05/2026) supported by the associated documents (Fire Test Reports) has been prepared to the satisfaction of FRNSW." Construction of the BESS had not commenced at the time of the Audit.	Compliant
Safety Management Study				
28	Prior to commencing construction, unless the Planning Secretary agrees otherwise, the Applicant must prepare a Safety Management Study for the development, in consultation with the owner of the gas pipeline. The study must include an assessment of potential electrical hazards, and must be consistent with the <i>Australian Standard 2885 for Pipelines – Gas and Liquid Petroleum</i> and <i>Australian Standard 4853-2012 – Electrical Hazards on Metallic</i>	• APA Licence 24 Land Use Change & Encroachment Safety Management Study Rev 0 dated 22/09/2023. • Letter from DPHI titled "Culcairn Solar Farm Safety Management System" dated 13/12/23 • Letter from DPHI, titled "Culcairn	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." Accordingly, the DPHI requested Neoen to submit a revised Safety Management Study which includes the	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<i>Pipelines.</i> Following completion of the Study, the Applicant must implement the measures described in the Safety Management Study.	Solar – Safety Management System” dated 03/06/25 APA Licence 24 Land Use Change and Encroachment Safety Management Study, from Neoen, dated 22/05/25	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” As noted in accordance with the DPHI letter of approval dated 12/12/23, the safety management system was revised and resubmitted to DPHI prior to commencing the construction and installation of electrical equipment within the gas pipeline easement. DPHI approved the revised Safety Management System on 3/3/26.	
Storage and Handling of Dangerous Goods				
29	The Applicant must store and handle all chemicals, fuels and oils used on site in accordance with: - The requirements of all relevant Australian Standards; and - The NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> if the chemicals are liquids. 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.	- Audit site Inspection 18/6/26 - Audit Interview 18/6/26	Only minor volumes of fuels and chemicals were stored on site. Fuels and chemicals were stored in appropriately with spill kits available to clean up any spills.	Compliant
Bush Fire Management				
30	The Applicant must; - Minimise the fire risks of the development, including managing vegetation fuel loads on site; - Ensure that the development; - Includes at least a 10 metre defendable space around the perimeter of the solar array area that permits unobstructed vehicle access; - Manages the defendable space and solar array areas as an Asset Protection Zone; - Complies with the relevant asset protection requirements in the RFS's <i>Planning for</i>	- Email from DPHI titled “Culcairn Solar Farm, Bushfire and Emergency Plan” dated 23/1/24” - Audit site Inspection 18/6/26 - Email from Neoen, titled “CUSF Fire Rescue Site Visit” dated 17/04/26 - CUSF Fire risk report, from Equans, (undated) - Meeting notes – Fire preparation and Lessons Learned fire Incident Walla SF, dated 21/11/25	During the Audit site inspection, the following measures were observed to be implemented to minimise the risk of bushfire: 45,000L fire water tanks (10 in total) - Provision for 10m defendable space around the perimeter of the solar facility - Fire extinguishers located at both the site compound areas and within each site vehicle. - Other materials and equipment that may be deployed in the event of a fire such as excavators and spoil.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<i>Bushfire Protection 2019 (or equivalent)</i> and <i>Standards for Asset Protection Zones</i>; 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 connection located adjacent to an internal access road; c) Assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and d) Notify the relevant local emergency management committee following construction of the development, and prior to the commencing of operations.		As recommended by the previous Audit a pre-bushfire season readiness review was undertaken to ensure the site team are prepared to respond to a bushfire emergency.	
Emergency Plan				
