



**SNOWY 2.0 TRANSMISSION  
CONNECTION PROJECT**

Independent Environmental Audit  
Construction Audit 2

**FINAL**

December 2024



## SNOWY 2.0 TRANSMISSION CONNECTION PROJECT

Independent Environmental Audit  
Construction Audit 2

### FINAL

Prepared by  
Umwelt (Australia) Pty Limited  
on behalf of  
Transgrid

Lead Auditor: Daniel Sullivan  
Assistant Auditor: Joshua Wheatley  
Report No. 22930/R02  
Date: December 2024



This report was prepared using  
Umwelt's ISO 9001 certified  
Quality Management System.

### **Acknowledgement of Country**

*Umwelt would like to acknowledge the traditional custodians of the country on which we work and pay respect to their cultural heritage, beliefs, and continuing relationship with the land. We pay our respect to the Elders – past, present, and future.*

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### Document Status

Rev No.	Reviewer		Approved for Issue	
	Name	Date	Name	Date
V1	Daniel Sullivan	1 November 2024	Daniel Sullivan	1 November 2024
V2 Final	Daniel Sullivan	3 December 2024	Daniel Sullivan	4 December 2024

# Executive Summary

Umwelt was commissioned by Transgrid to conduct the second construction Independent Environmental Audit (IEA) against infrastructure Approval SSI 9717 - MOD 1 for the Snowy 2.0 Transmission Connection Project. This audit was undertaken for the Department of Planning, Housing and Infrastructure (DPHI) for the period 15 March 2024 to 26 September 2024 (audit period). The audit also assessed compliance with the conditions of the Projects Environment Protection and Biodiversity Conservation Act (EPBC) Approval, management plans and other licence documents.

The audit team responsible for completing the audit as endorsed by DPHI included:

- Daniel Sullivan (Lead Auditor) (Exemplar Global International Certified Lead Auditor 113202)
- Joshua Wheatley (Assistant Auditor)
- Jacob Manners (Biodiversity)
- Luke Wolfe (Aboriginal Cultural Heritage) and
- Melissa Swan (Surface Water/Erosion and Sediment Control).

The audit consisted of a detailed desktop review and onsite audit including interviews with key Transgrid staff and a site inspection which assessed the compliance status of the Snowy 2.0 Transmission Connection Project against the Infrastructure Approval for all construction activities that have occurred within the audit period. The site audit was conducted across two separate dates with the heritage and biodiversity components of the audit occurring on the 11 September 2024 and the environmental management and water components occurring between the 24 – 26 September 2024.

The audit was conducted generally consistent with '*AS/NZS ISO 19011:2018 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing* and the *NSW Department of Planning, Industry & Environment's Independent Audit – Post Approval Requirements* dated May 2020 (Independent Audit Requirements)'.

This audit has concluded that the on the ground environmental management practices being applied at Snowy 2.0 Transmission Connection Project are appropriate. The Maragle (West) and Lobbs Hole (East) Project Areas were assessed during the field inspection and were observed to be well managed with supervisory personnel demonstrating a good understanding of management actions required to minimise environmental impacts from construction activities including the specific measures to manage and minimise biodiversity, Aboriginal cultural heritage and water/sediment and erosion control related impacts.

This audit has concluded that the environmental management practices being applied at the Snowy Hydro 2.0 Transmission Connection Project are appropriate and a high level of environmental compliance is being achieved. All areas of the site that were visited during the site inspection were observed to be well maintained and managed with site personnel demonstrating a good understanding of management actions and responsibilities to minimise impacts from construction activities.

Non-compliances identified during this audit are summarised in **Section 4.0**. None of the identified non-compliances that occurred during the audit period were considered to have caused material harm to the environment.

A review of management plans found that all required plans were in place and being implemented.

A number of recommendations and opportunities for improvement arising from a review of environmental management documentation, the audit site inspection and identified non-compliances are provided in **Section 6.0**.



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# 1.0 Introduction

On 2 September 2022 Transgrid were granted Infrastructure Approval SSI 9717 for the Snowy Hydro 2.0 Transmission Connection Project (the Project). The Infrastructure Approval for SSI 9717 allows for the construction and operation of new 330 kilovolt (kV) transmission lines and associated infrastructure connecting the Snowy 2.0 Main Works Project to the existing electricity grid. A modification of the Infrastructure Approval was determined on 30 August 2024 (MOD 1). MOD 1 sought to provide a 12 month extended period for Snowy Hydro to implement and deliver the biodiversity offset measures set out in the approved Biodiversity Offset Package to account for the delays experienced in the process.

Transgrid is responsible for the management of the Project and have awarded the design and construction contract to UGL (a national engineering and services provider) to complete the construction phase of the Project.

Transgrid commissioned Umwelt to conduct an Independent Environmental Audit (IEA) as required by Part C, Condition 10 of SSI 9717 – MOD 1. The IEA was conducted in accordance with SSI 9717 – MOD 1, NSW Government’s *Independent Audit – Post Approval Requirements* (Independent Audit Requirements) and with *AS/NZS ISO 19011:2018 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing*. As per the requirements stated under Condition C10 in SSI 9717 – MOD 1:

“Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.”

In accordance with the requirements of Condition C10, the Second Construction Audit was completed within six months of the completion of the Initial Construction Audit.

This IEA was conducted by Daniel Sullivan (Exemplar Global International Certified Lead Auditor 113202) and Joshua Wheatley from Umwelt. Daniel and Joshua were supported during the audit by experts in a number of fields including:

- Jacob Manners (Biodiversity)
- Luke Wolfe (Aboriginal Cultural Heritage) and
- Melissa Swan (Surface Water/Sediment and Erosion Control).

This IEA report has been certified by the lead auditor (see **Appendix 1**) as required by the Independent Audit requirements. As required by the Infrastructure Approval, the audit team was approved by DPHI to undertake the audit (refer to **Appendix 2**). The IEA consisted of a detailed desktop review and onsite component including a site inspection and assessed the compliance status of Snowy 2.0 Transmission Connection Project against the Infrastructure Approval and other relevant environmental approvals and licences, for construction occurring between 15 March 2024 and 26 September 2024 (the audit period). The heritage and biodiversity on-site components of the IEA were conducted on the 11 September 2024. Whereas the environmental management and surface water / erosion and sediment control components of the site inspection was undertaken between the 24-26 September 2024 (see **Appendix 3** for the audit plan and itinerary).

Some information requested by the audit team was not available on-site at the time of the audit and was subsequently collated and provided following the site audit to the audit team for review. The weather conditions during the biodiversity and heritage site components of this IEA were fine and sunny onsite (11 September 2024).

The temperature reached a maximum of 19°C on the 11 September 2024 (Tumbarumba Post Office BoM monitoring station site 072043). In the week preceding the heritage and biodiversity components of the IEA, conditions were relatively dry, with a total of 7 mm of rainfall recorded at the Tumbarumba Post Office BoM monitoring station.

The weather conditions during the environmental management and surface water/ erosion and sediment control site components of this IEA were fine and sunny on Day 1, Day 2 experienced rain and Day 3 observed periodic snowfall (24-26 September 2024). The temperature reached a maximum of 23.7°C on the 24 September 2024, 13.3°C on the 25 September 2024 and 16°C on the 26 September 2024 (Tumbarumba Post Office BoM monitoring station site 072043). In the week preceding the environmental management and surface water/ erosion and sediment control site components of the IEA, conditions were moderately dry, with a total of 3.8 mm of rainfall recorded at the Tumbarumba Post Office BoM monitoring station. It should be noted a total of 66.8 mm of rain was experienced onsite during the site inspection from the 25 -26 September 2024.

An opening meeting and close out meeting for the IEA was held on site at the Maragle Construction Compound, with the option for Transgrid and UGL employee to join via Microsoft teams. Transgrid and UGL environmental management team were in attendance at the opening meeting and closing meeting.

This report provides an outline of the IEA methodology and results and provides recommended actions for achieving full compliance with environmental approvals.

## **1.1 Audit Scope and Objectives**

The scope and objectives of the IEA were to assess Transgrid's compliance with:

- All conditions of the Infrastructure Approval for SSI 9717 – MOD 1 (dated 30 August 2024).
- All post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans.
- All environmental licences and approvals applicable to the Project.

The audit also included:

- A review of the environmental performance of the Project (including a comparison with the predicted impacts contained in the EIS, review of complaints and incidents registers and consideration of any feedback provided during agency consultation).
- A high-level assessment of whether Environmental Management Plans and sub-plans are adequate.
- Any other matters considered relevant by the auditor or the Department as raised during the pre-audit consultation.

### **1.1.1 Supporting Approvals**

The other approvals and statutory documents held by Transgrid for the Project which have been reviewed as part of this IEA include:

- EPBC Approval 2018/8363.
- Water Access Licence (WAL44782 and WAL44788).
- Any strategy, plan or program which has been prepared for the Project.

### **1.1.2 Supporting Documents**

In addition to assessing compliance against each of the conditions of the Infrastructure Approval for SSI 9717 – MOD 1 the following documents have also been reviewed as part of this IEA:

- All post approval and compliance documents prepared to satisfy the conditions of consent which include the:
  - Biodiversity Management Plan
  - Biodiversity Offset Package
  - Complaints Management System
  - Complaints Register
  - Construction Environmental Management Plan (CEMP) and all sub-plans
  - Emergency Plan
  - Environmental Management Strategy
  - Final Layout Plans
  - Heritage Management Plan
  - Notification of commencement of development, construction, operations, upgrading or decommissioning
  - Notification of Incident
  - Notification of Non-Compliance
  - Pre-construction Dilapidation Report
  - Spoil Management Plan
  - Traffic and Transport Management Plan
  - Transport Strategy
  - Visual Impact Management Plan

- Additional Easement Rehabilitation Strategy
- Water Management Plan
- Work as Executed Plans.

## 1.2 Audit Criteria - Compliance Status Descriptors

The compliance status of each approval was assessed in accordance with the compliance assessment criteria detailed within the Independent Audit Requirements and as directed in the letter from DPHI approving the audit team. The criteria have been reproduced in **Table 1.1** below.

**Table 1.1 Independent Audit Guidelines Compliance Assessment Criteria**

Assessment	Criteria
<b>Compliant</b>	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
<b>Non-compliant</b>	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
<b>Not triggered</b>	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

## 1.3 Structure of this Document

This report contains the following sections:

**Section 1.0 – Introduction.** An overview of the Project and the purpose and scope of the audit

**Section 2.0 – Audit Methodology.** A detailed description of the audit process

**Section 3.0 – Previous Independent Audit Recommendations and Status.** An overview of the findings of the previous audit and the action status of each recommendation.

**Section 4.0 – Compliance Assessment.** An overview of the findings of the audit, including detailed descriptions of any non-compliance identified

**Section 5.0 – Environmental Performance**

**Section 6.0 – Recommendations and Opportunities for Improvement**

**Appendix 1 – Independent Audit Declaration Form**

**Appendix 2 – DPHI Correspondence Approving the Auditor**

**Appendix 3 – Audit Plan and Itinerary**

**Appendix 4 – Compliance Tables for the Infrastructure Approval, EPBC Approval, Amendment Report Commitments and Stakeholder Feedback**

**Appendix 5 – Photographic Plates.** Photographs of key site features referred to in this report

## 2.0 Audit Methodology

The audit process involved the interview of personnel and relevant agencies, a review of documentation and samples of records provided by Transgrid. The site audit also included an inspection of the construction activities being undertaken across the Project Area to determine the level of environmental performance and compliance.

### 2.1 Audit Team

The audit team was led by Daniel Sullivan, a qualified and highly experienced lead environmental auditor, who has undertaken a number of DPHI independent environmental audits for infrastructure projects in NSW. Daniel was approved by DPHI to act as the lead auditor for the Project. Joshua Wheatley was approved by DPHI to act as the environmental auditor. DPHI approved the following experts to review their respective areas including:

- Jacob Manners (Biodiversity)
- Luke Wolfe (Aboriginal Cultural Heritage) and
- Melissa Swan (Surface Water/Erosion and Sediment Control).

A copy of the independent audit certification form as required by the NSW Audit Guidelines is included within **Appendix 1** with the DPHI correspondence approving the audit team included within **Appendix 2**.

### 2.2 Agency Consultation

Consistent with correspondence with DPHI during the planning phase for the Initial Construction Audit, the audit team for the Second Construction Audit comprises of suitably qualified and experienced specialists in the areas of Biodiversity, Aboriginal Cultural Heritage and Water/Sediment and Erosion Control. All specialists in the audit team are approved by DPHI as described in **Section 1.0**.

Further to the above as required by the Independent Audit Requirements during the audit teams' preparation for this IEA, input was sought from regulatory agencies to confirm any areas of compliance or environmental management at Snowy Hydro 2.0 Connection Project that should be a particular focus. As requested by DPHI the following agencies were contacted and invited to provide input as part of the scoping phase of this Audit:

- NSW Department of Planning, Housing and Infrastructure (DPHI)
- NSW Department of Primary Industries (DPI)
- NSW Rural Fire Service (RFS)
- Fire and Rescue NSW
- Heritage NSW
- Local Aboriginal Councils

- NSW Department of Planning and Environment—Water (DPE Water)
- Australian Government Department of Climate Change, Energy, the Environment and Water (AG DCCEEW)
- Forestry Corporation of NSW (FNSW)
- NSW Environmental Protection Agency (EPA)
- Transport for NSW (TfNSW)
- Biodiversity Conservation Science (BCS)
- Snowy Monaro Regional Council (SMRC)
- Snowy Valleys Council (SVC)
- National Park and Wildlife Services (NPWS).

An overview of the agency consultation is included in **Table 2.1**. Representatives from, DPHI, BCS, AG DCCEEW, EPA, NPWS, and TfNSW responded and provided feedback regarding items to be addressed in addition to the requirements of the Project Approval with their responses summarised in **Table 2.1** below. SVC and SMRC responded noting that they did not have any particular issues or areas to raise as requiring specific attention during the audit. No responses were received from RFS, DPI, Heritage NSW, Fire and Rescue, DPE Water and local Aboriginal Council.

**Table 2.1 Stakeholder Consultation**

Stakeholder	Person Contacted	Response	Where Addressed
BCS	<b>Miranda Kerr</b> <i>Senior Biodiversity Conservation Officer, South West</i>	BCS recommends the audit reviews the status of all relevant actions in the Biodiversity Management Plan (BMP) Table 5-3, and separate strategies and procedures in Appendices B – K.	<b>Section 5.4 Appendix 4</b>
		BCS recommends the audit focuses on comparing predicted clearing impacts in the final BDAR to actual impacts in the easement clearing zone (ECZ), hand clearing zone (HCZ) and hazard tree zone (HTZ).	<b>Section 5.4 Appendix 4</b>
		BCS notes monitoring of areas of partial clearance is required within three months of the start of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols. Corrective actions are to be applied on the basis of this reporting. BCS understands that vegetation integrity plots have been sampled in the ECZ, HCZ and HTZ. BC recommended the audit reviews reporting for MON 9 and any information about whether the predicted partial clearing has been achieved (measured by vegetation integrity scores).	<b>Section 5.4 Appendix 4</b>



Stakeholder	Person Contacted	Response	Where Addressed
		BCS has identified that vegetation elements predicted to be retained in partial clearing zones (e.g. grasses, forbs and sub-shrubs) appear to have been cleared in some locations in other transmission line CSSI projects. As a result, BCS request that the reporting requirements associated with B21c) (viii) be revised to include BCS as a reviewer of reports prepared by Transgrid or their contractors. This will aid in ensuring the details of the final Biodiversity Development Assessment Report and BMP are being met, and that vegetation clearing protocols are adapted to meet the partial clearing limits.	Proposed changes to approval conditions are not covered by the scope of the audit.
		BCS notes that the cleared partial impact zones on the western side of the Tumut River are covered in mulch. In some areas the mulch cover appears to be too deep to allow natural regeneration of native plants, and deeper than 50 mm maximum specified in the clearing procedure (BMP Appendix B). BSC request the audit investigates if mulch depth is being measured, and any corrective actions to alter mulch spreading methods if mulch is too deep.	<b>Appendix 4</b>
		BCS recommends the audit reviews monitoring measure MON 14 - identify, map and remove weeds before clearing	<b>Appendix 4</b>
		BCS recommends the audit reviews the status of glider pole installation in order to minimise impacts of clearing on Yellow-bellied Glider connectivity	<b>Section 5.4</b>
<b>AG DCCEEW</b>	<b>Ali Strous</b> <i>Senior Compliance Officer</i>	AG DCCEEW recommends the audit to include a high-level summary of changes made to reporting processes in response to findings from the previous audit (particularly the process around incident notifications and when AG DCCEEW is to be notified of an incident or potential non-compliance).	<b>Appendix 4</b>
<b>DPHI</b>	<b>Katrina O'Reilly</b> <i>Team Leader Development Assessment</i>	NSW Planning would like the below stakeholders to be consulted: EPA, BCS, AG DCCEEW, NPWS, TfNSW, Local Councils, DPI, Forestry, RFS, Fire and Rescue, Local Aboriginal Councils (RAPS), Heritage NSW, DPI and DPE Water.	<b>Section 2.2</b>
		DPHI recommends the audit investigates the evidence of compliance with approved footprint and current activities.	<b>Section 5.4</b> <b>Appendix 4</b>
		DPHI recommends the audit reviews the erosion and sediment controls, management, monitoring and maintenance.	<b>Section 5.6</b> <b>Appendix 4</b>
		DPHI requests the audit focuses on water management and monitoring.	<b>Section 5.6</b> <b>Appendix 4</b>
		DPHI recommends the audit investigates the comparison between EA predictions and actual impacts.	<b>Section 5.4</b> <b>Appendix 4</b>

Stakeholder	Person Contacted	Response	Where Addressed
		DPHI recommends the audit reviews evidence (tracking documentation/measures implemented) to ensure compliance with clearing and disturbance limits as per condition A6 and table 1 and with condition B 17	<b>Appendix 4</b>
		DPHI request the audit to investigate the compliance with Spoil management plan.	<b>Appendix 4</b>
		DPHI recommends the audit reviews the road maintenance as required by condition b 29 (through construction).	<b>Appendix 4</b>
		DPHI recommends the audit investigates the evidence of compliance with reporting/checks/monitoring committed to in the Biodiversity Management Plan Condition B21(c) (viii) which states monitor the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols;	<b>Section 5.4</b> <b>Appendix 4</b>
		DPHI requests the audit reviews the evidence of compliance with partial clearing, clearing commitments (how is this tracked, managed and monitored). DPHI also notes the audit should focus on the current clearing (in particular partial clearing) activity and ensure it is being undertaken in accordance with the commitments within BMP and description of partial clearing (section 5 of BMP).	<b>Section 5.4</b> <b>Appendix 4</b>
		DPHI recommends the audit reviews the evidence of consistency assessment/s will be applied to the detail design project component elements to confirm there is no exceedance of the approved Total and Partial Clearing Areas and associated offset obligations.	<b>Section 5.4</b>
		DPHI requests the audit to review the general discussion on any compliance with the interface works between the Snowy 2.0 Main Works and the Transmission Line	<b>Section 5.1</b>
<b>EPA</b>	<b>Chritina McInally</b> <i>Operations Officer</i> <i>Regulatory Operations</i>	EPA recommends the audit assess the need for enhanced sediment and erosion controls which go beyond industry standards (such as those prescribed by the blue book / white book).	<b>Appendix 4</b>
		EPA recommends the audit review procedures to be implemented pre, post and during rain events to minimise sediment discharge into the sediment basins or receiving waters.	<b>Appendix 4</b>
		EPA recommends the audit review procedures for the reuse of captured site water that prioritise alternatives to discharging into receiving waterways, such as dust suppression or on-site irrigation.	<b>Appendix 4</b>

Stakeholder	Person Contacted	Response	Where Addressed
		EPA requests the audit review the implementation of the Trigger Action Response Plan (TARP), which includes the requirement to notify the EPA of any pollution incident. The TARP also requires that any water quality monitoring result indicating an exceedance of the Water Quality Objectives is appropriately notified, investigated, and measures to prevent a recurrence are evaluated.	<b>Appendix 4</b>
FNSW	<b>Troy Darcy</b> <i>Telecommunications &amp; Property Asset Specialist</i>	FNSW request the audit reviews any road construction and drainage works focusing on making sure work has been completed in accordance with the Transport Strategy and that any necessary checks and approvals were obtained for any road construction or alteration.	<b>Appendix 4</b>
	<b>Garth Nagle</b> <i>Extractive Resources &amp; Land Development Manager</i>	FNSW request the audit focuses on the incident register and what the stakeholder notification process is for incidents following on from the PIN received by the Project.	<b>Section 5.3</b> <b>Appendix 4</b>
NPWS	<b>Nicole Shotter</b> <i>Manager Snowy 2.0 Southern Ranges Branch</i>	NPWS recommends the audit focuses on partial clearing. This should include a review of implementation methodology and resulting onsite outcomes compared to partial clearing description outlined in the EIS/EMP documents e.g. EMP Biodiversity MP section 5.3.	<b>Section 5.4</b> <b>Appendix 4</b>
		NPWS request the audit inspects <i>Phytophthora</i> management onsite given <i>Phytophthora</i> has been positively identified in some areas.	<b>Section 5.7</b> <b>Appendix 4</b>
		NPWS recommends heavy vehicle movements is reviewed during the audit and the ongoing protocols and compliance under the Traffic and Transport MP since an OSOM permit incident on 1 May 2024.	<b>Appendix 4</b>
TfNSW	<b>Ruvimbo Timba</b> <i>Development Services Case Officer - Renewables</i>	TfNSW recommends the audit reviews the consultation records for the Transport Strategy (Stage 1). TfNSW believe they not were not consulted.	<b>Appendix 4</b>

## 2.3 Site Interviews and Inspections

The opening meeting was held at the UGL Maragle Project Construction Compound and online to personnel who could not attend onsite commencing at 9:00 am on 24 September 2024. The list of participants is provided in **Table 2.2**.

**Table 2.2 Opening Meeting Attendees**

Person	Organisation	Title / Role
<b>Jason Snape</b>	Transgrid	Senior Environmental Advisor
<b>Bredan Toohey</b>	UGL	Environmental Manager
<b>Louis Linde</b>	UGL	Project Manager
<b>Tracy Stuart</b>	UGL	Senior Contracts Administrator

Person	Organisation	Title / Role
David Ridgway	UGL	Commercial Manager
Lachlan Whiteford	UGL	Environmental Graduate
Darrell van Bruchem	UGL	Construction Manager West
Bert Brookman	UGL	Construction Manager East
Camille Palmer	UGL	Senior Environmental Advisor
Sarah Steele	Treestone Environmental	CPESC Advisor
Andrew Buttigieg	Transgrid	Senior Project Manager
Chris Wooll	Transgrid	Environmental Advisor
Alozie Agomoh	UGL	Senior Environmental Advisor
Daniel Sullivan	Umwelt	Lead Auditor
Joshua Wheatley	Umwelt	Assistant Auditor

The audit team was introduced, and the scope of their responsibilities was conveyed to the auditees. The purpose, depth and scope of the audit were outlined as per the Audit Plan (refer **Appendix 3**). The methods to be used by the team to conduct the audit were explained. It was stated that the audit team would be interviewing personnel, reviewing site management plans, examining records and conducting a site inspection in order to address specific compliance requirements. Transgrid and UGL personnel were asked to provide an overview of the status of construction and relevant site environmental management measures such as biodiversity management, Aboriginal cultural heritage management, water management and erosion and sediment control.

### 2.3.1 Audit Interviews

During the site audit, interviews were conducted with relevant Transgrid and UGL staff and identified in **Table 2.3**.

**Table 2.3 Personnel Interviewed During the Audit**

Person	Organisation	Title / Role
Jason Snape	Transgrid	Senior Environmental Advisor
Bredan Toohey	UGL	Environmental Manager
Chris Wooll	Transgrid	Environmental Advisor
Camille Palmer	UGL	Senior Environmental Advisor
Sarah Steele	Treestone Environmental	CPESC Advisor
Darrell van Bruchem	UGL	Construction Manager West
Alozie Agomoh	UGL	Senior Environmental Advisor

## 2.3.2 Data Collection and Verification

Documents and data collated during the audit process were reviewed whilst on-site where possible. A number of documents were also provided to the auditor prior to the on-site component of the audit and documents that were requested during the on-site component of the audit were provided following the on-site component of the audit.

All information obtained during the audit process was verified by the audit team where possible. For example, statements made by site personnel were verified by viewing documentation and/or site inspections where possible. Where suitable verification could not be provided, this has been identified in the audit findings.

## 2.3.3 Site Inspection

A comprehensive site inspection of the active construction areas for the Project was conducted during the audit. It was observed that the works during this period included the establishment of the Maragle Construction Compound and switchyard, as well as clearing activities along the alignment and in Project Area West and Project Area East. All clearing in Project Area West has been completed. Additionally, the works involved civil construction activities for the Switchyard, access tracks, and tower pads.

The following locations were inspected during the audit:

- Maragle Project Construction Compound
- Maragle Substation Project Area
- Elliott Way/Access Track South Intersection
- Track 1, 6, 8, 9, 10
- Sheep Creek Station Bridge (Temporary)
- Lobbs Hole Project Construction Compound.

## 2.3.4 Closing Meeting

The closing meeting was held at the UGL Maragle Project Construction Compound and online to personnel who could not attend onsite commencing at 11:30 am on 26 September 2024. The objective of this meeting was to discuss outstanding matters, present preliminary findings and outline the process for finalising the compliance assessments and audit report. The list of participants who attended the closing meeting is provided in **Table 2.3**.

**Table 2.4 Closing Meeting Attendees**

Person	Organisation	Title / Role
Jason Snape	Transgrid	Senior Environmental Advisor
Bredan Toohey	UGL	Environmental Manager
Andrew Buttigieg	Transgrid	Senior Project Manager
Chris Wooll	Transgrid	Environmental Advisor

Person	Organisation	Title / Role
Camille Palmer	UGL	Senior Environmental Advisor
Heinrich Van den Bergh	UGL	Commercial Manager
Alozie Agomoh	UGL	Senior Environmental Advisor
Bert Brookman	UGL	Construction Manager East
Hoi Yin Bethany Ng	UGL	Contract Administrator
David Ridgway	UGL	Commercial Manager
Andrew Buttigieg	Transgrid	Senior Project Manager
Darrell Van Bruchem	UGL	Construction Manager West
Camille Palmer	UGL	Senior Environmental Advisor
Lachlan Whiteford	UGL	Environmental Graduate
Daniel Sullivan	Umwelt	Lead Auditor
Joshua Wheatley	Umwelt	Assistant Auditor

## 2.4 Independent Environmental Audit Reporting

Following completion of the site audit, which included review of Infrastructure Approval conditions and site activities, remaining document reviews and compliance assessments were completed, and site audit notes were reviewed in order to compile a list of outstanding matters to be noted in the audit report.

This report was prepared to provide an overview of the status of compliance by reference to the relevant compliance documentation and any other observations of the audit team during the site inspections and interviews. This report has been prepared on an exception basis, highlighting the compliance issues identified along with any areas where action or improvement is required. This IEA has been prepared in accordance with the Independent Audit Requirements.

## 2.5 Limitations

The findings of the IEA are based upon visual observations of the site and its vicinity, interviews with site personnel and our interpretation of documentation provided by Transgrid.

Opinions presented herein apply to the site as it existed at the time of the audit and from information provided by site personnel and agencies. Any changes to this information of which Umwelt is not aware and has not had the opportunity to evaluate therefore cannot be considered in this report.

The audit team have taken due care to consider all reasonably available information provided whilst undertaking this audit and have taken this information to represent a fair and reasonable characterisation of the environmental status of the site but recognise that any site assessment program is necessarily limited in scope and true site conditions may differ from those inferred from the available data.

## 3.0 Previous Independent Audit Recommendations and Status

The recommendations made in the Initial Construction Audit for Snowy 2.0 Transmission Works Project Independent Environmental Audit (Umwelt, 2024) and the status of the recommendations as of 26 September 2024 are detailed in **Table 3.1**.

**Table 3.1 Previous Audit Findings Update**

Condition / Issue	Initial Construction Audit - Recommendations	Transgrid Status Update
<b>Infrastructure Approval</b>		
<b>A2 (d)</b>	It is recommended Transgrid consult with DPHI in relation to the location of the Maragle temporary construction compound being located in an area not described in the EIS and seek confirmation that the Department are satisfied that the Transgrid SER for the location of these facilities within the existing TL 64 is appropriate for the Project.	A Summary Environmental Report (SER) was prepared on 1 June 2022, prior to issue of approval SSI-9717 on 2 September 2022. The aim of the SER was to assess the potential impacts of the Transmission Line 64 Overhead Earth Wire and Optical Ground Wire including the establishment of the Maragle temporary construction compound. The SER concluded the Maragle Temporary Construction Compound does not result in any additional impact within the Snowy 2.0 Transmission Connection Project Area. The Department was provided this response on the 30 August 2024. An acknowledgement letter has been received from the Department on the 03 September 2024. No further action is required.
<b>A13 (c)</b>	It is recommended signposting of management areas in installed where <i>Phytophthora sp.</i> has been identified through testing.	Signposting of management areas for <i>Phytophthora sp.</i> has been installed where <i>Phytophthora sp.</i> has been identified through testing
<b>A13 (c)</b>	It is recommended to construct and operate a washdown station capable of washing down vehicles and plant/machinery within the Maragle Project Area.	Washdown station within the Maragle Project Area have been installed as part of Project Area West construction compound establishment.
<b>B3 (c)</b>	OOHW flowchart be revised to include notification to SVC, DPHI and NPWS.	The OOHW flowchart has been revised to include notification to SVC, DPHI and NPWS. The OOHW flowchart which forms part of the Noise and Vibration Management Plan is pending approval from the Planning Secretary.
<b>B8 (h)</b>	It is recommended Section 6 of the Spoil Management Plan be revised to include details to explain how the management of spoil and the progress against the detailed completion criteria and performance indicators would be publicly reported.	The SWMP has been revised to details to explain how the management of spoil and the progress against the detailed completion criteria and performance indicators would be publicly reported. The revised SWMP is undergoing consultation with Fisheries, EPA, NSW DCCEEW Water, NPWS and FCNSW.
<b>B16 (b) i)</b>	Baseline surface water flow monitoring is recommended to demonstrate compliance with both condition B15 and B16.	The Project has committed to undertaking surface water flow monitoring however, monitoring is yet to occur. The Project is waiting for Planning Secretary approval of the revised SWMP prior to the start of monitoring.
<b>B16 (b) ii)</b>	It is recommended given that two years of baseline surface water quality monitoring data is now available it is recommended that the WQMP be updated to incorporate site specific water quality monitoring trigger values.	The Water Quality Management Plan has been revised to include site specific water quality monitoring trigger values. The revised SWMP is currently undergoing consultation with EPA, NPWS, DPI Fisheries and NSW DCCEEW Water. It is noted no consultation has been undertaken with FCNSW.



Condition / Issue	Initial Construction Audit - Recommendations	Transgrid Status Update
<b>B18 (b)</b>	It is recommended for completeness the BOP be revised to include additional details of how the cost for each specific biodiversity offset measure was calculated.	Consultation for the revision of the BOP with Snowy Hydro has commenced regarding the inclusion of additional details of how the cost for each specific biodiversity offset measure was calculated. Consultation is still ongoing.
<b>B28</b>	It is recommended that Transgrid seek written confirmation from the relevant roads authority/manager that the road upgrades have been completed to their satisfaction.	Written approval form SVC have been received on the 17 May 2024 providing confirmation that the road upgrades have been completed to their satisfaction.
<b>B32 (d) i)</b>	It is recommended that within the Traffic & Transport Management Plan that Appendix C Fatigue Management procedure is revised to reflect Project and remove references to rail.	The TTMP has been revised to remove all references to rail from Appendix C Fatigue Management procedure. The revised TTMP is pending approval from the Planning Secretary. However, it is noted the table of contents requires to be updated to reflect the changes.
<b>B32 (d) i)</b>	It is recommended that within the Traffic & Transport Management Plan that Appendix D Snow and Ice Traffic Management Plan is revised to include details of flooding.	The TTMP has been revised to include details of flooding in Appendix D Snow and Ice Traffic Management Plan. The revised TTMP is pending approval from the Planning Secretary.
<b>B32 (d) i)</b>	It is recommended the Traffic & Transport Management Plan be revised to include details of employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers	The TTMP has been revised to include details of employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers. The revised TTMP is pending approval from the Planning Secretary.
<b>B36 (c) i) / ii)</b>	It is recommended the Visual Impact Management Plan be revised to include detailed plans for minimising visual impacts of the Maragle substation and transmission line easement.	The Visual Impact Management Plan has been revised to include detailed plans for minimising visual impacts of the Maragle substation and transmission line easement. The revised Visual Impact Management Plan is pending approval from the Planning Secretary.
<b>B39</b>	Site managers / supervisors to ensure adequate fit for purpose storage containers / areas available to meet site volume requirements for chemical and hydrocarbons and that all hydrocarbon and chemical storage areas are routinely monitored.	Site managers / supervisors will ensure adequate fit for purpose storage containers / areas available to meet site volume requirements for chemical and hydrocarbons and that all hydrocarbon and chemical storage areas are routinely monitored.
<b>B44</b>	Transgrid should develop a waste tracking register for the Project that records details of all wastes generated by or imported to the Project area including details of treatment, processing, classification and disposal by licenced contractors to a licensed land disposal facility that covers both the East and West Project alignments.	A waste tracking register has implemented for the Project to record details of all wastes generated by or imported to the Project area.

Condition / Issue	Initial Construction Audit - Recommendations	Transgrid Status Update
<b>B45</b>	It is recommended that Transgrid seek to confirm and document an appropriate waste agreement with a waste disposal site licensed by the EPA for the disposal of waste originating from the West Project alignment.	During the audit period UGL has entered into a contract with Tumut Waste Pty Limited, trading as Bellettes, to manage the removal and disposal of General Solid Waste for our operations at Maragle. With regards to wastewater removal, UGL has entered into a contract with Jayson B & Melissa F Christie, trading as Christie's Waste Disposal for the removal of wastewater and disposal from its operations at Maragle
<b>C1 (d) v)</b>	It is recommended Section 3.7 of the EMS is revised to clearly set out the procedures on how to respond in the event of an emergency.	The EMS has been revised to clearly set out the procedures on how to respond in the event of an emergency. The revised EMS is pending approval from the Planning Secretary.
<b>C1 (e) ii)</b>	It is recommended the EMS be revised to include clear plan or table depicting all the monitoring to be carried out in relation to the Project.	The EMS has been revised to include a clear plan or table depicting all monitoring to be carried out in relation to the Project. The revised EMS is pending approval from the Planning Secretary.
<b>C11 (a) ii)</b>	It is recommended the final layout plans be uploaded to the Project website.	Final layout plans have been uploaded to the Project Website.
<b>EPBC Conditions</b>		
<b>4 d. e.</b>	It is recommended that the BMP be revised to include detailed criteria for determining surface water impacts (in respect of flows, quality and flooding) of the Action on the Booroolong Frog. The BMP should also be revised to include a monitoring program capable of detecting the specified criteria for triggering remedial action.	The BMP has been revised to include detailed criteria for determining surface water impacts (in respect of flows, quality and flooding). The revised BMP is undergoing consultation with BCS, NPWS and FCNSW.
<b>4 d. e.</b>	It is recommended baseline surface water flow data is provided to DCCEE and included in the BMP.	The BMP has been revised to include a monitoring program capable of detecting the specified criteria for triggering remedial action. The revised BMP is undergoing consultation with BCS, NPWS and FCNSW.
<b>EIS Commitments</b>		
<b>CEMP</b>	It is recommended the CEMP is revised to include Transgrid's Environmental Policy.	The CEMP has been revised to include Transgrid's Environmental Policy.
<b>W4</b>	It is recommended the generator located at the Maragle temporary construction compound be relocated further away from the drainage line (outside of the 40 m drainage line buffer).	The generator was scheduled to be repositioned outside the 40 m drainage line buffer on the 10 May 2024. The generator has since been removed as part of temporary construction compound removal from TL64 easement.

Condition / Issue	Initial Construction Audit - Recommendations	Transgrid Status Update
<b>L8</b>	It is recommended the CEMP is revised to include measures to identify, minimise impacts and report on any new identified geodiversity sites.	Transgrid notes no updates to the CEMP are required as relevant measures are included in the SWMP and HMP. These plans are subplans of the CEMP and forms part of the UGL Environmental Management System.
<b>SE52</b>	It is recommended the accommodation strategy is revised and updated to align with industry standards for accommodation strategies for state significant projects and consider the NSW Government's Cumulative Impact Assessment Guidelines for State Significant Projects.	The Workers Accommodation Strategy has been revised and updated to align with industry standards for accommodation strategies for state significant projects and consider the NSW Government's Cumulative Impact Assessment Guidelines for State Significant Projects.

## 4.0 Compliance Assessment

This section provides a discussion of the identified non-compliances and the status of the approval documentation assessed as part of the audit. **Appendix 4** provides a condition-by-condition checklist of the Infrastructure Approval and EPBC Approval and identified compliance status of each condition. **Appendix 4** also includes a review against the Summary of Mitigation Measures committed to in the Projects Amendment Report (Transgrid, 2023).

The scope of approvals assessed as part of this audit is detailed in **Section 1.2**. Recommendations and opportunities for improvement arising from the compliance review and identified non-compliances are included **Section 6.0**.

### 4.1 Infrastructure Approval for SSI 9717 – MOD 1

The Project commenced construction on 4 December 2023 and for the duration of the audit period has been progressing construction activities. Construction activities during this audit period has been primarily associated with the construction of the Maragle Construction Compound, pre-clearance monitoring, partial and total clearance activities and civil works. A summary of the identified non-compliances against the Infrastructure Approval are provided in **Table 4.1** with further details provided in the compliance tables in **Appendix 4**. There were six (6) non-compliances. The IEA notes there has been one warning issued during this audit period and is detailed in **Section 4.7**.

**Table 4.1 Non-Compliance with SSI 9717 – MOD 1**

Condition	Non-Compliance
A2	<b>NC- 01:</b> Non-Compliances against conditions have been identified during the audit period and are recorded in this table and in the main audit report.
B9	<b>NC- 02:</b> Surface water was taken from Paddy’s River pursuant to WAL 44762 without a water allocation.
B11	<b>NC- 03:</b> Two incidents were reported involving the discharge of turbid water. Refer to Section 4.3 for further detail.
B21	<b>NC- 04:</b> A Partial Clearance Verification Report has not been prepared to inform vegetation clearance processes. The BMP does not include a description of the measures required for partial clearing monitoring or verification reporting to confirm any changes required to the construction vegetation clearing process. The removal of weeds did not occur prior to vegetation clearing for construction.
B25	<b>NC- 05:</b> Third-party transport company failed to identify and abide by the conditions of the NVHR Permits.
B41 (b) ii)	<b>NC- 06:</b> The water supply tank located at the UGL Lobs Hole Compound was empty.