31	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; l) 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 (or equivalent)</i>; m) Identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; n) List works that should not be carried out during a total fire ban o) Include availability of fire suppression equipment, access and water; p) Include procedures for the storage and maintenance of any flammable materials; q) Detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;	- Culcairn Solar Farm, Bushfire and Emergency Plan (BEP), NGH 19/1/24 - Email from APA to Neoen titled "APA448542 RE: Culcairn Solar Farm – Emergency Management Plan for APA comments" dated 31/10/23 - Email from Fire and Rescue NSW titled "Culcairn Solar Farm Finalized Bushfire and Emergency Plan +ESIP" - Email from RFS to Neoen titled "Culcairn Solar Farm- Finalized EMP- RFS No objection" - Email from Bougues, titled "CUSF – PCS 42 Grass fire" dated 15/12/25 - Interim Incident Report, from Bouygues, dated 15/12/25 - Email from Bouygues, titled "BEMP Review" dated 23/02/26 - Email from Bouygues, titled "BEMP Review – Transition to O&M" dated 24/02/26	The BEP was issued to the owners of the gas pipeline (APA) who confirmed they do not have any comments. Fire and Rescue NSW noted they are satisfied with the BEP as it relates to this stage of the Project. The BEP was kept on site in an easily accessible location (with the other management plans).	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	r) Include a figure showing site infrastructure, Asset Protection zone and the on site water tank; s) 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; t) 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; u) Include bushfire emergency management planning; and v) Include details of how the RFS would be notified, and procedures that would be implemented, in the event that; • There is a fire on site or in the vicinity of the site • There are any activities on site that would have the potential to ignite surrounding vegetation; or • There are any proposed activities to be carried out during a bushfire danger period; and • Offer representatives of the local RFS brigade an opportunity to undertake a site familiarisation following construction of the development, and prior to commencing operations. Following approval the Applicant must implement the Emergency Plan.			
WASTE				
32	The Applicant must; a) Minimise the waste generated by the development b) Classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version); c) Store and handle all waste on site in accordance with its classification; d) Not receive or dispose of any waste on site; and	• Audit site Inspection 18/6/26 • Audit Interview 18/6/26 • Waste tracking register • Monthly Environment Reporting, (undated)	Minimal waste has been produced on the Project to date, a water tracking register has been prepared. Only non- hazardous waste, wastewater/sewage and office waste has been generated by the Project to date. Appropriate waste and recycling facilities have been	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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.		provided on site.	
ACCOMMODATION AND EMPLOYMENT STRATEGY				
33	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. This strategy must: - Propose measures to ensure there is sufficient accommodation for the workforce associated with the development; - Consider the cumulative impacts associated with other State significant development projects in the area; - Investigate options for prioritising the employment of local workers for the construction and operation of the development where feasible; and - Include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction. Following the Planning Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.	- Accommodation and Employment Strategy (AES) (V4, dated September 2023) - Letter from DPHI to Neoen titled "Culcairn Solar Farm Accommodation and Employment Strategy" dated 8/11/23 - Audit Interview 18/6/26 - Community Engagement Businesses Reduced, dated 10/02 - Tracker AIP, (undated)	The AES has been prepared and approved by DPHI on the 8/11/24. 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 secured some rental houses for the Project, however and utilise local hotels An accommodation camp was not established 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). 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 were engaged throughout the project.	Compliant
DECOMMISSIONING AND REHABILITATION				
34	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; Include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Table 4 below;	N/A	Not triggered until following operation	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	b) Describe the measures that would be implemented to; - Decommission the development and rehabilitate the site in accordance with the objectives in Table 4; - Minimise and manage the waste generated by the decommissioning of the development; and - Include a program to monitor and report on the implementation of these measures against the detailed completion criteria. The Applicant must decommission and rehabilitate the site in accordance with the approved Decommissioning and Rehabilitation Plan.			
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.	N/A	Not triggered until following the cessation of operation	Not Triggered

Schedule 4 – Environmental Management and Reporting

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT				
Environmental Management Strategy				
1	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: a) Provide the strategic framework for environmental management of the development; b) Identify the statutory approvals that apply to the development; c) Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; d) Describe the procedures that would be implemented to; • Keep the local community and relevant agencies informed about the operation and environmental performance of the development; • Receive, handle, respond to and record complaints; • Resolve any disputes that may arise; • Respond to any non-compliance; • Respond to emergencies; and e) Include; • References to any plans approved under the conditions of this consent; and • A clear plan depicting all the monitoring to be carried out in relation to the development. Following the Planning Secretary's approval, the	• Environmental Management Strategy (EMS) (Rev V5, January 2024) approved on 25/01/2024. • Letter from DPHI to Neoen titled "Environmental Management Strategy" dated 25/1/24	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.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Applicant must implement the Environmental Management Strategy.			
Revision of Strategies, Plans and Programs				
2	The Applicant must: a) Update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and b) Review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the: - Submission of an incident report under condition 7 of Schedule 4; - Submission of an audit report under condition 11 of Schedule 4; or - Any modification to the conditions of this consent.	- Audit interview 18/6/26 - Letter from DPHI, titled "Culcairn Solar Farm Landscaping Plan (V8)" dated 25/02/25 - Letter from DPHI, titled "Culcairn Solar Farm – Heritage Management Plan" dated 05/03/25 - Letter from DPHI, titled "Biodiveristy Management Plan" dated 17/03/25 - Letter from DPHI, titled "Culcairn Solar Farm – Accommodation and Employment Strategy" dated 04/04/25 - Letter from DPHI, titled "Culcairn Solar Farm – Environmental Management Strategy" dated 01/05/25 - Email from Bouyges, titled "BEMP Review" dated 23/02/26 - Letter from DPHI, titled "Culcairn Solar – Notification – Incident – Fires – 15 and 29 December 2025" dated 03/02/26 - Email from Bouygues, titled "BEMP Review – Transition to O&M" dated 24/02/26 - Letter from DPHI, titled "Culcairn Solar – Fire Safety Study and Emergency Plan Staging" dated 09/09.25 - Letter from Fire and Rescue, titled "Review of Fire Safety Study (FSS) – Culcairn Bess –	Management Plans reviewed and updated during the Audit period include the following - Landscaping Management Plan - Heritage Management Plan - Biodiversity Management Plan - Accommodation and Employment Strategy - Environmental Management Strategy - Safety Management System DPHI letters of approval were provided to the Auditor. Following the fires a review of the Bushfire and Emergency Plan was initiated and the findings will be included in the Emergency Plan that will be submitted for the BESS. However at the time of the Audit, the plan was still under final preparation and review as consultation with the operators of the BESS is required prior to finalisation.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		Weeamera Road, Culcairn" dated 18/05/26		
Updating and Staging of Strategies, Plans or Programs				
3	With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Planning Secretary for approval. With the agreement of the Planning Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent. Notes: - 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. - If the submission of any strategy, plan or program is to be staged then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any further stages, and the trigger for updating the strategy, plan or program.	- Audit interview 18/6/26 - Letter from DPHI to Neoen titled "Request to Stage Traffic Management Plan and Environmental Management Strategy" dated 23/11/23	DPHI have approved the staging of the TMP and the EMS in five stages	Compliant
NOTIFICATIONS				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
Notification of Department				
4	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	- Letter from Neoen to DPHI titled "Culcairn Solar Farm (SSD 10388)- Notice of Upgrade Commencement and expected onsite Construction Start" dated 18/1/24 - 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 - Letter from DPHI to Neoen titled "Culcairn Solar Farm, Notice of new commencement date of construction on site – 18 March" dated 14/3/24 - Letter from Neoen, titled "Culciarn Solar Fsrn (SSD 10288) – Notification of Commencement of Operation" dated 17/04/26 - Letter from Neoen, titled "Culcairn Solar farm (SSD 10288) – Notification of Commencement of operation" dated 22/04/26 - Letter from DPHI, titled "Culcairn Solar – Notification – Commencement Operations" dated 27/04/26	Neoen provided formal notification to DPHI on 18 January 2024 stating that works would commence 24 January 2024. DPHI issued a response noting Neoens Neoen's obligations. A further update was provided to DPHI on 13/3/24 advising the revised construction commencement date of 18/3/24 During this Audit period, DPHI were notified on the 17/4/26 of the operational commencement date. DPHI acknowledged the notificaton on 27/4/26.	Compliant
Final Layout Plans				
5	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, showing comparison to the	- Culcairn Solar Farm, Final Layout Plans, drawing number NEO-CUSF-1000PV-DWG-1 - Email from Neoen to DPHI titled	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	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	approved layout and including details on the siting of solar panels and ancillary infrastructure, via the Major Projects website.	"Culcairn Solar Farm – Final Layout Plans SSD-10288 – PA 36 – Request for Additional Information" Culcairn Solar Farm SSD Post Approval document" dated 6 May 2024	addressed by Neoen.	
Work as Executed Plans				
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.	- Email from Major Projects Planning, titled "Culcairn Solar Farm – Work as executed plan" dated 05/06/26 - Site Plans from Neoen, titled "Operational Layout Preliminary Design" (undated)	Work as executed plans were issued to DPHI on 5/6/26 and were provided on the project website.	Compliant
Incident Notification				