### 4.1.1 Compliance Performance Summary

In summary it is considered that Transgrid have demonstrated a high level of compliance against SSI 9717 – MOD 1 during the audit period with 90.2% of the compliance requirements under SSI 9717 – MOD 1 being met (note items identified in **Appendix 4** as not triggered are not included in this assessment summary).

The systems and processes that have been put in place are considered appropriate to manage compliance and are considered to have been implemented well. None of the six (6) non-compliances identified are considered to have resulted in material environmental harm. Despite this if the actions proposed in **Section 5.0** are adopted then there is no reason the Project cannot demonstrate full compliance.

## 4.2 EPBC Approval

During the audit period construction activities undertaken have been conducted under EPBC 2018/8363. The EPBC Approval as issued under the *Environment Protection and Biodiversity Conservation Act 1999* outline Transgrid’s responsibilities and the environmental performance standards it is required to meet.

The Project reports its performance against the above responsibilities and environmental performance status via the submission of its Annual Compliance Report. Generally, the Project has demonstrated compliance with the conditions of its EPBC, however, some non-compliances have been identified. The non-compliances identified with EPBC 2018/8363 are detailed in **Table 4.2** below with further detail provided in **Appendix 4**.

**Table 4.2 Non-Compliance with EPBC 2018/8363**

Condition	Non-compliance
3	<b>NC- 07:</b> Non-Compliance was triggered in relation to partial clearing monitoring, verification reporting and weed management under the BMP. Additionally, a non-compliance was also triggered due to water supply tank located at Lobbs Hole Compound being empty.
6	<b>NC- 08:</b> Non-compliance issues have been identified in relation to partial clearing monitoring, verification reporting and weed management under the BMP. Refer to Condition B21 in <b>Table 4.1</b> for further detail.
34	<b>NC- 09:</b> A formal request to modify the Infrastructure Approval was submitted to the Planning Secretary on the 7 August 2024. Australian Government (AG) DCCEEW were not notified until the 26 August 2024 which is greater than 2 business days of formally proposing a change.

## 4.3 Amendment Report Mitigation Measures

Generally, the Project has demonstrated compliance with the mitigation measures of its amendment report, however, one non-compliance was identified. The non-compliance identified with amendment report is detailed in **Table 4.3** below with further detail provided in **Appendix 4**.

**Table 4.3 Non-Compliance with Amendment Report Mitigation Measures**

Mitigation Measure	Non-compliance
<b>W7</b>	<b>NC-10:</b> Surface water was taken from Paddy’s River pursuant to WAL 44762 without a water allocation.

## 4.4 Environmental Management Plans

Transgrid and UGL have developed a number of Environmental Management Plans and post approvals compliance documentation for the Project in accordance with relevant requirements of the Infrastructure Approval. These documents address specific impacts associated with the Project, such as heritage, biodiversity and sediment and erosion control, and reflect the requirements detailed in the Infrastructure Approval.

An overview of the compliance status of the Environmental Management Plans and post approvals documentation, including an overview of the compliance with the requirements of the Infrastructure Approval and implementation status of the plans, is included in **Table 4.4** with further details provided in **Appendix 4**. Recommendations and opportunities for improvement, as relevant, are included in **Section 5.0**.

**Table 4.4 Environmental Management Plans**

Condition	Management Plan	Status of Plan
<b>B3</b>	<b>Out-of-Hours Work Protocol (OOHWP)</b>	<p>An OOHWP has been prepared and approved for the Project as confirmed during the Initial Construction Audit. A review of the OOHWP against the requirements of SSI 9717 – MOD 1 has confirmed that it contains the required information as per the conditions of approval (refer to <b>Appendix 4</b> for further details of compliance review).</p> <p>The OOHWP has been revised during the audit period to align with recommendations included in the Initial Construction Audit. The NVMP inclusive of the OOHWP was submitted to the Planning Secretary for approval on the 16 August 2024. The NVMP was undergoing consultation at the conclusion of the audit.</p>
<b>B8</b>	<b>Spoil Management Plan</b>	<p>A Spoil Management Plan has been prepared and approved for the Project as confirmed during the Initial Construction Audit. The Spoil Management Plan has been combined with the SMWP.</p> <p>During the audit period the Spoil Management Plan has been revised and submitted to stakeholders (including NSW DCCEE Water, EPA, DPI Fisheries and NPWS) for consultation. It is noted the Spoil Management Plan has not been submitted to FCNSW or NRAR.</p> <p>A review of the revised ‘Draft’ Spoil Management Plan has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 including the recommendations outlined in the Initial Construction Audit. The Spoil Management was undergoing consultation at the conclusion of the audit (refer to <b>Appendix 4</b> for further details of compliance review).</p>

Condition	Management Plan	Status of Plan
B16	<b>Soil and Water Management Plan (SWMP)</b>	<p>The Water Management Plan referred to as the SWMP as confirmed during the Initial Construction Audit has been prepared for the Project and has been combined with the Soil and Water Management Plan as approved by the Planning.</p> <p>During the audit period the SWMP has been revised and submitted to stakeholders (including NSW DCCEE Water, DPI Fisheries, EPA and NPWS) for consultation. It is noted the SWMP has not been submitted to FCNSW or NRAR).</p> <p>A review of the revised 'Draft' SWMP has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 including the recommendations outlined in the Initial Construction Audit. The SWMP was undergoing consultation at the conclusion of the audit (refer to <b>Appendix 4</b> for further details of compliance review).</p>
B18	<b>Biodiversity Offset Package (BOP)</b>	<p>The BOP has been prepared for the Project as confirmed during the Initial Construction Audit (refer to <b>Appendix 4</b> for further details of compliance review). It is noted Transgrid are in consultation with Snowy Hydro regarding the revision of the BOP to align the strategy with the recommendations outlined in the Initial Construction Audit. At the conclusion of the audit the BOP was still subject to ongoing consultation with Snowy Hydro.</p>
B21	<b>Biodiversity Management Plan (BMP)</b>	<p>A BMP has been prepared and approved for the Project as confirmed during the Initial Construction Audit.</p> <p>During the audit period the BMP has been revised and submitted to stakeholders (including BCS, FCNSW and NPWS) for consultation. The BMP was also submitted to AG DCCEE on the 26 August 2024.</p> <p>A review of the revised 'Draft' BMP has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 including the recommendations outlined in the Initial Construction Audit. The BMP was undergoing consultation at the conclusion of the audit (refer to <b>Appendix 4</b> for further details of compliance review).</p>
B24	<b>Heritage Management Plan (HMP)</b>	<p>A HMP has been prepared and approved for the Project as confirmed during the Initial Construction Audit. The HMP comprises of both the Cultural Heritage and Historic Heritage Management Plan. A review of the HMP against the requirements of SSI 9717 – MOD 1 has confirmed that it contains the required information as per the conditions of approval (refer to <b>Appendix 4</b> for further details of compliance review). The HMP has not been revised during the audit period.</p>
B27	<b>Transport Strategy</b>	<p>A staged Transport Strategy has been approved for the Project as confirmed during the Initial Construction Audit. A review of the Transport Strategy Stage 1 against the requirements of SSI 9717 – MOD 1 has confirmed that it contains the required information as per the conditions of the approval (refer to <b>Appendix 4</b> for further details of compliance review).</p> <p>The Transport Strategy Stage 1 has not been revised during this audit period.</p>

Condition	Management Plan	Status of Plan
B32	<b>Traffic and Transport Management Plan (TTMP)</b>	<p>A TTMP has been approved for the Project as confirmed during the Initial Construction Audit. The approved TTMP is to be prepared in two stages.</p> <p>During the audit period the TTMP was subject to two revisions. The first revision underwent consultation with relevant stakeholders (including SVC, NSW Police, SMRC, FCNSW, NPWS and TfNSW). The first revised TTMP was submitted to the Planning Secretary on the 14 June 2024 and approved on the 25 June 2024.</p> <p>The second revision of the TTMP was submitted to the Planning Secretary on the 15 August 2024. A review of the revised 'Second Draft' TTMP has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 including the recommendations outlined in the Initial Construction Audit. The TTMP was awaiting approval at the conclusion of the audit (refer to <b>Appendix 4</b> for further details of compliance review).</p>
B33	<b>Long-Term Road Strategy</b>	The Long-Term Road Strategy was not required to be prepared at the time of the audit. The Long-Term Road Strategy is required to be prepared within 2 years following commencement of construction.
B36	<b>Visual Impact Management Plan</b>	A Visual Impact Management Plan has been prepared and approved for the Project as confirmed during the Initial Construction Audit. A review of the revised 'Draft' Visual Impact Management Plan has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 including the recommendations outlined in the Initial Construction Audit. The Visual Impact Management Plan was submitted to the planning Secretary for Approval on the 12 August 2024. The plan was awaiting approval at the conclusion of the audit (refer to <b>Appendix 4</b> for further details of compliance review).
B38	<b>Additional Easement Rehabilitation Strategy (11 kv Line Rehabilitation Strategy)</b>	A 11 kv Line Rehabilitation Strategy has been prepared to the satisfaction of NPWS within six months from the commencement of construction as confirmed during the Second Construction Audit. A review of the 11 kv Line Rehabilitation Strategy confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1.
B42	<b>Emergency Plan</b>	<p>An Emergency Plan been prepared and approved for the Project as confirmed during the Initial Construction Audit.</p> <p>During the audit period the Emergency Plan has been revised and submitted to stakeholders (including FCNSW, RFS, FRNSW and NPWS) for consultation. The revised Emergency Management Plan was submitted to the Planning Secretary. The revised Emergency Plan was approved on the 25 June 2024.</p> <p>A review of the revised Emergency Plan has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 (refer to <b>Appendix 4</b> for further details of compliance review).</p>
B48	<b>Rehabilitation Management Plan</b>	The Rehabilitation Management Plan was not required to be prepared at the time of the audit. The Rehabilitation Management Plan is required to be prepared within 12 months following commencement of construction.



Condition	Management Plan	Status of Plan
C1	<b>Environmental Management Strategy (EMS)</b>	<p>An EMS has been prepared and approved for the Project as confirmed during the Initial Construction Audit. A review of the revised 'Draft' EMS has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 including the recommendations outlined in the Initial Construction Audit. The EMS was submitted to the planning Secretary for Approval on the 08 August 2024. The strategy was awaiting approval at the conclusion of the audit (refer to <b>Appendix 4</b> for further details of compliance review).</p>

## 5.0 Environmental Performance

### 5.1 Management Commitment and Resourcing

Throughout the audit, Transgrid and UGL staff were co-operative and forthcoming with information and this allowed the audit team to gain an understanding of the culture of the organisation and project team working on the Project. It was noted during the audit that the project staff had excellent record keeping in relation to environmental approvals and compliance. Regarding resourcing for environmental personnel, Jason Snape, Senior Environmental Advisor from Transgrid is responsible for overall compliance associated with the delivery of the Project and coordinates regularly with UGL personnel. Jason is then supported by Chris Wool who is Transgrid's Environmental Advisor for the Project.

Brendan Toohey is the Environment Manager for UGL and is supported by a team of environmental professionals that is spread across the Project alignment which is split into two distinct Project areas including Lobbs Hole (eastern alignment) and Maragle (western alignment). On the eastern alignment Brendan is supported by Alozie Agomoh, Senior Environmental Advisor and Lauren Logue, Environmental Advisor. On the western alignment Brendan is supported by Camille Palmer, Senior Environmental Advisor and Vivian Lee Yu, Environmental Advisor.

To meet the commitments outlined by the Infrastructure Approval third party environmental contractors are also used to support the environment team as needed. In respect to this audit period the Project has continued to engage Lesryk Environmental, Land Eco Consulting, Kleinfelder Australia and SLR Consulting to assist in fulfilling biodiversity requirements relating to pre-clearance surveys and monitoring. In total approximately 83 ecologists have been engaged and are rostered on a rotating schedule. Furthermore, Navin Heritage Consultants have also been engaged to support in providing assistance for Aboriginal Cultural Heritage management.

Given the scale and complexity of the Project, interface meetings with neighbouring Projects are conducted weekly. Participants include representatives from Snowy Hydro, Transgrid, Future Generation Joint Venture, and UGL. The purpose of these meetings is to provide all stakeholders with insight into work scope activities, facilitate the development of optimal solutions, and prevent work stoppages for all involved parties.

### 5.2 Compliance Management

Transgrid alongside UGL utilise compliance tracking systems to ensure they meet the specific performance measures and criteria set out by this approval. The compliance trackers that have been developed for the Project outline responsible parties, evidence of compliance and associated comments from Transgrid or UGL and relevant links to associated files. Additionally, Transgrid manages a Notification tracker for regulators and stakeholders related to the relevant approvals and agreements.

It was evident during the audit that Transgrid and UGL communicate and operate concurrently. To track these communications across teams, they utilize a software called TeamBinder. This platform centralizes all documentation and streamlines the review and approval process for controlled documents.

Jason Snape explained when documents are uploaded into the system, TeamBinder automatically distributes them to the relevant users via email notifications with all transactions and revisions are recorded within the system. Correspondence is also auto numbered, filed and maintained securely throughout the project. Any outstanding communications can be identified and accessed in real time.

During the audit, Jason Snape also discussed Transgrid's internal compliance tracker, known as "CAMS." Much like the team binder, CAMS is designed to be a central repository for all documentation. Although it is still under development, the goal of CAMS is to record each approval condition and assign responsibilities and notifications to ensure compliance. Additionally, CAMS will function as a library/archive for the Project, safeguarding information so that documents and processes remain intact in the event of staff changes.

## 5.3 Reportable Environmental Incidents and Complaints

The reportable environmental incidents, Penalty Infringement Notices (PINs) and regulatory orders that occurred during the audit period are discussed in the following sections. It is noted that during the audit period there were zero community complaints received.

### 5.3.1 Penalty Infringement Notices / Orders

No penalty infringement notices were received during this audit period.

One Warning Letter was received in relation to the Project during the audit period as detailed below:

- On 18 March 2024, while conducting the Stage 2 pre-clearing inspection for Track 6a Project Ecologists (Kleinfelder) identified two habitat trees bearing a blue and pink 'H' marker lying on the ground, indicating it had been felled during the Stage 1 clearing. A notification of the breach was submitted on the 20 March 2024 to the Department, AG DCCEEW and NPWS by Transgrid. An Official Warning Letter was issued from AG DCCEEW on the 3 May 2024 in relation to the incident. No fauna was harmed during the incident as reported by Transgrid.

### 5.3.2 Reportable Incidents

The reportable environmental incidents which have occurred during the audit period as advised by Transgrid are detailed below with further details provided in **Appendix 4**:

- On the 22 April 2024, a horizontal mulcher was being used to mulch previously felled vegetation within the Maragle 500kV Substation Construction Pad. A main hydraulic hose split during operation resulting in spilling of hydraulic oil over an area of approximately 50m<sup>2</sup> containing mulch and topsoil. A notification was sent to the Department, NPWS and AG DCCEEW on the 22 April 2024.
- On 1 May 2024 three heavy vehicles failed to identify and abide by the conditions of the NVHR Permits, namely the need for escort vehicles. four of the trucks entered Lobs Hole and demountables were delivered to site, the remaining three were stopped by NSW Police at Adaminaby. NSW Police issued infringement notices to the drivers of the trucks. Transgrid became aware of the incident on the 2 May 2024. A notification was sent to the Department and NPWS on the 2 May 2024.

- On the 31 May 2024, a heavy rainfall event of approximately 53 mm occurred. Water quality monitoring was undertaken in accordance with the SWMP and Environmental Protection Licence 21753 and found elevated NTU levels identified within New Zealand Gully. Transgrid become aware of the incident on the 4 June 2024. A notification was sent to the Department and NPWS on the 4 June 2024.
- Approximately 0.60 ML of water has been extracted from Paddys River for dust suppression purposes under a WAL held by UGL (WAL44782) without procuring a water allocation. Transgrid become aware of the incident on the 30 July 2024. A notification was sent to the Department and the NPWS on the 30 July 2024.
- On the 26 September 2024, a heavy rainfall event of approximately 43 mm occurred. within Project Area East Post-rainfall inspections undertaken. in accordance with the SWMP, identified turbid water seeping beneath an earthen bund located on Access Track 8. The seeping turbid water was recorded to have discharged beyond the Project Area boundary. A notification was sent to the Department, NPWS and DCCEEW on the 26 September 2024.

## 5.4 Biodiversity Management

As required and endorsed by DPHI, Jacob Manners, Principal Ecologist and Accredited BAM Assessor undertook the auditing of the Projects Biodiversity Management requirements and obligations.

The key focus of biodiversity management for the Project is to ensure that all avoidance, mitigation and management measures relevant to biodiversity and referred to in the environmental assessment documents and relevant permits and approvals are addressed.

During the site inspection, project ecologists were observed conducting pre-clearing surveys in accordance with the BMP. It is noted a comprehensive process is being implemented by the Project to verify unexpected findings, which includes assessing species that were not included in the Biodiversity Development Assessment Report (BDAR) for offsets, as well as species that occur outside designated offset areas. Consequently, during the period since the last audit the BMP has been updated to reflect the discovery of unexpected threatened species.

It is noted that throughout the clearing process, threatened arboreal mammals have been encountered during the audit period; however, these animals have been successfully released without injury, demonstrating a commitment to wildlife protection. There was one incident however where a fatality was recorded during the audit period. This event took place on 16 April 2024, during Stage 2 clearing of a habitat tree. The trunk of the tree collapsed unexpectedly during the soft felling process, resulting in the deaths of seven Feathertail Gliders that were residing in a den within the trunk. Because of the den's location and the small size of the opening, it was not possible to identify the den prior to felling. Out of a total of ten Feathertail Gliders, three survived; one was taken to a local wildlife carer due to an injured leg, one was relocated, and the final glider naturally dispersed from the tree.

During the site audit inspection, it was evident that some tree trunks and native vegetation had been preserved wherever possible. A working group has been formed to determine the design parameters and develop a strategy for installing glider poles as explained by Brendan Toohey from UGL during the audit. Existing trees in the alignment have been identified that can be retained for glider poles and these were observed during the inspection (refer to **Plate 1** in **Appendix 5**).

Areas of partial clearing were also observed during the inspection, including the Transmission Structure Zone outside Civil Works Areas, construction benches, access tracks, and the Easement Clearing Zone. Appendix B of the BMP provides a detailed description of the allowable methods in these zones (refer to **Plate 2 in Appendix 5**). Notably, the BMP specifies that vegetation with growth potential below 4 m should be left intact or allowed to regenerate. Observations indicated that ground stripping had not occurred in the inspected areas of partial clearing, as evidenced by the presence of retained stumps and root balls, as well as the persistence of groundcover vegetation (refer to **Plate 3 in Appendix 5**). Overall, general compliance with the BMP guidelines for partial clearing was noted.

However, it was identified that the Infrastructure Approval required that partial clearance monitoring was required to be carried out within the first three months of construction (construction commenced in December 2023). However, vegetation clearing did not begin until March 2024, outside of the three-month period. It is considered that the intent of the approval condition was to monitor and report on the first three months of partial clearing (from commencement of clearing). It was noted that monitoring was undertaken for partial clearance areas during the 3 months following commencement of clearing.

Condition B21 requires that this monitoring data be used to prepare a verification report to guide future clearance works. At the time of the audit, a partial clearing verification report was not available, and this has been noted as a non-compliance. During the audit period, vegetation clearing had progressed significantly, with clearing at the Maragle site completed by September 2024. Due to the absence of a verification report, it was unable to be confirmed if the partial clearing monitoring has been used to inform required changes to improve the construction vegetation clearing protocols.

It is recommended that Transgrid prepare the verification report and consult with BCS to update the BMP, ensuring the inclusion of timelines and subject content for the verification report. At the time of the audit, discussions were ongoing regarding the retrieval of data from the author of the BDAR for comparison with the monitoring results.

A Consistency Assessment has been prepared for the Project by WSP (2024) and was reviewed during this audit. The Consistency Assessment has demonstrated an overall reduction to the total and partial clearing areas impacted by the Project however, lacks information to confirm whether associated offset obligations are consistent with the approval. The total impact area has increased for PCT 285 (0.1 ha) and PCT 999 (1.92 ha), and a detailed assessment of impacts to each species polygon has not been provided. Additionally, PCT mapping is missing for some sections of the Updated Disturbance Footprint. The Consistency Assessment also notes consistency assessments are still undergoing for concrete batching plants. It is recommended that Transgrid provide additional information to support the Consistency Assessment. This should include clear and accurate PCT and species polygon mapping and impact totals for all additional impact areas not assessed in the BDAR and clear demonstration that any additional impacts do not exceed the approval conditions.

## 5.5 Aboriginal Cultural Heritage Management

As required and endorsed by DPHI the auditing of the Projects Cultural Heritage Management requirements and obligations was undertaken by Luke Wolfe, Principal Archaeologist.

During the audit, the Project Team presented examples of subconsultant reporting, examples of compliance with the Heritage Management Plan and Consent Conditions, details of the record keeping methods and strategies for dissemination of information and lessons learnt to stakeholders and personnel.

The Project Team overall demonstrated a commitment to respectful engagement with RAPs (with particular emphasis on engagement of Elders), along with a demonstration of proactive effort to maintain compliance with the Project Conditions and Heritage Management Plan. It was noted that as part of the cultural heritage induction smoking ceremonies were held to enable a strong connection to country.

In discussion with the Project team and subsequent correspondence, Brendan Toohey explained that three Aboriginal heritage finds were identified during the audit period. The three Aboriginal Heritage finds are detailed below:

- On the 18 March 2024 in Track 6a ten suspected Aboriginal objects were identified within the approved Development Footprint. Provided documentation indicated the Project heritage consultant collected Aboriginal objects which were relocated to areas outside of the impact zone. A 10 m exclusion zone was subsequently established around the object relocation position and appropriate signage was installed, compliant with Section 6.3 and 67.4 of the Heritage Management Plan (Rev 0.07). AHIMS records and/or ASIR forms indicated object relocation and compliance with Project approval conditions.
- On the 22 April 2024 in Track 6 Aboriginal object/s were identified. Salvage and relocation of the object/s occurred and subsequent correspondence with relevant stakeholders confirmed. AHIMS records and/or ASIR forms indicated object relocation and compliance with Project approval conditions.
- On the 3 July in Track 6a, 3 July 2024 Aboriginal object/s were identified. Salvage and relocation of the object/s occurred and subsequent correspondence with relevant stakeholders confirmed. AHIMS records and/or ASIR forms indicated object relocation and compliance with Project approval conditions.

While no active Aboriginal heritage works were observed during the audit, the audit team was provided the opportunity to observe typical post-clearance works areas to gain an understanding of how clearance activities are undertaken. It was noted that post-vegetation clearance ground visibility was generally poor, but acceptable as a practical limitation (refer to **Plate 4 in Appendix 5**). A conference call with the Project heritage consultant during the site inspection provided additional opportunity to discuss consultation and engagement processes with Aboriginal stakeholders. In general, the Project team appeared to be proactive and respectful with engagement with stakeholders and demonstrated compliance with HMP protocols.

The audit team raised an opportunity of improvement of providing consolidated Project updates to RAPs and investigating the context of Aboriginal objects/sites identified to date to determine if and/or how unexpected finds relate to the broader cultural context of the Project Area and environment.

## 5.6 Erosion and Sediment Control and Water Management

As required and endorsed by DPHI the auditing of the Projects Erosion and Sediment Control and Water Management requirements and obligations was undertaken by Melissa Swan, Principal Environmental Engineer and Certified Professional in Erosion and Sediment Control (CPESC #8954). The audit of erosion and sediment control and water management for the Project included a site inspection of all of the areas identified in **Section 2.3.2**.

There were two incidents which occurred during the audit period which had the potential to cause water pollution (refer to **Section 5.3.2** for further detail).

Based on a review of the incident reports, the immediate response to the incidents and ongoing follow up actions are considered appropriate.

In general, the SWMP was found to be compliant with the project approval conditions and compliant with the mitigation measures in the Amendment Report in regard to water management however one potential non-compliance was noted with regards to the Infrastructure Approval Condition and Amendment Report Mitigation Measures (refer to **Appendix 4**).

A site inspection was undertaken by the lead and assistant auditor and accompanied by Melissa Swan (Endorsed Water/Sediment and Erosion Control Specialist). During the site inspection the installed erosion and sediment controls were inspected and generally were in good condition and installed as per the Progressive Erosion and Sediment Control Plans (Progressive ESCPs) (refer to **Plate 5**, **Plate 6** and **Plate 7** in **Appendix 5**). During the walk around of the site it was found to be sufficiently maintained, with all areas managed to an appropriate standard. Hydrocarbon management measures were being implemented effectively, with spill and containment kits available for use as required (refer to **Plate 8** in **Appendix 5**).

It was noted in discussions with the site team during the site inspection for Audit 2 that the SWMP refers to meeting a target of “better than Blue Book” (Blue Book being Landcom’s Managing Urban Stormwater: Soils and Construction (2004)) for erosion and sediment controls across the site. Interviews with site personnel during the audit identified that the site team interprets this target as implementing enhanced groundcover during the construction works (i.e. trying to achieve minimal “open/disturbed” areas through the use of immediate/quickly installed appropriate temporary (such as mulch, soil binders and geofabric) and permanent ground cover measures). Temporary ground cover measures were observed to be used across the site during the site inspection.

## 5.7 Site Audit Inspection

A detailed site inspection of the active construction areas of the Project Area was undertaken during the site audit. The inspection included of all of the areas identified in **Section 2.3.3**.

During the site inspection the Maragle Project Construction Compound was found to be sufficiently maintained, with all areas managed to an appropriate standard. General housekeeping measures were being implemented effectively, with the area being kept free of litter and waste organised in respective bins (refer to **Plate 9** in **Appendix 5**). Chemicals were stored in appropriate bunded areas (refer to **Plate 10** in **Appendix 5**). Additionally firefighting equipment were readily available however it was noted the fire supply tank was not signposted (refer to **Plate 11** and **Plate 12** in **Appendix 5**). It is recommended the water tanks across all Project sites be signposted in the case of an emergency firefighting services can easily locate the water supply.

Erosion and sediment controls appear to be in place and functioning. Rock checks and diversion drains were observed to be well maintained. Spill kits were located adjacent to the Maragle Substation Project Area and were stocked. The sediment basin was also observed (refer to **Plate 13** in **Appendix 5**). During the site inspection between 24-26 September 2024 the site experienced 66.8 mm of rain, observations over this period confirmed water from all areas at Maragle compound/switchyard appeared to report to and be captured by the sediment basin appropriately. Site teams were also actively flocking the sediment basin over this time however it noted the basin was approaching capacity due to the volume of rain fall experienced. It is vital Transgrid continue to monitor and manage / maintain this basin and catchment to ensure it continues to operate (or better term) as designed.



The Maragle Substation Project Area was also inspected. It was evident the area has been subject to extensive clearing, it was later confirmed on the 26 September 2024 of the site visit that clearing works have been completed within the Maragle Substation Project Area, with civil works expected to commence (refer to **Plate 14** in **Appendix 5**). Materials were observed to be organised into various stockpiles, with each stockpile clearly signposted (refer to **Plate 15** and **Plate 16** in **Appendix 5**). All equipment was also seen to be in good condition and appeared to be well maintained whilst being operated in a proper and efficient manner (refer to **Plate 17** in **Appendix 5**).

During the site audit inspection, wheel wash stations were also noted in both Project Areas East and West to ensure that vehicles and equipment remain free of weeds, seeds, and pathogens when entering or exiting the site (refer to **Plate 18** in **Appendix 5**). Additionally, rubber mats were observed at various access points, and rumble grids were in operation at the entry and exit points of the Maragle Project Construction Compound (refer to **Plate 19** in **Appendix 5**).

An inspection of the sealed roads was also completed and showed to be well maintained and in good condition showing no evidence of dirt/mud tracking (refer to **Plate 4** in **Appendix 5**).

Signage for management areas impacted by *Phytophthora sp.* was observed during the audit. QR codes were also noted in locations where *Phytophthora sp.* had been identified (refer to **Plate 20** in **Appendix 5**). Onsite explanations indicated that these codes assist in informing personnel about the necessary procedures and actions to prevent the potential spread of pathogens from the cleared areas. Additionally, portable pump packs for disinfecting footwear and equipment were observed.

The Lobs Hole Project Compound was also inspected and was observed to be well maintained. During the inspection of the Lobbs Hole site chemical and hydrocarbon storage containers were observed to be well organised and well maintained (refer to **Plate 21** in **Appendix 5**). Recycling programs were observed to be well implemented at the Lobbs Hole Project Compound with waste segregation and designated bins provided and clearly sign posted (refer to **Plate 22** in **Appendix 5**). Firefighting equipment was also seen and readily available at the compound. It is noted the water supply tank at Lobbs Hole was empty upon inspection.

The temporary Sheep Creek Station Bridge was observed. It is noted the temporary bridge has been installed and limited clearing has progressed beyond the bridge. Erosion and sediment control were observed to be installed and functioning (refer to **Plate 23** in **Appendix 5**). Other than the above, based on observations made during the site audit and evidence reviewed it is considered that the construction of the Project is being undertaken generally consistent with what was proposed and assessed within the Amendment Report.



# 6.0 Recommendations and Opportunities for Improvement

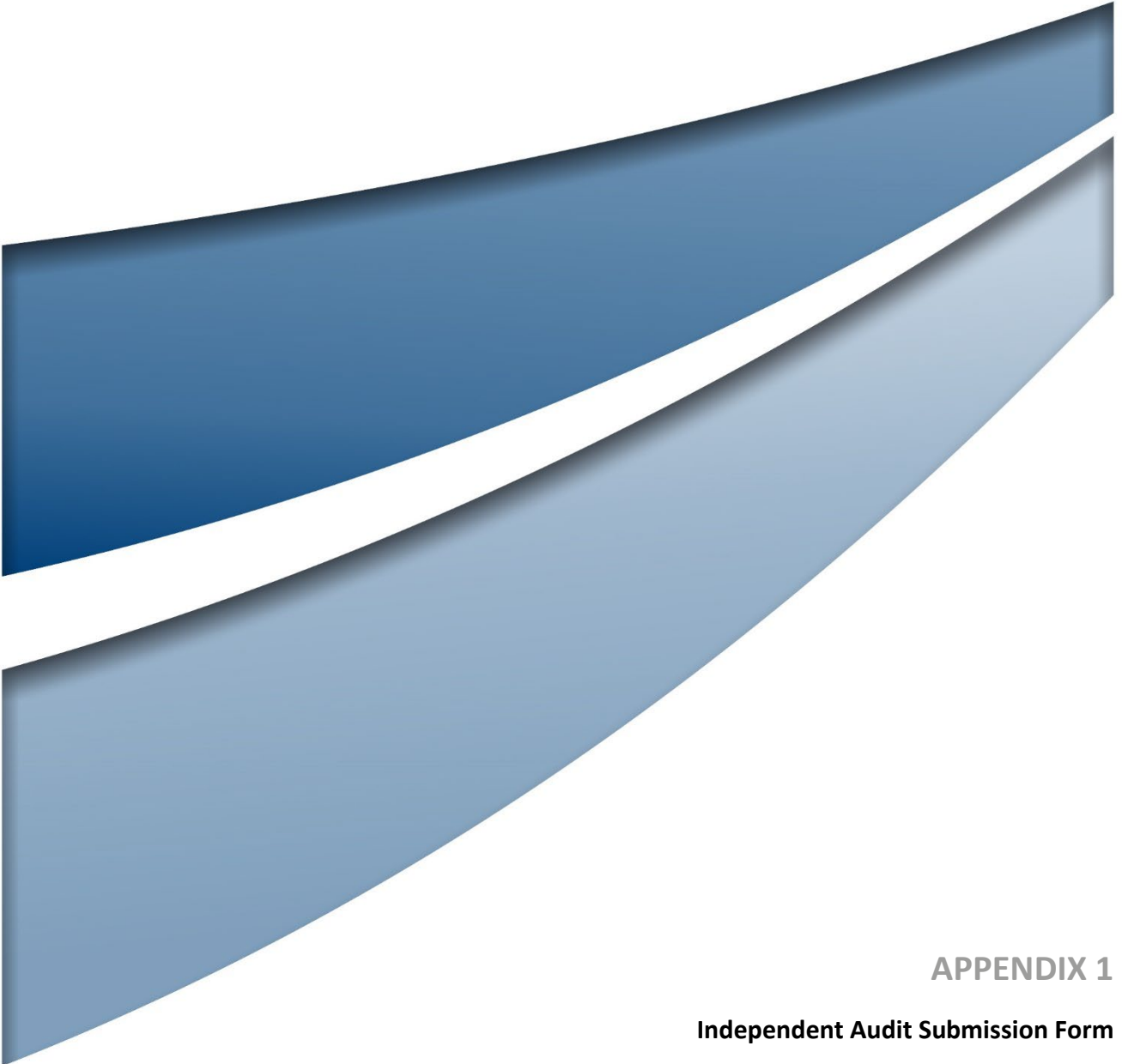
## 6.1 Recommendations and Opportunities for Improvement

A summary of recommendations and opportunities for improvement identified as an outcome of the audit process is provided in **Table 6.1**.

**Table 6.1 Recommendations**

Condition / Issue	Recommendation
<b>SSI 9717 – MOD 1 Infrastructure Approval</b>	
<b>B16</b>	It is recommended that the existing TARPs be updated or new TARPS prepared to cover general pollution incidents and discharge of sediment laden water and that these be appended to the SWMP.
	It is recommended the requirements for enhanced erosion controls and examples of what these entail should be documented within project TARPS; regular toolbox talks and site training as appropriate to ensure all staff are aware of the requirements for enhanced erosion and sediment controls for the project.
<b>B21</b>	It is recommended partial clearing monitoring is completed and a Verification Report Is prepared for Agency review so that any changes required to the construction vegetation clearing protocols can be identified and implemented during partial clearing works.
	It is recommended Transgrid consult with BCS to update the BMP, ensuring the inclusion of timelines for verification reporting and the approach to updating clearing protocols as might be required regarding the outcomes of partial clearing monitoring.
	It is recommended weed monitoring and management is undertaken in accordance with BMP MON14 and completed prior to completing clearing works.
	A number of measures to improve the management of partial clearing which should be investigated as part of the verification report include: <ul style="list-style-type: none"> <li>• Development of a rapid methodology for monitoring partial clearing areas post clearing to ensure that partial clearing requirements have been followed and improvements can be identified early and implemented quickly.</li> <li>• Completion of rapid monitoring of partial clearing areas within three months of clearing for individual clearing permit areas.</li> <li>• Development and implementation of a medium to long-term monitoring methodology for partial clearing to determine whether the BDAR vegetation integrity predictions are being met, for integration with post construction site rehabilitation initiatives.</li> <li>• Assessment of locations and depth of mulch deposited in the partial clearing zones and determination of any positive or negative impacts related to vegetation retention and regeneration.</li> <li>• Consideration of whether any restrictions or amendments to mulch spreading rates or locations are required to improve or support vegetation regeneration outcomes.</li> <li>• Consider practicable initiatives for reduction of machine movements in partial clearing zones, such as locating stockpiles of logs for export in more appropriate areas such as total clearing zones.</li> </ul>

Condition / Issue	Recommendation
	<ul style="list-style-type: none"> <li>Description of the successful methods which are currently being implemented to ensure partial clearing works are successful, such as retention of tree stumps. The description of existing successful methods is considered important to ensure a consistent approach is maintained throughout the partial clearing program.</li> </ul>
<b>B24</b>	<p>It is recommended Transgrid continue to provide consolidated project updates and updated Aboriginal site mapping to RAPs.</p> <p>It is recommended Transgrid continue to invite RAPs/identified knowledge holders to provide feedback on the distribution of sites and cultural understanding.</p> <p>It is recommended Transgrid continue to invite to RAPs/identified knowledge holders to comment on the effectiveness of Aboriginal site/object management protocols.</p>
<b>B41</b>	<p>It is recommended UGL ensure all water tanks are filled with water prior the dedicated bushfire danger season.</p> <p>It is recommended the water tanks across all Project sites be signposted in the case of an emergency firefighting services can easily locate the water supply.</p>
<b>B46</b>	<p>It is recommended moving forward Transgrid seek to attain waste dockets from JR Richards and Bellettes.</p>
<b>C2</b>	<p>It is recommended a document review register is created to track and keep records of all of the reviews that are triggered by Condition C2, including where a plan has been reviewed but the outcomes of that review identified no revisions were required.</p>
<b>EPPC 2018/8363</b>	
<b>Part B 25</b>	<p>It is recommended relevant plans including the BMP and EMS are updated to include specifics on what plans are required to report on non-compliances and incident to AG DCCEEW as outlined by AG DCCEEW correspondence dated 4 October 2024.</p>
<b>Amendment Report Commitments</b>	
<b>B1</b>	<p>It is recommended that Transgrid provide additional information to support the Consistency Assessment. This should include clear and accurate PCT and species polygon mapping and impact totals for all additional impact areas not assessed in the BDAR and clear demonstration that any additional impacts do not exceed the approval conditions.</p>
<b>W10</b>	<p>It is recommended that the environmental inspection weekly checklist and the pre- and post- rainfall inspection checklists are updated to include a compliance measure relating to the conditions and controls installed around waterway crossings and access tracks to prompt staff completing these inspections to check all tracks and crossings remain in good condition.</p>
<b>HAZ4</b>	<p>It is recommended the Ocon Refuelling Procedure is revised to include a minimum of 40 metres clearance is required between fuel/chemical storage points and woody vegetation.</p>



## APPENDIX 1

### Independent Audit Submission Form

## Appendix 1 - Independent Audit Report Declaration Form

Independent Audit Report Declaration Form

**Project Name:** Snowy 2.0 Transmission Connection Project

**Consent Number:** SSI 9717

**Description of Project:** Construction and operation of new 330 kilovolt (kV) transmission lines and associated infrastructure connecting the Snowy 2.0 Main Works Project to the existing electricity grid.

**Project Address:** Elliot Way Maragle NSW 2653 (Snowy Mountains)

**Proponent:** Transgrid

**Title of Audit:** Independent Environmental Audit of Snowy 2.0 Transmission Connection Project  
Construction Audit 2

**Date:** 4 December 2024

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

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, 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;
- 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;
- 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
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, 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:

- 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 proponent 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 a corporation, \$1 million and for an individual, \$250,000; and
- The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

**Name of Auditor:** Daniel Sullivan

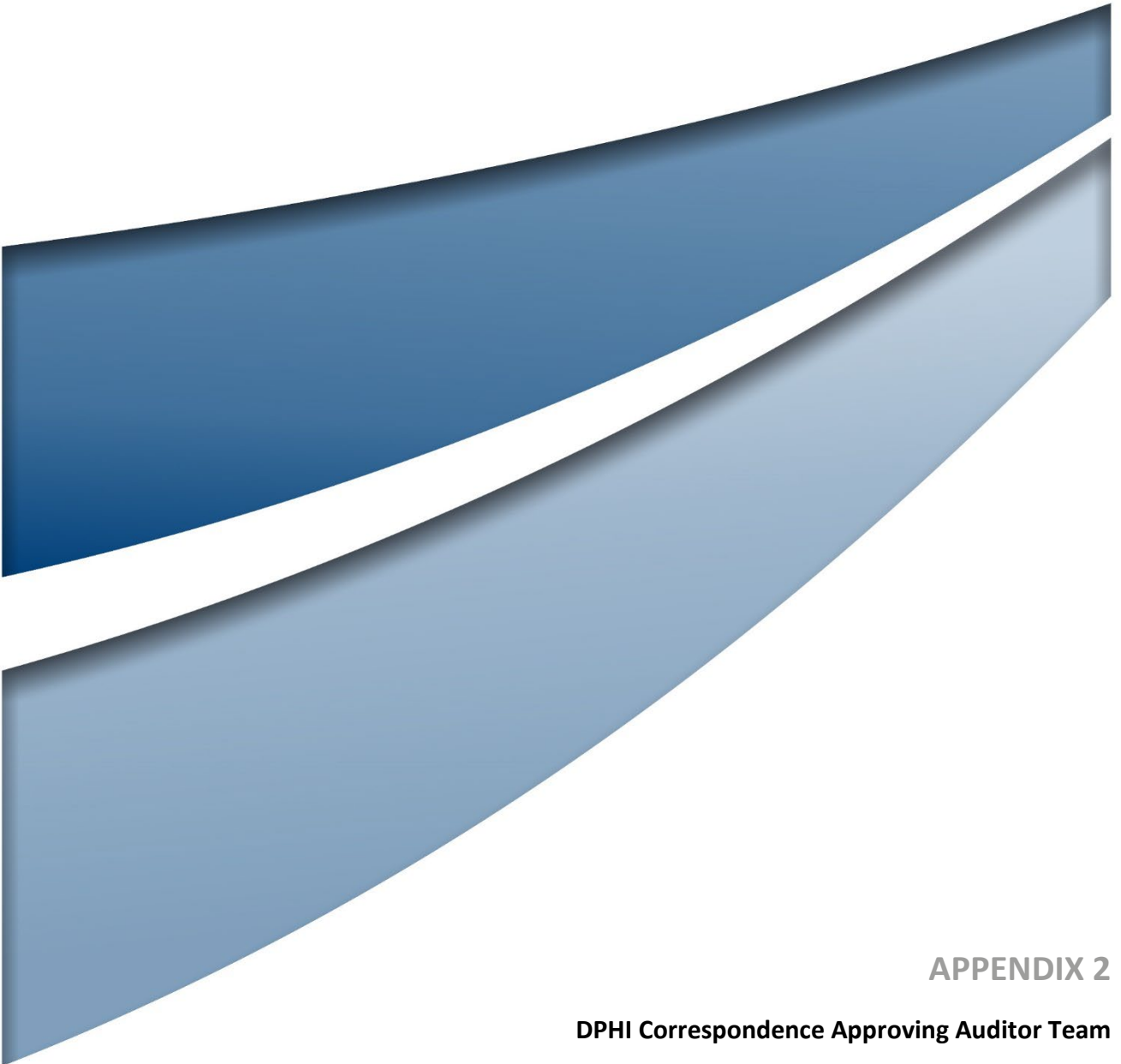
**Signature:**



**Qualification:** BEnvSc, Exemplar Global Internationally Certified Lead Auditor (No. 113202)

**Company:** Umwelt (Australia) Pty Limited

**Company Address:** 75 York Street Teralba NSW 2284



## APPENDIX 2

**DPHI Correspondence Approving Auditor Team**

Mr Andrew Buttigieg  
180 THOMAS STREET  
HAYMARKET NSW 2000  
27/04/2023

Dear Mr Buttigieg

**Snowy 2.0 - Transmission Connection - (SSI-9717)  
Independent Environmental Audit Team approval**

Reference is made to the post approval documents regarding the Independent Environmental Audit (IEA) timing schedule and the suitability of the Audit team's qualifications, experience and independence, to undertake the IEA and prepare the IEA report, submitted to the Department of Planning and Environment (the department) for the Snowy 2.0 - Transmission Connection on 22 March 2023 as required Condition C10 of SSI 9717 (the approval).

Having considered the qualifications and experience of the audit team from Umwelt Australia Pty Ltd the Planning Secretary endorses the appointment of the audit team listed below, to undertake the IEA and prepare the IEA report in accordance with Condition C10 of the approval.

Mr Daniel Sullivan - Lead Auditor;  
Mr Chris Bonomini - Principal Engineer – Water Process and Risk;  
Mr James Garnham - Senior Ecologist; and  
Mr Luke Wolfe - Principal Archaeologist.

In respect to the request of relief from the counting of three (3) winter shutdown months in the IEA audit frequency of every year of the construction phase, the department is of the opinion that the snowmelts are one of the major potential impact times for erosion/sediment issues associated with the site and hence this 3 months-time period is to be included in the 26 weeks.

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

The Department reserves the right to request an alternate auditor or audit team for future audits. Notwithstanding the agreement for the above listed auditor for this Project, each respective project approval requires a request for the agreement to the auditor be submitted to the Department, for the consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor will be considered.

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

Yours sincerely



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

NSW Planning ref: SSI-9717-PA-38

Mr Andrew Buttigieg

Project Manager - Snowy 2.0 Transmission Connection

The Trustee for the NSW Electricity Networks Operations Trust

ABORIGINAL COUNTRY

180 THOMAS STREET

HAYMARKET New South Wales 2000

05/02/2024

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Sent via the Major Projects Portal only

**Subject: Snowy 2.0 - Transmission Connection – Independent Environmental Audit - Auditor replacement approval request 2 February 2024**

Dear Mr Buttigieg

Reference is made to your post approval matter, SSI-9717-PA-38, requesting the Planning Secretary's approval of an alternate suitably qualified, experienced, and independent person to assist in the Independent Audit of the Snowy 2.0 - Transmission Connection - submitted as required by C10 of SSI 9717 (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 2 February 2024.

NSW Planning notes that Mr Chris Bonomini has moved on to a role outside of Umwelt Australia Pty Ltd and is no longer available for the endorsed audit team. NSW Planning has reviewed the replacement auditor nomination and based on the information you have provided is satisfied that Ms Melissa Swan is suitably qualified, experienced, and independent. Consequently, as nominee of the Planning Secretary, I approve the appointment of Ms Swan as part of the IEA team.

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

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

Yours sincerely



Katrina O'Reilly

Team Leader - Compliance

Compliance

As nominee of the Planning Secretary





NSW Planning ref: SSI-9717-PA-42  
Mr Andrew Buttigieg  
Project Manager - Snowy 2.0 Transmission Connection  
The Trustee for the NSW Electricity Networks Operations Trust  
180 THOMAS STREET  
HAYMARKET New South Wales 2000  
15/02/2024

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**Subject: Snowy 2.0 - Transmission Connection – Independent Environmental Audit -  
alternate auditors approval**

Dear Mr Buttigieg

Reference is made to your post approval matter, SSI-9717-PA-42, requesting the Planning Secretary's approval of an additional and an alternate suitably qualified, experienced, and independent persons to assist in the Independent Environmental Audit (IEA) of the Snowy 2.0 - Transmission Connection - submitted as required by C10 of SSI 9717 (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 14 February 2024.

NSW Planning notes that Mr James Graham is unable to participate in the IEA due to personal reasons.

NSW Planning has reviewed Mr Graham's replacement auditor nomination and based on the information you have provided is satisfied that Mr Jacob Manners (Principal Ecologist and Accredited BAM Assessor) is suitably qualified, experienced, and independent. In addition, NSW Planning have reviewed Mr Joshua Wheatley (Environmental Consultant) information, as assistant auditor to Mr Daniel Sullivan and is satisfied he is suitably qualified, experienced, and independent. Consequently, as nominee of the Planning Secretary, I approve the appointment of Mr Manners and Mr Wheatley as part of the IEA team.

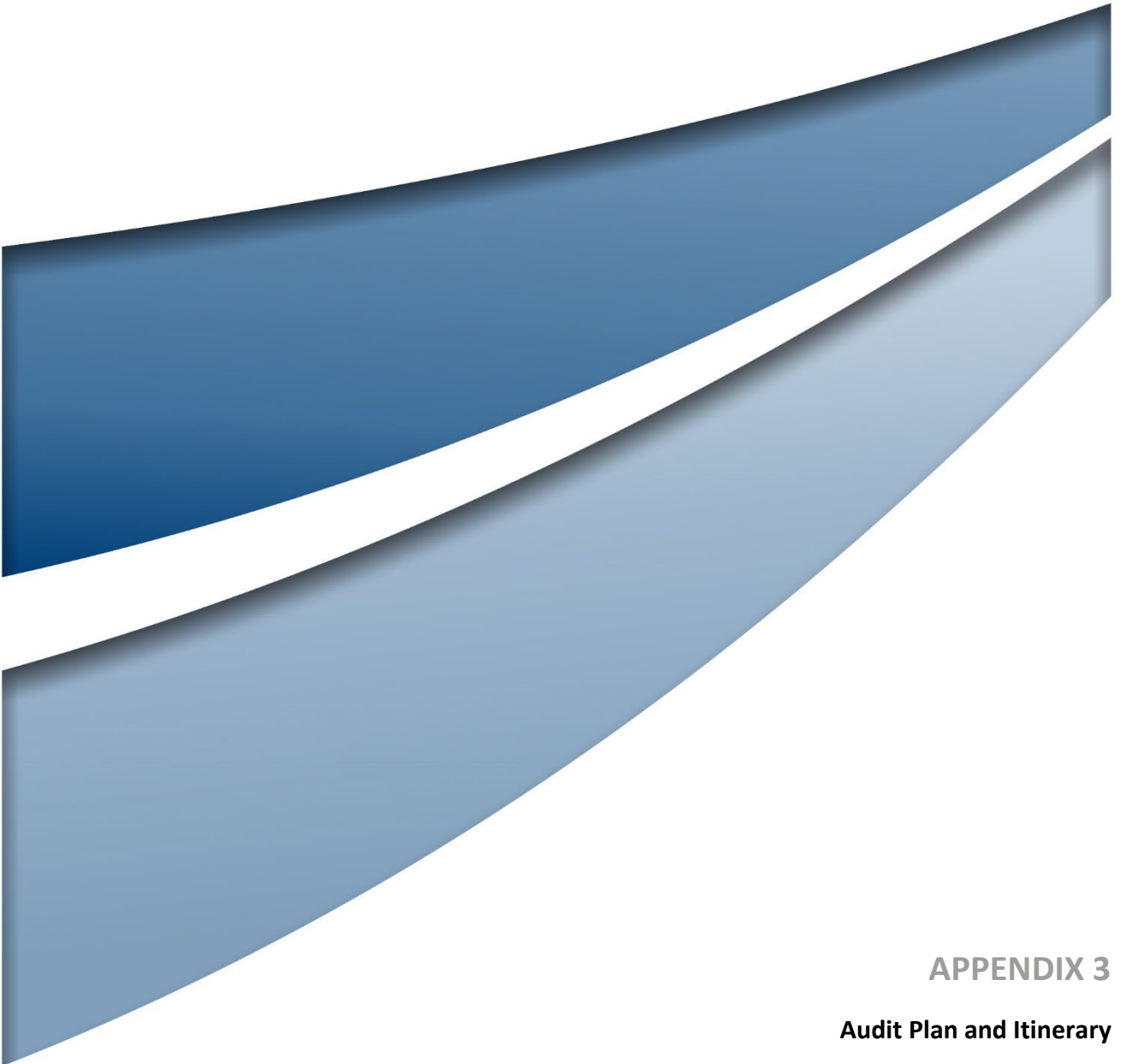
Please ensure this correspondence is appended to the Independent Audit Report.

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

Yours sincerely



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



## APPENDIX 3

### **Audit Plan and Itinerary**



## TransGrid

# Snowy 2.0 Transmission Connection Project SSI 9717 Independent Construction Audit 2

## Audit Plan

<b>To:</b>	Jason Snape (Transgrid)
<b>From:</b>	Umwelt (Australia) Pty Limited
<b>Author:</b>	Daniel Sullivan (Umwelt)
<b>Date:</b>	5 August 2024
<b>Subject:</b>	Snowy Hydro 2.0 Connection Project –Independent Construction Audit 2

**Audit Period:** 15 March 2024 to 26 September 2024

**Site Audit Date:** 11 September and 24 - 26 September 2024

### Audit Team:

Name	Role
Daniel Sullivan	Lead Auditor
Joshua Wheatley	Assistant Auditor
Jacob Manners	Biodiversity Specialist
Luke Wolfe	Aboriginal Archaeology Specialist
Melissa Swan	Sediment & Erosion / Water Specialist

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This plan and any files transmitted with it are confidential and are intended to provide information for use in discussions between Umwelt and the named recipient(s) only.

## 1.0 Audit Scope and Objectives

In accordance with the Development Consent for SSI 9717 and the NSW Department of Planning, Industry & Environment's (DPIE) *Independent Audit – Post Approval Requirements* dated May 2020 (Independent Audit Requirements) an Initial Independent Audit is required to be completed for Snowy Hydro 2.0 Connection Project (the Project).

The scope and objectives of the Initial Independent Audit are to assess TransGrid's compliance with:

- All conditions of the Development Consent for SSI 9717 (dated 2 September 2022) that are applicable to the construction phase
- All post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans and
- All environmental licences and approvals applicable to the development excluding environment protection licences issued under the *Protection of the Environment Operations Act 1997*.

The audit will also include:

- A review of the environmental performance of the development (including a comparison with the predicted impacts contained in the EIS, review of complaints and incidents registers and consideration of any feedback provided during agency consultation)
- A high-level assessment of whether Environmental Management Plans and sub-plans are adequate and
- Any other matters considered relevant by the auditor or the Department.

## 2.0 Audit Criteria

Reporting of compliance will be based on the compliance status descriptors as defined in the Independent Audit Requirements as shown in **Table 1**. No other terms may be used to describe the compliance status.

**Table 1: Compliance Status Descriptors**

Status	Description
Compliant (C)	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant (NC)	The auditor has determined that 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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

### 3.0 Audit Process

**Document Review:** The documents listed in Part 1 of **Table 2** below will be reviewed prior to and during the audit to enable compilation of audit checklists and allow the auditor to gain an understanding of the site.

**Agency Consultation:** Consultation will be undertaken with Department of Planning, Housing and Infrastructure (DPHI) (formerly Department of Planning and Environment) with regard to the scope of the audit. During this consultation the Department may request that further consultation be undertaken with other parties including other agencies.

**Site Inspection/Audit:** Four days have been allowed for the on-site component of the audit. During the site inspection access is requested to all development areas and environmental aspects that form part of the Project. To maximise the time on site, documentation as discussed below will be reviewed prior to the site inspection.

An indicative itinerary for the site inspection is provided in **Table 3**. This will be revised and reissued as final prior to the site audit date.

During the audit, the following people are proposed to be interviewed (if available):

- Project Manager / Site Manager
- Senior Environmental Advisor;
- Site Environmental Leads;
- Relevant supervisors / personnel from key construction areas visited during the site inspections including those with responsibility for environmental management; and
- Other persons identified during the course of the audit (as relevant).

For the Opening and Closing Meetings, it is suggested that as a minimum these should be attended by the Project Manager/ Site Manager, Senior Environmental Advisor, relevant area supervisors and any other personnel nominated by TransGrid.

**Table 2: Pre-Audit Documentation Requirements**

Issue	Document	Status
<b>Documentation Required Prior to Audit</b>		
<b>Environmental Documentation</b>	Confirmation if any other Approvals or Licences have been required and obtained since the last audit (and copies if yes).	Required
	Copies of any notifications (including any written requirements or directions) given by Secretary under the approval since the last audit	Required
	Management Plans / Strategies- If any changes / amendments to management plans copies of updated approved plans and details of what the changes were.	Required
	Copies of correspondence to relevant agencies for consultation, submission and approval of plans	Required
	Details of any PINs received, and incidents reported within the audit period including reports	Required
	Complaints register from 15 March to date (audit period)	Required
	Aboriginal Heritage Salvage Report(s) relevant to the audit period (ie. since last audit)	Required
	Update on status of addressing actions from previous audit.	Required

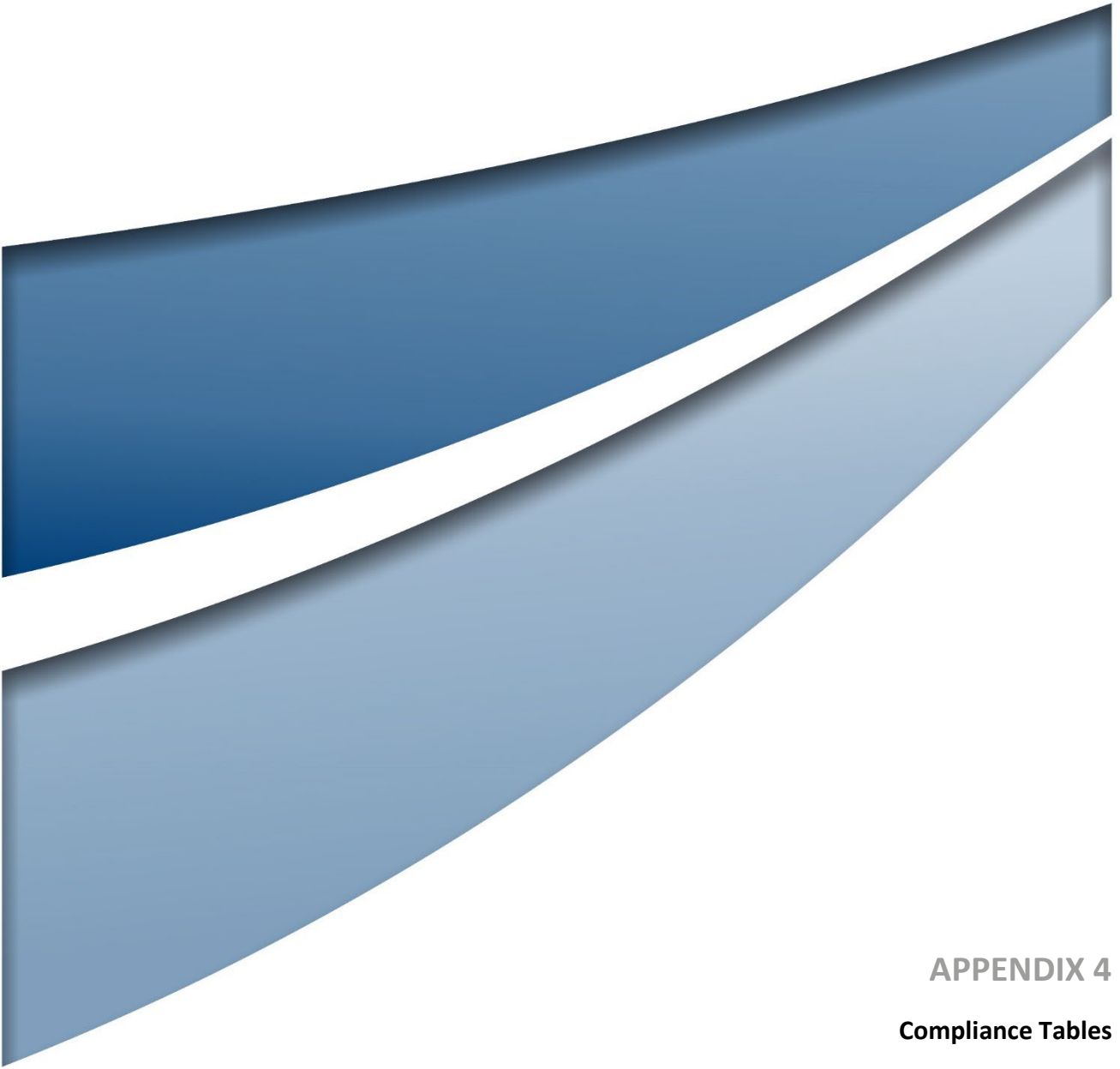
**Table 2: Indicative Itinerary for Site Inspection/Audit**

Day/Time	Description	Personnel
<b>Biodiversity &amp; Aboriginal Heritage Components (Wednesday 11 September 2024)</b>		
8.00am - 9.30am	<b>Documentation Compliance Review - Focus on Biodiversity</b> <ul style="list-style-type: none"> <li>Review of SSI 9717 consent</li> <li>Review key EIS commitments</li> <li>Review activities against EIS</li> <li>Regulator consult issues and audit feedback</li> <li>Reportable incidents and complaints</li> </ul>	Environmental personnel and appropriate site personnel as required
9.30am - 10.30am	<b>Documentation Compliance Review - Focus on Aboriginal Heritage</b> <ul style="list-style-type: none"> <li>Review of SSI 9717 consent</li> <li>Review key EIS commitments</li> <li>Review activities against EIS</li> <li>Regulator consult issues and audit feedback</li> <li>Reportable incidents and complaints</li> </ul>	Environmental personnel and appropriate site personnel as required
11.00am - 12.30pm	<b>Field Inspection (Biodiversity &amp; Aboriginal Specialist) Maragle Site (Western Alignment)</b> <ul style="list-style-type: none"> <li>All Cleared Areas</li> <li>Any areas where pre-clearing works are planned / commenced</li> <li>Sensitive sites where mitigation / management is required</li> </ul>	Environmental personnel and appropriate site personnel as required
12.30pm - 1.00pm	<b>Lunch</b>	
2.00pm - 3.30pm	<b>Field Inspection (Biodiversity &amp; Aboriginal Specialist) Lobbs Hole Site (Eastern Alignment)</b> <ul style="list-style-type: none"> <li>All Cleared Areas</li> <li>Any areas where pre-clearing works are planned / commenced</li> <li>Sensitive sites where mitigation / management is required</li> </ul>	Environmental personnel and appropriate site personnel as required
3:30pm – 4:00pm	<b>Biodiversity &amp; Aboriginal Heritage Wrap Up</b> <ul style="list-style-type: none"> <li>Brief close out to confirm any initial findings and outstanding RFI approach, etc</li> </ul>	Environmental personnel and appropriate site personnel as required

Lead Audit Day 1 (Tuesday 24 September 2024)		
9.00am - 9.30am	<b>Opening Meeting</b> <ul style="list-style-type: none"> <li>• Introductions</li> <li>• Purpose of Audit</li> <li>• Confidentiality Arrangements</li> <li>• Audit Process and Timing</li> </ul>	Manager/supervisor, environmental personnel and site personnel as invited by Transgrid
9:30am - 10:00am	<b>Presentation on Snowy 2.0 Transmission Connection Project and construction activities in Audit Period</b> <ul style="list-style-type: none"> <li>• Transgrid personnel to present an overview of the progress of construction across the site, including outline of environmental management system and controls</li> </ul>	Manager/supervisor and environmental personnel
10.00am - 12.00pm	<b>Documentation Compliance Review</b> <ul style="list-style-type: none"> <li>• Review of SSI 9717 consent</li> </ul>	Environmental personnel and appropriate site personnel as required
12.00pm - 12.30pm	<b>Lunch</b>	
12.30pm - 4.00pm	<b>Documentation Compliance Review (Cont.)</b> <ul style="list-style-type: none"> <li>• Review of SSI 9717 consent (cont).</li> <li>• Close out of previous audit actions</li> <li>• Review key EIS commitments</li> <li>• Review activities against EIS</li> <li>• Regulator consult issues and audit feedback</li> <li>• Reportable incidents and complaints</li> <li>• Management plans commitments review</li> <li>• Training and communication</li> </ul>	Environmental personnel and appropriate site personnel as required
4.00pm - 4.30pm	<b>Auditors Revision and End of Day 1</b>	Umwelt Auditor Only
Lead Audit Day 2 (Wednesday 25 September 2024)		
8.00am – 8.30am	<b>Day 2 Morning Catchup</b> <ul style="list-style-type: none"> <li>• Recap of Day 1 as needed</li> <li>• Plans for Day 2 and inspections</li> </ul>	Environmental personnel and appropriate site personnel as required
8.30am – 10.00am	<b>Documentation Compliance Review – Focus on Water / Sed Erosion Specialist Areas</b> <ul style="list-style-type: none"> <li>• Review of SSI 9717 consent</li> <li>• Review key EIS commitments</li> <li>• Review activities against EIS</li> <li>• Regulator consult issues and audit feedback</li> <li>• Reportable incidents and complaints</li> <li>• Management plans commitments review</li> </ul>	Environmental personnel and appropriate site personnel as required
10:30am – 12:00pm	<b>Field Inspection (inc Water Specialist) Maragle Site (Western Alignment)</b> <ul style="list-style-type: none"> <li>• All Cleared Areas</li> <li>• Any areas where pre-clearing works are planned /</li> </ul>	Environmental personnel and appropriate site personnel as required



	<p>commenced</p> <ul style="list-style-type: none"> <li>• Sensitive sites where mitigation / management is required</li> </ul>	
<b>12.00pm – 12.30pm</b>	<b>Lunch</b>	
<b>1:30pm – 3:30pm</b>	<p><b>Field Inspection (inc Water Specialist)</b>  <b>Lobbs Hole Site (Eastern Alignment)</b></p> <ul style="list-style-type: none"> <li>• All Cleared Areas</li> <li>• Any areas where pre-clearing works are planned / commenced</li> <li>• Sensitive sites where mitigation / management is required</li> </ul>	Environmental personnel and appropriate site personnel as required
<b>3:30pm – 4:00pm</b>	<p><b>Water Specialist Wrap Up</b></p> <ul style="list-style-type: none"> <li>• Brief close out to confirm any initial findings and outstanding RFI approach, etc</li> </ul>	Environmental personnel and appropriate site personnel as required
<b>Lead Audit Day 3 (Thursday 26 September 2024)</b>		
<b>9.00am - 9.30am</b>	<p><b>Day 3 Morning Catchup</b></p> <ul style="list-style-type: none"> <li>• Recap of Day 2 as needed</li> <li>• Plans for Day 3</li> </ul>	Environmental personnel and appropriate site personnel as required
<b>9.30am - 12.00pm</b>	<p><b>Documentation review</b></p> <ul style="list-style-type: none"> <li>• Time to review any additional documentation requested on Day 1 &amp; 2 or during site inspections</li> </ul>	Environmental personnel and appropriate site personnel as required
<b>12.00pm - 12.30pm</b>	<b>Lunch</b>	
<b>12.30pm - 2.00 pm</b>	<b>Auditor Revision and Preparation for Closeout Meeting</b>	Umwelt Auditor Only
<b>2.00pm - 2.30 pm</b>	<p><b>Close Out Meeting</b></p> <ul style="list-style-type: none"> <li>• Overview of findings</li> <li>• Confirmation of outstanding items or documents required</li> <li>• Confirm audit review and completion process</li> </ul>	Manager/supervisor, Environmental personnel and site personnel as invited by Transgrid



**APPENDIX 4**  
**Compliance Tables**

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
<b>SCHEDULE 2</b>					
<b>PART A ADMINISTRATIVE CONDITIONS</b>					
<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>					
<b>A1.</b>	In meeting the specific performance measures and criteria of this approval, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation, upgrading or decommissioning of the development.	Transgrid CAMS Compliance Tracker Environmental Management Strategy (Rev 0.06) dated 28/07/2023	Compliant	As confirmed during the Initial Construction Audit the Maragle 330kV Switching Station and 330kV Transmission Line Connections Environmental Management Strategy (EMS) document (sighted) provides the framework for environmental management for the Snowy Hydro 2.0 Transmission Connection Project. It also generally addresses the requirements of this Infrastructure Approval.  Findings and observations made during the Construction Audit 2 and site inspection confirmed that Transgrid are continuing to implement and maintain the appropriate measures required under respective management plans aimed at preventing / minimising material harm to the environment.  As confirmed during the Initial Construction Audit, Transgrid alongside its Principal Contractor 'UGL' continue to utilise compliance tracking systems (sighted) to ensure they meet the specific performance measures and criteria set out by this approval. During the Construction Audit 2 it is noted Transgrid is revising its compliance tracking system and utilising CAMS as their new compliance tracker. This revised tracking system would allow Transgrid to upload documents/ evidence against each condition of this approval but also send notifications to relevant personnel ensuring proper processes are followed. CAMS also has the ability if used effectively to preserve the history of the development ensuring the security of information (J. Snape pers. comm).  There were some reportable incidents during this audit period as described below in these compliance tables; however no material harm was shown to occur to the environment.	
<b>TERMS OF APPROVAL</b>					
<b>A2.</b>	The development must be carried out:  (a) in compliance with the conditions of this approval; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in Appendix 2.	Transgrid CAMS Compliance Tracker DPHI Acknowledgement Letter dated 03/09/2024 Initial Construction Audit May 2024: Proponent Responses dated 30/08/2024	<b>Non-compliant</b>	(a) The Snowy Hydro 2.0 Transmission Connection Project is being carried out generally in accordance with the conditions of this Infrastructure Approval and the EIS. <b>Non-Compliances against conditions have been identified during the audit period and are recorded in this table and in the main Audit Report</b> (b) No written direction by the Planning Secretary has been received during the reporting period (J. Snape pers. comm). (c) No changes to layout during this audit period, however it is noted changes are expected to occur during the next audit period (J. Snape pers. comm). (d) All works during the reporting period were carried generally in accordance with the development layout outlined in Appendix 2.  In response to the Recommendation identified in the Initial Construction Audit, Transgrid have outlined a Summary Environmental Report (SER) was prepared on 1 June 2022, prior to issue of approval SSI-9717 on 2 September 2022. The aim of the SER was to assess the potential impacts of the Transmission Line 64 Overhead Earth Wire and Optical Ground Wire including the establishment of the Maragle temporary construction compound. The SER concluded the Maragle Temporary Construction Compound does not result in any additional impact within the Snowy 2.0 Transmission Connection Project Area. The Department was provided this response on the 30 August 2024. An acknowledgement letter has been received from the Department (sighted) on the 03 September 2024. No further action is required.	<b>NC - 01</b>
<b>A3.</b>	The Proponent 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 this approval; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and (c) the implementation of any actions or measures contained in these documents.		Not triggered	This condition has not been triggered during the audit period (J. Snape pers. comm).	
<b>A4.</b>	The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		Noted		

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)																														
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC																									
A5.	Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This condition does not apply to the immediate written notification required in respect of an incident under condition C7.		Not triggered	No requests were made to the Department during this audit period (J. Snape pers. comm).																										
<b>LIMITS ON APPROVAL</b>																														
<b>Restrictions on Disturbance Area and Native Vegetation Clearing</b>																														
A6	<p>The Proponent must comply with the restrictions in Table 1 below.</p> <p>Table 1 Restrictions on Approval</p> <table border="1"> <caption>Table 1 Restrictions on Approval</caption> <thead> <tr> <th>Matter</th> <th>Kosciuszko National Park</th> <th>Bago State Forest</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Maximum Disturbance Area</td> <td>81 ha</td> <td>44 ha</td> <td>125 ha</td> </tr> <tr> <td>Maximum Native Vegetation Full Clearing</td> <td>37 ha</td> <td>34 ha</td> <td>71 ha</td> </tr> <tr> <td>Maximum Native Vegetation Partial Clearing</td> <td>38 ha</td> <td>9.2 ha</td> <td>47.2 ha</td> </tr> </tbody> </table> <p><small>The areas in Table 1 relate to direct disturbance and clearing and do not include the indirect impacts of this disturbance and clearing.</small></p>	Matter	Kosciuszko National Park	Bago State Forest	Total	Maximum Disturbance Area	81 ha	44 ha	125 ha	Maximum Native Vegetation Full Clearing	37 ha	34 ha	71 ha	Maximum Native Vegetation Partial Clearing	38 ha	9.2 ha	47.2 ha	Transgrid C1611 Maragle 330 KV Switching Station and 330KV Transmission Line Connections Project Status Report July2024, August 2024 and September 2024	Compliant	<p>During the Initial Construction Audit, it was confirmed that clearing activities commenced on the 8 March 2024. The development continues to operate under a staged clearing permit system to ensure clearing is undertaken within the approved limits and areas. The extent of vegetation clearing under the Approval at the time of this audit period has been summarised in <b>Table A1</b> below, as reported by the Transgrid.</p> <p><b>Table A1. Extent of Clearing</b></p> <table border="1"> <thead> <tr> <th>Matter</th> <th>Kosciuszko National Park</th> <th>Bago State Forest</th> </tr> </thead> <tbody> <tr> <td>Maximum Native Vegetation (Full Clearance)</td> <td>17.0 ha*</td> <td>31.9 ha</td> </tr> <tr> <td>Maximum Native Vegetation (Partial Clearance)</td> <td>18.7 ha*</td> <td>8.0 ha</td> </tr> </tbody> </table> <p><small>Note: * Full clearing extent cleared also includes areas where the current condition is only partially cleared (i.e. trees removed but low vegetation left intact), however may be totally cleared in the future as necessary as per the plan.</small></p> <p>The extent of clearing undertaken to date, as reported by the Transgrid, is compliant with the restrictions outlined by Condition A6 (B. Toohey pers. comm).</p>	Matter	Kosciuszko National Park	Bago State Forest	Maximum Native Vegetation (Full Clearance)	17.0 ha*	31.9 ha	Maximum Native Vegetation (Partial Clearance)	18.7 ha*	8.0 ha	
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<b>LAPSE OF APPROVAL</b>																														
A7.	This approval will lapse if the Proponent does not physically commence the development within 5 years of the date on which it is granted.		Compliant	Confirmed during the Initial Construction Audit the development commenced construction on the 4 December 2023 which coincides within 5 years of the date on which the development was granted approval.																										
<b>EVIDENCE OF CONSULTATION</b>																														
A8.	<p>Where conditions of this approval require consultation with an identified party, the Proponent must:</p> <p>(a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and</p> <p>(b) provide details of the consultation undertaken including:</p> <p>i) the outcome of that consultation, matters resolved and unresolved; and</p> <p>ii) details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved.</p>	Summary_DCR_All_Plans Register dated 07/08/2024	Compliant	<p>(a) Confirmed during the Initial Construction Audit all management plans as detailed in the sections below have been consulted with relevant parties prior to submission to the Planning Secretary. Details of additional consultation that has been undertaken during this audit period have been outlined in the conditions below.</p> <p>(b) Transgrid utilises multiple compliance tracking systems to ensure the details of consultation records are maintained. These tracking systems include the use of CAMS and a number of excel registers. The Summary_DCR_All_Plans Register (sighted) summarises and contains details of stakeholder consultation across all management plans for the development. The register also includes the outcome of the consultation, matters resolved and unresolved, outcomes of consultations, status and details of any disagreement remaining between stakeholders and how the matters were addressed.</p>																										
<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>																														
A9.	<p>Unless the Proponent and the applicable authority agree otherwise, the Proponent must:</p> <p>(a) undertake any works on or in the vicinity of public infrastructure in consultation with the applicable public authority or service provider responsible for the public infrastructure;</p> <p>(b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p>	<p>Elliot Way Near Track 2 – Minor Damage Email Correspondence dated 19/09/2024</p> <p>Elliot Way Near Track 2 – Minor Damage Email Correspondence dated 24/09/2024</p>	Compliant	<p>(a) No works were undertaken during this audit period on or in the vicinity of public infrastructure (J. Snape pers. comm).</p> <p>(b) Minor damage to Elliot Way near track 2 was identified during the audit period. NPWS was notified of the damage on the 19 September 2024. A response from NPWS was received on the 24 September acknowledging the initial email and indicated NPWS would be in contact soon to discuss/resolve the matter. Consultation is ongoing.</p> <p>(c) Not triggered during this audit period.</p> <p>(d) Noted</p>																										

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<p>(c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</p> <p>(d) This condition does not apply to any damage to roads caused as a result of general road usage which is expressly provided for in the conditions of this approval.</p>				
<b>DEMOLITION</b>					
A10.	The Proponent must ensure that all demolition work on site is carried out in accordance with <i>AS 2601-2001: The Demolition of Structures</i> (Standards Australia, 2001), or its latest version.		Not triggered	No demolition works have been undertaken during this audit period (B. Toohey pers. comm).	
<b>STRUCTURAL ADEQUACY</b>					
A11.	<p>All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA; and where the BCA is not applicable, to the relevant Australian Standard.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>Under Part 6 of the EP&amp;A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.</li> <li>The EP&amp;A Regulation sets out the requirements for the certification of the development.</li> </ul>	<p>Maragle UGL Construction Compound Online Certificate Compliance Electrical Work (CCEW) dated 09/06/2024</p> <p>Maragle UGL Construction Compound (Septic Tank) - SVC Inspection Report dated 25/07/2024</p>	Compliant	<p>During the audit period only temporary buildings (includes site amenities and site offices) were constructed. This included the construction of the Maragle UGL Construction Compound.</p> <p>As part of the commissioning works of the construction compound, a Compliance Electrical Check (sighted) and Septic Tank Inspection (sighted) was completed and shown to comply with design requirements and specifications.</p>	
<b>COMPLIANCE</b>					
A12.	The Proponent must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this approval relevant to activities they carry out in respect of the development.	<p>UGL Induction Record</p> <p>Maragle 330kV Transmission Line &amp; Switching Station Induction Presentation dated 30/09/2024</p> <p>Environmental Work Method Statement – Clearing and Grubbing dated 02/08/2024</p>	Compliant	<p>All employees and contractors inducted on site must review the UGL Lobs Hole to Maragle 330kV Transmission Line &amp; Switching Station Induction (sighted). The induction covers Environmental Information &amp; Compliance relevant to the conditions of this approval which is highlighted in Part 2 of the presentation.</p> <p>A copy of the employee induction was sighted on 26 September 2024.</p> <p>As confirmed during the Initial Construction Audit relevant mitigation measures are continued to be included in Environmental Method Statements (sighted) which are provided to employees to ensure individuals are aware of their obligations related to their activities.</p>	
<b>OPERATION OF PLANT AND EQUIPMENT</b>					
A13.	<p>All plant and equipment used on site, or in connection with the development must be:</p> <p>(a) maintained in a proper and efficient condition;</p> <p>(b) operated in a proper and efficient manner; and</p> <p>(c) kept free of weeds, seeds and pathogens when entering or leaving the site.</p>	<p>T358 Vehicle History Summary</p> <p>Spider Lift Inspection Form dated 24/08/2024</p> <p>UGL HV Pre-start Register</p> <p>Weed and Pathogen Declaration Record - Rigid Water Cart dated 15/04/2024</p>	Compliant	<p>(a)/(b) All plant and equipment observed onsite appear to be well maintained and operated in a proper and efficient manner. A sample of services records (Spider Lift Inspection form) and vehicle histories were sighted during the audit.</p> <p>(c) All plant onsite is accompanied by a Weed And Pathogen Hygiene Declaration Record providing evidence that the plant has been cleaned and inspected ensuring it has been kept free of weeds, seeds and pathogens. Between April 2024 and September 2024, a total of 180 declarations have been received (B. Toohey pers. comm). A Weed and Pathogen Declaration Record for a Rigid Water Cart dated 15 April 2024 was sighted during the site audit inspection.</p> <p>During the site audit inspection wheel wash stations were observed within the Project Area East and West to ensure vehicles and plant were kept free of weeds, seeds and pathogens when entering or leaving the site. Additionally, rubber mats were also observed located at various access points and rumble grids were in use at entry/exit points at the Maragle Construction Compound.</p> <p>In response to a Recommendation identified in the Initial Construction Audit signposting of management areas where <i>Phytophthora sp.</i> has been installed. Additionally, during the site audit inspection where areas of <i>Phytophthora sp.</i> were identified, QR codes were observed to be in use ensuring personnel were aware of the relevant procedures and actions to be undertaken.</p> <p>In response to a Recommendation identified in the Initial Construction Audit a vehicle wash down station was installed at Maragle Construction Compound (sighted).</p>	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
<b>APPLICABILITY OF GUIDELINES</b>					
A14.	References in the conditions of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.		Noted		
A15.	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may, when issuing directions under this approval in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.		Not triggered	No requests or directions from the Planning Secretary were received in respect of ongoing monitoring and management obligations during this audit period (J. Snape pers. comm).	
<b>PART B ENVIRONMENTAL CONDITIONS – GENERAL</b>					
<b>NOISE AND VIBRATION</b>					
<b>Construction Hours</b>					
B1.	Unless the Planning Secretary agrees otherwise, road upgrades, construction, upgrading and decommissioning activities may only be undertaken between 6 am to 6 pm.	Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction Presentation dated 09/30/2024	Compliant	Construction activities have only been undertaken during nominated construction hours (B. Toohey pers comm). Nominated hours for road upgrades, construction, upgrading and decommissioning activities are detailed in the UGL induction on slide 15. No out-of-hours works permits have been issued (B. Toohey pers comm).	
B2.	The following construction, upgrading and decommissioning activities may be carried out outside the hours specified in condition B1 above: <ul style="list-style-type: none"> <li>(a) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or</li> <li>(b) emergency work to avoid the loss of life, property or to prevent material harm to the environment; or</li> <li>(c) activities that are inaudible at sensitive receivers that do not require traffic movements on local roads; or</li> <li>(d) road upgrades required by the relevant roads authority/manager to be undertaken outside the construction hours specified in condition B1; or</li> <li>(e) works carried out in accordance with an Out-of-Hours Work Protocol approved in accordance with condition B3.</li> </ul>		Not triggered	No works have been carried outside nominated construction hours during this audit period (J. Snape and B. Toohey pers comm)	
B3.	An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of works which are outside the hours defined in condition B1. The Protocol must be approved by the Planning Secretary before commencing these works. The Protocol must: <ul style="list-style-type: none"> <li>(a) be prepared in consultation with Council;</li> <li>(b) provide a process for the consideration of out-of-hours works against the relevant construction noise, traffic noise and vibration criteria, including the determination of low and high risk activities;</li> <li>(c) identify an approval process that considers the risk of activities, proposed mitigation, management, and coordination,</li> <li>(d) identify Department and Council arrangements for approved out of hours work.</li> </ul>	Noise and Vibration Management Plan (Rev 0.06) dated 16/08/24 Appendix A: Out of Hours Work (OOHW) Protocol OOHW Approval Flowchart DPHI Post Approval Form NVMP Submission dated 16082024	Compliant	Confirmed during the Initial Construction Audit, an Out-of-Hours Work Protocol has been prepared. The Out of Work Protocol addresses the requirements of Condition B3.  In response to an Opportunity of Improvement identified in the Initial Construction Audit, during this audit period the OOHW flowchart has been revised to include notification to SVC, DPHI and NPWS. The OOHW flowchart was sighted and is included in the revised Out-of-Hours Work Protocol. The revised Noise and Vibration Management Plan (NVMP) (rev 0.06) was submitted through the Planning Portal to the Planning Secretary on the 16 August 2024. The NVMP (rev 0.06) was pending approval at the time of the audit.	



Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
<b>Construction and Decommissioning</b>					
B4.	The Proponent must take all reasonable and feasible steps to minimise the construction, upgrading or decommissioning noise of the development in the locations where the noise is audible to sensitive receivers, including any associated traffic noise.	Utilities Transmission Line Traffic And Transport Management Plan (Rev 0.16) dated 27/09/2023 Noise and Vibration Management Plan (Rev 0.05) dated 27/07/2023 Complaints Register	Compliant	All works undertaken during this audit period have been related to construction activities including clearing and civil works. All construction related activities were restricted to nominated construction hours (B. Toohey pers. comm). Noise mitigation measures are addressed in the NVMP (Rev 0.05) and Traffic and Transport Management Plan (Rev 0.16) (TTMP). Mitigation measures undertaken onsite include limiting machine/vehicle idling and maintenance of equipment (B. Toohey pers. comm). No complaints have been received during this audit period (B. Toohey pers. comm).	
B5.	The Proponent must implement mitigation measures with the aim of achieving the road traffic noise assessment criteria for land uses from NSW Road Noise Policy (DECCW, 2011).	Utilities Transmission Line Traffic And Transport Management Plan (Rev 0.18) Appendix K Driver Code Of Conduct For Maragle Project dated 14/06/2024	Compliant	Confirmed in the Initial Construction Audit the Drivers Code Of Conduct For Maragle Project (sighted) includes measures to reduce noise with the aim of achieving the road traffic noise assessment criteria for land uses from NSW Road Noise Policy (DECCW, 2011).	
<b>AIR QUALITY</b>					
B6.	In addition to the performance outcomes, commitments and mitigation measures specified in the EIS, the Proponent must take all reasonable steps to: <ul style="list-style-type: none"> <li>(a) minimise the off-site dust, fume, blast emissions and other air pollutants of the development; and</li> <li>(b) minimise the surface disturbance of the site.</li> </ul>	Soil and Water Management Plan (Rev 0.09) Appendix H Contaminated Land Management Plan dated 24/11/2023	Compliant	Confirmed in the Initial Construction Audit, the development implements a range of mitigation measures aimed at reducing offsite pollutants and minimising surface disturbance which are all outlined in relevant management plans including the Contaminated Land Management Plan and Soil and Water Management Plan (Rev 0.09) (SWMP). <ul style="list-style-type: none"> <li>(a) Mitigation measures to minimise off-site dust and other air pollutants include the operation of water carts at both sites in addition to the use of mulch to prevent cover over all inactive areas where ground disturbance has occurred.</li> <li>(b) The UGL Clearing Tracking Methodology statement was reviewed which provides an overview of how UGL limit disturbance within the approved footprint. Management measures include reviewing clearing tracking data capture through use of a surveyor and georeferenced drone imagery. Evidence of survey pegs and drone deployment on site was observed during the site audit inspection. Transgrid and UGL advised that as per commitments in the EIS and management plans, they continue to look into opportunities in revising the development footprint with the aim of reducing surface disturbance (J. Snape pers. comm).</li> </ul>	
<b>SOIL AND WATER</b>					
<b>Permanent Spoil Emplacement Areas</b>					
B7.	Apart from the spoil that is provided to the NPWS for use in other parts of the Kosciuszko National Park, Forestry Corporation for use in other parts of State Forest, sent off-site, used to construct temporary or permanent infrastructure for the development or Snowy 2.0 Main Works (in accordance with that infrastructure approval, or used to rehabilitate the site or the Snowy 2.0 Main Works site, the Proponent must ensure that any spoil disposed within Kosciuszko National Park are emplaced in the following emplacement areas: <ul style="list-style-type: none"> <li>(a) Ravine Bay; or</li> <li>(b) GF01; or</li> <li>(c) Lobs Hole; or</li> <li>(d) Tantangara for spoil containing naturally occurring asbestos only.</li> </ul> <p><i>Note: The location of these emplacement areas is shown in the figures in Appendix 2.</i></p>	Spoil Movement and Placement Permit Register Spoil Movement and Placement Permit SMP-004 dated 23/04/2024 Spoil Movement and Placement Permit SMP-004 dated 08/10/2024	Compliant	During this audit period a total of 50,094 m <sup>3</sup> of spoil has been transported by the development. All spoil has been used either to assist in the construction of temporary or permanent infrastructure for the development (Permit SMP-004 sighted) or has been transported to the Main Works Temporary Stockpile (Emplacement Area) (Permit SMP-001 sighted) which is intended to supplement the Snowy Hydro 2.0 Main Works final rehabilitation requirements.	
<b>Spoil Management Plan</b>					
B8.	Prior to the commencement of construction, the Proponent must prepare a Spoil Management Plan to the satisfaction of the Planning Secretary for the development. This plan must: <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, FCNSW, EPA, Water Group, NRAR and DPI;</li> </ul>	Soil And Water Management Plan (Rev 0.10) dated 02/06/2024 Soil And Water Management Plan (Rev 0.09) Appendix A	Compliant	Confirmed in the Initial Construction Audit a Spoil Management Plan has been prepared and approved for the development. The Spoil Management Plan addresses all requirements outlined by Condition B8. In response to Recommendations identified in the Initial Construction Audit, the Spoil Management Plan has been updated to include additional details of the reuse of non-reactive spoil in other parts of the Kosciuszko National Park, Bago State Forest and/or offsite. The Spoil Management Plan has also been updated to include details to explain how the management of spoil and the progress against the detailed completion criteria and performance indicators would be publicly reported.	

**Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)**

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<p>(b) include a description of the measures that would be implemented to:</p> <ul style="list-style-type: none"> <li>i) minimise the spoil generated by the development;</li> <li>ii) maximise the reuse of non-reactive spoil on site and in other parts of the Kosciuszko National Park, Bago State Forest and/or offsite;</li> <li>iii) minimise the water quality impacts of the temporary spoil stockpiles;</li> </ul> <p>(c) provide an overarching framework for the management of all spoil generated on site, including the testing, classification, handling, temporary storage, chain of custody and disposal of spoil – that complies with the spoil management requirements in condition B7 above;</p> <p>(d) include a detailed plan for managing the temporary spoil stockpiles of the development, which includes suitable triggers for remedial measures (if necessary) and describes the contingency measures that would be implemented to address any water quality risks;</p> <p>(e) investigating, assessing and managing contaminated land and soils in the development area;</p> <p>(f) investigation, assessing and managing the potential for naturally occurring asbestos, potentially acid forming material and other hazardous materials in the development area;</p> <p>(g) include a detailed plan for managing and the disposal of all the reactive or contaminated spoil generated on site, including the contingency measures that would be implemented if the volumes of this spoil are greater than expected and unsuitable for land disposal;</p> <p>(h) include a program to monitor and publicly report on:</p> <ul style="list-style-type: none"> <li>i) the management of spoil on site;</li> <li>ii) progress against the detailed completion criteria and performance indicators.</li> </ul> <p>Following the Planning Secretary’s approval, the Proponent must implement the approved Spoil Management Plan.</p>	<p>Spoil Management Plan dated 24/11/2023</p> <p>Soil And Water Management Plan (Rev 0.09) Appendix H Contaminated Land Management Plan dated 24/11/2023</p>		<p>It is noted the final revision of the Spoil Management Plan has yet to be approved due to ongoing consultation with relevant stakeholders but is expected to be approved during the next audit period (J. Snape pers. comm).</p>	
<b>Water Supply</b>					
<b>B9.</b>	<p>The Proponent must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.</p> <p><i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Proponent is required to obtain the necessary water licences for the development.</i></p>	<p>Non-Compliance Notification – Water Access Licence Detailed Report dated 07/08/2024</p> <p>UGL Water Access Licence Detailed Investigation Report 07/08/2024</p>	<b>Non-compliant</b>	<p>Confirmed in the Initial Construction Audit the development holds two water access licences which include:</p> <ul style="list-style-type: none"> <li>• WAL44782</li> <li>• WAL44788.</li> </ul> <p>However, during the audit period <b>surface water was taken from Paddy’s River pursuant to WAL 44762 without a water allocation</b>. UGL were unaware that WAL44782 was designated under an ‘Unregulated River’ category of access licence, which has a zero-share component of water take from the Tumbarumba Water Source under the Water Sharing Plan for the Murray Unregulated River Water Sources 2024 (NSW). Water was extracted from the Paddys River Fill Point, using water carts, on the 14 February (Outside Audit Period) and ceasing on the 31 May (Within Audit Period). During this time, 0.6ML of water was extracted from the Paddys River Fill Point. This incident was reported to relevant agencies as required with further details provided in Condition C7 of this Infrastructure Approval Table.</p>	<b>NC-02</b>



Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
<b>Erosion and Sedimentation</b>					
B10.	The Proponent must: <ul style="list-style-type: none"> <li>(a) minimise erosion and control sediment generation;</li> <li>(b) take all reasonable and feasible measures to prevent a discharge to waters. This may include, but need not be limited to: <ul style="list-style-type: none"> <li>i) adopt enhanced erosion and sediment controls, taking into consideration the best available information from the Snowy 2.0 Main Works project;</li> <li>ii) minimising the volume of dirty water generated onsite; and</li> <li>iii) exploring and implementing beneficial reuse opportunities such as irrigation and dust suppression.</li> </ul> </li> </ul>	Soil And Water Management Plan (Rev 0.09) dated 24/11/2023 PESCP Register Track 12 Pad 17 ESCP Mark Ups dated 02/04/2024 Access Road and Stockpile ESCP no date Track 2 Pad 12 and 13 ESCP Mark Ups dated 25/07/2024	Compliant	(a) An Erosion and Sediment Control Plan (ESCP) (sighted) has been prepared for the development and is incorporated within the SWMP. The ESCP documents the planned measures to minimise erosion and control sediment generation. Progressive ESCPs have also been prepared to accompany the Primary ESCP. The progressive ESCPs are updated based on changes to site conditions and can take the form of “red line” mark ups of drawings. A register is maintained onsite (sighted) documenting any revisions to the progressive ESCPS. (b) i) Confirmed during the Initial Construction Audit. The ESCP’s consider best available information from Snowy 2.0 Main Works Project and have been designed to use “better than Blue Book” erosion and sediment controls. Learnings from Snowy 2.0 discussed during the audit include increased size of diversion bunds, early rehabilitation and diverting of water earlier upslope with catch drains rather than relying on sediment basins. ii) Confirmed during the Initial Construction Audit minimising dirty water is outlined in the SWMP. No groundwater dewatering has occurred during the audit period. One sediment basin has been installed on site during the audit period and no discharges from the basin have occurred during the audit period (J. Snape pers. comm). Staged clearing is occurring to minimise the amount of “open” catchment available to generate dirty water runoff. Clean water diversion catch drains are being installed as a priority. Due to staged clearing and bulk earthworks, the catchments are shaped and sizes of controls are evolving to split the catchment up further to minimise the volume of dirty water being generated on site. iii) Confirmed during the Initial Construction Audit water reuse is detailed in the SWMP. During this audit period no additional opportunities have been explored. Any water captured in the on-site sediment controls is used for dust suppression via watercart as required and irrigation back onto the site. A water irrigation and disposal permit system is in place (sighted) to detail the required control measures during irrigation of water around the site.	
<b>Pollution of Waters</b>					
B11.	Unless otherwise authorised by an EPL the Proponent must ensure the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	Major Projects Notification - New Zealand Gully Turbid Water dated 04/06/2024 Major Projects Notification - Track 8 Turbid Water dated 26/09/2024	Non-compliant	During the audit period two incidents were reported involving the discharge of turbid water. An overview of the incidents is provided below: <ul style="list-style-type: none"> <li>• <b>New Zealand Gully Turbid Water:</b> A heavy rainfall event of approximately 53.1 mm impacted the Project area 31 May 2024. Water quality monitoring was undertaken in accordance with the SWMP and Environmental Protection Licence 21753. Transgrid was advised by UGL of <b>elevated NTU levels identified within New Zealand Gully during water quality monitoring on 4 June 2024.</b></li> <li>• <b>Track 8 Turbid Water:</b> On 25 September 2024, 47.8 mm of rain was recorded within a 24-hour period for Project Area East. Post-rainfall inspections were undertaken and identified <b>turbid water seeping beneath an earthen bund located on Access Track 8. The seeping turbid water was recorded to have discharged beyond the Project Area boundary.</b> In field water quality monitoring for Nephelometric Turbidity Units (NTU) was undertaken by UGL at the point where the water seeping under the bund entered the clean water diversion drain, with a reading of 156 NTU being recorded which exceeds Default Guideline Values for Upland Rivers – National Parks, Nature Reserves and State.</li> </ul> Both events were reported to relevant agencies as required with further details provided in Condition C7 of this Infrastructure Approval Table.	NC-03
B12.	The Proponent must: <ul style="list-style-type: none"> <li>(a) ensure that appropriate components of the substation are suitably bunded;</li> <li>(b) ensure that all liquid waste captured by the substation’s spill oil containment system is classified, transported, and disposed of at a facility that can lawfully accept the waste; and</li> <li>(c) minimise any spills of hazardous materials or hydrocarbons and clean up any spills as soon as possible after they occur.</li> </ul>	Soil And Water Management Plan (Rev 0.09) Appendix B Spil Response Procedure dated 24/11/2023 Incident Notification Report – Maragle Switchyard Hydraulic Spill dated 22/04/2024	Compliant	(a) The construction of the substation has not commenced during this audit period (C. Palmer pers. comm). (b) Confirmed during the Initial Construction Audit a Spill Response Procedure is included in the SWMP. (c) During the site inspection it was observed hazardous materials/hydrocarbons were stored within a bunded storage container. During the audit period one incident regarding a hydrocarbon spill was reported. Details of this incident is summarised below: <ul style="list-style-type: none"> <li>• <b>Maragle Switchyard Hydraulic Spill:</b> On 22 April 2024 the main hydraulic hose from a horizontal mulcher split. In result spilling hydraulic oil over an area of approximately 20m<sup>2</sup>. The spill occurred approx. 75m from the closest waterway, an unnamed 1st Order ephemeral drainage line. The spill was reported as an incident due to potential for transport of contaminants through surface runoff and potential harm to the environment. Spill response undertaken in accordance with Spill Response Procedure listed as Appendix B in the SWMP. No actual or potential non-compliance with conditions of approval was identified in the incident report.</li> </ul>	
B13.	The Proponent must ensure that any groundwater dewatering activities do not discharge to watercourses.		Not triggered	No groundwater dewatering has been undertaken onsite during this audit period (B. Toohey pers. comm).	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
<b>Riparian Areas</b>					
B14.	<p>The Proponent must ensure:</p> <p>(a) all activities on waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012), unless DPE Water agrees otherwise; and</p> <p>(b) the geomorphic condition of the major rivers and distributary channels crossed by the development is not impacted.</p>	SLR Letter -Snowy 2.0 Sheep Station Creek Bridge Crossing - v3.0 dated 26/08/2024	Compliant	<p>(a) During the audit period work has commenced on waterfront land adjacent to Sheep Station Creek. SLR was engaged to provide a review of the Sheep Station Creek Bridge design prepared by Robert Bird Group for the development. SLR considers that the design is compliant with the relevant consent condition, including that the temporary and permanent bridges over Sheep Station Creek is designed and constructed to comply with the relevant requirements of the Guidelines for Controlled Activities on Waterfront Land (2012).</p> <p>(b) The review conducted by SLR indicated that the centreline elevation of the permanent bridge indicates that there is no material reduction in waterway area. It is noted that the western abutment of the bridge may be inundated to depths of less than 100 mm, however this will not materially affect flood levels. Based on the previous flood modelling results, the addition of the structure will not materially alter flood levels or depths of flow. Since the bridge clear spans the creek channel, there will also not be any alteration of velocity or flow distribution. The Temporary Bridge is a steel bridge located upstream of the permanent bridge, with a length of 12.192 m. The bridge design indicates that the bridge will clear the creek channel. Since this bridge is not elevated above the predicted 1% AEP flood level, noted as RL555.67 on the drawings, there is likely to be minor afflux during a 1% AEP flood event. However, the bridge is unlikely to affect flood behaviour or velocities along the creek during more frequent events. Given this assessment it is unlikely that the geomorphic condition of Sheep Station Creek will be altered by the construction of the permanent or temporary bridge provided the appropriate ESCs are also in place for the duration of the works.</p>	
<b>Flooding</b>					
B15.	<p>The Proponent must ensure that the development:</p> <p>(a) does not materially alter the flood storage capacity, flows or characteristics in the development area or off-site; and</p> <p>(b) is designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site, unless otherwise agreed by either FCNSW or NPWS.</p>	SLR Letter -Snowy 2.0 Sheep Station Creek Bridge Crossing - v3.0 dated 26/08/2024	Compliant	Works occurring within the audit period located within potentially flood affected areas are works relating to the construction of Sheep Station Creek Bridge. SLR flood modelling undertaken for the works confirms that the proposed bridges (temporary and permanent) will not significantly impact flood conditions within Sheep Station Creek for the 1% AEP Flood Event. The bridge deck is above the predicted flood level for both bridges. Levels remain below the bridge deck of the permanent bridge with 60mm freeboard. Flood levels reach the top of the bridge deck of the temporary bridge.	
<b>Water Management Plan</b>					
B16.	<p>Prior to the commencement of construction, the Proponent must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This sub-plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person in consultation with the EPA, FCNSW, NPWS, the Water Group and NSW DPI;</p> <p>(b) include provisions for:</p> <p>i) detailed baseline data on surface water flows and quality in the watercourses that could be affected by the development, and a program to augment this baseline data over time;</p> <p>ii) detailed criteria for determining surface water impacts of the development (flows, quality and flooding), including criteria for triggering remedial action (if necessary); and</p> <p>iii) a description of the measures that would be implemented to minimise the surface water impacts of the development and comply with the relevant water management requirements in conditions B10 to B15 are complied with; and</p> <p>(c) managing flood risk during construction.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Water Management Plan.</p>	<p>Soil And Water Management Plan (Rev 0.09) dated 24/11/2023</p> <p>DCR_SWMP 0.10_20241009_Agencies Register</p> <p>Pre-Rainfall Inspection Checklist Maragle Compound, Switchyard Pad and Laydown, Track 9 and 12 dated 28/05/2024</p> <p>Post-Rainfall Inspection Checklist Maragle Compound, Switchyard and Substation dated 12/06/2024</p> <p>SWMP Revision Portal Submission Screenshot dated 29/08/2024</p>	Compliant	<p>Confirmed in the Initial Construction Audit a Water Management Plan (referred to as the SWMP) has been prepared and approved. The SWMP addresses all requirements outlined by Condition B16.</p> <p>In response to Recommendations outlined in the Initial Construction Audit the development has committed to undertaking surface water flow monitoring, however monitoring is yet to occur. The Water Quality Management Plan has also been revised in response to the recommendations outlined in the SWMP to include site specific water quality monitoring trigger values. However, the SWMP has not been approved and is still undergoing consultation with EPA, NPWS, FCNSW, DPI Fisheries and NSW DCCEEW Water.</p> <p>During this audit, the SWMP was reviewed. The review found that the SWMP includes two Trigger Action Response Plans (TARPs) in Appendix C:</p> <ul style="list-style-type: none"> <li>Receiving Waters Exceedance TARP.</li> <li>Basin Overtopping Event TARP.</li> </ul> <p>However, there was no specific TARP for general pollution incidents or the discharge of sediment-laden water. Additionally while the need for enhanced ERSED controls were acknowledged it does not appear to be documented in the TARPs.</p> <p>The water irrigation and disposal permit system was also assessed during the audit. It was noted that water captured in sediment basins and sediment traps is reused on-site for irrigation and dust suppression as necessary (B. Toohey, pers. comm.). However, two incidents involving the discharge of turbid water occurred during the audit period. For details, refer to Condition C7 of the tables.</p> <p>During the site audit inspection, it was observed that ground cover materials (such as mulch, soil binders, and geofabric) are being prioritized to minimize exposed disturbed surfaces.</p> <p><b>Recommendation: It is recommended that the existing TARPs be updated or new TARPs prepared to cover general pollution incidents and discharge of sediment laden water and that these be appended to the SWMP.</b></p>	

**Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)**

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
				<p><b>Recommendation: It is recommended that the existing TARPs be updated or new TARPs prepared to cover general pollution incidents and discharge of sediment laden water and that these be appended to the SWMP.</b></p> <p><b>Recommendation: It is recommended the requirements for enhanced erosion controls and examples of what these entail should be documented within project TARPs; regular toolbox talks and site training as appropriate to ensure all staff are aware of the requirements for enhanced ERSED controls for the project.</b></p>	

**BIODIVERSITY**

**Restrictions on Clearing and Habitat**

<b>B17.</b>	<p>Unless otherwise agreed with the Planning Secretary, the Proponent must:</p> <p>(a) ensure that no more than:</p> <p>i) 9.35 ha of <i>Caladenia montana</i> species habitat</p> <p>ii) 89.06 ha of Gang-gang Cockatoo (breeding) species habitat</p> <p>iii) 10.86 ha of Masked Owl (breeding) species habitat</p> <p>iv) 117.29 ha of Eastern Pygmy-possum species habitat</p> <p>v) 59.03 ha of Yellow-bellied Glider species habitat; and</p> <p>vi) 1.67 ha of Booroolong Frog species habitat</p> <p>vii) is cleared for the development; and</p> <p>(b) minimise:</p> <p>i) the impacts of the development on hollow-bearing trees;</p> <p>ii) the impacts of the development on threatened species; and</p> <p>iii) the clearing of native vegetation and key habitat.</p>	<p>Biodiversity Management Plan (Rev 0.12) dated 22/11/2023</p> <p>UGL Clearing Tracking Methodology statement</p> <p>UGL Environmental Inspection Weekly Checklist – Track 9, 12, 10 and 1 dated 30/07/2024</p> <p>UGL Maragle Form 09 - 24hr Preclearing Checklist dated 23/04/2024</p>	Compliant	<p>During the Initial Construction Audit, it was observed that the development operates under a staged clearing permit system to ensure clearing is undertaken within the specified limits. The UGL Clearing Tracking Methodology statement was reviewed, which includes clearing tracking data capture through use of a surveyor and georeferenced drone imagery.</p> <p>(a) No clearance has occurred outside approved limits during this reporting period (B. Toohey pers. comm). Extent of clearing has been summarised in the table below:</p> <p><b>Table 2 Habitat Clearing Extent</b></p> <table border="1"> <thead> <tr> <th>Species</th> <th>Extent of Clearing (Ha)</th> <th>Clearing Limit (Ha)</th> </tr> </thead> <tbody> <tr> <td><i>Caladenia montana</i></td> <td>0.57</td> <td>9.35</td> </tr> <tr> <td>Gang-gang Cockatoo</td> <td>74.20</td> <td>89.06</td> </tr> <tr> <td>Masked Owl</td> <td>10.20</td> <td>10.86</td> </tr> <tr> <td>Pygmy-possum</td> <td>74.49</td> <td>117.29</td> </tr> <tr> <td>Yellow-bellied Glider</td> <td>54.17</td> <td>59.03</td> </tr> <tr> <td>Booroolong Frog</td> <td>0.94</td> <td>1.67</td> </tr> </tbody> </table> <p>(b) Measures to minimise impacts to threatened species were observed during the site audit inspection. Measures included the demarcation of exclusion zones and the retention of limb-removed hollow bearing trees which were located within the outer edges of the approved clearing area. Personnel were also interviewed and were able to explain the measures required under the approved BMP, including but not limited to adherence to pre-clearing threatened species survey requirements, exclusion zones, implementation of an Unexpected Finds Procedure, adherence to hand-clearing zone requirements, monitoring of vegetation integrity for partial clearing zones.</p>	Species	Extent of Clearing (Ha)	Clearing Limit (Ha)	<i>Caladenia montana</i>	0.57	9.35	Gang-gang Cockatoo	74.20	89.06	Masked Owl	10.20	10.86	Pygmy-possum	74.49	117.29	Yellow-bellied Glider	54.17	59.03	Booroolong Frog	0.94	1.67	
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**Biodiversity Offset Package**

<b>B18.</b>	<p>Prior to carrying out any development that would impact on biodiversity values outside Kosciuszko National Park, the Proponent must prepare a Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT, to the satisfaction of the Planning Secretary in writing. The Package must include, but not necessarily be limited to:</p> <p>(a) details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS;</p> <p>(b) the cost for each specific biodiversity offset measures, which would be required to be paid into the Biodiversity Conservation Fund if the relevant measures is not implemented and delivered (as calculated in accordance with Division 6 of the Biodiversity Conservation Act 2016 (NSW)) and the offset payment calculator that was established as of 9 August 2021;</p> <p>(c) the timing and responsibilities for the implementation and delivery of measures required in the Package; and</p>	<p>Team Binder Re: B18, B19 &amp; B20 Biodiversity Offset Package dated 11/09/2024</p>	Compliant	<p>Confirmed during the Initial Construction Audit a Biodiversity Offset Package (BOP) has been prepared and approved. The BOP addresses all requirements of this condition. The BOP is required to be delivered by September 2025 (date revised from 1 September 2024 by MOD 1). In response to a Recommendation identified in the Initial Construction Audit, consultation of revision of the BOP with Snowy Hydro has commenced (correspondence sighted) regarding the inclusion of additional details of how the cost for each specific biodiversity offset measure was calculated. Consultation is still ongoing.</p>	
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**Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)**

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<p>(d) confirmation that the biodiversity offset measures will have been implemented and delivered by no later than 1 September <del>2024</del> 2025.</p> <p>Following approval, the Proponent must implement and deliver the Biodiversity Offset Package.</p>				
B19.	<p>Prior to carrying out any development outside of the Kosciuszko National Park that could impact the biodiversity values requiring offset, the Proponent or its nominee must lodge a bank guarantee with a total value of \$24,869,236, in accordance with the Deed of Agreement with the Planning Secretary executed on 1 September 2022. The Proponent must comply with the terms of the Deed.</p> <p><i>Note: this condition provides security to the Minister for the performance of the Proponent's obligations under this approval in relation to biodiversity offsets and release funds for payment into the Biodiversity Conservation Trust in the event that the biodiversity offsets (either in whole or part) are not delivered in accordance with the Package by the Proponent.</i></p>		Compliant	Confirmed during the Initial Construction Audit a bank guarantee in the amount of \$24,869,236.00 relating to biodiversity offsets had been paid.	
<b>Biodiversity Offset Package (Kosciuszko National Park)</b>					
B20.	<p>Prior to carrying out any development that could impact the biodiversity values inside Kosciuszko National Park, the Proponent or its nominee must pay \$10,586,027 to the NPWS to offset the residual biodiversity impacts.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• The NPWS will use these funds and any interest generated by these funds to enhance the biodiversity values of the Kosciuszko National Park. However, in limited circumstances where it is not possible to address all of the residual impacts of the development within Kosciuszko National Park, the NPWS may use some of these funds to ensure suitable conservation actions are carried outside the park.</li> <li>• To ensure accountability, the NPWS will: <ul style="list-style-type: none"> <li>○ develop and implement a detailed program for the allocation of these funds to specific projects, focusing on the ecosystems and species affected by the development; and</li> <li>○ monitor, evaluate and publicly report on the progress of the implementation of the detailed program and the effectiveness of the specific projects;</li> </ul> </li> <li>• The NPWS will develop and implement a specific program in consultation with DCEW and BCS to carry out conservation actions to address the residual biodiversity impacts of the development on the following Commonwealth listed species and communities: <ul style="list-style-type: none"> <li>○ Booroolong Frog.</li> </ul> </li> </ul>		Compliant	Confirmed during the Initial Construction Audit a payment of \$10,586,027.00 to NPWS had been paid.	



Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
<b>Biodiversity Management Plan</b>					
B21.	<p>Prior to carrying out any development that could impact biodiversity values, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s in consultation with NPWS, BCS, FCNSW and DCCEEW;</p> <p>(b) be prepared in accordance with the Biodiversity Development Assessment Report (Revision 7, dated 22 August 2022);</p> <p>(c) include a description of the measures that would be implemented to:</p> <p>i) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;</p> <p>ii) minimise the clearing of native vegetation and habitat within the disturbance area;</p> <p>iii) minimise the impacts of the development on threatened flora and fauna species within the disturbance area and its surrounds, including the:</p> <ul style="list-style-type: none"> <li>• <i>Caladenia montana</i>;</li> <li>• Gang-gang Cockatoo;</li> <li>• Masked Owl;</li> <li>• Eastern Pygmy-possum;</li> <li>• Yellow-bellied Glider; and</li> <li>• Booroolong Frog</li> </ul> <p>iv) minimise the potential indirect impacts on threatened flora and fauna species, migratory species and 'at risk' species;</p> <p>v) minimise potential fauna strike in sensitive habitat areas on the road network within the site, including reducing speed limits between sunset and sunrise;</p> <p>vi) minimise the impacts on fauna on site, including undertaking pre-clearance surveys;</p> <p>vii) protect native vegetation and key fauna habitat outside the approved disturbance area;</p> <p>viii) monitor the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols;</p> <p>ix) maximise the salvage of resources within the disturbance area for reuse in the restoration of vegetation and habitat on site, including native vegetative material, hollow logs, ground timber, and topsoil containing vegetative matter and native seed bank;</p>	<p>Biodiversity Management Plan (Rev 0.12) dated 22/11/2023</p> <p>Maragle Form 01 - Device Deployment dated 05/07/2024</p> <p>Maragle Form 05 - Device Deployment dated 01/04/2024</p> <p>Pest &amp; Predator Presence Register</p> <p>Clearing Tracking Methodology Outline</p> <p>Weed Transect Monitoring Program Maragle 330kV Switching Station &amp; Transmission Line Autumn 2024 dated 29/07/2024</p> <p>Maragle Form 09 - 24hr Preclearing Checklist dated 23/04/2024</p> <p>Maragle Form 09 - 24hr Preclearing Checklist – T16 – T14 dated 23/04/2024</p> <p>Maragle Form 09 - 24hr Preclearing Checklist- T16 to T14 dated 15/04/2024</p> <p>Fauna Death During Clearing - Feathertail Glider Detailed Report dated 15/04/2024</p> <p>WSP Consistency Assessment Report Snowy Hydro 2.0 Connection Project dated 09/08/2024</p>	Non-compliant	<p>Confirmed during the Initial Construction Audit, a Biodiversity Management Plan (BMP) has been prepared and approved by the Planning Secretary for the development. The BMP addresses all requirements outlined by Condition B21. It is noted a Vegetation Management Plan has not been prepared and details surrounding the verification reporting for partial clearing is minimal. The Vegetation Management Plan however is not required to be prepared until 12 months from the commencement of construction, as per Planning Secretary Approval. This plan would be subject to review during the next audit period.</p> <p>Confirmed during the Initial Construction Audit, it was evident during this audit period pre-clearance surveys for threatened species were continued to be undertaken (sighted).</p> <p>Evidence of implementation of the BMP was observed during the site audit inspection, management measures included:</p> <ul style="list-style-type: none"> <li>• Accurate and clear identification of retained areas of retained vegetation and habitats</li> <li>• Salvage of logs, noting some salvaged logs are planned for export off site</li> <li>• Installation of glider poles (potential).</li> </ul> <p>Areas of partial clearing were observed during the site audit inspection. Areas inspected included</p> <ul style="list-style-type: none"> <li>• Transmission Structure Zone (TSZ) – outside Civil Works Areas</li> <li>• Construction Benches</li> <li>• Access Tracks and</li> <li>• Easement Clearing Zone (ECZ) – machine accessible.</li> </ul> <p>A detailed description of the allowable methods in these zones is provided in Appendix B of the BMP. It is noted that the BMP identifies vegetation with growth potential to below 4 m will be left intact or allowed to regenerate. It was evident that ground stripping had not occurred in the areas of partial clearing inspected as evidenced by retained stumps/root balls and persistence of groundcover vegetation. General compliance with the methods described for partial clearing within the BMP was observed.</p> <p>It is noted partial clearance monitoring and verification reporting was conditioned to be carried out within the first three months of construction (construction commenced in December 2023). However, vegetation clearing did not begin until March 2024, outside of the three-month period. It is considered that the condition's intent was to monitor and report on the first three months of partial clearing (i.e. 3 months from commencement of clearing) to identify any necessary changes to the construction vegetation clearing protocols implemented to support the retention and/or regeneration of partially cleared areas to predicted VI targets. The predicted VI targets for partial clearing areas reflect an approach of partial offsetting, compared to offsetting for full loss of biodiversity values associated with total clearing. Graphs of partial clearing extent tracking have been provided with extracts from project status reports, and field sheets which show evidence of commencement of BAM Plot monitoring to inform vegetation integrity score calculations (sighted). However, the monitoring data appears to have been collected greater than three months from both the commencement of construction and commencement of clearing dates.</p> <p><b>At the time of the audit, a partial clearing verification report was not available. During the audit period, vegetation clearing had progressed significantly, with clearing at the Maragle site completed on the 26 September 2024. Due to the absence of a verification report, it was unable to be confirmed if the partial clearing monitoring has been used to inform required changes to improve the construction vegetation clearing protocols. While partial clearing totals are included in the monthly report, the information provided does not appear to support or align with the verification approach for partial clearing.</b></p> <p>It is recommended that Transgrid consult with BCS to update the BMP, to include the timelines and subject matter for the verification report. It is noted that the lack of information in the BMP regarding the requirements for partial clearing monitoring and the Verification Report was raised in the Initial Construction Audit Report.</p> <p>Discussions in relation to obtaining the data from the Author of the BDAR for comparison with monitoring results were ongoing at the time of the audit to support reporting under Condition B21(c) iii).</p> <p>Monitoring of weeds, pathogens and feral pests has also commenced. SLR have been engaged to undertake the quarterly reports for the Pest &amp; Predator Monitoring. The first two reports are currently in progress (B. Toohey pers. comm). Camera locations and deployment dates are tracked in the Pest &amp; Predator Presence Register (sighted). Deployment and retrieval of cameras is tracked using Fulcrum software (sighted).</p> <p><b>However, weed monitoring undertaken to date does not demonstrate compliance with the requirements of Biodiversity Monitoring Requirement MON14 which specifies identification, mapping and removal of weeds before clearing for</b></p>	NC-04