7	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7.	- Audit interview 18/6/26 - Incident Register - Email from Major Projects titled "Communication regarding Hydraulic oil leak – 5 litres – Incident 9 August 2024 SSD – 10288-PA-47" dated 01/09/24 - Email from Major Projects, titled "Communication regarding Notification – incident septic tank leak – 22 Nov 24 SSD-10288-PA-55" dated 27/11/24 - Email from Major Projects, titled "Communication regarding Notification – 200ml oil leak in site – 9 May 2024 SSD-10288-PA-40" dated 09/06/24 - Email from Major Projects, titled	During the Audit period, eight incidents were reported to DPHI as follows: - Minor oil and fuel spills (5) - Septic tank leak (2) - Fires (x2) On 3/2/26, DPHI formally responded to the fire notifying events noting that the fires occurred on the 15 and 29 of December, however the notification was not issued until the 29/1/26. This timeframe does not meet the requirement to notify the incidents immediately. Subsequently DPHI confirmed a breach of this condition has occurred. The Auditor notes that some of the incidents reported (such as minor fuel/ hydraulic spills that were contained on site with effective control and cleanup may not have	Non Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		“Communication regarding Notification – Incident – spill 5L – 13 Nov 24 SSD-10288-PA-57” dated 27/11/24 - Email from Major Projects, titled “Communication regarding Notification – Incident – spill 5L – 27 March 2025 SSD-10288-PA-58” dated 31/03/25 - Email titled Major Projects, titled “Communication Regarding Notification fuel leak incident 23 Sept 24 SSD-10288-PA-50” dated 30/09/24 - Email from Major Projects, titled “Culcairn Solar Farm – Incident, Septic tank spill” dated 17/02/25 - Email from Major Projects, titled “Culcairn Solar farm – Post Approval Document Received – (SSD-10288-PA-90)” dated 29/01/26	triggered the definition of a reportable incident in accordance with the conditions of consent. Recommendation It is therefore recommended that: - A review of the incident classification and reporting incident procedure is undertaken to more clearly define incidents that “cause or threaten” material harm in accordance with the conditions of consent - All incidents that meet the definition of material harm including fires are reported to DPHI immediately.	
Non-Compliance Notification				
8	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance	Audit interview 18/6/26	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.	Audit interview 18/6/26	There have been no non compliances reported to date.	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
10	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Audit interview 18/6/26	There have been no non compliances reported to date.	Not Triggered
INDEPENDENT ENVIRONMENTAL AUDIT				
11	Independent Audits of the development must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements</i> (2020) to the following frequency: - Within 3 months of the commencing construction; and - Within 3 months of the commencement of operations.	This Audit report	The initial audit was undertaken on the 21st of May 2024 within 3 months of the commencement of construction. This operational audit was undertaken on 18th of June 2026, within three months of the commencement of operation on 27/4/26.	Compliant
12	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Letter from DPHI titled "Culcairn Solar – Independent Environmental Audit- Auditor Endorsement Request Operatio"s" dated 26/5/26	Independent Auditors were approved by DPHI on 2/1/24 for the initial Audit and on 25/5/26 for the operational Audit The letter of approval for the operational audit 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 must be commenced.	Audit Interview 18/6/26	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
14	In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements</i> (2020), the Applicant must: - 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; - Submit the response to the Planning Secretary; and - Make each Independent Audit Report, and response to it, publicly available	- Letter from Neoen to DPHI titled "Independent Environmental Audit" dated 17/7/24 - Independent DPHI Compliance Audit, SSD 10288 Culcairn Solar Farm, Trigalana Environmental, dated 10/7/24 Documents – Culcairn Solar Farm	The previous Audit report was submitted to the Planning secretary on 17/7/24. A copy of the submission letter and the Audit report were available on the NEOEN website.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	within 60 days of the submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.			
15	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approvals Requirements (2020)</i> unless otherwise agreed by the Planning Secretary.	Documents – Culcairn Solar Farm - Letter from Neoen to DPHI titled "Independent Environmental Audit" dated 17/7/24 - Independent DPHI Compliance Audit, SSD 10288 Culcairn Solar Farm, Trigalana Environmental, dated 10/7/24	The previous Independent Audit report was submitted to DPHI on 17/7/24, with 2 months of the completion of the Audit site inspection on the 21/5/24,	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.	N/A	Not triggered, there has not been any request made in accordance with this condition.	Not Triggered
ACCESS TO INFORMATION				
17	The Applicant must; - Make the following information publicly available on its website as relevant to the stage of the development; - The EIS; - The final layout plans for the development; - Current statutory approvals for the development; - Approved strategies, plans or programs required under the conditions of this consent; - The proposed staging plans for the development if the construction, operation or	Culcairn Solar Farm - Clean Energy For NSW	The following plans documents were provided on the website: - Environmental Impact Statement 2020 - Submissions Report - Amendment Report - Accommodation and Employment Strategy - Biodiversity Management Plan - Construction & Noise Vibration Management Plan - Environmental Management Strategy - Groundcover Management Plan - Heritage Management Plan - Landscape Plan - Soil and Water Management Plan	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	decommissioning of the development is to be staged; • How complaints about the development can be made; • Provide a 24hr telephone line and instruction as to how complaints or enquiries about how the development can be made; • Any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • Any other matter required by the Planning Secretary; and b) Keep this information up to date.		• Traffic Management Plan • Waste Management Plan • Community Communication Strategy • Final Layout Plans • Environmental Audit Reports • Link to Major Portal website • Complaints Management: • 24hr phone line • Complaints process • Email address	