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Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<p>x) collect seeds within the approved disturbance area for use in the ecological rehabilitation of the site;</p> <p>xi) minimise the spread of weeds, pathogens and feral pests on site, and import or export of these matters to or from the site;</p> <p>xii) minimise the generation and dispersion of sediment to watercourses, particularly the Sheep Station Creek, Lick Hole Gully, Cave Gully, Wallaces Creek and Yarrangobilly River;</p> <p>xiii) minimise the light spill from night works, including using directional and LED lighting; and</p> <p>xiv) minimise bushfire risk.</p> <p>(d) include construction clearing and operation vegetation management protocols</p> <p>(e) include a strategy to address:</p> <p>i) management of activities within the 50 m exclusion zone of the Yarrangobilly River and its tributaries;</p> <p>ii) a trigger action response plan identifying actions to be implemented should any water quality criteria be exceeded focusing on the extent to which exceedances might affect the Booroolong Frog; and</p> <p>(f) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p>			<p><b>construction and recording of weed spraying for use in ongoing weed monitoring programs. No verifiable evidence could be provided to show weeds have been cleared prior to vegetation clearing for construction.</b></p> <p>A number of Unexpected Finds were encountered during the audit period (B. Toohey pers. comm).</p> <p>Unexpected Finds included:</p> <ul style="list-style-type: none"> <li>Southern Greater Glider</li> <li>Sooty Owl.</li> </ul> <p>Potential Unexpected Finds which have been subsequently discounted during the audit period included:</p> <ul style="list-style-type: none"> <li>Squirrel Glider which was confirmed as a Sugar Glider</li> <li>Potential call recording of a Koala which was confirmed as a deer</li> <li>Potential record of <i>Thesium australe</i> confirmed as <i>Stackhousia monogyna</i></li> <li>Potential <i>Caladenia concolor</i> specimens.</li> </ul> <p>One fauna fatality event was reported during the audit period. The event occurred on the 16 April 2024 during Stage 2 clearing of a habitat tree. The trunk of the tree failed during the soft felling procedure causing a collapse of the structure above resulting in the deaths of 7 Feathertail Gliders whose den was located in the trunk of the tree. Due to the location of the den within the trunk, the den could not be identified prior to felling due to the size of the den opening on the trunk. There were 10 Feathertail Gliders in total. Of the remaining 3, one was transferred to a local wildlife carer due to an injured leg, 1 was relocated and 1 naturally dispersed from the tree.</p> <p><b>Recommendation: It is recommended that monitoring of a representative sample of the partial clearing zones be completed and a partial clearing verification report be provided in a timely manner so that any changes required to the partial clearing methods described in the BMP can be identified and implemented.</b></p> <p><b>Recommendation: It is recommended Transgrid consult with BCS to update the BMP, ensuring the inclusion of timelines and subject matter for the verification reporting regarding partial clearing.</b></p> <p><b>Recommendation: It is recommended weed monitoring and management is undertaken in accordance with BMP MON14 and completed prior to completing clearing works.</b></p> <p><b>Opportunities for Improvement: A number of measures to improve the management of partial clearing which should be investigated as part of the verification report include:</b></p> <ul style="list-style-type: none"> <li>Development of a rapid methodology for monitoring partial clearing areas post clearing to ensure that partial clearing requirements have been followed and improvements can be identified early and implemented quickly</li> <li>Completion of rapid monitoring of partial clearing areas within 3 months of clearing for individual clearing permit areas</li> <li>Development and implementation of a medium to long-term monitoring methodology for partial clearing to determine whether the BDAR vegetation integrity predictions are being met, for integration with post construction site rehabilitation initiatives</li> <li>Assessment of locations and depth of mulch deposited in the partial clearing zones and determination of any positive or negative impacts related to vegetation retention and regeneration</li> <li>Consideration of whether any restrictions or amendments to mulch spreading rates or locations are required to improve or support vegetation regeneration outcomes</li> <li>Consider practicable initiatives for reduction of machine movements in partial clearing zones, such as locating stockpiles of logs for export in more appropriate areas such as total clearing zones</li> <li>Description of the successful methods which are currently being implemented to ensure partial clearing works are successful, such as retention of tree stumps. The description of existing successful methods is considered important to ensure a consistent approach is maintained throughout the partial clearing program.</li> </ul>	

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<b>HERITAGE</b>					
<b>Protection of Heritage Items</b>					
<b>B22.</b>	The Proponent must ensure the development does not cause any direct or indirect impacts on: (a) any Aboriginal heritage items located outside the approved construction envelope (see Appendix 3); and (b) any of the historic heritage items outside the construction envelope (see Appendix 3).	HSEQ Toolbox – Clearing Procedure and Requirements Track 9 dated 03/04/2024	Compliant	It was evident during this site audit inspection UGL continue to maintain boundary fencing around specific heritage items/Aboriginal sites which have been demarcated by colour-specific rope and appropriate signage. Reference to proximal heritage items/Aboriginal sites and procedures are continued to be discussed in toolbox talks (sighted) and Aboriginal site representatives are engaged prior to clearance and/or ground disturbing activities (B. Toohey pers. comm). During this audit period no Aboriginal objects or historic heritage items outside of the approved construction envelope have been impacted (B. Toohey pers. comm).	
<b>B23.</b>	Prior to carrying out any activity that could harm heritage items, the Proponent must: (a) salvage and relocate all heritage items identified for salvage and relocation to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010); (b) undertake archival recording, test excavation and/or salvage of the historic items listed in Table 5 and Table 7 of Appendix 3 if these items are to be affected by the development.		Compliant	(a) No known heritage clearance activities were undertaken during this audit period. (b) Confirmed in the Initial Construction Audit archival recordings were only required to be undertaken at sites R56 and R120. Archival records are included in Appendix 3 of the Post Approvals Historic Management Actions Report.	
<b>Heritage Management Plan</b>					
<b>B24.</b>	Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 3, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared in consultation with Heritage Council, Heritage NSW, NPWS and Aboriginal Stakeholders; (b) include a description of the measures that would be implemented for: i) protecting the heritage items identified in Table 1 of Appendix 3, including fencing off the heritage items (where required) prior to carrying out any development that could harm the heritage items, and protecting any items located outside the approved construction envelope; ii) salvaging and relocating the heritage items identified in condition B23; iii) where impacts cannot be avoided to R56 and R120, details of the proposed archaeological research design and excavation methodology, and findings of the Final Archaeological Excavation Report, in accordance with the relevant Heritage Council guidelines; iv) minimising and managing the impacts of the development on heritage items within the construction envelope, including a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works; v) a contingency plan and reporting procedure if:	Heritage Management Plan (Rev 0.07) dated 10/08/2023 Unexpected Finds Register – HMP Track 6 Unexpected Find Notification Email Correspondence dated 22/03/2024 Track 8 Unexpected Find Notification General Correspondence dated 17/04/2024 Tower 6, Track 6a Unexpected Find Notification General Correspondence dated 19/03/2024 56-6-0598 ASIRF dated 04/04/2024 56-6-0599 ASIRF dated 04/04/2024 56-6-0600 ASIRF dated 04/04/2024 56-6-0601 ASIRF dated 08/04/2024 56-6-0602 ASIRF dated 04/04/2024	Compliant	Confirmed during the Initial Construction Audit, a Heritage Management Plan has been prepared and approved for the development. The Heritage Management Plan addresses all requirements outlined by Condition B24. During this audit period, the following unexpected finds were identified during audit period: <ul style="list-style-type: none"> <li>On the 18 March 2024 in Track 6a ten (10) suspected Aboriginal objects were identified within the approved Development Footprint. Provided documentation indicated the Project heritage consultant collected Aboriginal objects which were relocated to areas outside of the impact zone. A 10 m exclusion zone was subsequently established around the object relocation position and appropriate signage was installed, compliant with Section 6.3 and 67.4 of the Heritage Management Plan (Rev 0.07). AHIMS records and/or ASIR forms indicated object relocation and compliance with Project approval conditions.</li> <li>On the 22 April 2024 in Track 6 Aboriginal object/s were identified. Salvage and relocation of the object/s occurred and subsequent correspondence with relevant stakeholders confirmed. AHIMS records and/or ASIR forms indicated object relocation and compliance with Project approval conditions.</li> <li>Track 8. A historical relic was identified in April 2024.</li> <li>On the 3 July in Track 6a, 3 July 2024 Aboriginal object/s were identified. Salvage and relocation of the object/s occurred and subsequent correspondence with relevant stakeholders confirmed. AHIMS records and/or ASIR forms indicated object relocation and compliance with Project approval conditions.</li> </ul> <b>Recommendation: It is recommended Transgrid continue to provide consolidated project updates and updated Aboriginal site mapping to RAPs.</b>  <b>Recommendation: It is recommended Transgrid continue to invite RAPs/identified knowledge holders to provide feedback on the distribution of sites and cultural understanding.</b>  <b>Recommendation: It is recommended Transgrid continue to invite to RAPs/identified knowledge holders to comment on the effectiveness of Aboriginal site/object management protocols.</b>	

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	<ul style="list-style-type: none"> <li>heritage items outside the approved construction envelope are damaged;</li> <li>previously unidentified heritage items are found; or</li> <li>Aboriginal skeletal material is discovered;</li> </ul> vi) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and vii) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and (c) include a program to monitor and publicly report on the effectiveness of these measures and any heritage impacts of the development; and (d) include a program to publish; <ul style="list-style-type: none"> <li>i) any detailed archival records required under the conditions of this approval; and</li> <li>ii) the findings of any excavations and salvage works.</li> </ul> Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan.				
<b>TRAFFIC AND TRANSPORT</b>					
<b>Designated Heavy and Heavy Vehicles Requiring Escort Routes</b>					
<b>B25.</b>	All heavy vehicles requiring escort associated with the development must only travel to and from the site via the Primary Access Routes described in the EIS, as identified in the figure in Appendix 4, unless the Planning Secretary agrees otherwise.  Note: The Proponent is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.	Utilities Transmission Line Traffic And Transport Management Plan (Rev 0.18) dated 14/06/2024 Pre-Arrival Safety Flyer dated 20/09/2024 Incident Report - Over size mass vehicles not having escorts - 1 May 2024 dated 26/06/2024	<b>Non-compliant</b>	Confirmed during the Initial Construction Audit, details of heavy vehicles requiring escort and haulage routes are detailed in the TTMP. All heavy vehicles escorted during the audit period only used approved haulage routes (B. Toohey pers. comm). Additionally, Pre-Arrival Flyers (sighted) have been prepared by UGL for distribution to personnel to ensure they are aware of their obligations prior to arriving onsite which includes approved travel routes.  However, <b>there was one incident identified within the audit period occurring on the 2 May 2024. The incident involved a third-party transport company engaged by UGL's supplier who failed to identify and abide by the conditions of the NVHR Permits, namely the need for escort vehicles. Vehicles had travelled from Bathurst without pilot accompaniment as required by permits under Heavy Vehicle National Law (NSW). NSW Police issued infringement notices to the drivers of the trucks. UGL arranged escort vehicles to attend and fulfil the requirements of the NHVR Permit. This was reported to the Department and NPWS on the 2 May 2024, as required with further details provided against Condition C7 in these tables.</b>	<b>NC-05</b>
<b>B26.</b>	All heavy and light vehicles associated with the development: <ul style="list-style-type: none"> <li>(a) must travel to and from the site via the Primary Access Route described in the EIS, as identified in the figure in Appendix 4; and</li> <li>(b) may travel to and from the site via the Secondary Access Routes and Water Supply Routes, subject to the requirements in condition B31, to the satisfaction of the relevant roads authority/manager.</li> </ul> unless the Planning Secretary agrees otherwise.	Utilities Transmission Line Traffic And Transport Management Plan dated (Rev 0.18) dated 14/06/2024 Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction Presentation dated 30/09/2024	Compliant	Confirmed during the Initial Construction Audit, approved routes are shown in Figure 4 in Appendix A of the TTMP. Direction to only travel only approved roads is also outlined in the UGL Site Induction on Slide 15.	
<b>Transport Strategy</b>					
<b>B27.</b>	Prior to commencing construction in Project Area West, the Proponent must prepare a Transport Strategy, in consultation with the relevant roads authority/manager, to the satisfaction of the Planning Secretary, which: <ul style="list-style-type: none"> <li>(a) identifies the location and type of any necessary road upgrades (including roads, intersections, crossing points, bridges and access points), including consideration of relevant amenity impacts;</li> </ul>	Transport Strategy (Stage 1) dated 7/08/2023 Transport Strategy (Stage 1) Participants ShareFile Link Screenshot dated 14/04/2024	Compliant	Confirmed during the Initial Construction Audit, the Transport Strategy is intended to be prepared in two stages (approved). The first Transport Strategy (Stage 1) was reviewed and confirmed during the Initial Construction Audit. The Transport Strategy (Stage 1) addressed all requirements outlined by Condition B27. The Transport Strategy for Stage 2 is required to be completed prior to construction and operation of infrastructure related to the 500 kV component of the substation. Consultation records from the Transport Strategy (Stage 1) were also reviewed. It was noted a ShareFile link was sent to Andrew Lissenden of TfNSW on 14 April 2023 as part of the Transport and Traffic Management Plan consultation process. As part of this process the Transport Strategy (Stage 1) was also attached and sent for review.	



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	<p>(b) ensures that any road upgrades comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), unless the relevant road authority agrees otherwise;</p> <p>(c) includes a detailed assessment of potential impacts of any necessary road upgrades (such as heritage and biodiversity impacts), including consideration of appropriate mitigation measures;</p> <p>(d) identifies whether intersections, crossing points and access points would be permanent or temporary; and</p> <p>(e) includes measures or notifying, seeking feedback from and addressing the concerns of impacted residents along the route;</p>				
<b>B28.</b>	Prior to commencing construction in Project Area West, the proponent must implement the road upgrades and the mitigation measures identified in the Transport Strategy in condition B27, to the satisfaction of the relevant roads authority/manager.	SVC Engineering Compliance Certificate – Elliot Way dated 16/05/2024	Compliant	In response to a Recommendation identified in the Initial Construction Audit, Transgrid has sought written confirmation from SVC (relevant roads authority/manager) confirming road upgrades have been completed to their satisfaction. An Engineering Compliance Certificate (sighted) from SVC has been provided noting all work were carried out in accordance with the Council’s Rural Driveway Specifications.	

**Road Maintenance**

<b>B29.</b>	<p>The Proponent must:</p> <p>(a) undertake an independent dilapidation survey to assess the:</p> <p>i) existing condition of all local roads on the transport route shown in the figure in Appendix 4 (including local road crossings) prior to construction, upgrading or decommissioning works; and</p> <p>ii) condition of all local roads on the transport route (including local road crossing):</p> <ul style="list-style-type: none"> <li>• within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed to by the relevant roads authority/manager;</li> <li>• on an annual basis during construction, or within a timeframe agreed to by the relevant roads authority/manager;</li> </ul> <p>(b) repair (or pay the full costs associated with repairing) any damage to local roads on the transport route (including local road crossings):</p> <p>(c) rehabilitate and/or make good any development related damage:</p> <p>i) identified during the construction and/or decommissioning works if it could endanger road safety, as soon as possible after it is identified but within 7 days at the latest, unless the relevant road authority/manager agrees otherwise; and</p>	NPWS Email Correspondence Minor damage Track 2 Elliot Way dated 19/09/2024	Compliant	<p>(a) Confirmed during the Initial Construction Audit, a Dilapidation Report has been prepared encompassing the existing conditions (pre-construction) between Tumbarumba and O’Hares Campground, New South Wales (Tooma Road and Elliot Way) in November 2023. A second dilatation report has not been triggered during this audit period.</p> <p>(b) Minor damage has been caused near access track 2 for Elliot Way during the audit period. Damage was reported to NPWS on the 19 September 2024. UGL have claimed responsibility and are seeking advice from NPWS on how to resolve the issue. Consultation is still ongoing.</p> <p>(c) No rehabilitation of roads has been undertaken during this audit period (B. Toohy pers. comm).</p>	
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	<p>ii) identified in any dilapidation survey completed after the construction, upgrading or decommissioning works within 2 months of the completion of the survey to the satisfaction of the relevant roads authority/manager.</p>				
B30.	<p>The Proponent must:</p> <p>(a) restrict development-related vehicle speeds on Lobs Hole Ravine Road, Mine Trail Road and within the site to 30 km/h between sunset and sunrise, unless the Planning Secretary agrees otherwise;</p> <p>(b) restrict the use of Elliott Way inside KNP to no more than 8 heavy vehicles per day, for water cartage purposes only from the Snowy Hydro T2 Tailbay site;</p> <p>(c) restrict development-related vessel speeds on Talbingo Reservoir to current TfNSW speed limits.</p>	<p>Utilities Transmission Line Traffic And Transport Management Plan dated (Rev 0.18) dated 14/06/2024</p>	Compliant	<p>Confirmed during the Initial Construction Audit the requirements outlined by Condition B30 are outlined in the TTMP.</p> <p>(a) During this audit inspection speed signs were observed enforcing the 30km/h speed limit.</p> <p>(b) Condition has not been triggered</p> <p>(c) No vessels have been purchased by the development therefore condition has not triggered</p>	
<b>Bridge Crossing – Sheep Station Creek</b>					
B31.	<p>The Proponent must ensure that any temporary and the permanent bridge over Sheep Station Creek is designed and constructed to comply with the relevant requirements of the:</p> <p>(a) Relevant Austroads Standards (such as elevating them above the 1% AEP flood level);</p> <p>(b) Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018); and</p> <p>(c) Policy and Guidelines for Fish Habitat Conservation (DPI, 2013) and Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (NSW Fisheries, 2003).</p>	<p>SRL Letter Sheep Creek Station Design Review dated 26/08/2024</p> <p>SLR Email Correspondence dated 14/11/2024</p>	Compliant	<p>During the audit period UGL engaged SLR Consulting (SLR) to undertake a compliance review of the design of the temporary and permanent bridge over Sheep Station Creek. Both designs addressed all guidelines outlined by Condition B31. Flood modelling by SLR indicated that for a 1% AEP flood event:</p> <ul style="list-style-type: none"> <li>Permanent Bridge - flood level 555.99 is less than the underside of bridge deck 556.05. The flood modelling indicates an afflux of only 0.03 m.</li> <li>Temporary Bridge – there is minor afflux (0.15 m) associated with inundation of the bridge structure.</li> </ul> <p>SLR confirmed that based on the design no bridge designs were modelled to be overtopped during the 1% AEP events (Email correspondence sighted).</p>	
<b>Traffic and Transport Management Plan</b>					
B32.	<p>Prior to commencing construction or road upgrades identified in condition B27 (whichever comes first), the Proponent must prepare a Traffic Management Plan for the development in consultation with FCNSW, NPWS, TfNSW, Snowy Valleys Council, Snowy Monaro Regional Council and NSW Police, and to the satisfaction of the Planning Secretary. This plan must include:</p> <p>(a) details of the transport route to be used for all development-related traffic;</p> <p>(b) details of the road upgrade works required by condition B27 of this approval;</p> <p>(c) details of the measures that would be implemented to comply with the transport management requirements in conditions B25 to B30 above;</p> <p>(d) details of the measures that would be implemented to:</p> <p>i) minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including:</p> <ul style="list-style-type: none"> <li>a description of the proposed dilapidation surveys required by condition B29 of this approval;</li> </ul>	<p>Traffic And Transport Management Plan (Rev.018) dated 14/06/2024</p> <p>Post Approval Form TTMP dated 15/08/2024</p>	Compliant	<p>Confirmed during the Initial Construction Audit, a staged approach for the TTMP has been adopted. Stage 1 of the TTMP has been prepared and approved. The TTMP addressed all requirements outlined by Condition B32.</p> <p>In response to an Opportunity of Improvement identified in the Initial Construction Audit, the Fatigue Management procedure has been revised to reflect the development and references to rail have been removed however it is noted Rail Safety is still included in the table of contents. <b>It is recommended the table of contents is updated to reflect the document changes.</b></p> <p>Additionally, the Snow and Ice Traffic Management Plan has also been revised to include details of flooding.</p> <p>In response to a Recommendation identified in the Initial Construction Audit the TTMP has been revised to include details of employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers. It is noted during this audit a revised TTMP was submitted to the Planning Secretary and is currently awaiting approval.</p> <p><b>Recommendation: It is recommended the table of contents within the Fatigue Management Procedure is updated to reflect the document changes.</b></p>	

**Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)**

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<ul style="list-style-type: none"> <li>• a description of the proposed measures for managing traffic flow around the work sites, construction compounds and accommodation camp;</li> <li>• scheduling heavy vehicle movements to avoid peak periods;</li> <li>• minimising convoy lengths;</li> <li>• reducing the speeds of development-related traffic at key intersections along the Snowy Mountains Highway, including the Link Road intersection;</li> <li>• temporary traffic controls, including detours and signage;</li> <li>• procedures for stringing cables and transmission lines across roads and Talbingo Reservoir;</li> <li>• notifying the local community about development-related traffic impacts;</li> <li>• procedures for receiving and addressing complaints from the community about development-related traffic;</li> <li>• minimising potential cumulative traffic impacts with other projects in the area;</li> <li>• minimising potential conflict between development-related traffic and rail services, stock movements and school buses, in consultation with local schools, including preventing queueing on the public road network;</li> <li>• minimising impacts to the public using Talbingo Reservoir and any water related infrastructure such as the O'Hares campground boat ramp;</li> <li>• implementing measures to minimise development-related traffic on the public road network outside standard construction hours;</li> <li>• minimising dirt and debris tracked on to the public road network from development related-traffic;</li> <li>• details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service;</li> <li>• encouraging car-pooling or ride sharing by employees;</li> <li>• scheduling the haulage vehicle movements to minimise convoy lengths or platoons;</li> <li>• responding to local climate conditions that may affect road safety, such as snow, ice, fog, dust, wet weather and flooding;</li> <li>• ensuring loaded vehicles entering or leaving the site have their loads covered or contained and leave site in a forward direction;</li> <li>• responding to any emergency repair or maintenance requirements;</li> </ul>				

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Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<ul style="list-style-type: none"> <li>• provisions for maintaining access to the site for FCNWS, NPWS and emergency vehicle access to the site at all times;</li> <li>• a traffic management system for managing over-dimensional vehicles; and</li> <li>• fatigue management;</li> <li>ii) minimise the impacts of the road and intersection upgrades of the development;</li> <li>iii) provide sufficient parking on site for all vehicles and ensure vehicles associated with the development do not park on the public road network;</li> <li>iv) maintain all roads and water-related infrastructure on site in a safe and serviceable condition;</li> <li>iii) minimise the traffic noise impacts of the development;</li> <li>(e) details of the haulage of spoil to be disposed within Kosciuszko National Park in accordance with condition B7;</li> <li>(f) ensure any vessel or structure occupying waters must display appropriate shapes and lights in accordance with the Marine Safety (Domestic Commercial Vessel) National Law 2012;</li> <li>(g) include a detailed:               <ul style="list-style-type: none"> <li>i) Heavy Vehicle Salvage Plan;</li> <li>ii) Driver’s Code of Conduct;</li> <li>iii) Marine Transport Management Plan;</li> <li>iv) Snow &amp; Ice Traffic Management Plan;</li> <li>v) Communication Strategy to keep the public informed about the impacts of the development;</li> </ul> </li> <li>(h) include a program to:               <ul style="list-style-type: none"> <li>i) ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan;</li> <li>ii) record and track vehicle movements; and</li> <li>iii) monitor and publicly report on the effectiveness of these measures.</li> </ul> </li> </ul> <p>Following the Planning Secretary’s approval, the Proponent must implement the Traffic Management Plan.</p>				
<b>Long-Term Road Strategy – Kosciuszko National Park</b>					
<b>B33.</b>	<p>Within 2 years of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Long-Term Road Strategy for the development to the satisfaction of NPWS. This strategy must:</p> <ul style="list-style-type: none"> <li>(a) identify the road network within the Kosciuszko National Park required for the development during operations, including the detailed specifications for this road network;</li> </ul>		Not triggered	The Long-Term strategy is not required to be prepared during this audit period.	

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Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<p>(b) identify which roads within the Kosciuszko National Park can be narrowed or closed following construction and then rehabilitated;</p> <p>(c) include a detailed program for the rehabilitation of these roads, which can be incorporated into the Rehabilitation Management Plan for the development; and</p> <p>(d) identify future road maintenance and funding responsibilities for the long-term road network following construction.</p> <p>Following NPWS's approval, the Proponent must implement the Long-Term Road Strategy.</p>				
<b>VISUAL AMENITY</b>					
<b>Visual Appearance</b>					
<b>B34.</b>	<p>The Proponent must:</p> <p>(a) take reasonable steps to minimise the visual impacts of the development;</p> <p>(b) ensure all transmission towers blend into the surrounding landscape as far as possible and minimises the potential for glare and reflection by either:</p> <p>i) painting towers with a colour that; and/or</p> <p>ii) pre-dulling towers with a finish that;</p> <p>(c) ensure the visual appearance of ancillary facilities (including paint colours), blends in as far as possible with the surrounding landscape; and</p> <p>(d) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.</p>	<p>Visual Impact Management Plan (Rev 13) dated 7/08/2023</p>	Compliant	<p>(a) Transgrid continue to commit in taking all reasonable steps to minimise the visual impacts of the development. Confirmed during the Initial Construction Audit mitigation measures regarding visual impacts are provided in Section 5.2 – 5.8 of the Visual Impact Management Plan. Measures include painting perimeter security fencing.</p> <p>(b) No towers have been built during this audit period (J. Snape pers. comm).</p> <p>(c) No ancillary infrastructure has been built within this audit period (J. Snape pers. comm).</p> <p>(d) As outlined in Section 5.7 of the Visual Impact Management Plan only mandatory safety, identifying or directional signs may be placed on ancillary buildings. No additional signage for other purposes including advertising may be placed on buildings. No additional signage was observed during the site audit inspection.</p>	
<b>Lighting</b>					
<b>B35.</b>	<p>The Proponent must:</p> <p>(a) take all reasonable steps to minimise the off-site visual impacts of the development; and</p> <p>(b) ensure that any external lighting associated with the development:</p> <p>i) is installed as low intensity lighting (except where required for safety or emergency purposes);</p> <p>ii) does not shine above the horizontal; and</p> <p>iii) complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting.</p>	<p>Visual Impact Management Plan (Rev 13) dated 7/08/2023</p>	Compliant	<p>Lighting associated with the development has been installed in compliance with Australian/New Zealand Standard AS/NZS 4282:2019 - Control of Obtrusive Effects of Outdoor Lighting.</p> <p>During the site audit inspection lighting was observed to be installed as low intensity lighting which was also confirmed by (B. Toohey and J. Snape pers. comm).</p>	
<b>Visual Impact Management Plan</b>					
<b>B36.</b>	<p>Prior to the commencement of construction, the Proponent must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared in consultation with FCNSW and the NPWS;</p>	<p>Visual Impact Management Plan dated 7/08/2023</p> <p>Visual Impact Management Plan Post Approval From dated 12/08/2024</p>	Compliant	<p>Confirmed during the Initial Construction Audit, a Visual Impact Management Plan has been prepared and approved for the development. The Visual Impact Management Plan addresses all requirements outlined by Condition B36.</p> <p>In response to Recommendation outlined in the Initial Construction Audit the Visual Impact Management Plan has been revised to include detailed plans for minimising visual impacts of the Maragle substation and the transmission line easement. Changes have been included in Rev 14 of the Visual Impact Management Plan which was submitted to the Department on the 12 August 2024 for approval.</p>	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<p>(b) describe the measures that would be implemented to comply with condition B34 above; and</p> <p>(c) include detailed plans for minimising the visual impacts of the following permanent infrastructure:</p> <p>i) Maragle switchyard and substation;</p> <p>ii) transmission line, towers and easement.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Visual Impact Management Plan for the development.</p>				
<b>PARK VALUES</b>					
<b>B37.</b>	<p>The Proponent must make the following payments to NPWS for residual impacts of the development on park values:</p> <p>(a) \$1 million prior to carrying out any development;</p> <p>(b) \$1 million within 1 year of commencing construction;</p> <p>(c) \$1 million within 2 years of commencing construction;</p> <p>(d) \$1 million within 3 years of commencing construction;</p> <p>(e) \$1 million within 4 years of commencing construction;</p> <p>unless the Planning Secretary agrees otherwise.</p> <p>Note: The NPWS will use these funds and any interest generated by these funds to enhance the park values of the Kosciuszko National Park. The NPWS will:</p> <ul style="list-style-type: none"> <li>develop a detailed program for the allocation of these funds to specific projects;</li> <li>monitor, evaluate and publicly report on the spending of these funds and the effectiveness of these projects.</li> </ul>		Compliant	Confirmed during the Initial Construction Audit Snowy Hydro Limited on behalf of Transgrid have submitted 2 payments of \$1,000,0000 to the Department of Planning and Environment Finance Shared Services required to be paid prior to carrying out any development and within 1 year of commencing construction.	
<b>B38.</b>	<p>Within 6 months of the commencement of construction, the Proponent will prepare an Additional Easement Rehabilitation Strategy to the satisfaction of NPWS, to undertake the following infrastructure projects, that addresses:</p> <p>(a) Providence Portal substation to Tantangara Dam – removal of transmission line, replacement with a standalone supply or underground line between the Snowy 2.0 Tantangara intake/portal area and Tantangara Dam area, and rehabilitation of the easement;</p> <p>(b) Eucumbene Portal to Happy Jacks transmission – transmission lines being removed and replaced by an alternative standalone power supply and rehabilitation of the easement; and</p> <p>(c) timing for each program of works.</p> <p>Following approval, the Proponent must implement the Additional Easement Rehabilitation Strategy.</p>	11 kv Line Rehabilitation Strategy dated 11/05/2024 DPHI Additional Easement Rehabilitation Strategy letter dated 02/07/2024	Compliant	<p>The Additional Easement Rehabilitation Strategy was prepared by Snowy Hydro on behalf of Transgrid and finalised on the 22 May 2024 within 6 months of the commencement of construction. The Additional Easement Rehabilitation Strategy has been prepared in consultation with and to the satisfaction of NPWS as acknowledged by the DPHI (sighted).</p> <p>(a)(b) Infrastructure Projects is briefly included in Section 1, with location of the proposed works illustrated in Figure 1 and Figure 2. The removal of infrastructure is detailed in Section 7 and rehabilitation approach included in Section 8. It is noted further detail retaining to soil and vegetation rehabilitation will be detailed in future REF(s) and a rehabilitation Management Plans.</p> <p>(c) The timing of project implementation is included in Section 11 which outlines:</p> <ul style="list-style-type: none"> <li>The physical removal of the Eucumbene to Happy Jacks Transmission line is scheduled to commence in Summer 2024/2025.</li> <li>The timing of the removal of Providence Portal to Tantangara Transmission line is scheduled to occur late 2027.</li> </ul>	

**HAZARD AND RISK**



Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
<b>Dangerous Goods</b>					
B39.	The Proponent must ensure that the storage, handling, and transport of dangerous goods is undertaken in accordance with the relevant Australian Standards and guidelines, particularly AS1940 The storage and handling of flammable and combustible liquids and AS/NZS 1596:2014 The storage and handling of LP Gas, the Dangerous Goods Code, and the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.		Compliant	Confirmed during the Initial Construction Audit mitigation measures addressing the storage, handling and transport of dangerous goods is included in the SWMP. During the site inspection chemicals were generally well organised and kept in bunded areas. In response to an Opportunity for Improvement identified in the Initial Construction Audit storage containers / areas appeared to meet site volume requirements for chemical and hydrocarbons. hydrocarbon and chemical storage areas were observed to be well maintained.	
<b>Electric and Magnetic Fields</b>					
B40.	The Proponent must ensure that the design, construction and operation of the development is managed to comply with the applicable electric and magnetic fields (EMF) limits in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz – 100 kHz) (ICNIRP, 2010).		Not triggered	The development is still undergoing detailed design (B. Toohey pers. comm).	
<b>Operating Conditions</b>					
B41.	The Proponent must: <ul style="list-style-type: none"> <li>(a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;</li> <li>(b) ensure that the development; <ul style="list-style-type: none"> <li>i) complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones;</li> <li>ii) is suitably equipped to respond to any fire on site, including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds;</li> <li>iii) incorporates the recommendations of a fire risk assessment as per Transgrid's design standards;</li> </ul> </li> <li>(c) ensures that buildings within the compounds comply with Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS's Planning for Bushfire Protection 2019;</li> <li>(d) ensure any fire trails or asset protection zones associated with the development are wholly contained within the approved disturbance area;</li> <li>(e) develop procedures to manage potential fires on site, in consultation with the RFS, FRNSW, FCNSW and NPWS;</li> <li>(f) assist the RFS, FRNSW, FCNSW, NPWS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</li> <li>(g) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.</li> </ul>	Bushfire Plan (Rev 0.06) dated 30/08/2023 Emergency Plan (Rev 0.07) dated 25/06/2024	<b>Non-compliant</b>	(a) Confirmed during the Initial Construction Audit, Bushfire mitigation measures for the development are included in Section 5 of the Bushfire Plan (b) <ul style="list-style-type: none"> <li>i) Confirmed during the Initial Construction Audit, APZ works undertaken during construction will be in accordance with Appendix 4 of Planning for Bush Fire Protection (NSW RFS, 2019).</li> <li>ii) A minimum 20,000L dedicated fire water supply tank is available at three assembly areas including UGL Switchyard, UGL Lobs Hole Compound, and FGJV Lobs Hole Accommodation Camp. <b>However it was noted the water supply tank located at the UGL Lobs Hole Compound was empty.</b></li> <li>iii) The development is still subject to detailed design (J. Snape pers. comm)</li> </ul> (c) Consistent with the Initial construction Audit Transgrid and UGL have considered and are ensuring buildings comply with the Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS's Planning for Bushfire Protection 2019 as part of final IFC design (J. Snape pers. comm) (d) Consistent with the Initial Construction Audit, the final IFC design of Project has not been completed for the Project during this audit period. Transgrid and UGL have assured access tracks and APZs associated with the development are wholly contained within the approved disturbance area (J. Snape pers. comm). (e) Confirmed during the Initial Construction Audit, the Bushfire Plan which is included as an appendix in the Emergency Plan has undergone consultation with RFS, FRNSW, FCNSW and NPWS. See condition (f) Noted (g) Not triggered during this audit period.  <b>Recommendation: It is recommended UGL ensure all water tanks are filled with water and that the minimum 20,000L supply is maintained at each construction compound.</b>  <b>Opportunity for Improvement: It is recommended the water tanks across all Project sites be signposted in the case of an emergency firefighting services can easily locate the water supply.</b>	<b>NC-06</b>
<b>Emergency Plan</b>					

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Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
B42.	<p>Prior to commencing construction, the Proponent must prepare and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, in consultation with the Local Emergency Management Committee and to the satisfaction of the NPWS, FCNSW, RFS and FRNSW. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by NPWS and FCNSW;</li> <li>(b) be consistent with: <ul style="list-style-type: none"> <li>i) the Department’s Hazardous Industry Planning Advisory Paper No. 1, ‘Emergency Planning’,</li> <li>ii) Kosciuszko National Park Fire Management Strategy 2008-2013 (NPWS, 2008),</li> <li>iii) FCNSW Guidelines including the Code of Practice for Timber Harvesting in Softwood Plantations 2022;</li> <li>iv) RFS’s Planning for Bushfire Protection 2019 (or equivalent);</li> <li>v) RFS’s Development Planning – A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (RFS, 2014);</li> <li>vi) the Fire and Rescue NSW Act 1989; and</li> <li>vii) the Work Health and Safety (WHS) Act 2011;</li> </ul> </li> <li>(c) include evacuation protocols for the site;</li> <li>(d) describe the measures that would be implemented to: <ul style="list-style-type: none"> <li>i) minimise the risk of bushfire on site;</li> <li>ii) protect the assets on site from bushfires;</li> <li>iii) respond to any bushfires on or in the vicinity of the site;</li> <li>iv) minimise flood risks on site, including flooding response procedures;</li> <li>v) minimise the risk of landslips on site, including landslip response procedures;</li> <li>vi) evacuate the site in an emergency; and</li> </ul> </li> <li>(e) include details on how live transmission infrastructure can be safely isolated in an emergency.</li> </ul> <p>The Proponent must implement the Emergency Plan for the duration of the development.</p>	<p>Emergency Plan (Rev 0.07) dated 25/06/2024  DPHI Approval Letter dated 25/06/2024  FCNSW Email Correspondence – EP Review dated 31/05/2024  FRNSW Email Correspondence – EP Review dated 09/05/2024  NPWS Email Correspondence – EP Review dated 27/05/2024  RFS Email Correspondence – EP Review dated 24/05/2024</p>	Compliant	<p>Confirmed during the Initial Construction Audit an Emergency Plan has been prepared and approved for the development. The Emergency Plan addresses all requirements outlined in Condition B42.</p> <p>The Emergency Plan was revised during the audit period to remove reference to the winter shutdown period. The revised Emergency Plan was sent to FCNSW, FRNSW, NPWS and RFS for consultation (sighted). The revised Emergency Plan was approved by the Planning Secretary on the 25 June 2024.</p>	
<b>WASTE</b>					
B43.	<p>Excluding the spoil generated by the development from within KNP, waste generated during construction, operation, upgrading and decommissioning must be dealt with in accordance with the following priorities:</p> <ul style="list-style-type: none"> <li>(a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced;</li> <li>(b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and</li> </ul>	<p>Waste Management Strategy (Rev 0.08) dated 01/11/2023</p>	Compliant	<p>Confirmed during the Initial Construction Audit a Waste Management Strategy has been prepared for the development and addresses the requirements outlined by Condition B43.</p> <p>During the site inspection for the Construction Audit 2 it was evident recycling programs were continued to be implemented and maintained including recycling bottles and cans and reusing water for dust suppression in total cleared areas.</p>	



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Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	(c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.				
B44.	The importation of waste and storage, treatment, processing, reprocessing or disposal of such waste must comply with the Protection of the Environment Operations Act 1997, the Protection of the Environment Operations (Waste) Regulation 2014, and orders or exemptions under the regulation.	UGL Waste Management Register UGL Imported Material Tracking Register	Compliant	During this audit period only road base, rock and dust has been imported to site (Import Material Tracking Register sighted). No waste has been imported to site during the audit period (J. Snape pers. comm). In response to a recommendation outlined in the Initial Construction Audit Transgrid have developed a waste tracking register for the development that records details of all wastes generated by or imported to the Project area including details of treatment, processing, classification and disposal by licenced contractors to a licensed land disposal facility that covers both the East and West Project alignments.	
B45.	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	Forest Hill Liquid Waste Storage and Transfer Station EPL 10060	Compliant	Confirmed during the Initial Construction Audit waste originating from the Eastern Project alignment is exported to Bellettes Landfill (EPA Licenced Facility) and waste from the Project West Is exported to Forest Hill Liquid Waste Storage and Transfer Station which is operated by JJ Richards and Sons. In response to a Recommendation in the Initial Construction Audit a copy of the EPL from Forest Hill Liquid Waste Storage and Transfer Station has been provided showing waste is being disposed of at a site licenced by the EPA.	
B46.	All waste that is removed from site must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal docketts retained for audit purposes.	Transgrid C1611 Maragle 330kv Switching Station And 330kv Transmission Line Connections Project Status Report dated July, August and September 2024	Compliant	Confirmed during the Initial Construction Audit waste is continued to be removed onsite is tracked by UGL and is reported monthly within UGL Monthly Status Report. Waste reported in this documents is also further broken down in accordance with the EPA's Waste Classification Guidelines. It is noted during the audit Transgrid has sought to attain waste docketts during the audit period. As confirmed by Belletes (sighted) specific waste docketts are not prepared by for the Maragle site.  <b>Recommendation: It is recommended going forward Transgrid seek to attain waste docketts from JR Richards and Belletes.</b>	