Appendix C Site Photographs



Photo 1: Solar panels and environmental protection signage



Photo 2: Solar panels and sealed internal access road



Photo 3: Danger advisory signage, APA high pressure gas main



Photo 4: Location markers, APA high pressure gas main



Photo 5: Fire water tank

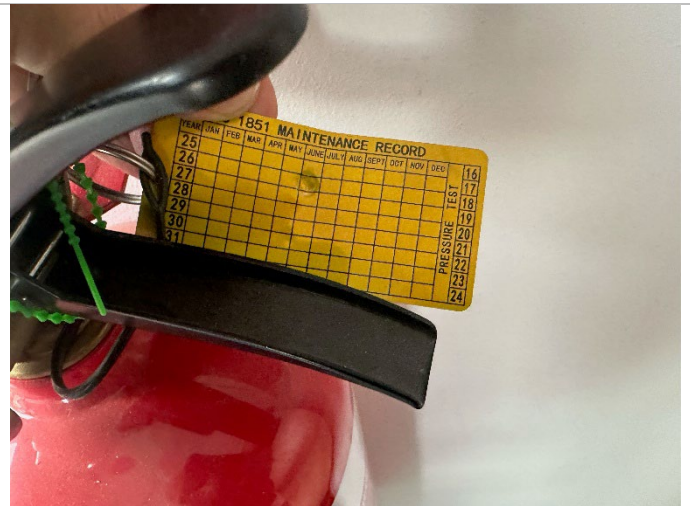


Photo 6: Fire extinguisher maintenance record

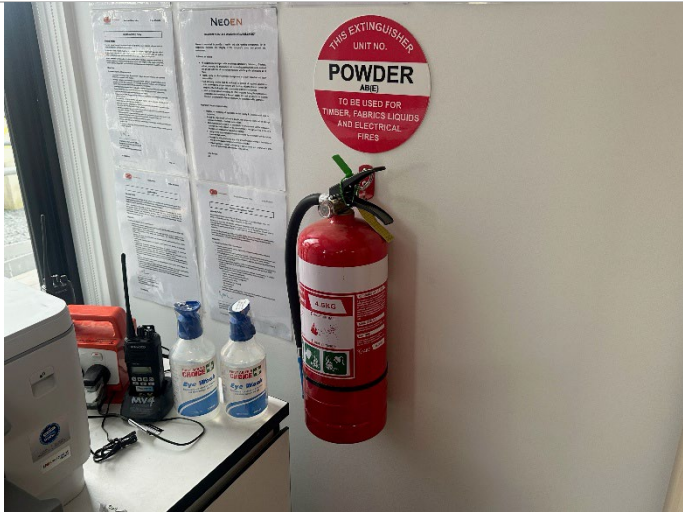


Photo 6: Fire extinguisher – office compound



Photo 7: Fire extinguisher – site vehicle



Photo 8: Emergency assembly point and emergency documentation, site entrance



Photo 9: Speed restriction signage



Photo 10: Fire risk advisory signage



Photo 11: Visual screening for sensitive residential receiver



Photo 12: Solar arrays and inverters



Photo 13: Sealed internal access road and weed die back



Photo 14: Sealed internal access road



Photo 15: Construction phase rumble grid and vehicle washdown, retained for BESS construction



Photo 16: Slasher in operation



Photo 17: Biodiversity plantings



Photo 17: Retained course woody debris habitat features



Photo 18: Retained course woody debris habitat features



Photo 18: Nest box



Photo 19: Aboriginal cultural heritage feature



Photo 20: Biodiversity Plantings



Photo 21: Site location for BESS installation



Photo 21: Restricted access, no go fencing and signage for APA zone



Photo 22: Fully stocked spill kit



Photo 23: Office waste and recycling bins



Photo 24: Permanent waterway crossing/drainage feature

Appendix D Stakeholder Consultation

Appendix D-1 Consultation Summary

Organisation	Key Issues/Comments	Auditor Response
DPHI	The Department would like the below stakeholders to be consulted: • Local Aboriginal Councils (RAPS) • EPA • Great Hume Council • DPIE Water • FRNSW • RFS • TfNSW • Heritage NSW	These organisations were consulted with prior to and during the Audit with summary of responses and issues raised as noted below
	Compliance with commitments, reporting and monitoring requirements in relevant management plans.	Refer to Appendix A.
	Management plans updated to reflect current stage of development.	Since the initial Audit, management plans have been updated during the Audit period to reflect the current stage of the development • Landscaping Management Plan • Heritage Management Plan • Biodiversity Management Plan • Accommodation and Employment Strategy • Environmental Management Strategy • Safety Management System
	Appropriate approvals have been obtained for infrastructure such as CC and OCs.	Refer to the Auditors response to Schedule 2, Condition 7 in Appendix B
	VPA has been entered into and implemented.	The VPA 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 with evidence of further payments provided to the Auditor
	BESS construction, location and capacity complies with consent.	At the time of the Audit site inspection, Construction of the BESS has not commenced. The Auditor notes that approval to increase the capacity of the BESS has been obtained during the Audit period.
	Compliance with the Vegetation buffer conditions Schedule 3 condition 10 have been established and tracking to meet conditions requirements.	As observed during the Audit site inspection, vegetation buffer zones have been implemented with maintenance activities being undertaken including slashing, mowing and weed management.
	Compliance with the implementation, monitoring, reviewing and reporting requirement in the LMP Schedule 3 condition 11.	As observed during the Audit site inspection, landscape plantings have been completed. A contractor has been appointed to maintain with monthly maintenance reports provided to the Auditor as evidence. Monthly reports include details of rainfall, soil moisture site plant numbers,

Organisation	Key Issues/Comments	Auditor Response
		tree replacements, maintenance works undertaken, works undertaken (e.g weeding, brush cutting etc).
	Weed monitoring and management.	A contractor has been appointed to maintain with monthly maintenance reports provided to the Auditor as evidence. Monthly reports include details of rainfall, soil moisture site plant numbers, tree replacements, maintenance works undertaken, works undertaken (e.g weeding, brush cutting etc). There was no proliferation of weeds and some die back/evidence of weeding observed. Weeds were being slashed at the time of the site inspection.
	Fire Safety Study has been implemented.	Although the construction of the BESS has not commenced, the Fire Safety Study has been
	Measures required in Schedule 3 condition 30 and 31 have been implemented and maintained and site shows preparedness for Bushfires or other emergencies.	Refer to Appendix A and Appendix C for site photographs of fire protection measures
	Waste management on site.	Minimal waste has been produced on the Project to date, a waste tracking register has been prepared. Only non-hazardous waste, wastewater/sewage and office waste has been generated by the Project to date. Appropriate waste and recycling facilities have been provided on site.
Local Aboriginal Councils (RAPS)	The Auditor contacted a representative of the Local Aboriginal Land Council who noted the following: - Aboriginal stakeholders were consulted with throughout the project and were involved with the pre-construction surveys and salvage of artefacts - Prior to the commencement of construction an immersive training program with management was held - Employment opportunities were provided by the project to local aboriginals. A bus was arranged to transport workers to site from Albury each day - The stakeholder was generally satisfied with the level of project engagement - Artefacts have now been returned to country under the supervision of the RAPS - Opportunities to procure local aboriginal suppliers have been initiated	Noted.
EPA	No response received	N/A
DPIE Water	The requirement to prepare and implement management plans that relate to water sources and their dependent	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:

Organisation	Key Issues/Comments	Auditor Response
	ecosystems and users, and associated impact management and mitigation. These plans may include: - Water Management Plans and related sub-plans e.g. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. - Extraction Plans and related sub-plans e.g. Water Management Plan, Subsidence Management Plan. - The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting. - Water supply availability is clearly defined for the Project. - Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018. - Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant. - Water Access Licence/s used to account for water take by the Project nominates the work where the water is being taken from. - Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.	- Soil and Water Management Plan - Spill response procedure - Erosion and Sediment Control Plan Minimal water is being consumed by the Project to date, an agreement with Greater Hume Council has been entered into to supply water from an existing Council Borehole The works will not result in impacts to groundwater (groundwater depths are >100m) and this is addressed in the Soil and Water Management Plan.
FRNSW	The Auditor spoke to the FRNSW representative who advised that now the project is operational, they would like to visit the site to familiarise themselves with the key aspects including fire fighting resources, water etc as well as access arrangements etc	Noted, a recommendation has been made to invite the local FRNSW team to the site for a familiarisation induction as requested.
RFS	No response received	N/A
TFNSW	TfNSW raise a number of issues as follows: - Compliance with Instrument of Consent for transport-related conditions. - Implementation and enforcement of shuttle bus arrangements	The issues TfNSW have raised mainly relate to the construction phase, which is now complete. The project is now fully in the operational phases with minimal traffic visiting the site each day. Traffic records were provided for both the construction and operational phases with no exceedences of criteria or the relevant conditions of consent. Pre and Post construction road condition surveys have been completed with no damage to the local roads recorded. The surveys have been prepared in consultation with Greater Hume Shire Council and approved by DPHI

Organisation	Key Issues/Comments	Auditor Response
	• Management of construction traffic volumes during AM and PM peak periods. • Any pre-construction minor works mitigation measures and associated Planning Secretary approvals. • Completion of road upgrades and compliance with the scope of the road upgrades set within the Instrument of Consent. • Implementation of the Traffic Impact Assessment (TIA) and Traffic Management Plans (TMPs). • Commitments made within the Environmental Impact Statement (EIS). • Assumptions underpinning the assessed traffic task within the TIA, including traffic distribution assumptions. • Effectiveness of mitigation measures detailed within the TMP. • Alignment between assessed and actual traffic volumes and vehicle characteristics. • Suitability of existing intersection treatments under cumulative background and project traffic. • Ongoing appropriateness of approved OSOM routes for the configurations being utilised. • Any incidents of non-compliance with mitigation measures, commitments or assessed traffic volumes, and measures implemented in response. • Audit report outcomes and recommended actions relevant to the State road network	Traffic Management Plans have been updated throughout the Audit period to reflect the current stage of work Road upgrades were completed and endorsed by Council The Auditor was provided with examples of oversize, overmass permits relating to the construction phases as well as records of heavy vehicle movements with no exceedences of the limits in this condition Further information is provided in Appendix B
Greater Hume Council	Council confirmed they have no issues requiring the Auditors attention.	• Noted.

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 21st 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

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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

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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 21th 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

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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

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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

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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

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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

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

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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

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Appendix D-3 Correspondence Received

richard.peterson-trigalana@outlook.com

From: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>
Sent: Thursday, 21 May 2026 8:54 AM
To: Richard Peterson
Subject: RE: SSD10288 - Culcairn Solar Independent Environmental Audit (Operations - Consultation)

Good morning Richard,

The Department would like the below stakeholders to be consulted:

Local Aboriginal Councils (RAPS)
EPA
Great Hume Council
DPIE Water
FRNSW
RFS
TfNSW
Heritage NSW

Areas of focus to include:

Compliance with commitments, reporting and monitoring requirements in relevant management plans.
Management plans updated to reflect current stage of development.
Appropriate approvals have been obtained for infrastructure such as CC and OCs.
VPA has been entered into and implemented.
BESS construction, location and capacity complies with consent.
Compliance with the Vegetation buffer conditions Schedule 3 condition 10 have been established and tracking to meet conditions requirements.
Compliance with the implementation, monitoring, reviewing and reporting requirement in the LMP Schedule 3 condition 11.
Weed monitoring and management.
Fire Safety Study has been implemented.
Measures required in Schedule 3 condition 30 and 31 have been implemented and maintained and site shows preparedness for Bushfires or other emergencies.
Waste management on site.

Regards
Katrina

From: Richard Peterson <Richard.Peterson@trigalana.com>
Sent: Monday, 18 May 2026 8:46 AM
To: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>
Cc: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Subject: SSD10288 - Culcairn Solar Independent Environmental Audit (Operations - Consultation)

Hi Katrina

richard.peterson-trigalana@outlook.com

From: Colin Kane <CKane@greaterhume.nsw.gov.au>
Sent: Friday, 26 June 2026 4:29 PM
To: Richard Peterson
Subject: RE: SSD 10288 - Culcairn Solar Farm Independent Environmental Audit (Operations) - Consultation

Hello Richard

Sorry for the slow response. I can advise that Council has no issue requiring your attention.

Regards

Colin Kane
Director Environment and Planning
Greater Hume Council
39 Young St
PO Box 99
Holbrook NSW 2644
T 02 6036 0131 M 0428 667 071



www.greaterhume.nsw.gov.au

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From: Richard Peterson <Richard.Peterson@trigalana.com>
Sent: Saturday, 30 May 2026 2:36 PM
To: MailMailbox <mail@greaterhume.nsw.gov.au>
Subject: SSD 10288 - Culcairn Solar Farm Independent Environmental Audit (Operations) - Consultation

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To Greater Hume Council

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. The following 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](#) and in accordance with the DPHI Independent Audit guideline.

[Independent Audit – Post Approval Requirements – March 2026](#)

richard.peterson-trigalana@outlook.com

From: Daryl Manson <Daryl.Manson@fire.nsw.gov.au>
Sent: Tuesday, 2 June 2026 1:59 PM
To: richard.peterson@trigalana.com
Subject: FW: SSD 10288 - Culcairn Solar Farm Independent Environmental Audit (Operations) - Consultation

Good afternoon Richard,

This site is out of FRNSW district. I have nothing to add at this stage.

In saying that once construction commences we would be available to come out for a pre incident plan along the the NSW RFS.

Kind Regards,



INSPECTOR DARYL MANSON
Duty Commander
Regional South 3 | Fire and Rescue NSW
T: 02 5942 9008 | M: 0437 278 256
43-45 Johnston Street, Wagga Wagga, NSW 2650

'Trust is earned in drops and lost in buckets'.

PREPARED FOR ANYTHING.

www.fire.nsw.gov.au



From: RS3 Admin <RS3Admin@fire.nsw.gov.au>
Sent: Monday, 1 June 2026 9:00 AM
To: Daryl Manson <Daryl.Manson@fire.nsw.gov.au>; Stewart Alexander <Stewart.Alexander@fire.nsw.gov.au>
Cc: RS3 Admin <RS3Admin@fire.nsw.gov.au>
Subject: FW: SSD 10288 - Culcairn Solar Farm Independent Environmental Audit (Operations) - Consultation

Please see below



KAYLA GIBBS
Business Support Officer
Area Command Regional South | Fire and Rescue NSW
E: kayla.gibbs@fire.nsw.gov.au
T: (02) 6229 6703
Unit 2/56 Bayldon Road, Queanbeyan NSW 2620

PREPARED FOR ANYTHING.

www.fire.nsw.gov.au



From: Info <Info@fire.nsw.gov.au>
Sent: Monday, 1 June 2026 8:46 AM
To: RS3 Admin <RS3Admin@fire.nsw.gov.au>
Subject: FW: SSD 10288 - Culcairn Solar Farm Independent Environmental Audit (Operations) - Consultation

From: Richard Peterson <Richard.Peterson@trigalana.com>
Sent: Saturday, 30 May 2026 2:41 PM
To: Info <Info@fire.nsw.gov.au>
Subject: SSD 10288 - Culcairn Solar Farm Independent Environmental Audit (Operations) - Consultation

To NSW Fire and Rescue,

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. The following 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](#) and in accordance with the DPHI Independent Audit guideline.
[Independent Audit – Post Approval Requirements – March 2026](#)

The Audit will focus on the operational aspects of the Project.
I am planning on undertaking the audit on the 18th of June 2026 and as part of the audit, the NSW Department of Planning, Housing and Infrastructure (DPHI) have requested I consult with NSWFR 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 16th of June 2026 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

Our ref: OUT26/6513

Richard Peterson
Trigalana Environmental Pty Ltd
Richard.peterson@trigalana.com

4/06/2026

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

Dear Richard Peterson,

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

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

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

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

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

- Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alistair Drew".

Alistair Drew
Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

From: Alexandra Power <Alexandra.Power@transport.nsw.gov.au>
Sent: Friday, 3 July 2026 1:26 PM
To: Richard Peterson
Subject: Re: SSD 10288 - Culcairn Solar Farm Independent Environmental Audit (Operations) - Consultation

Hello Richard,

Apologies for the delay.

fNSW suggests that the Independent Environmental Audit scope for Culcairn Solar Farm considers.

- Compliance with Instrument of Consent for transport-related conditions.
- Implementation and enforcement of shuttle bus arrangements
- Management of construction traffic volumes during AM and PM peak periods.
- .Any pre-construction minor works mitigation measures and associated Planning Secretary approvals.
- Completion of road upgrades and compliance with the scope of the road upgrades set within the Instrument of Consent.
- Implementation of the Traffic Impact Assessment (TIA) and Traffic Management Plans (TMPs).
- Commitments made within the Environmental Impact Statement (EIS).
- Assumptions underpinning the assessed traffic task within the TIA, including traffic distribution assumptions.
- Effectiveness of mitigation measures detailed within the TMP.
- Alignment between assessed and actual traffic volumes and vehicle characteristics.
- Suitability of existing intersection treatments under cumulative background and project traffic.
- Ongoing appropriateness of approved OSOM routes for the configurations being utilised.
- Any incidents of non-compliance with mitigation measures, commitments or assessed traffic volumes, and measures implemented in response.
- Audit report outcomes and recommended actions relevant to the State road network

Kind regards

Alexandra Power

A/Manager Development Services West
Transport Planning
Planning, Integration and Passenger

Transport for NSW

P 1300 019 680 E development.renewables@transport.nsw.gov.au

transport.nsw.gov.au

Working days Monday-Friday 9.30-5.30pm



Transport
for NSW



I acknowledge the Aboriginal people of the country on which I work, their traditions, culture and a shared history and identity. I also pay my respects to Elders past and present and recognise the continued connection to country.

Please consider the environment before printing this email.

From: Richard Peterson

Sent: Friday, June 19, 2026 3:41 PM

To: Kylie.Anne.PONT@transport.nsw.gov.au

Cc: Development Renewables

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

You don't often get email from richard.peterson@trigalana.com. [Learn why this is important](#)

CAUTION : This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

Hi Kylie

I have recently been appointed to undertake an Independent Audit of the Culcairn Solar Farm in NSW. The following 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](#) and in accordance with the DPHI Independent Audit guideline.

[Independent Audit – Post Approval Requirements – March 2026](#)

The Audit will focus on the operational aspects of the Project.

I am planning on undertaking the audit on the 18th of June 2026 and as part of the audit, the NSW Department of Planning, Housing and Infrastructure (DPHI) have requested I consult with TFNSW so any issues or focus areas

Appendix E Auditor Declaration

Project name	Culcairn Solar Farm
Consent Number	SSD-10288
Description of Project	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
Applicant	Neoen Australia Pty Ltd
Date	14 August 2026

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