**REHABILITATION**

B47.	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>(a) rehabilitate all parts of the site within the Kosciuszko National Park to comply with the rehabilitation objectives in Table 2 and the ecological rehabilitation objectives in Table 3;</li> <li>(b) rehabilitate the Bago State Forest site to comply with the rehabilitation objectives in Table 2;</li> <li>(c) complete the rehabilitation of the site, including the removal of all temporary infrastructure, creation of landforms, narrowing of roads within 3 years of completing construction;</li> <li>(d) complete the ecological rehabilitation of the site, apart from areas used for operations, within 20 years of completing construction;</li> <li>(e) complete the final rehabilitation of the site, including the removal of all remaining infrastructure within 3 years of decommissioning the development; and</li> <li>(f) complete the ecological rehabilitation of the areas used for operations within 20 years of decommissioning the development.</li> </ul>		Not triggered	Construction has not been completed. Initial rehabilitation works are required within three years of completion of construction. Therefore, this condition has not been triggered.											
<p><b>Table 2 Rehabilitation Objectives</b></p> <table border="1"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>Land Use</td> <td>Return the site to its previous use in consultation with NPWS and FCNSW</td> </tr> <tr> <td>Land</td> <td>Safe, stable and non-polluting; Progressively rehabilitate the site as soon as possible following disturbance; Employ interim rehabilitation strategies to areas that can't be permanently rehabilitated yet to minimise dust generation, erosion, uncontrolled discharges of sediment, and the spread of weeds to other parts of the Kosciuszko National Park;</td> </tr> <tr> <td>Infrastructure</td> <td>Decommission and remove infrastructure, unless NPWS and/or FCNSW agrees otherwise;</td> </tr> <tr> <td>Community</td> <td>Ensure public safety</td> </tr> </tbody> </table>		Feature	Objective	Land Use	Return the site to its previous use in consultation with NPWS and FCNSW	Land	Safe, stable and non-polluting; Progressively rehabilitate the site as soon as possible following disturbance; Employ interim rehabilitation strategies to areas that can't be permanently rehabilitated yet to minimise dust generation, erosion, uncontrolled discharges of sediment, and the spread of weeds to other parts of the Kosciuszko National Park;	Infrastructure	Decommission and remove infrastructure, unless NPWS and/or FCNSW agrees otherwise;	Community	Ensure public safety				
Feature	Objective														
Land Use	Return the site to its previous use in consultation with NPWS and FCNSW														
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Infrastructure	Decommission and remove infrastructure, unless NPWS and/or FCNSW agrees otherwise;														
Community	Ensure public safety														

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Table 3 | Ecological rehabilitation objectives, including indicative completion criteria and performance indicators

Ecological rehabilitation objective	Completion criteria	Performance indicators
<b>Objective 1:</b> The vegetation composition of the rehabilitation is recognisable as a plant community type (PCT) contained within the Shuben Vegetation Classification and which was present on site prior to the project's temporary disturbance.	(a) Native plant species composition is characteristic of the target PCT based on suitable analysis against a reference data set using the PCT Assignment Tool. (b) The target PCT BAM composition score is within or greater than the inter-quartile range of local reference site values for the assigned PCT.	All native vascular plant species are monitored to species level from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method, and/or other method approved by the Planning Secretary. Monitoring should include appropriate reference sites outside the disturbance area, ideally capturing the range of variation of the 2003 and 2019/20 files.
<b>Objective 2:</b> The vegetation structure of the rehabilitation is recognisable as, or shows a substantial trend towards, a PCT contained within the Shuben Vegetation Classification and which was present on site prior to the project's temporary disturbance.	Cover, abundance and height range of native plant growth forms are characteristic of the target PCT's and within or greater than the inter-quartile range of local reference site values for the assigned PCT.	The cover, abundance and height range of all native vascular plant species are monitored from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method, and/or other method approved by the Planning Secretary.
<b>Objective 3:</b> Levels of ecosystem function have been established that demonstrate the rehabilitation is self-sustainable or shows a substantial trend towards a self-sustaining state.	Growth medium, including topsoil, is suitable for target PCT's establishment, and indicators of nutrient cycles are suitable for sustaining the target PCT's. All priority attributes of nutrient cycling, soil processes and both subsoil and topsoil properties should be within or greater than the interquartile range of local reference site values for the assigned PCT. Rehabilitation vegetation communities are maturing, and natural recruitment is occurring for species within each growth form at rates within or greater than the interquartile range of local reference site values for the assigned PCT. The number and ground cover of weed species is comparable to, or less than, the interquartile range of local reference site values for the assigned PCT. Fauna habitat features and resources (food and shelter characteristics) within the rehabilitation vegetation communities are present and within or greater than the interquartile range of local reference site values for the assigned PCT.	Growth medium, covering both subsoil and topsoil properties, and soil processes are monitored using methods approved by the Planning Secretary. All species are monitored for establishment of second generation juveniles/seedlings and capacity for recruitment from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method, and/or other method approved by the Planning Secretary. Number and ground cover of weed species are monitored from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method, and/or other method approved by the Planning Secretary. Presence/absence of some fauna habitat features (e.g. flowering plant, characteristic bark, logs with hollows and/or nest boxes) and quantitative assessment of other features (e.g. leaf litter cover, bare ground, wood debris) are monitored from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method and/or other method approved by the Planning Secretary.

**Rehabilitation Management Plan**

<b>B48.</b>	<p>Within 12 months following commencement of construction, the Proponent must prepare a Rehabilitation Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, FCNSW, BCS, EPA, NSW DPI and TfNSW;</li> <li>(b) be consistent with the Spoil Management Plan, Long-Term Road Strategy and Visual Mitigation Management Plan;</li> <li>(c) include a conceptual plan for the rehabilitation of the whole site;</li> <li>(d) include the detailed program for the rehabilitation of roads in the Kosciuszko National Park in accordance with the approved Long-Term Road Strategy;</li> <li>(e) include a topsoil balance for the site, which includes a strategy for:                             <ul style="list-style-type: none"> <li>i) maximising the reuse of topsoil on site (provided it is suitable for reuse);</li> <li>ii) using other suitable growth media; and</li> <li>iii) importing additional topsoil to the site (if necessary);</li> </ul> </li> <li>(f) include a native seed collection and propagation program in accordance with Florabank (<a href="http://www.florabank.org.au">www.florabank.org.au</a>) and/or NPWS guidelines for the site, which includes a strategy for:                             <ul style="list-style-type: none"> <li>i) maximising the collection and use of native seed resources from the site prior to disturbance;</li> <li>ii) collecting seed from the surrounding area, including other parts of the Kosciuszko National Park (with the approval of the NPWS); and</li> <li>iii) prioritising the use of local sources of seed for the ecological rehabilitation of the site;</li> </ul> </li> <li>(g) include a detailed ecological rehabilitation management plan for the development that:</li> </ul>	NPWS Correspondence - Proposed Native Seed Mixes dated 19/09/2024	Not triggered	A Rehabilitation Management Plan is not required to be finalised during this audit period. However noting the Rehabilitation Management Plan is in draft UGL sought endorsement for seed mixes from NPWS during the audit period in order to commence sourcing of seed from the market to supplement seed collection and to achieve satisfactory stabilisation of disturbed areas within the Spring 2024 growing season.	
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**Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)**

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<p>i) provides an overarching description of the proposed ecological rehabilitation works, identifying the:</p> <ul style="list-style-type: none"> <li>• plant community types to be established; and</li> <li>• area of land to be established for each plant community type;</li> </ul> <p>ii) provides maps showing the proposed location of each plant community type;</p> <p>iii) describes the detailed measures that would be implemented to comply with the ecological rehabilitation objectives in Table 3;</p> <p>(h) identify the key risks to the successful completion of the rehabilitation and describe the contingency measures that would be implemented to address these risks;</p> <p>(i) include detailed completion criteria and performance indicators for the rehabilitation of the development (having regard) to the criteria and indicators in Table 3, including criteria for triggering remedial action (if necessary); and</p> <p>(j) include a program to monitor and publicly report on:</p> <ul style="list-style-type: none"> <li>i) the rehabilitation of the site;</li> <li>ii) the implementation of the each of the detailed plans, including the effectiveness of the proposed mitigation and contingency measures; and</li> <li>iii) progress against the detailed completion criteria and performance indicators.</li> </ul> <p>Following the Planning Secretary’s approval, the Proponent must implement the Rehabilitation Management Plan.</p>				

**PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING**

**ENVIRONMENTAL MANAGEMENT STRATEGY**

<b>C1.</b>	<p>Prior to commencing development, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <ul style="list-style-type: none"> <li>(a) provide the strategic framework for environmental management of the development;</li> <li>(b) identify the statutory approvals that apply to the development;</li> <li>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</li> <li>(d) set out the procedures that would be implemented to: <ul style="list-style-type: none"> <li>i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>ii) receive, handle, respond to, and record complaints;</li> <li>iii) resolve any disputes that may arise;</li> </ul> </li> </ul>	<p>Environmental Management Strategy (Rev 0.06) dated 28/07/2023</p> <p>Environmental Management Strategy (Rev 0.07) dated 01/08/2024 [Pending Approval]</p> <p>DPHI Post Approval Form EMS submission dated 08/08/2024</p>	Compliant	<p>Confirmed during the Initial Construction Audit the EMS was approved by the Planning Secretary on the 03 August 2023 prior to commencement. During this audit period the EMS has been revised and has been sent to the Planning Secretary and is pending approval.</p> <ul style="list-style-type: none"> <li>(a) Included in Appendix D TransGrid Environmental Framework.</li> <li>(b) Included in Section 2.</li> <li>(c) Included in Section 3.10.</li> <li>(d) <ul style="list-style-type: none"> <li>i) Included in Section 4.5.</li> <li>ii) Included in Section 4.2.</li> <li>iii) Included in Section 4.2.</li> <li>iv) Included in Section 3.12.</li> </ul> </li> <li>v) Response to emergencies is mentioned in Section 3.7, with further detailed provided in the Emergency Plan. In response to a Recommendation included in the Initial Construction Audit Section 3.7 of the revised EMS has been updated to clearly set out the procedures on how to respond in the event of an emergency.</li> <li>(e) <ul style="list-style-type: none"> <li>i) Included in Appendix E Document Map.</li> <li>ii) In response to a Recommendation included in the Initial Construction Audit the revised EMS includes clear table depicting all monitoring that is to be carried out in relation to the development.</li> </ul> </li> </ul>	
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Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	iv) respond to any non-compliance; v) respond to emergencies; and (e) include: i) references to any strategies, plans and programs approved under the conditions of this approval; and ii) a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this approval.  Following the Planning Secretary's approval, the Proponent must implement the Environmental Management Strategy.				
<b>REVISION OF STRATEGIES, PLANS AND PROGRAMS</b>					
<b>C2.</b>	The Proponent must review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 months of the:  (a) the submission of an incident report under condition C7; (b) the submission of an Independent Audit under condition C10; (c) the approval of any modification of the conditions of this approval; or (d) the issue of a direction of the Planning Secretary under condition A2 which requires a review.	20240708_Summary_DCR_AI I_Plans	Compliant	As noted in these compliance tables a number of incidents have occurred during the audit period triggering reviews of relevant strategies, plans and programs. In response to these reviews a number of plans (including the EMS, BMP, SWMP, TTMP, NVMP, Visual Impact Management Plan, Emergency Plan) have been updated during the audit period following these reviews. Transgrid maintain a register for tracking all comments and revisions for all management plans but this does not account for plans that have been reviewed but not requiring updates or revisions.  <b>Recommendation: It is recommended a document review register is created to track and keep records of all of the reviews that are triggered by Condition C2, including where a plan has been reviewed but the outcomes of that review identified no revisions required.</b>	
<b>STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS</b>					
<b>C3.</b>	With the approval of the Planning Secretary, the Proponent may:  (a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).  If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this approval.	DPHI Post Approval Form NVMP Submission n.d. DCR_SWMP 0.10_20241009_Agencies Register NSW DCCEEW Email Correspondence Revised Biodiversity Management Plan (Rev 0.13) dated 26/08/2024 DPHI Post Approval Form VIMP Submission dated 12 August 2024 DPHI Approval Letter EP dated 25/06/2024	Compliant	(a) Confirmed during the Initial Construction Audit the Planning Secretary approved a staging request to prepare management plans on a staged basis on the 27 March 2023 allowing the development scope to be delivered in two stages: <ul style="list-style-type: none"> <li>Stage 1 – All activities associated with the construction and operation of infrastructure related to the 330 kV grid connection.</li> <li>Stage 2 – All activities associated with the construction and operation of infrastructure related to the 500 kV component of the substation.</li> </ul> (b) Confirmed during the initial Construction Audit request was sought from TransGrid to combine the Spoil Management Plan and Water Management Plan. The Planning Secretary approved the request on the 18 November 2022. (c) During the audit period, majority of management plans have been revised. The current status of approved management plans required by this approval is provided below: <ul style="list-style-type: none"> <li>EMS – Revision 0.07 was submitted to Planning Secretary for approval on the 08 August 2024.</li> <li>BMP – Revision 0.13 is undergoing consultation with BCS, NPWS and FCNSW.</li> <li>SWMP - Revision 0.10 is undergoing consultation with EPA, NPWS, DPI Fisheries and NSW DCCEEW Water</li> <li>NVMP – Revision 0.06 was submitted to Planning Secretary for approval (no date was provided).</li> <li>TTMP – Revision 0.18 was prepared in consultation with TfNSW and NPWS. The Planning Secretary approved Revision 0.18 on the 25 June 2024. A subsequent Revision 0.19 was also prepared and was submitted to the Planning Secretary on 15 August 2024.</li> <li>Heritage Management Plan – No change.</li> <li>Emergency Plan – Revision 0.07 was prepared in consultation with FCNSW, FRNSW, NPWS and RFS. The Planning Secretary approved Revision 0.07 on the 25 June 2024.</li> <li>Visual Impact Management Plan - Revision 14 was submitted to Planning Secretary for approval on the 12 August 2024.</li> </ul>	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<p>If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.</p> <p>If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this approval if those requirements are not applicable to the particular stage.</p>				
<b>NOTIFICATIONS</b>					
<b>Notification of Department</b>					
C4.	<p>Prior to commencing development, construction, operations, upgrading or decommissioning of the development, the Proponent must notify the Department in writing via the Major Projects website portal and NPWS and FCNSW of the date of commencing the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Proponent must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>		Compliant	Confirmed during the Initial Construction Audit prior to commencing construction Transgrid submitted a notification in writing to Major Projects website portal, FCNSW, NPWS and DCCEEW. The development is currently in Stage 1 of its construction.	
<b>Final Layout Plans</b>					
C5.	<p>Prior to commencing construction, the Proponent must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including:</p> <ul style="list-style-type: none"> <li>(a) details on siting of transmission towers and ancillary facilities; and</li> <li>(b) showing comparison to the approved layout and approved vegetation clearing.</li> </ul> <p>The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans. Works as Executed Plans.</p>		Compliant	Confirmed during the Initial Construction Audit detailed designs of the development were issued to the Department via the Major Projects website prior to the commencement of construction.	
C6.	<p>Prior to commencing operations, the Proponent must submit plans that confirm the constructed layout of the development and showing comparison to the final layout plans to the Planning Secretary, via the Major Projects website.</p>		Not triggered	The development is currently undertaking construction. Operations have not commenced (J. Snape pers. comm).	
<b>Incident Notification</b>					
C7.	<p>The Department and the NPWS must be notified via the Major Projects website portal immediately after the Proponent 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 5.</p>	<p>Major Projects Notification - Track 6a Habitat Tree Clearing dated 20/03/2024</p> <p>Major Projects Notification - Maragle Switchyard Hydraulic Spill dated 22/04/2024</p> <p>Major Projects Notification - Maragle Heavy Vehicle Pilot Escort dated 02/05/2024</p> <p>Major Projects Notification - New Zealand Gully Turbid Water dated 04/06/2024</p> <p>Major Projects Notification - Water Access Licence</p>	Compliant	<p>There were 6 recorded incidents that occurred within this Audit Period. Events were reported immediately to the Department and NPWS after Transgrid were aware of the non-compliance. Details are below:</p> <ul style="list-style-type: none"> <li>• <i>Track 6a Habitat Tree Clearing</i>: Two felled habitat trees were identified within Track 6a prior to the commencement of Stage 2 habitat vegetation clearing. Event occurred on the 20 March 2024. Notification was sent to the Department and NPWS on the 20 March 2024.</li> <li>• <i>Maragle Switchyard Hydraulic Spill</i>: A hydraulic oil spill was observed within the Maragle 500kV Substation Construction Pad on the 22 April 2024. A notification was sent to the Department and the NPWS on the 22 April 2024.</li> <li>• <i>Maragle Heavy Vehicle Pilot Escort</i>: On 1 May four heavy vehicles failed to abide by the conditions of the NVHR Permits. Transgrid became aware of the incident on the 2 May 2024. A notification was sent to the Department and NPWS on the 2 May 2024.</li> <li>• <i>New Zealand Gully Turbid Water</i>: A heavy rainfall event of approximately 53 mm occurred on the 31 May 2024 causing a discharge turbid water into New Zealand Gully, within the Project area. Transgrid become aware of the incident on the 4 June 2024. A notification was sent to the Department and the NPWS on the 4 June 2024.</li> <li>• <i>Water Access Licence Potential Non-Conformance</i>: Approximately 0.60 ML of water has been extracted from Paddys River for dust suppression purposes under a WAL held by UGL (WAL44782) without procuring a water allocation.</li> </ul>	



Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
		Potential Non-Conformance dated 30/07/2024 Major Projects Notification - Track 8 Turbid Water dated 26/09/2024		Transgrid become aware of the incident on the 30 July 2024. A notification was sent to the Department and the NPWS on the 30 July 2024. <ul style="list-style-type: none"> <li>Track 8 Turbid Water: A heavy rainfall event of approximately 43 mm occurred on the 26 September 2024 causing a discharge of turbid water offsite o Track 8. Transgrid become aware of the incident on the 26 September 2024. A notification was sent to the Department and the NPWS on the 26 September 2024.</li> </ul>	
<b>Non-Compliance Notification</b>					
C8.	The Planning Secretary and the NPWS must be notified in writing via the Major Projects website portal within seven days after the Proponent becomes aware of any non-compliance.		Compliant	See Condition C7.	
C9.	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.  Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.		Compliant	Non-compliance notifications within this audit period addressed all details as outlined in this condition and are shown in the notifications submitted via the Major Projects Portal.	
<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>					
C10.	Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.		Compliant	The Initial Construction Audit was undertaken 15 week post the commencement of construction as approved by the Planning Secretary on the 31 January 2024. The Second Construction Audit was undertaken within 6 months of the Initial Construction Audit which is in accordance with the requirements of the Independent Audit Post Approval Requirements (2020).	
<b>ACCESS TO INFORMATION</b>					
C11.	The Proponent must: (a) make the following information and documents publicly available on its website as relevant to the stage of the development: i) the EIS; ii) the final layout plans for the development; iii) current statutory approvals for the development; iv) approved strategies, plans or programs required under the conditions of this approval; v) the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; vi) a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this approval; vii) how complaints about the development can be made; viii) any independent environmental audit, and the Proponent's response to the recommendations in any audit; and ix) any other matter required by the Planning Secretary; and (b) keep such information up to date.	Project website	Compliant	Transgrid provides the information required under this condition on its website: <a href="https://www.TransGrid.com.au/projects/snowy-2-0-transmission-connection-project/">https://www.TransGrid.com.au/projects/snowy-2-0-transmission-connection-project/</a> . All relevant documents including the previous independent environmental audit is provided on the website. In response to the recommendation outlined in the initial Construction Audit the final layout plans for the development are also uploaded to the project website.	

**Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)**

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC						
<b>Part A – Conditions Specific to Action</b>											
1	To minimise the impacts of the action on protected matters, the approval holder must: <ul style="list-style-type: none"> <li>a. not clear more than:                             <ul style="list-style-type: none"> <li>(i) 1.67 ha of habitat for Booroolong Frog; and</li> <li>(ii) 118.34 ha of habitat for Spot-tailed Quoll; and</li> </ul> </li> <li>b. minimise the impacts of the Action on hollow-bearing trees.</li> </ul>	Biodiversity Management Plan (rev 0.12) dated 22/11/2023		a. Clearing commenced on the 08 March 2024 which occurred outside the audit period however clearing activities were undertaken during this audit period. Extent of clearing of Spotted Quoll and Booroolong frog habitat is summarised in the table below. <b>Table 1: Extent of Clearing@</b> <table border="1" data-bbox="1605 394 2585 510"> <thead> <tr> <th>Species</th> <th>Extent of Clearing</th> </tr> </thead> <tbody> <tr> <td>Booroolong Frog</td> <td>0.94 ha</td> </tr> <tr> <td>Spot-tailed Quoll</td> <td>75.54 ha</td> </tr> </tbody> </table> Clearing is within approved limits. b. Implementation of impact minimisation for hollow bearing trees was discussed and observed during the audit inspection.	Species	Extent of Clearing	Booroolong Frog	0.94 ha	Spot-tailed Quoll	75.54 ha	
Species	Extent of Clearing										
Booroolong Frog	0.94 ha										
Spot-tailed Quoll	75.54 ha										
2	The approval holder must not clear outside the project area.		Compliant	No clearing outside the clearing areas was detected or notified to the Transgrid during this audit period (J. Snape pers. comm)							
3	To mitigate impacts on protected matters, the approval holder must implement conditions B21, B41 and C1 of the State Infrastructure Approval, in so far as they relate to monitoring, mitigating and avoiding impacts to protected matters.	Biodiversity Management Plan (rev 0.12) dated 22/11/2023 Environmental Management Strategy (rev 0.06) dated 28/07/2023	<b>Non-compliant</b>	Condition C1 is compliant. <b>Condition B21 was triggered non-compliant in relation to the absence of a partial clearance verification report to inform vegetation clearance and lack of description of measures that would be implemented for partial clearing verification reporting and monitoring in the BMP.</b> Refer to Condition B21 of the Infrastructure Approval Table for further detail. <b>Condition B21 was triggered non-compliant in relation to lack of weed clearing prior to vegetation clearing under the BMP.</b> Refer to Condition B21 of the Infrastructure Approval Table for further detail. <b>Condition B41 was triggered non-compliant due to water supply tank located at Lobbs Hole Compound being empty.</b> Refer to Condition B41 of the Infrastructure Approval Table for further detail.	<b>NC-07</b>						
4	The Biodiversity Management Plan required under condition B21 of the State Infrastructure Approval must: <ul style="list-style-type: none"> <li>a. be consistent with relevant statutory documents;</li> <li>b. demonstrate how the approval holder will minimise erosion and control sediment generation;</li> <li>c. demonstrate how the approval holder will take all reasonable and feasible measures to prevent any discharge to waters;</li> <li>d. in respect of all watercourses which contain habitat for Booroolong Frog, as indicated by the areas within the yellow polygons designated 'Booroolong Frog' within the designated 'Study area' in the map at Attachment B, specify:                             <ul style="list-style-type: none"> <li>(i) what and how detailed baseline data on surface water flows and quality will be collected prior to the commencement of the Action; and</li> <li>(ii) a program to augment data regarding surface water flows and quality data over time;</li> </ul> </li> <li>e. specify detailed criteria for determining surface water impacts (in respect of flows, quality and flooding) of the Action on the Booroolong Frog, including criteria for triggering remedial action (if necessary);</li> <li>f. specify a monitoring program capable of detecting any specified criteria for triggering remedial action, if they occur; and</li> <li>g. include a description of the measures that will be implemented to minimise the surface water impacts of the Action on the Booroolong Frog.</li> </ul>	Biodiversity Management Plan (rev 0.12) dated 22/11/2023	Compliant	<ul style="list-style-type: none"> <li>a. BMP has been prepared in accordance with</li> <li>b. Included in Section 5.8 of the BMP</li> <li>c. Included in Section 5.8 of the BMP</li> <li>d.                             <ul style="list-style-type: none"> <li>(i) Methodology provided in BMP Appendix G - Table 4-2</li> <li>(ii) BMP refers to SWMP</li> </ul> </li> <li>e. Detailed criteria for determining surface water impacts (in respect of flows, quality and flooding) of the Action on Booroolong Frog is to be included in the revised BMP (pending consultation and approval).</li> <li>f. A monitoring program capable of detecting any specified criteria for triggering remedial action is to be included in the revised BMP (pending consultation and approval).</li> <li>g. Mitigation measures specific to the Booroolong Frog contained in BMP Appendix G Table 4-1.</li> </ul>							
5	The approval holder must submit the Biodiversity Management Plan and Environmental Management Strategy required by conditions B21 and C1 of the State Infrastructure Approval to the department for the Minister's approval before they are approved by the NSW Planning Secretary.		Not applicable								

Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
6	The approval holder must implement the Biodiversity Management Plan and Environmental Management Strategy approved by the Minister until the end date of this approval, unless otherwise agreed by the Minister in writing.	Biodiversity Management Plan (rev 0.12) dated 22/11/2023	Non-compliant	Implementation of the BMP has commenced and is ongoing. Non-compliance issues have been identified in relation to the <b>absence of the provision of a verification report</b> and the <b>removal of weeds prior to clearing</b> . <b>Please refer to Condition B21 of the Infrastructure Approval Table for further detail.</b>	NC-08
7	To offset the impacts of the Action on protected matters, the approval holder must implement conditions B18, B19 and B20 of the State Infrastructure Approval.		Not applicable	Compliant with Condition B18, B19 and B20 of the State Infrastructure approval.	
8	The approval holder must notify the department in writing within 10 business days of making a biodiversity offset payment to the NSW National Parks and Wildlife Service. Each notification must state the date of payment, the amount paid, and the component of the biodiversity offset obligations in respect of which the payment is made.				
<b>Submission and Publication of Plans</b>					
9	The approval holder must submit all plans required by these conditions electronically to the department.	AG DCCEEW Correspondence - Revised Environmental Management Strategy (rev0.07) dated 25/08/2024 AG DCCEEW Correspondence - Revised Biodiversity Management Plan (rev0.13) dated 26/08/2024	Compliant	Confirmed during the Initial Construction Audit the EMS and BMP were sent and approved by the Department. During this audit period a revised EMS was sent on the 2 August 2024, a revised BMP was sent to the Department on the 26 August 2024.	
10	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date: a. the plan is approved by Secretary of the NSW Department of Planning and Environment as required under a state/territory government condition which must be complied with in accordance with these EPBC Act conditions.	Project Webpage	Compliant	Confirmed during the Initial Construction Audit management plans have been uploaded and sighted during this audit are still accessible on the Project page. <a href="https://www.lumea.com.au/projects/snowy-2-0-transmission-connection-project/#environmental-documentation">https://www.lumea.com.au/projects/snowy-2-0-transmission-connection-project/#environmental-documentation</a>	
11	The approval holder must keep all published plans required by these conditions on the website until the expiry date of this approval.	Project Webpage	Compliant	Refer to Condition 10.	
12	The approval holder is required to exclude or redact sensitive ecological data from plans published on the website or otherwise provided to a member of the public.		Not applicable	Confirmed during the Initial Construction Audit data has already been made publicly available by the NSW Government on the Major Projects webpage.	
13	If sensitive ecological data is excluded or redacted from a plan in accordance with condition 12, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.		Not applicable		
<b>Part B – Administrative Conditions</b>					
<b>Notification of Date of Commencement of Action</b>					
14	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days of commencement of the Action.		Not applicable	Confirmed during the Initial Construction Audit AG DCCEEW were notified of the commencement of construction within 5 business days.	
15	If the commencement of the Action does not occur within 5 years from the date of this approval, then the approval holder must not commence the Action without the prior written agreement of the Minister.		Not applicable	Action has commenced within 5 years of this approval	
<b>Compliance Records</b>					
16	The approval holder must maintain accurate and complete compliance records.	CAMS	Compliant	Transgrid utilise compliance tracking systems and excel registers/spreadsheets (sighted) to ensure they meet the specific performance measures and criteria set out by this approval. The compliance tracker CAMS outline responsible personnel for relevant actions as well as maintaining evidence of compliance.	



Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
17	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request. <i>Note: Compliance records may be subject to audit by the department, or by an independent auditor in accordance with section 458 of the EPBC Act, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the department's website or through the general media.</i>		Not triggered	No requests were received during the audit period (J. Snape pers. comm)	
18	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the department's Guidelines for biological survey and mapped data (2018), or any subsequent official version or as otherwise specified by the Minister in writing.		Compliant	All plans prepared in accordance with the department's Guidelines for biological survey and mapped data (2018) and Guide to providing maps and boundary data for EPBC Act projects (2021).	
19	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the department's Guide to providing maps and boundary data for EPBC Act projects (2021), or any subsequent official version or as otherwise specified by the Minister in writing.		Compliant	All plans prepared in accordance with the department's Guidelines for biological survey and mapped data (2018) and Guide to providing maps and boundary data for EPBC Act projects (2021).	
20	The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 12 months of the commencement of the Action.		Not triggered		
<b>Annual Compliance Reporting</b>					
21	The approval holder must prepare a compliance report for each 12-month period following the date of this approval, or as otherwise agreed to in writing by the Minister.		Not triggered	A compliance report was not required to be submitted during this audit period. A compliance report was prepared on the 10 January 2024 and submitted to AG DCCEEW on the 15 January 2024.	
22	Each compliance report must be consistent with the department's Annual Compliance Report Guidelines (2014), or any subsequent official version.		Not triggered	Refer to Condition 21.	
23	Each compliance report must include: <ul style="list-style-type: none"> <li>a. Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents.</li> <li>b. One or more shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.</li> <li>c. A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.</li> </ul>		Not triggered	Refer to Condition 21.	

Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
24	<p>The approval holder must:</p> <ol style="list-style-type: none"> <li>Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required.</li> <li>Notify the department electronically, within 5 business days of the date of publication that a compliance report has been published on the website.</li> <li>Provide the weblink for the compliance report in the notification to the department.</li> <li>Keep all published compliance reports required by these conditions on the website until the expiry date of this approval.</li> <li>Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.</li> <li>If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website.</li> </ol> <p><i>Note: Compliance reports may be published on the department's website.</i></p>		Not triggered	Refer to Condition 21.	
<b>Reporting Non-compliance</b>					
25	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.	<p>Major Projects Notification - New Zealand Gully Turbid Water dated 04/06/2024</p> <p>AG DCCEEW Notification - Track 6a Habitat Tree Clearing dated 20/03/2024</p> <p>AG DCCEEW Notification - Maragle Switchyard Hydraulic Spill dated 22/04/2024</p> <p>AG DCCEEW Notification - Track 8 Turbid Water dated 26/09/2024</p> <p>AG DCCEEW Non-Compliance Reporting Requirements Correspondence dated 04/10/2024</p>	Compliant	<p>Two reportable incidents have occurred during this audit period which include:</p> <ul style="list-style-type: none"> <li><i>Track 6a Habitat Tree Clearing</i> - TransGrid became aware of the non-compliance on or about 20 March 2024. TransGrid notified AG DCCEEW on the same day.</li> <li><i>Maragle Switchyard Hydraulic Spill</i> - TransGrid became aware of the non-compliance on or about 22 April 2024. TransGrid notified AG DCCEEW on the same day.</li> </ul> <p><b>Opportunity for Improvement: It is recommended relevant plans including the BMP and EMS are updated to include specifics on what plans are required to report on non-compliances and incident to AG DCCEEW as outlined by AG DCCEEW correspondence dated 04 October 2024.</b></p>	
26	<p>The approval holder must specify in the notification:</p> <ol style="list-style-type: none"> <li>Any condition or commitment made in a plan which has been or may have been breached.</li> <li>A short description of the incident and/or potential non-compliance and/or actual non-compliance.</li> <li>The location (including co-ordinates), date, and time of the incident and/or potential non-compliance and/or actual non-compliance.</li> </ol> <p><i>Note: If the exact information cannot be provided, the approval holder must provide the best information available.</i></p>	<p>AG DCCEEW Notification - Track 6a Habitat Tree Clearing dated 20/03/2024</p> <p>AG DCCEEW Notification - Maragle Switchyard Hydraulic Spill dated 22/04/2024</p> <p>AG DCCEEW Notification - Track 8 Turbid Water dated 26/09/2024</p>	Compliant	All incident notifications addressed all requirements outlined by Condition 26.	
27	The approval holder must provide to the department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance, the details of that incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan. The approval holder must specify:	<p>Track 6a Habitat Tree Clearing EPBC Report dated 27/03/2024</p> <p>Maragle Switchyard Hydraulic Spill EPBC Report dated 26/04/2024</p>	Compliant	<p>Two reportable incidents have occurred during this audit period which include:</p> <ul style="list-style-type: none"> <li><i>Track 6a Habitat Tree Clearing</i> - TransGrid notified AG DCCEEW of the incident on 20 March 2024. A report was sent on the 27 March 2024 and included relevant details from a, b and c.</li> <li><i>Maragle Switchyard Hydraulic Spill</i> - TransGrid notified AG DCCEEW of the incident on 22 April 2024. A report was sent on the 26 April 2024 and included relevant details from a, b and c.</li> </ul>	

Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)					
Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<ul style="list-style-type: none"> <li>a. Any corrective action or investigation which the approval holder has already taken.</li> <li>b. The potential impacts of the incident and/or non-compliance and/or non-compliance.</li> <li>c. The method and timing of any corrective action that will be undertaken by the approval holder.</li> </ul>				
<b>Independent Audit</b>					
28	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every five-year period following the commencement of the Action until this approval expires, unless otherwise specified in writing by the Minister.		Not triggered	An independent audit of compliance was not triggered during the audit period.	
29	<p>For each independent audit, the approval holder must:</p> <ul style="list-style-type: none"> <li>a. Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit.</li> <li>b. Only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department.</li> <li>c. Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department.</li> <li>d. Publish each audit report on the website within 15 business days of the date of the department's approval of the audit report.</li> <li>e. Keep every audit report published on the website until this approval expires.</li> </ul>		Not triggered	Refer to Condition 29.	
30	Each audit report must report for the five-year period preceding that audit report.		Not triggered	Refer to Condition 29.	
31	Each audit report must be completed to the satisfaction of the Minister and be consistent with the department's Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines (2019), or any subsequent official version.		Not triggered	Refer to Condition 29.	
<b>Completion of an Action</b>					
32	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.		Not triggered		
33	Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data.		Not triggered	The development is within its construction phase during the audit period.	
<b>Change to State Infrastructure Development</b>					
34	The approval holder must notify the department in writing of any proposed change to the State Infrastructure Approval that may relate to protected matters within 2 business days of formally proposing a change and within 5 business days of becoming aware of any proposed change.	Notification of proposed change to State Infrastructure Approval SSI-9717 Condition B18 and Administrative Non-compliance Notification dated 26/08/2024	<b>Non-compliant</b>	Transgrid sought a 12-month extension to the date required to 'implement and deliver' all biodiversity offset measures per Condition B18 of the State Infrastructure Approval. This request was formally submitted to the Planning Secretary on the 7 August 2024. <b>AG DCCEEW were not notified until the 26 August 2024 which is greater than 2 business days of formally proposing a change.</b>	<b>NC - 09</b>
35	The approval holder must notify the department in writing of any change to the State Infrastructure Approval conditions that may relate to protected matters, within 10 business days of a change to conditions being finalised.		Compliant	A notification was submitted to AG DCCEEW on the 3 September 2024 notifying the determination of the modification of the Infrastructure Approval (determined on the 30 August 2024). The notification was submitted within 5 business days.	

**Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)**

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
<b>Revision of Management Plans</b>					
36	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.		Not triggered	No management plans have been approved by the department during the audit period.	
37	The approval holder may choose to revise an action management plan approved by the Minister under condition 5 or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the Action in accordance with the RAMP would not be likely to have a new or increased impact.	AG DCCEEW Correspondence - Revised Biodiversity Management Plan rev0.13 dated 26/08/2024	Not triggered	In pursuit of section 143A of the EPBC Act, Transgrid has sought to submit a revise BMP to the Minister without formal approval. The revised BMP would not be likely to have a new or increased impact. Revisions are regarding recommendations from the Initial Independent Environmental Audit.	
38	If the approval holder makes the choice under condition 37 to revise an action management plan without submitting it for approval, the approval holder must: <ul style="list-style-type: none"> <li>a. Notify the department electronically that the approved action management plan has been revised and provide the department with:                             <ul style="list-style-type: none"> <li>(i) an electronic copy of the RAMP;</li> <li>(ii) an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP;</li> <li>(iii) an explanation of the differences between the approved Action management plan and the RAMP;</li> <li>(iv) the reasons the approval holder considers that taking the Action in accordance with the RAMP would not be likely to have a new or increased impact; and</li> <li>(v) written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the department.</li> </ul> </li> <li>b. Subject to condition 40, implement the RAMP from the RAMP implementation date.</li> </ul>	AG DCCEEW Correspondence - Revised Biodiversity Management Plan rev0.13 dated 26/08/2024	Compliant	The BMP (rev 0.13) was sent to the department on the 26 August 2024. The BMP addresses requirements from l to v of Condition 38.	
39	The approval holder may revoke its choice to implement a RAMP under condition 37 at any time by giving written notice to the department. If the approval holder revokes the choice under condition 37, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 37.		Not triggered		
40	If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the Action in accordance with the RAMP would be likely to have a new or increased impact, then: <ul style="list-style-type: none"> <li>a. Condition 37 does not apply, or ceases to apply, in relation to the RAMP.</li> <li>b. The approval holder must implement the action management plan specified by the Minister in the notice.</li> </ul>		Not triggered		
41	At the time of giving the notice under condition 40, the Minister may also notify that for a specified period of time, condition 37 does not apply for one or more specified Action management plans.  Note: Conditions 37, 38, 39 and 40 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised Action management plan, at any time, to the Minister for approval.		Not triggered		

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
<b>Construction Environmental Management</b>					
	The management of environmental impacts during construction would be documented in the CEMP. The CEMP would provide a centralised mechanism through which all potential construction-related environmental impacts will be managed. It would also provide the overall framework for the system and procedures to ensure that environmental impacts are minimised, and that legislative and approval requirements are fulfilled.	Construction Environmental Management Plan - Maragle 330kV Switching Station and 330kV Transmission Line Connections dated 6/08/2024	Compliant	Confirmed during the Initial Construction Audit, management of environmental impacts during construction are documented within the 'Aspects and impacts register' included as Appendix G of the Construction Environmental Management Plan (CEMP).	
	<p>The CEMP would include:</p> <ul style="list-style-type: none"> <li>• TransGrid's and the Contractor's environmental policy, objectives, and performance targets for construction</li> <li>• Reference to all relevant statutory and other obligations, including consents, licenses and approvals</li> <li>• Management policies, procedures, and review processes to assess the implementation of mitigation measures and the environmental performance of the project against the objective and targets <ul style="list-style-type: none"> <li>○ Requirements and guidelines for management in accordance with</li> <li>○ The mitigation measures specified in this EIS</li> </ul> </li> <li>• Requirements in relation to incorporating and implementing mitigation measures and emergency response procedures</li> <li>• Roles and responsibilities of all personnel and contractors to be employed on site</li> <li>• Incident and contingency management procedures</li> <li>• Procedures for complaints handling and ongoing communication with the community</li> <li>• Monitoring and auditing program, as defined by this EIS and the conditions of the approval.</li> </ul>	Construction Environmental Management Plan - Maragle 330kV Switching Station and 330kV Transmission Line Connections dated 6/08/2024	Compliant	Confirmed during the Initial Construction Audit, a CEMP has been prepared for the Project. In response to an Opportunity for Improvement identified in the Initial Construction Audit, the CEMP has been updated to include Transgrid's Environmental Policy (Appendix P).	
	<p>The CEMP would comprise a main CEMP document, issue-specific sub-plans, activity-specific procedures and strategies, and site-based control maps as relevant. These include:</p> <ul style="list-style-type: none"> <li>• Rehabilitation plan</li> <li>• Spoil management plan</li> <li>• Construction traffic management plan (CTMP)</li> <li>• Biodiversity management plan</li> <li>• Soil and water management plan (SWMP)</li> <li>• Cultural heritage management plan (CHMP)</li> <li>• Historic and natural heritage management plan</li> <li>• Flood management plan (FMP)</li> <li>• Contaminated land management plan (CLMP) and associated NOA management plan (if required)</li> <li>• Prepare-Act-Survive bushfire response plan</li> <li>• Construction waste management plan (CWMP)</li> <li>• Worker accommodation strategy.</li> </ul>	Construction Environmental Management Plan - Maragle 330kV Switching Station and 330kV Transmission Line Connections dated 6/08/2024	Compliant	Confirmed during the Initial Construction Audit, the CEMP includes relevant sub-plans, activity-specific procedures and strategies, and site-based control maps as relevant for the Project.	
<b>Biodiversity</b>					
<b>B1</b>	<p>Detailed design of the project will focus on the retention of managed shrub and groundcover vegetation zones, within the ECZ, H CZ and HTZ to avoid and minimise the loss of vegetation and habitat and movements of fauna across the landscape and to minimise the impact of predation on displaced fauna.</p> <p>Final design for permanent creek crossing structures on access roads will implement a design option to ensure stream flow is unaffected (e.g. single span to minimise stream disturbance and flow).</p> <p>Design and micro-siting of access tracks will avoid and minimise impacts to rock outcrops, large boulders, piled rock, and rock features that provide potential sheltering and breeding habitat for fauna including threatened species and avoid mapped habitat trees. Access track corridors will be established with consideration to terrain (e.g., utilisation of the ridgelines to navigate to the higher elevations) to minimise cut/fill and vegetation clearing.</p>	<p>WSP Consistency Assessment dated 9/02/2024</p> <p>SLR Letter -Snowy 2.0 Sheep Station Creek Bridge Crossing - v3.0 dated 26/08/2024</p>	Compliant	<p>Opportunities will continue to be explored regarding the detailed design and retention of managed shrub and groundcover vegetation zones, rock outcrops, large boulders, piled rock, and rock features where possible during the phase of construction (J. Snape pers. comm)</p> <p>A Consistency Assessment has been prepared for the Project by WSP (2024) and was reviewed during this audit. The Consistency Assessment has demonstrated an overall reduction to the total and partial clearing areas impacted by the Project. However lacks information to confirm whether associated offset obligations are consistent with the approval. The total impact area has increased for PC T 285 (0.1 ha) and PCT 999 (1.92 ha), and a detailed assessment of impacts to each species polygon has not been provided. Additionally, PCT mapping is missing for some sections of the Updated Disturbance Footprint. The Consistency Assessment also notes consistency assessments are still undergoing for concrete, concrete batching plants.</p>	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
				<p>Additionally works concerning permanent creek crossing structures occurring within the audit period relate to the construction of Sheep Station Creek Bridge. SLR flood modelling undertaken for the works confirms the structure will not materially alter flood levels or depths of flow and since the bridge clear spans the creek channel, there will also not be any alteration of velocity or flow distribution.</p> <p><b>Recommendation: It is recommended that Transgrid provide additional information to support the Consistency Assessment. This should include clear and accurate PCT and species polygon mapping and impact totals for all additional impact areas not assessed in the BDAR and clear demonstration that any additional impacts do not exceed the approval conditions.</b></p>	
B2	<p>A BMP will be prepared and approved prior to construction. The BMP will be prepared by a qualified ecologist in consultation with BCS and NPWS, and include a plan for implementing, evaluating and reporting on the effectiveness of all mitigation measures outlined in the revised BDAR (Appendix C), but not be limited to these measures. The BMP will be based on SMART principals (Specific, Measurable, Achievable, Realistic, Timebound) and will focus on monitoring the performance of proposed measures and informing an adaptive management approach based on performance triggers for remedial action or additional offsets where further impacts are identified.</p> <p>The BMP will include a program to monitor, evaluate and publicly report on the outcomes of a biodiversity monitoring program (refer Section 11.2 of the revised BDAR). The BMP must stipulate objectives for monitoring, and how baseline data will be captured and represented.</p>	<p>Biodiversity Management Plan (Rev 0.12) dated 22/11/2023</p>	Compliant	<p>Confirmed during the Initial Construction Audit a Biodiversity Management Plan (BMP) has been prepared prior to the commencement of construction. The BMP is being implemented during this audit period.</p>	
B3	<p>A Rehabilitation Plan will be prepared and approved prior to construction in consultation with BCS, NPWS and FCNSW. The Rehabilitation Plan will inform the implementation of rehabilitation within the lease/licence area. Such areas will be identified in the final detailed design and will also include areas disturbed during construction that are not required to be maintained or cleared for the operation of the project.</p> <ul style="list-style-type: none"> <li>The plan will focus on the implementation of soil erosion prevention, re-establishment of local endemic plant species suitable to the vegetation formation and habitat and outline the details of rehabilitation objectives and how their outcomes for success will be measured, locations, target landforms and plant community types</li> <li>Restoration of riparian vegetation (i.e. weed control) will be implemented to protect and improve key habitat areas of the Booroolong Frog</li> <li>The plan will include a program for adaptive monitoring of specific success measures and reporting and include a Trigger Action Response Plan (TARP). The TARP will include notification to NPWS and BCS that remedial actions have been triggered and agreement about the response</li> <li>Revegetation of slopes will be undertaken in accordance with the rehabilitation plan</li> <li>Landscaping of pervious surfaces using native indigenous species only</li> <li>Soil loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder)</li> <li>Ongoing maintenance of the rehabilitation work will be required, including management of weeds and pathogens</li> <li>Topsoil and subsoil generated during construction will be stockpiled separately on-site to be used for rehabilitation. Stockpiles will be managed according to best management practices (Managing Urban Stormwater: Soils and Construction).</li> </ul>		Not triggered	<p>In accordance with Condition B48 of the Infrastructure Approval a Rehabilitation Management Plan is not required to be prepared within 12 months following commencement of construction. Therefore the condition has not been triggered during the audit period.</p>	
B4	<p>Pre-clearing Process: the pre-clearing process will include two stages. Stage 1 will include survey and translocation of any fauna from the disturbance area into areas of retained vegetation prior to the development of the project. This may include detailed markup of threatened species</p>	<p>Biodiversity Management Plan (Rev 0.12) dated 22/11/2023 BCS Email Correspondence IEA dated 01/10/2024</p>	Compliant	<p>Requirements of Condition B4 are addressed in the BMP Appendix B Clearing Procedure. Evidence of implementation of the clearing procedure was discussed and observed during the audit site inspection.</p> <p>BCS have advised that they are receiving regular pre-clearing reports and that translocation of <i>Caladenia montana</i> is not required for the Project.</p>	



Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<p>locations and their translocation such as <i>Caladenia montana</i>. All work must be carried out by qualified ecologist. The next pre-clearing stage will include final inspections of the disturbance area immediately before the construction activity commences to check and physically mark any important habitat features that need to be considered when identifying exclusion zones and conducting the staged habitat removal process within the total and partial clearing zones. Document, mark and record the location of:</p> <ul style="list-style-type: none"> <li>• Large stick nests</li> <li>• Any rock features</li> <li>• Habitat/hollow-bearing trees</li> <li>• Threatened flora.</li> </ul> <p>The outcomes of the pre-clearing inspections will be reported to BCS/NPWS prior to the commencement of vegetation clearing. The report will include any fauna relocated or euthanised, including name of qualified/licensed handler, species, location notes, and release location and method.</p>				
B5	<ul style="list-style-type: none"> <li>• The boundary of the clearing limits for each disturbance zone will be clearly marked on site by a surveyor before vegetation clearing commences.</li> <li>• Exclusion zones, or 'No-Go' zones, will be clearly marked at the edge of the total clearing zones and ECZ to protect the vegetation to be retained outside the project from inadvertent direct impacts</li> <li>• Exclusion zones and the edge of the clearing boundary will be marked with high visibility fencing and signage</li> <li>• Booroolong Frog: A 50 metre exclusion zones will be marked and clearly delineated from other survey markers with signage place around the tributaries that flow downhill into the Yarrangobilly Creek, this includes the limits of clearing on the lower end of Sheep Station Creek, Cave Gully, Lick Hole Gully and Wallace Creek that are crossed by the project to protect the downstream habitat of Booroolong Frog</li> <li>• Booroolong Frog: The 50 metre exclusion zone adopted for the Main Works project on Yarrangobilly Creek, will be retained for construction of the transmission line</li> <li>• Hazard trees identified from the LiDAR assessment are to be flagged for removal, and any other adjacent and important habitat trees and features, also identified for retention and to avoid disturbance during the felling activity should also be clearly marked and included in maps within the CEMP.</li> </ul>	Biodiversity Management Plan (Rev 0.12) Appendix B Clearing Procedure dated 22/11/2023	Compliant	Requirements of Condition B5 are addressed in the BMP Appendix B Clearing Procedure. Evidence of implementation of the clearing procedure was discussed and observed during the audit site inspection.	
B6	A vegetation clearing methodology has been developed (provided as Appendix K of the revised BDAR), the methods described focus on the removal of vegetation in total and partial clearing zones. These methods will be incorporated as a vegetation clearing plan within the BMP designed to document the methods of vegetation and habitat clearing within each zone, including soil protection measures, mechanical and non-mechanical approaches, removal of habitat, protection of retained vegetation, and appropriate storage and re-use of mulch and timber to avoid disturbance of retained vegetation. Hollows logs and limbs encountered during clearing will be retained for placement within adjacent vegetation or on the maintained easement within shrub retention areas. The plan will include a requirement to prepare a post clearing report that records the final clearing extent using GPS to demonstrate whether clearing is within the approved disturbance area, and if exceeded, recalculate additional offset obligations.	Biodiversity Management Plan (Rev 0.12) Appendix B Clearing Procedure dated 22/11/2023	Compliant	Requirements of Condition B6 are addressed in the BMP Appendix B Clearing Procedure.	
B7	The vegetation clearing procedures will include provisions that any felled timber within Bargo State Forest that FCNSW determine can be repurposed will be removed off-site by FCNSW.	Biodiversity Management Plan (Rev 0.12) Appendix B Clearing Procedure dated 22/11/2023	Compliant	Requirements of Condition B7 are addressed in the BMP Appendix B Clearing Procedure.	
B8	A staged habitat removal process will be required for removal of habitat (hollow-bearing trees, habitat trees, and bushrock) Staged habitat removal minimises direct impacts on fauna by providing them with an opportunity to vacate hollows and relocate naturally. The process includes:	Biodiversity Management Plan (Rev 0.12) Appendix B Clearing Procedure, Appendix C Fauna Rescue and Release	Compliant	Requirements of Condition B8 are addressed in the BMP Appendix B Clearing Procedure, Appendix C Fauna Rescue and Release Procedure and Appendix D Unexpected Threatened Species Procedure.	



Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<ul style="list-style-type: none"> <li>If possible, avoid clearing during times when hollow-dependent fauna are breeding</li> <li>Contact vets and wildlife carers before works commence</li> <li>Ensure that licensed wildlife carers and/or ecologists are on site during habitat removal</li> <li>Adopt two staged removal clearing non-habitat first (e.g. shrubs, regrowth, ground cover and nonhabitat trees). Allow at least 24 hours for fauna to vacate habitat before removing habitat</li> <li>Ensure wildlife carers and/or ecologists are present during removal of habitat trees, and that habitat trees are felled carefully, using equipment that allows habitat trees to be lowered to the ground with minimal impact</li> <li>A procedure for the ethical handling of injured or displaced fauna is to be documented in the BMP</li> <li>Record the effort and outcomes of the habitat removal process</li> <li>Save and reuse cleared material for rehab and habitat</li> <li>Preparation of an 'Unexpected threatened species finds procedure' to be implemented during construction and operation. Applies to all activities that have potential to impact upon threatened flora and fauna species which have not already been assessed and approved. Any threatened entities found in a location previously unknown during construction or operation must be immediately notified to NPWS</li> <li>Preparation of a Fauna handling and rescue procedure to be implemented during construction and operation.</li> </ul>	Procedure and Appendix D Unexpected Threatened Species Procedure dated 22/11/2023			
<b>B9</b>	Clearance of construction areas prior to commencement of daily construction to ensure there is no wildlife present. This will involve drive through sweep of areas planned for construction, by the contractors environmental representatives. If an animal is located within the construction area during works, the Delivery Manager and Project Management Site Representative are to be notified immediately. All work must immediately cease within the immediate area of the find and a local wildlife rescue or an ecologist will be required for assistance where necessary.		Compliant	Mitigation measures are included in the BMP. It is noted there was once fauna fatality incident during the audit period however this was not of a result of mismanagement. All procedures were followed and executed as outlined in the BMP. Further detail please refer to Condition B21 of the Infrastructure Approval Tables.	
<b>B10</b>	<p>An operational Vegetation Management Plan (VMP) will be prepared by an experienced ecologist prior to commencement of project operation. The plan will focus on vegetation management within the ECZ and HTZ with the aim of maintaining long-term Vegetation Integrity targets. The VMP will interpret the vegetation integrity scores into feasible actions to maintain vegetation condition, and outline project specific ongoing vegetation clearing requirements and methodology.</p> <p>The VMP will include a strategy for maintaining the expected vegetation outcomes for all partial impact zones assessed in the revised BDAR. The strategy will:</p> <ul style="list-style-type: none"> <li>Translate the vegetation integrity (VI) scores into management actions to be applied during construction and operation of the project</li> <li>Include triggers for corrective actions</li> <li>Include details for review and reporting by a qualified ecologist in consultation with NPWS and BCS</li> <li>The VMP will be guided by Transgrid's vegetation risk model and operational vegetation clearance requirements, in addition to the principles for Integrated Vegetation Management (IVM) which will aim to preserve future Vegetation Integrity scores within the ECZ</li> <li>Long-term monitoring will be conducted to measure the effectiveness of the VMP. The methods and timing of the monitoring will be documented in the VMP and will include a responsibility to report the results to BCS and NPWS</li> <li>The VMP will detail methods for vegetation maintenance in the ECZ with a focus on retaining plant species diversity and cover of low understorey and groundcover plants &lt;200mm, while tree and shrub regrowth will be suppressed for long-term easement management</li> </ul>		Not triggered	An operational Vegetation Management Plan is not required to be prepared during this audit period.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<ul style="list-style-type: none"> <li>The VMP will detail methods of maintenance in the HTZ with a focus on retaining all non-hazard trees, as well as shrubs, grasses, and forbs. Ongoing inspection (using Lidar, and follow-up on foot or drone) of hazard trees will occur and document the method of removal for each tree to ensure that non-hazard trees are not impacted during tree felling. Where threatened orchids are mapped (Caladenia montana), hazard trees will be sensitively removed to avoid impacting on the ground layer. This will include removing trees from the top down and cutting into small sections, transferring into the ECZ and mulching</li> <li>The VMP will address measures required to minimise fire risk during operation of the project.</li> </ul>				
<b>B11</b>	<p>A Soil and Water Management Plan (SWMP) will be prepared and implemented as part of the CEMP. The plan will include stringent controls to mitigate impacts of runoff and sediment transfer from the project area during construction and operation. Control measures will remain in situ until site stabilisation completion criteria are met. The plan will ensure protection of aquatic habitat in the tributaries crossed by the project, and particularly aimed at protecting the habitat for the Booroolong Frog associated with Yarrangobilly Creek.</p> <p>An assessment of the current sediment basin design for the Main Works project will occur, to determine if the design specifications are suitable for the additional sediment load expected during construction of the easement. Where modification or augmentation is required, sediment basins will be increased in size to cope with any additional expected sediment load.</p> <p>Sedimentation will be managed through implementation of effective sediment control management plans will be implemented to ensure that sediment does not enter the waterways and result in changes to the habitat structure of riparian areas or areas downstream of the project area. Effective control measures will include:</p> <ul style="list-style-type: none"> <li>Erosion and sediment control plans for all stages of construction</li> <li>The implementation of sediment control measures across the project area - sediment control ponds and sediment basins, coir logs and sediment fencing to control sediment run-off, catch drains and perimeter bunds and diversion drains</li> <li>A schedule will be included for cleaning sediment basins with intervals to be informed from the outcomes of monitoring basins from Snowy 2 Main Works construction and catchment modelling. The schedule will include additional checks after rainfall events of &gt;50 mm in 24 hours</li> <li>Additional or supplementary control measures (i.e. sediment fencing, diversions, and detention ponds) will be implemented at high risk areas such as the bridge crossings at Sheep Station Creek, Cave Gully and Wallaces Creek and at structures sites and access roads on the slopes around Yarrangobilly Creek and associated tributaries</li> <li>Additional water quality monitoring points will be installed and monitored in locations to be agreed with NPWS and BCS, which are downhill of the construction footprint and upstream of Booroolong Frog habitat. An adaptive monitoring plan will be developed to trigger a rapid response if sediment loads detrimental to Booroolong frog are detected</li> <li>Runoff from spoil piles will be managed through the above listed control measures to ensure that there is no contamination or sediment entering waterways or adjacent areas</li> <li>Accidental spills will be reported to the contractors environmental representative as soon as the incident is observed so that the site can be remediated rapidly</li> <li>Implementation of tannin leachate management controls may be required as determined by the monitoring program</li> <li>Sediment traps or filters (targeting removal of coarse sediment) will be maintained at all discharge locations and will be monitored and maintained as per the scheduled requirements</li> <li>Other source controls, such as mulching, matting and sediment fences may be used in consultation with BCS and NPWS and need to be approved in the CEMP and any deviation from measures by DPE will need to be sought. Similarly, natural erosion</li> </ul>	Soil And Water Management Plan (Rev 0.09) dated 24/11/2023	Compliant	A SWMP has been prepared and addresses the requirements of Condition B11.	

**Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))**

Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<p>controls incorporating organic materials, micro water capture and contour shaping will need to be approved in the CEMP where appropriate</p> <ul style="list-style-type: none"> <li>Disturbed areas will be stabilised and rehabilitated to reduce erosion potential (i.e. exposure period of bare earth). This will be particularly important for revegetation of slopes as soon as possible, in accordance with the rehabilitation plan. Landscaping of pervious surfaces using native indigenous species only. Soil loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder)</li> <li>Any imported fill will be certified at source locations to ensure it is pathogen and weed free Excavated Natural Material or Virgin Excavated Natural Material)</li> <li>An induction protocol will be mandatory for all personnel involved in construction and operation works</li> <li>There needs to be acknowledgement of imported material e.g. road base being washed off tracks etc in the surrounding environment and how that will be dealt with.</li> </ul>				
<b>B12</b>	<p>To prevent an increase in weeds and disease pathogens in adjacent vegetation the following will be carried out:</p> <p>A Weed control and monitoring programs will be developed and documented in the BMP in consultation with BCS and NPWS and any deviation from measures approved by DPE are to be raised and approved. The program will include adaptive management strategies for priority weed species during construction, and early operational phase. The details of the monitoring program will be determined during the preparation of the BMP and follow the principles outlined in Section 11.2 of the revised BDAR (Appendix C)</p> <ul style="list-style-type: none"> <li>Identify all weed species in KNP in consultation with NPWS. Priority weeds species in Bago State Forest are consistent with high threat weeds</li> <li>Identify, map, and remove all weeds before clearing for construction, and record location of weed and sprayed area for use in ongoing weed monitoring and management programs.</li> <li>Prepare a vehicle and machinery hygiene strategy and implement during construction and operation. The strategy will include specific locations, timing and methods for removing soil and plant matter from vehicles and machinery. Ensure vehicle and machinery hygiene measures in the strategy are applied during construction and operation</li> <li>During the clearing works, weeds will be disposed and managed appropriately to stop the spread of weed species</li> <li>Wash down stations will be constructed at suitable locations to wash down vehicles and employee shoes to stop the spread of weeds, pathogens (including amphibian chytrid fungus, <i>Phytophthora cinnamomi</i> and exotic rust fungi) and the introduction of new species</li> <li>During construction, any biosecurity issues identified are to be reported to FCNSW and NPWS immediately.</li> </ul>	<p>Biodiversity Management Plan Appendix H Weed and Pathogen Control Monitoring Program (Rev 0.10) dated 22/11/2023</p>	<p>Compliant</p>	<p>Requirements of B12 are addressed in the Biodiversity Management Plan Appendix H Weed and Pathogen Control Monitoring Program</p>	
<b>B13</b>	<p>To prevent an increase in predatory and pest species the following will be carried out:</p> <ul style="list-style-type: none"> <li>Personal waste / refuse generated during construction will be stored appropriately in inaccessible bins and disposed at appropriate waste disposal facilities off-site. Any personal waste generated during operation will be removed from the site (including substation) and disposed in an appropriate waste facility.</li> <li>A feral animal monitoring program will be developed and implemented as described in Section 11.2 of the revised BDAR (Appendix C)</li> <li>Based on performance triggers for adaptive management. It will be important to share data with NPWs and State Forests. Increased predator activity will trigger the need for predator control based on performance measures to be outlined in the BMP. Control will be done in consultation with NPWS and DPE - State Forests.</li> </ul>	<p>Biodiversity Management Plan Appendix I Pest and Predator Monitoring Program (Rev 0.08) dated 22/11/2023</p>	<p>Compliant</p>	<p>Inaccessible bins were observed onsite during the site audit inspection. Waste originating from the Eastern Project alignment is exported to Bellettes Landfill (EPA Licenced Facility) and waste from the Project West is exported to Forest Hill Liquid Waste Storage and Transfer Station which is operated by JJ Richards and Sons.</p> <p>A Pest and monitoring Program has been prepared for the Project and is included as Appendix I in the BMP. Monitoring of feral pests has commenced during the audit period. SLR have been engaged to undertake the quarterly reports for the Pest &amp; Predator Monitoring. The first two reports are currently in progress (B. Toohey pers. comm).</p>	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
B14	<p>The extensive survey data for this project, and the Main Works EIS will be utilised to identify specific bird and bat populations that are at risk of collision and electrocution. E.g. For higher risk species deploy species specific bird divertors, with day/night reflectors within approved buffer distance, along key sections of transmission line. This will be appropriate for diurnal and nocturnal birds The BMP to include adaptive management for high-risk bird and bat species as outlined below with intervals and strategies to be determined in consultation with NPWS:</p> <ul style="list-style-type: none"> <li>Regular monitoring within the transmission line easements for evidence of bird / bat collision with transmission lines (intervals to be determined in consultation with NPWS)</li> <li>Monitoring of taller structures for evidence of raptor nest building</li> <li>Develop target trigger for number of high-risk species incidents</li> <li>Deploy species specific bird / bat divertors / reflectors in areas where a defined number of incidents have occurred.</li> </ul>	Biodiversity Management Plan Appendix K Bird and Bat Management Plan (Rev 0.06) dated 22/11/2023	Compliant	Requirements of Condition B14 are addressed in the BMP Section 5.13 and Appendix K Bird and Bat Management Plan.	
B15	<p>To reduce light impacts the following will be implemented:</p> <ul style="list-style-type: none"> <li>Directional lighting will be used for any permanent lighting required (i.e. substation) to minimise light spill</li> <li>Artificial lighting required during construction in the early morning and late afternoon in winter will be limited to within approved construction hours.</li> </ul>		Compliant	No permanent lighting has been installed during the audit period. Works and lighting has been limited to approved construction hours (B. Toohey pers. comm).	
B16	The barbed wire/razor wire fencing installed around the substation switchyard will have improved visibility measures installed, such as adding visible objects to the fence, for example tape, plastic flags, and metal tags.		Not triggered	No barbed or razor wire has been installed around the substation switchyard during the audit period (B. Toohey pers. comm)	
B17	The ECZ will be maintained as per the VMP, with the preservation of low ground cover vegetation to provide cover for small ground-dwelling fauna and birds to cross the easement		Not triggered	Preparation of the VMP has not been triggered during this audit period.	
B18	Vehicle movements on newly formed access tracks will be limited to 20km/h speed limit implemented to reduce the risk of vehicle strike to fauna.		Compliant	Vehicle limits were sighted during the site audit inspection.	
B19	All tree pruning operations will be carried out in accordance with the Australian Standard AS4373-2007 Pruning of Amenity Trees.	Clearing and Grubbing Environmental Work Method Statement 02/08/2024	Compliant	Zero non-compliance's were reported in relation to tree pruning operations during the audit period. Tree pruning operations are carried out following relevant Environmental Safety work Method Statements.	
Aboriginal Heritage					
AH1	Where possible, impacts to identified Aboriginal sites will be avoided.		Noted		
AH2	<p>A CHMP and accompanying unexpected finds procedure will be prepared, to guard against inadvertent impacts to Aboriginal objects during construction. The CHMP will specify that project works will be restricted to the disturbance area. It will include provisions to ensure workers are made aware of cultural heritage places and their value, for example through project inductions. The CHMP will include provisions to guard against indirect impact to AHIMS# 56-6-0477 and provide a method to manage potential heritage constraints and unexpected finds during construction.</p> <p>The long-term storage of any recovered Aboriginal objects will be developed during the completion of the CHMP, in consultation with the RAPs, but is likely to include (in preferential order):</p> <ul style="list-style-type: none"> <li>Re-burial on site, in an appropriate location in the vicinity of the project</li> <li>Lodged with a RAP under a Care and Control Agreement</li> <li>Deposition with the Australian Museum.</li> </ul>	Aboriginal Heritage Management Plan (Rev 0.06) dated 2/08/2023	Compliant	Confirmed during the Initial Construction Audit, an Aboriginal Heritage Management Plan (AHMP) has been prepared and forms part of the Heritage Management Plan for the Project. The AHMP addresses all requirements outlined in Condition AH2.	
AH3	<p>Salvage collection of surface artefacts, will be carried out prior to construction, at ST PAD 01 and ST PAD 02, ST PAD 03, Str5 AS, AHIMS# 56-6-0540, and AHIMS# 56-6-0048 and AHIMS# 56-6—0477 (if required) with the RAPs. Surface collection will be undertaken using the following method:</p> <ul style="list-style-type: none"> <li>Artefact collection will be undertaken by a team comprising an archaeologist and RAP representatives</li> <li>Artefact locations will be marked on the ground and recorded with a hand-held GPS (or equivalent) prior to collection</li> </ul>	Maragle Switching Station and Transmission Line Connection Works Site Collection Report dated March 2024	Compliant	Confirmed during the Initial Construction Audit a program of surface collection was completed for associated Aboriginal sites and reported.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<ul style="list-style-type: none"> <li>Collected artefacts will be catalogued on site by the team, with recorded attributes as listed for the test excavation analysis</li> <li>Artefacts will be placed in individual bags, labelled with location information</li> <li>Following the completion of the surface collection program, a brief report will be prepared which outlines the results of the program.</li> </ul>				
AH4	In the event that a site or artefact (as defined by the NPW Act or Heritage Act) is identified during construction works, works will cease at the location and no further harm to the object will occur. The find will be immediately reported to TransGrid, and the regulator in accordance with legislation. No work will commence in the vicinity of the find until any required approvals have been given by the regulator. In the event that skeletal remains are encountered during the activity, works must stop immediately, the area secured to prevent unauthorised access and TransGrid, NSW Police and Heritage NSW contacted.	Track 6 Unexpected Find Notification Email Correspondence dated 22/03/2024 Tower 6, Track 6a Unexpected Find Notification General Correspondence dated 19/03/2024	Compliant	Two unexpected Aboriginal heritage finds were identified during this audit period. Unexpected finds were appropriately managed in accordance with Condition AH4. No skeletal remains have been identified to date. Further detail refer to Condition B24 of the Infrastructure Approval Table.	
AH5	If changes are made to the project to include impacts outside the disturbance area, further archaeological investigation will must be conducted		Not triggered	No changes to the Project to include impacts outside the disturbance area were determined during the audit period (J. Snape pers. comm).	
Non-Aboriginal Heritage					
NH1	During detailed design, if the disturbance area changes but is still within the project area, a consistency assessment will be prepared to confirm if impacts are consistent with the EIS.		Not triggered	No significant changes to the Project design have occurred from what was assessed in the EIS.	
NH2	A historic and natural heritage management plan will be prepared for the project, which clearly outlines the extent of impact to each recorded historic heritage item within the disturbance area and potential impacts to those sites located within the broader project area. The plan should clearly outline measures for their protection (where applicable) and details of further investigation and archaeological archival recording where appropriate.	Historic Heritage Management Plan (Rev 0.08) dated 10/08/2023	Compliant	Confirmed during the Initial Construction Audit, a Historic Heritage Management Plan has been prepared and forms part of the Heritage Management Plan for the Project. The Historic Heritage Management Plan addresses all requirements outlined in Condition NH2.	
NH3	If archaeological excavations are required: <ul style="list-style-type: none"> <li>Transgrid will nominate a suitably qualified and experienced historical archaeologist to manage the historical archaeological program. This person must fulfil the Heritage Council’s Excavation Director Criteria 2019 for the excavation of locally significant archaeological sites</li> <li>Archaeological Research Design and Excavation Methodology will be prepared to guide the archaeological program. It will be prepared according to Heritage Council of NSW guidelines. The methodology will be submitted for comments to the Heritage Council of NSW (or its delegate) and approval by DPE prior to the commencement of archaeological excavation</li> <li>A final archaeological excavation report will be prepared within 12 months of the completion of archaeological excavation. It will include details of any significant artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity by the land owner. Copies of the final excavation report will be provided to DPE, the Heritage Council of NSW and to the local Council’s local studies unit.</li> </ul>		Not triggered	No historical (non-Aboriginal) heritage archaeological excavation activities were required during this audit period (J. Snape pers. comm).	
NH4	All heritage items within the disturbance area that are to be impacted by the project will be subject to archival recording and archaeological excavations prior to the commencement of works. If these sites have been entirely destroyed by the Snowy 2.0, then the mitigation measures relating to archival recording and archaeological excavations will not apply.	Historic Management Actions Report (Draft) by Navin Heritage Consultants dated 03/10/2024	Compliant	Confirmed during the Initial Construction Audit, further assessments were undertaken to determine heritage management actions. Archival recordings were only required to be undertaken R56 and R120. Archival records are included in Appendix 3 of the Post Approvals Historic Management Actions Report.	
NH5	If the construction of the project will destroy or directly impact the R45 (Lobs Hole Copper Mine Water Race), archival recording and archaeological excavation must occur prior to the commencement of construction.	Historic Management Actions Report (Draft) by Navin Heritage Consultants dated 03/10/2024	Compliant	Confirmed as part of the Initial Construction Audit, archival recordings were only required to be undertaken R56 and R120. Archival records are included in Appendix 3 of the Post Approvals Historic Management Actions Report.	
NH6	In the event that a site or artefact (as defined by the NPW Act or Heritage Act) is identified during construction works, works will cease at the location and no further harm to the object will occur. The find will be immediately reported to TransGrid, and the regulator in accordance with legislation. No work will commence in the vicinity of the find until any required approvals have been given by the regulator. In the event that skeletal remains are encountered during the	Track 8 Unexpected Find Notification General Correspondence dated 17/04/2024	Compliant	A single unexpected historical (non-Aboriginal) heritage find was identified during this audit period and was appropriately managed in accordance with this commitment. No skeletal remains have been identified to date. Further detail refer to Condition B24 of the Infrastructure Approval Table.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	activity, works must stop immediately, the area secured to prevent unauthorised access and TransGrid, NSW Police and DPIE contacted.				
<b>Water</b>					
<b>W1</b>	<p>The waterway crossing over flood impacted waterways such as Sheep Station Creek will be designed and constructed in a way that minimises flood risk and minimises upstream and downstream impacts. The waterway crossing will be designed to ensure flow and drainage is maintained in waterways where construction works are taking place or where the permeant waterway crossing will be. The waterway crossing will be constructed in accordance with minimum design criteria for waterway crossings outlined in Why do fish need to cross the road? Fish passage requirements for waterway crossings (Fairfull and Witheridge, 2003).</p> <p>The design of waterway crossing will also consider the appropriate measures are outlined in:</p> <ul style="list-style-type: none"> <li>Forest Soil and Water Protection – A Guide for Operators (State Forests of NSW, 2000)</li> <li>Fire Trail Design, Construction and Maintenance Manual (RFS, 2017).</li> </ul> <p>All new waterway crossings, construction and rehabilitation of works near or within watercourses be accordance with the requirements of the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).</p>	SLR Letter -Snowy 2.0 Sheep Station Creek Bridge Crossing - v3.0 dated 26/08/2024	Compliant	<p>During the audit period UGL engaged SLR to undertake a compliance review of the design of the temporary and permanent bridge over Sheep Station Creek. The permanent design addressed all requirements outlined in Why do fish need to cross the road? Fish passage requirements for waterway crossings (Fairfull and Witheridge, 2003).</p> <p>The review conducted by SLR indicated that the centreline elevation of the permanent bridge indicates that there is no material reduction in waterway area. Based on the previous flood modelling results, the addition of the structure will not materially alter flood levels or depths of flow. Since the bridge clear spans the creek channel, there will also not be any alteration of velocity or flow distribution.</p> <p>During the site audit inspection appropriate erosion and sediment controls were observed to be installed for the works occurring at Sheep Station Creek.</p>	
<b>W2</b>	<ul style="list-style-type: none"> <li>Flood modelling will be undertaken at the detailed design stage to define flood behaviour for the existing conditions due to mainstream and overland flooding. The flood models will be utilised to identify and address potential impacts of the proposed works for construction and operation of the project on flooding</li> <li>Overland flooding impacts will be considered during detailed design, to ensure that the substation’s drainage and stormwater system is adequate, and the substation's platforms are above the required flood immunity</li> <li>Structures within the flood extent will be designed with appropriate foundation to ensure stability against hydrostatic pressure and debris load.</li> </ul>	SLR Letter -Snowy 2.0 Sheep Station Creek Bridge Crossing - v3.0 dated 26/08/2024	Compliant	<p>Consistent with Condition W1, flood modelling has been undertaken by SLR to enable identification of any potential impacts from and to Sheep Station Creek Bridge as a result of flooding.</p> <p>Flooding impacts will be considered during the detailed design of the substation however the design has not been finalised during the audit period (B. Toohey pers. comm)</p>	
<b>W3</b>	<p>A SWMP will be prepared and implemented prior to and during construction. During the preparation of SWMP, Transgrid will working closely with the EPA in developing and designing key sediment and erosion controls as to prevent any change to the existing baseline surface water quality within and adjoining the project area.</p> <p>The SWMP will include:</p> <ul style="list-style-type: none"> <li>Erosion and sediment control plans for all stages of construction that will be submitted for approval prior to its implementation. Initially the principal SWMP will be prepared, and it will be followed by the Progressive SWMP that will be regularly updated during the construction phase to take into consideration changes that may occur that require revised erosion and sediment controls</li> <li>Details on the construction and management of sediment basin if determined to be required</li> <li>Protection of waterways such as scour protection, stabilisation and revegetation</li> <li>Any imported fill will be certified at source locations as pathogen and weed free Excavated Natural Material or Virgin Excavated Natural Material)</li> <li>Management of stockpiles and spoil</li> <li>Tannin leachate management controls</li> <li>Management of accidental spills, response and reporting</li> <li>An induction protocol</li> <li>Responsibilities for all management measures.</li> </ul> <p>All erosion and sediment control measures will be designed, implemented, progressively rehabilitated and maintained in accordance with relevant sections of Managing Urban Stormwater: Soil and Construction Volume 1 (Landcom, 2004) ('the Blue Book') (particularly Section 2.2) and Managing Urban Stormwater: Soil and Construction Volume 2A – Installation of Services (DECC, 2008).</p>	<p>Soil And Water Management Plan (Rev 0.09) dated 24/11/2023</p> <p>PESCP Register</p> <p>Track 12 Pad 17 ESCP Mark Ups dated 02/04/2024</p> <p>Access Road and Stockpile ESCP no date</p> <p>Track 2 Pad 12 and 13 ESCP Mark Ups dated 25/07/2024</p>	Compliant	<p>Confirmed as part of the Initial Construction Audit, the SWMP and primary ESCP addresses all requirements outlined by this condition.</p> <p>An ESCP (sighted) has been prepared for the Project and is incorporated within the SWMP. The ESCP documents the planned measures to minimise erosion and control sediment generation. Progressive ESCPs have also been prepared to accompany the Primary ESCP. The progressive ESCPs are updated regularly based on changes to site conditions and can take the form of “red line” mark ups of drawings. A register is maintained onsite (sighted) documenting any revisions to the progressive ESCPS.</p> <p>During the site inspection erosion and sediment controls were observed to be in place across the site as per the Progressive ESCPs. Controls observed included (but were not limited to) catch drains and diversion drains and bunds, sediment basins, sediment sumps, mulching and soil binders for scour protection, geofabric liners for scour protection, stabilised site access points and sediment fences.</p>	



Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
W4	<p>A water quality monitoring program will be developed as part of the SWMP as described in Appendix E. It will be developed and implemented to gain an appreciation of background water quality, to observe any changes in surface water quality that may be attributable to the project and inform appropriate management responses.</p> <p>The surface water quality monitoring program will be carried out during the pre-construction, construction, and operational stages of the project.</p>	Water Quality Monitoring Data Field Sheets - April, May, June, July, August and September 2024	Compliant	<p>A Water Quality Monitoring program (WQMP) has been developed and is included as Appendix F of the SWMP. The WQMP documents the methodology for the implementation of a background water quality monitoring program including distribution of sampling locations, frequency and type of analytes to monitor and trigger values for determining potential environmental impact and the associated trigger action response plan (TARP). Baseline water quality monitoring was undertaken from 2022 to 2024 with reports being available on the projects website (noting results from 2024 have not been uploaded).</p>	
W5	<ul style="list-style-type: none"> <li>All chemicals or other hazardous substances will be stored in a bunded area and away from any drainage lines/pits. The capacity of the bunded area will be at least 130% of the largest chemical volume contained within the bunded area</li> <li>No refuelling or bulk herbicide preparation will occur within 40 m of natural drainage lines</li> <li>Environmental spill kits containing spill response materials suitable for the works being undertaken will be kept on site at all times and be used in the event of a spill</li> <li>Any spills will be contained, cleaned up promptly and immediately reported to the relevant site representative.</li> </ul>	Soil And Water Management Plan (Rev 0.09) dated 24/11/2023	Compliant	<p>Confirmed during the Initial Construction Audit relevant mitigation measures are considered in the SWMP.</p> <p>It was observed during the site audit inspection chemicals were stored within bunded containers.</p> <p>In response to a Recommendation included in the Initial Construction Audit the generator located near an unnamed drainage line in the Temporary Maragle Construction Compound has been removed.</p> <p>During the audit period spill kits were observed at various locations across the site. Spill kits were observed to contain required materials to assist in the event of a spill.</p>	
W6	<ul style="list-style-type: none"> <li>The SWMP will include arrangements for managing wet weather events, including monitoring of potential high risk events (such as storms) and specific controls and follow-up measures to be applied in the event of wet weather</li> <li>Where required, adequate sediment controls (including the consideration of sediment basins) will be included in the access track design to manage erosion and sedimentation and associated impacts on receiving waters.</li> </ul>	Soil And Water Management Plan (Rev 0.09) dated 24/11/2023	Compliant	<p>Confirmed during the Initial Construction Audit relevant mitigation measures are considered in Section 5 of the SWMP and Section 5 of the ESCP. It was also confirmed ESCs for access tracks are documented within the Progressive ESCPs for the Project.</p> <p>During the site audit inspection adequate sediment controls were observed to be installed along inspected access tracks.</p>	
W7	<p>For the Snowy 2.0 T2 Tailbay site and Paddys River water uptake site:</p> <ul style="list-style-type: none"> <li>A water extraction licence will be sought prior to the extraction of any water from Talbingo Reservoir and the Paddy's River</li> <li>Prior to extraction of water near Paddy's River Flat Campground, rubber mats will be placed on the ground under the water trucks to prevent erosion and sediments entering the waterway</li> <li>During water extraction from Talbingo Reservoir and Paddy's River, slow velocities of water pumping and screens on the hoses will be used to minimise small aquatic fauna been inadvertently picked up.</li> </ul>	<p>Non-Compliance Notification – Water Access Licence Detailed Report dated 07/08/2024</p> <p>UGL Water Access Licence Detailed Investigation Report 07/08/2024</p>	Non-compliant	<p>Confirmed during the Initial Construction Audit the Project only holds two water access licences which include:</p> <ul style="list-style-type: none"> <li>WAL44782</li> <li>WAL44788.</li> </ul> <p><b>However, during the audit period surface water was taken from Paddy's River pursuant to WAL 44762 but without a water allocation.</b> UGL were unaware that WAL44782 was designated under an 'Unregulated River' category of access licence, which has a zero-share component of water take from the Tumbarumba Water Source under the Water Sharing Plan for the Murray Unregulated River Water Sources 2024 (NSW). Water was extracted from the Paddys River Fill Point, using water carts, on the 14 February (Outside Audit Period) and ceasing on the 31 May (Within Audit Period). During this time, 0.6ML of water was extracted from the Paddys River Fill Point.</p> <p>During the audit period rubber mats were observed to be available on site.</p>	NC - 10
W8	<p>Temporary dewatering for construction is not anticipated. In the event that dewatering is required then the following management measures will apply:</p> <ul style="list-style-type: none"> <li>Confirmation of whether or not a licence under the WM Act as defined under the NSW Aquifer Interference Policy (DPI Water, 2012) is required prior to any dewatering activity commencing</li> <li>Should the amount of water extracted be more than 3 ML/year, a water access licence will be obtained</li> <li>If dewatering is required, the management of discharge water will be documented in the SWMP Discharge water will be limited to vegetated, grassed areas, away from waterways, and within the construction footprint. If the discharge water is highly turbid, dewatering through a filter sock (or similar), or via transportable sedimentation tanks will be considered, where appropriate, to minimise sedimentation.</li> </ul>	Soil And Water Management Plan (Rev 0.09) dated 24/11/2023	Compliant	<p>Confirmed during the Initial Construction Audit, the management of discharge water is included in the SWMP alongside a Water Irrigation and Disposal Permit which is included as Appendix I.</p> <p>During this audit period no dewatering of groundwater has occurred (B. Toohey pers. comm).</p>	
W9	A flood management plan (FMP) will be prepared for the project and will detail the processes for flood preparedness, materials management, weather monitoring, site management and flood incident management.	Emergency Plan (Rev 0.07) dated 25/06/2024	Compliant	Confirmed during the Initial Construction Audit Flood management has been addressed in the Emergency Plan for the Project and addresses all of the requirements outlined by this condition.	



Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	The FMP will also address procedures and responsibilities for flood response (preparation of site upon receipt of flood warning, evacuation of site personnel) during and recovery following a flood event.				
W10	Waterway crossing and access tracks will be inspected as part of the maintenance inspections to ensure all crossings remain in good condition.	Soil And Water Management Plan (Rev 0.09) dated 24/11/2023 Maragle Compound, Switchyard Pad and laydown, Track 9 and 12 Pre- Rainfall Inspection Checklist dated 28/05/2024 Maragle Compound, Switchyard and Substation Post-Rainfall Inspection Checklist dated 12/06/2024 Maragle Switchyard, Substation & Laydown area Environmental Inspection Weekly Checklist dated 25/04/2024	Compliant	Confirmed during the Initial Construction Audit monitoring requirements for soil and water management including waterway crossings and access tracks is included in Table 6-1 of the SWMP. During the audit period it was observed that waterway crossings have been considered within the pre-rainfall inspection checklists (sighted). It is noted however that Waterway crossings are not included as standard monitoring compliance measures on the weekly inspection checklist nor the post-rainfall checklist and access tracks are not included as standard monitoring compliance measures on the pre- and post-rainfall inspection checklists nor on the weekly inspection checklist.  <b>Recommendation: It is recommended that the environmental inspection weekly checklist and the pre- and post- rainfall inspection checklists are updated to include a compliance measure relating to the conditions and controls installed around waterway crossings and access tracks to prompt staff completing these inspections to check all tracks and crossings remain in good condition.</b>	
<b>Land</b>					
L1	Targeted geological investigations will be undertaken in areas of surface disturbance using a risk-based approach. Results from these investigations will determine the level of management to be implemented for soils and contamination (including NOA).	Soil And Water Management Plan (Rev 0.09) Appendix A Spoil Management Plan dated 24/11/2023 Transgrid Email Correspondence Maragle Switchyard Positive Phytophthora Result dated 02/05/2024	Compliant	During the audit period UGL have undertaken a detailed baseline pathogen testing program. Testing was undertaken in the switchyard, specific locations in the West and from Towers 1-8 in the East. UGL have not conducted sampling for NOA during the audit period as works undertaken occur outside mapped NOA areas (B. Toohey pers. comm)..	
L2	A contaminated land management plan will be prepared prior to construction works commencing. It will include management measures to <ul style="list-style-type: none"> <li>Manage areas of known or potential contamination that will be impacted during construction</li> <li>Manage unexpected finds in the event that unexpected contamination sources are identified (including NOA). This will include guidance on identifying potential contaminated land characteristics (visual, odours, etc), steps to cease works in the affected area, further investigation to assess the extent, magnitude and type of contaminants and appropriate remedial actions.</li> </ul>	Soil And Water Management Plan (Rev 0.09) Appendix H Contaminated Land Management Plan dated 24/11/2023	Compliant	Confirmed during the Initial Construction Audit, a Contaminated Land Management Plan has been included in the Soil and Water Management Plan and is listed as Appendix H. The Contaminated Land Management addresses the requirement outlined in Condition L2.	
L3	<ul style="list-style-type: none"> <li>Further assessment will be carried out during the geotechnical investigation for the project to verify the presence/absence of NOA within the NOA risk zones. Should NOA be detected, a NOA management plan will be prepared and implemented to guide the handling, transport and disposal of the material</li> <li>NOA awareness training will be provided to all staff and contractors working in areas with NOA risk</li> <li>If asbestiform and/or indicator minerals and/or textures are encountered or suspected during excavation works, work is to stop in the area and management be alerted. The area will be isolated with a 10 metre exclusion zone and sign posted, access will be restricted and specialist geological and occupational hygiene advice will be sought prior to further progressing work in that area.</li> </ul>		Compliant	UGL have not conducted sampling for NOA during the audit period as works undertaken occur outside mapped NOA areas (B. Toohey pers. comm).	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
L4	<p>A spoil management strategy will be prepared for the project. The spoil management plan will outline appropriate management procedures for the generation, management and importation (if required) of spoil. It will include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Confirming spoil quantities</li> <li>• Carrying out appropriate assessments, including geotechnical investigations</li> <li>• Procedures for classification of spoil</li> <li>• Identification of spoil reuse measures, including segregation of soils as subsoils and topsoils</li> <li>• Spoil stockpile management procedures including minimising the number of stockpiles, area and time they are exposed, and locating stockpiles away from drainage lines and natural waterways and from where they will be susceptible to erosion</li> <li>• Spoil haulage routes</li> <li>• Spoil disposal and reuse locations</li> <li>• Imported spoil sources and volumes.</li> </ul>	Soil And Water Management Plan (Rev 0.09) Appendix A Spoil Management Plan dated 24/11/2023	Compliant	Confirmed during the Initial Construction Audit, a Spoil Management Plan has prepared for the Project and addresses all of the requirements outlined in Condition L4.	
L5	<p>Management of topsoil stockpiles and other excavated material stockpiles to minimise dust and sediment in runoff will include:</p> <ul style="list-style-type: none"> <li>• Minimising the number of stockpiles, area and time they are exposed</li> <li>• Locating stockpiles away from drainage lines and natural waterways and from where they will be susceptible to erosion</li> <li>• Stockpiles will be bunded in accordance with the Blue Book (Landcom, 2004) Managing Urban Stormwater – Soils and Construction, Volume 1, 4th Edition)</li> </ul> <p>Stabilise stockpiles, establish sediment controls and suppress dust as required.</p>	Soil And Water Management Plan (Rev 0.09) dated 24/11/2023	Compliant	Confirmed during the Initial Construction Audit, Stockpile management requirements are included in Section 5.2 of the Primary Erosion and Sediment Control Plan. During the site audit inspection stockpiles were observed to be managed appropriately.	
L6	<p>Excavated material will be managed in accordance with the spoil management strategy.</p> <ul style="list-style-type: none"> <li>• Where applicable, excess spoil will be re-used for other elements of the project such as access track construction. Where spoil cannot be reused it will be managed as per the SWMP. Alternatively, excess material will be disposed of at other suitable locations (including at Ravine Bay, GF01, Main Yard or other Snowy 2.0 approved emplacement areas) as agreed to with NPWS, FCNSW.</li> <li>• Material which has been assessed as not suitable for reuse on land or for subaqueous disposal at the Ravine Bay, GF01, Main Yard or other Snowy 2.0 approved emplacement areas (as part of the Snowy 2.0 management procedure) or cannot be reused will be classified in accordance with the Waste Classification Guidelines (EPA, 2014). Excavated material will be transported to an appropriate excavated material disposal area. Approval will be obtained prior to transport and will require an estimate of the likely volume of excavated material to be disposed</li> </ul>	Soil And Water Management Plan (Rev 0.09) Appendix A Spoil Management Plan dated 24/11/2023	Compliant	Confirmed as part of the Initial Construction Audit, the Spoil Management Plan addresses all of the requirements outlined in this condition.	
L7	Excavated material to be disposed in the spoil emplacement locations (including Ravine Bay, GF01, Main Yard or other Snowy 2.0 approved emplacement areas) will be transported to the emplacement area by TransGrid and/or contractor and then managed by Snowy Hydro in accordance with the relevant approved Snowy 2.0 Rehabilitation Plan prepared by Snowy Hydro.	<p>Spoil Movement and Placement Permit Register</p> <p>Spoil Movement and Placement Permit SMP-004 dated 23/04/2024</p> <p>Spoil Movement and Placement Permit SMP-004 dated 08/10/2024</p>	Compliant	All spoil has been used either to assist in the construction of temporary or permanent infrastructure for the development (Permit SMP-004 sighted) or has been transported to the Main Works Temporary Stockpile (Emplacement Area) (Permit SMP-001 sighted) which is intended to supplement the Snowy Hydro 2.0 Main Works final rehabilitation requirements.	
L8	The CEMP will include measures to identify and report any newly identified geodiversity sites. It will also include measures to minimise impacts to known geodiversity sites	Construction Environmental Management Plan - Maragle 330kV Switching Station and 330kV Transmission Line Connections dated 6/08/2024	Compliant	<p>Confirmed during the Initial Construction Audit measures considering geodiversity sites have been included in relevant sub-plans.</p> <p>In response to an Opportunity for Improvement identified in the Initial Construction Audit, Transgrid notes no updates to the CEMP are required as relevant measures are included in the SWMP and HMP.</p>	

**Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))**

Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
L9	<p>A Rehabilitation Plan will be prepared in consultation with NPWS and FCNSW to guide the long term rehabilitation of the project. The rehabilitation plan will be based on the rehabilitation strategy outlined in Section 5.4.10 and will:</p> <ul style="list-style-type: none"> <li>• Include a detailed plan for rehabilitation of the site</li> <li>• Characterise the soil types within the disturbance area</li> <li>• Include details of soil management measures, including</li> <li>• Topsoil stripping and stockpiling procedure</li> <li>• Subsoil management measures</li> <li>• Soil reinstatement methodology which includes a topsoil application procedure</li> <li>• Include measures to minimise:</li> <li>• Loss of soil</li> <li>• Loss of organic matter, nutrient and soil decline</li> <li>• Compaction</li> <li>• Consideration of how rehabilitation will be carried out where soils are unable be recovered, or soils are poor/unfit for re-use</li> <li>• Include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the sites, and triggering any remedial action (if necessary)</li> <li>• Describe the measures that would be implemented to:</li> <li>• Comply with the rehabilitation objectives and associated performance and completion criteria</li> <li>• Progressively rehabilitate the site</li> <li>• Include a program to monitor and report the effectiveness of these measures.</li> </ul>		Not triggered	Rehabilitation Management Plan is currently being prepared (J. Snape pers. comm).	

**Transport**

T1	<p>A CTMP will be prepared and implemented and will include</p> <ul style="list-style-type: none"> <li>• Confirmation of haulage routes</li> <li>• Measures to maintain access to local roads, and maintain the capacity of existing roads where possible</li> <li>• Site specific traffic control measures (including signage) to manage and regulate traffic movement</li> <li>• Requirements and methods to consult and inform the local community of impacts on the local road network due to the development-related activities</li> <li>• Consultation with TfNSW, and Snowy Valleys Council, NPWS, FCNSW and Snowy Hydro’s contractors</li> <li>• The investigation of alternative routes to avoid transport through Batlow through the use of roads owned by FCNSW</li> <li>• Consultation with the emergency services to ensure that procedures are in place to maintain safe, priority access for emergency vehicles and emergency management activities</li> <li>• Access to construction sites including entry and exit locations and measures to prevent construction vehicles queuing on Elliott Way</li> <li>• A response plan for any construction related traffic incident</li> <li>• Monitoring, review and amendment mechanisms</li> <li>• Individual traffic management requirements at each phase of construction</li> <li>• Measures to minimise the number of workers using private vehicles travelling to and from project area west</li> </ul>	Traffic And Transport Management Plan (Rev.018) dated 14/06/2024	Compliant	Confirmed during the Initial Construction Audit, a Transport and Traffic Management Plan (TTMP) has prepared for the Project and addresses all of the requirements outlined in Condition T1. The TTMP has been revised during the audit period. Please see Condition B32 in the Infrastructure Approval Tables for further detail.	
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**Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))**

Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<ul style="list-style-type: none"> <li>• Employment of standard traffic management measures to minimise short-term traffic impacts expected during construction</li> <li>• Management of oversized vehicles</li> <li>• Relevant traffic safety measures, including appropriate signage, driver conduct and safety protocols</li> <li>• Identify requirements for, and placement of, traffic barriers.</li> <li>• A fatigue and weather condition management plan for both light and heavy vehicles that details driver protocols for both driver fatigue and adverse weather</li> <li>• Bridge load assessments will be carried out in conjunction with the OSOM permit application process.</li> </ul> <p>The CTMP will also consider the following strategies to maintain access for regular and emergency management activities:</p> <ul style="list-style-type: none"> <li>• Staging of construction works to avoid the need for roads to be fully closed for any extended period of time</li> <li>• Development of alternative access routes in consultation with NPWS and emergency services if any closures are required</li> <li>• Provision of sufficient shoulder width or regular stopping bays to allow regular and emergency vehicles to pass or stop.</li> </ul>				
<b>T2</b>	Should the construction planning require that heavy vehicles to use the route via Elliot Way, Link Road and Goat Ridge Road between the project area east and project area west, the details will be included in the CTMP and a road safety audit and risk assessment will be carried out.		Not triggered	Not triggered during the audit period (J. Snape pers. comm).	
<b>T3</b>	If works will affect the free flow of traffic a Traffic Control Plan will be prepared, and a Road Occupancy Licence will be obtained from TfNSW.		Not triggered	Works during this audit period have not affected the free flow of traffic during this audit period (J. Snape pers. comm).	
<b>T4</b>	<p>Road maintenance will be managed through the following measures:</p> <ul style="list-style-type: none"> <li>• A road dilapidation survey of Elliott Way and other potential local roads utilised by the project will be carried out prior to commencing construction as agreed to with Snowy Valleys Council and NPWS. Any impacts identified as caused by the project will be rectified as specified with any road maintenance agreements</li> <li>• Routine defect identification and rectification of the access roads and tracks will be managed as part of the project maintenance procedure</li> <li>• Access roads and tracks will be designed in accordance with the relevant vehicle loading requirements.</li> </ul>		Compliant	See Condition B29 of the Infrastructure Approval Table for details.	
<b>T5</b>	Affected communities, visitors, FCNSW, NPWS and emergency services will be notified in advance of any disruptions to traffic and restriction of access impacted by project activities.	Stakeholder and Community Engagement Plan dated August 2023	Compliant	Confirmed during the Initial Construction Audit, Transgrid continue to operate in accordance with the Stakeholder and Community Engagement Plan.	
<b>T6</b>	Access protocols within KNP will be undertaken in accordance with the MOU between TransGrid and NPWS for the Procedure for the Undertaking of Inspection, Maintenance and Emergency Works of TransGrid Network Assets and Associated Infrastructure.		Noted		
<b>T7</b>	<p>For the access track to structures 12 and 13 (first two structures on the western side of Talbingo Reservoir), measures will be incorporated into the final design under consultation with NPWS to enable vehicles to safely stop for personnel to open and close the access track gate. Such measures may include:</p> <ul style="list-style-type: none"> <li>• The placement of the gate at a suitable distance along the track as to avoid vehicles parking on/adjacent to Elliott Way</li> <li>• Incorporation of a pull over bay alongside the existing Elliott Way road surface.</li> <li>• Appropriate safety measures including the use of guard rails will be incorporated into the design where required.</li> </ul>	Elliott Way - Transmission Line track intersections - Track 10 Guardrail email correspondence dated 22/11/2024	Compliant	Access tracks to structures 12 and 13 are still subject to detailed design. UGL are currently undertaking consultation with NPWS regarding design.	

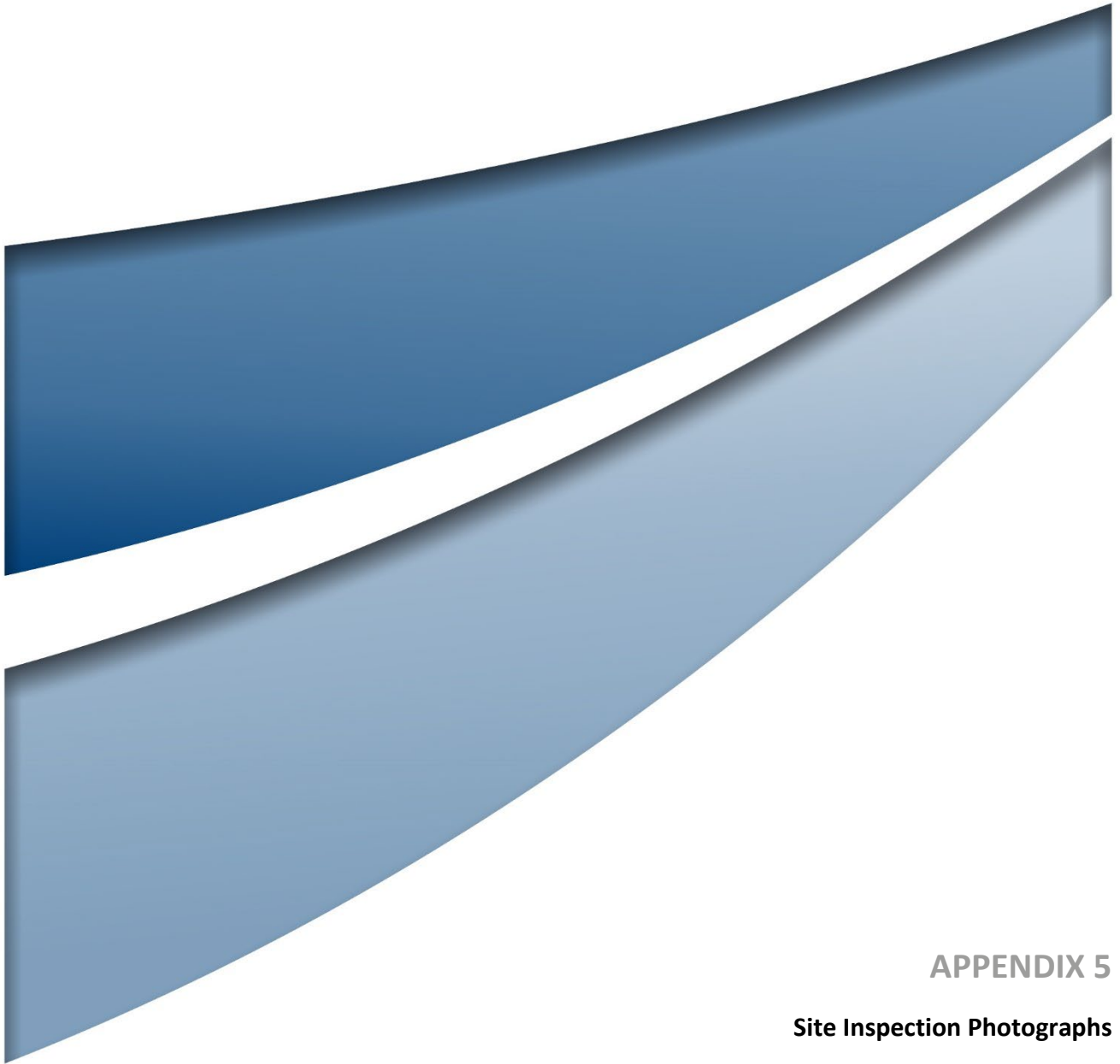
Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
<b>Landscape Character and Visual Impact</b>					
VIA1	Detailed design will consider the retention of existing vegetation to the greatest extent practicable south of Elliott Way and around the substation to ensure that potential visual impacts from Elliott Way are minimised.	Visual Impact Management Plan (Rev 13) dated 7/08/2023	Compliant	Confirmed during the Initial Construction Audit, the Visual Impacts Management Plan ensures the detailed design considers the retention of existing vegetation. It is noted the Visual Impact Management Plan was revised during the audit period. It is currently pending approval from the Planning Secretary.	
VIA2	<ul style="list-style-type: none"> <li>All construction plant, equipment, waste and excess materials will be contained within the designated boundaries of the work site and will be removed from the site following the completion of construction</li> <li>Stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality</li> <li>On completion of the work disturbed areas will be stabilised and returned to as close to original condition.</li> </ul>	Soil And Water Management Plan (Rev 0.09) dated 24/11/2023	Compliant	Confirmed during the Initial Construction Audit some details outlined in this condition are included in the Soil And Water Management Plan however the Project would ensure requirements are covered within the Rehabilitation Management which is currently being prepared (J. Snape pers. comm) Condition will be revised upon the preparation of the Rehabilitation Management Plan which is currently being prepared during this audit period.	
VIA3	<ul style="list-style-type: none"> <li>The new structures will undergo accelerated ageing of the zinc galvanised coatings prior to erection to help reduced the visual impacts of the project</li> <li>To assist with reducing the visual obviousness of the structures through Lobs Hole Ravine, five structure pairs (Structure pairs 1, 2, 3, 7 and 8) will be painted olive green.</li> </ul>	Visual Impact Management Plan (Rev 13) dated 7/08/2023	Compliant	Mitigation measures outlined I Condition VIA 3 are addressed in Section 5.2. of the Visual Impact Management Plan.	
<b>Noise and Vibration</b>					
NV1	The standard techniques for controlling noise impacts during construction are presented in the ICNG. During construction relevant standard measures as outlined in Section 6 of the ICNG will be implemented.	Noise and Vibration Management Plan (Rev 0.05) dated 27/07/2023	Compliant	Confirmed during the Initial Construction Audit noise mitigation measures are included in Section 7 of the Noise and Vibration Management Plan (NVMP).	
NV2	Do not conduct vibration intensive works within the recommended safe setback distances. Avoid the use of vibration intensive plant within the nominated human comfort distances.	Noise and Vibration Management Plan (Rev 0.05) dated 27/07/2023	Compliant	Confirmed during the Initial Construction Audit relevant management measures considering vibration outlined by Condition NV2 are included in Section 7 (Table 7.1) of the NVMP.	
NV3	Care will be taken when carrying out vibration-intensive activities (e.g. use of hydraulic rock breakers and vibratory rollers, and blasting) within distances approaching the recommended safe setback distances around heritage items R45 and R49. Where maintaining of these setback distances isn't possible a suitably qualified person will be present or monitoring will be undertaken during the works to suspend activities in the instance of any issues.	Noise and Vibration Management Plan (Rev 0.05) dated 27/07/2023	Compliant	Confirmed during the Initial Construction Audit relevant management measures considering vibration outlined by Condition NV3 are included in Section 4.2 of the NVMP.	
NV4	A detailed blast plan will be prepared by the blasting contractor prior to each blast to mitigate the potential for the recommended safe setback distances being encroached.		Not triggered	No blasts have occurred during this audit period (J. Snape pers. comm).	
<b>Air Quality</b>					
AQ1	<p>Air quality mitigation measures will include, but not be limited to:</p> <ul style="list-style-type: none"> <li>Identifying potential sources of air pollution</li> <li>Dust mitigation and suppression measures to be implemented</li> <li>Plant and equipment will be switched off when not in use</li> <li>Vehicles, plant and construction equipment will be appropriately sized for the task and properly maintained so as to achieve optimum fuel efficiency</li> <li>Materials will be delivered with full loads and will come from local suppliers, where possible</li> <li>Methods to manage work during strong winds or other adverse weather conditions</li> <li>A progressive rehabilitation of disturbed areas.</li> </ul>	Soil And Water Management Plan (Rev 0.09) dated 24/11/2023	Compliant	Confirmed during the Initial Construction Audit air quality mitigation measures are addressed in Section 5.8 of the SWMP.	
<b>Hazards and Risks</b>					
HAZ1	All designs will be in accordance with the ICNIRP Guidelines for limiting exposure to time varying Electric and Magnetic Fields (1Hz – 100Hz) (ARPANSA, 2010) with consideration to the public and on-site workers.		Not triggered	The Project is still undergoing detailed design (B. Toohey pers. comm).	
HAZ2	<p>The following lightning protection measures will be included in the detailed design:</p> <ul style="list-style-type: none"> <li>Each structure will be equipped with earthing fixtures</li> </ul>		Not triggered	The Project is still undergoing detailed design (B. Toohey pers. comm).	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<ul style="list-style-type: none"> <li>Each transmission line will have two earthing lines at the top of each structure to provide protection to the conductors from lightning strike</li> <li>Lightning masts will be installed at the substation.</li> </ul>				
HAZ3	<p>A Prepare-Act-Survive bushfire response plan will be prepared for the project. The plan will be prepared according to Planning for Bush Fire Protection (RFS, 2019) and in consultation with NPWS, FCNSW and Snowy Valleys Bush Fire Management Committee.</p> <p>The fire prevention/mitigation strategies within Bago State Forest will be generally in accordance with Forest Practices Codes including the Standard Operating Procedure -Plantation Harvesting, Haulage and Site Preparation Fire Restrictions (Fire Prevention 19/51).</p> <p>The plan will include responsibilities associated with and details of</p> <ul style="list-style-type: none"> <li>Site specific hazards and risks for the project area</li> <li>Procedures to maintain bushfire awareness</li> <li>Bushfire mitigation measures</li> <li>Fire preparedness actions including: <ul style="list-style-type: none"> <li>Evacuation triggers</li> <li>Evacuation routes</li> <li>Mustering points</li> <li>Neighbourhood safer places and refuges of last resort</li> <li>Instructions for sheltering in-vehicle if there are no other options.</li> </ul> </li> </ul>	Emergency Plan Appendix H Bushfire Plan (Rev 0.06) dated 30/08/2023	Compliant	Confirmed during the Initial Construction Audit, bushfire risks and response are addressed in the Emergency Plan. The Bushfire Plan listed as Appendix H of the Emergency Plan addresses the requirements set out by Condition HAZ3.	
HAZ4	<ul style="list-style-type: none"> <li>For the main construction compounds, a minimum of 40 metres clearance is required between fuel/chemical storage points and woody vegetation. The construction compound buildings will have at least 20 metres clearance to the vegetation.</li> <li>Firefighting equipment will be maintained at and/or accessible to all active construction sites during the declared bushfire danger season, and site personnel trained in its use. Equipment will be appropriate to the activities being conducted and the fire danger at the time of works, but as a minimum must include: <ul style="list-style-type: none"> <li>4WD Striker with slip-on water unit, equipped with diesel pump and hoses</li> <li>Extinguishers</li> <li>Knap sacks</li> <li>Hand tools (e.g. fire rakes).</li> </ul> </li> <li>Any vegetation cleared as part of these works will be removed from site (as much as reasonably practicable), or otherwise processed to avoid excessive bushfire fuel accumulation as agreed with FCNSW and NPWS.</li> </ul>	Emergency Plan (Rev 0.07) dated 25/06/2024 Oncon Refuelling Procedure dated 12/03/2024	Compliant	<p>In response to a non-compliance included during the Initial Construction Audit fuel/chemical storage points have been moved and are no longer within 40 m of vegetation.</p> <p>It was observed during the site inspection fire equipment was maintained and accessible. Equipment included fire extinguishers and furphy's. It was noted the water supply tank at Lobbs Hole was empty.</p> <p><b>Recommendation: It is recommended the Oncon Refuelling Procedure is revised to include a minimum of 40 metres clearance is required between fuel/chemical storage points and woody vegetation.</b></p> <p><b>Recommendation: It is recommended the water supply tank is filled prior to the declared bushfire danger season.</b></p>	
HAZ5	<ul style="list-style-type: none"> <li>All chemicals or other hazardous substances will be stored in a bunded area and away from any natural drainage lines. The capacity of the bunded area will be at least 130% of the largest chemical volume contained within the bunded area. The location of the bunded enclosure/s will be shown on Site Plans.</li> <li>The storage, handling and use of dangerous goods and hazardous substances will be carried out in accordance with the WHS Act and Regulations, the Storage and Handling of Dangerous Goods Code of Practice (WorkCover NSW, 2005) and relevant Australian Standards</li> </ul>		Compliant	During the site audit inspection, it was observed that chemicals and other hazardous substances were stored in a bunded area and away from any natural drainage lines.	
HAZ6	<ul style="list-style-type: none"> <li>Routine condition monitoring and risk-based maintenance of project elements to minimise the incidence of ignitions from asset failures</li> <li>Ongoing vegetation management will be in accordance with TransGrid's operational vegetation monitoring and management procedures. This will include regular inspection and maintenance of trees and woody vegetation within the transmission corridor to provide safe clearance distance to the overhead conductors, and maintenance of the substation APZ</li> </ul>		Not triggered	Conditions relate to the operational phase of the Project.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<ul style="list-style-type: none"> <li>The APZ surrounding the substation will be completely cleared with vegetation managed to approximately 100 mm in height</li> <li>Ongoing risk management of trees located outside the easement that have potential to strike the conductor if they were to fall</li> <li>Access tracks will be maintained to facilitate ongoing access to transmission structures for maintenance. It is recommended that these tracks are to be maintained to the standards of a Category 9 fire trail (RFS, 2016) to allow fire response in the area.</li> </ul>				
HAZ7	Hot work (activities involving high temperatures) and fire risk work (activities involving heat or with the potential to generate sparks) will be managed under TransGrid procedures.	Emergency Plan Appendix H Bushfire Plan (Rev 0.06) dated 30/08/2023	Compliant	Confirmed during the Initial Construction Audit the procedure for Hot Work and Fire Risk Work is included as Appendix C of the Bushfire Plan. The procedure addresses the requirements of Condition HAZ7.	
<b>Social and Economic</b>					
SE1	<p>A CSEP will be prepared and implemented to help provide timely and accurate information to the community during construction. The plan will include (as a minimum):</p> <ul style="list-style-type: none"> <li>Mechanisms to provide details and timing of proposed activities to key stakeholders including residents, business owners, NPWS, FCNSW, emergency service, health and medical facilities, visitors, accommodation providers and annual event organisers, recreational users and motorists including changed traffic and access conditions and amenity impacts</li> <li>Process for receiving and responding to queries and complaints regarding the project's construction.</li> </ul>	Stakeholder and Community Engagement Plan dated August 2023	Compliant	Confirmed during the Initial Construction Audit requirements included in Condition SE1 are addressed in the Stakeholder and Community Engagement Plan.	
SE2	<ul style="list-style-type: none"> <li>A worker accommodation strategy will be prepared for the project to manage demand for tourist accommodation from the construction workforce during the construction phase and postconstruction</li> <li>Maximise the use of the Snowy 2.0 works accommodation where possible to minimise demand for local accommodation</li> <li>Consider local business opportunities in project procurement practices, including encouraging contractors to source local goods and services, where possible</li> <li>Identify and communicate to local communities (prior to and during construction) opportunities and requirements for work on the project.</li> </ul>	Snowy 2.0 Connection Project Workers' Accommodation Strategy dated 3 September 2024	Compliant	Confirmed during the Initial Construction Audit a Workers Accommodation Strategy has been prepared for the Project. In response to an Opportunity for Improvement identified in the Initial Construction Audit, the Workers Accommodation Strategy has been updated and revised to align with industry standards for accommodation strategies for state significant projects and consider the NSW Government's Cumulative Impact Assessment Guidelines for State Significant Projects.	
SE3	<ul style="list-style-type: none"> <li>Development, monitoring and review of project incident response plans, including ongoing consultation with emergency service providers about changes to local access and potential delays and disruptions</li> <li>Preparation of a workforce health and safety plan that includes measures for responding to health, medical and safety incidents during construction.</li> </ul>	Stakeholder and Community Engagement Plan dated August 2023 Health And Safety Management Plan dated 27/04/2023	Compliant	Confirmed during the Initial Construction Audit a Health and Safety Management Plan has been prepared for the Project whilst the development, monitoring and review of project incident response plans is included in the Stakeholder and Community Engagement Plan.	
SE4	The operation and maintenance of the portion of the project in KNP will be carried out in accordance with any access and operational protocols established between TransGrid and NPWS.		Noted		
<b>Waste</b>					
WR1	Further consultation with local waste facilities will be carried out during detailed design to further determine potential disposal locations		Compliant	Confirmed during the Initial Construction Audit consultation has been undertaken with local EPA licenced waste facilities.	
WR2	<ul style="list-style-type: none"> <li>A construction waste management plan (CWMP) will be prepared for the project and outline appropriate management procedures. It will include, but not be limited to:</li> <li>Identification of the waste types and volumes that are likely to be generated by the project</li> <li>Adherence to the waste minimisation hierarchy principles of avoid/reduce/reuse/recycle/dispose</li> </ul>	Soil and Water Management Plan Appendix H Contaminated Land Management Plan (Rev 0.08) dated 01/11/2023	Compliant	Confirmed during the Initial Construction Audit a Waste Management Strategy which is included as Appendix C of the Contaminated Land Management Plan has been prepared for the Project and addresses the requirements of this condition.	
	Waste management procedures to manage the handling and disposal of waste, including vegetation, spoil, unsuitable material or unexpected waste volumes				



Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC
	<ul style="list-style-type: none"> <li>Identification of reporting requirements and procedures for tracking of waste types and quantities</li> </ul> <p>A resource management strategy detailing the process to identify reuse options for surplus materials.</p>				
<b>WR3</b>	Excess spoil generated in project area east will be transported by truck to Lobs Hole where it will be managed and disposed of by Snowy Hydro (in accordance with the methods described in the Snowy 2.0 Major Works EIS and any conditions of their approval).	Soil and Water Management Plan Appendix A Spoil Management Plan (Rev 0.07) dated 24/11/2023.	Compliant	Confirmed during the Initial Construction Audit excess spoil management is outlined in Section 3.4 of the Spoil Management Plan.	
<b>WR4</b>	All waste, including surplus soils, which cannot be reused will be classified in accordance with the Waste Classification Guidelines (EPA, 2014), removed from the site and disposed of at a facility that can lawfully accept the waste in accordance with the POEO Act and POEO Waste Regulation.	Soil and Water Management Plan Appendix H Contaminated Land Management Plan (Rev 0.08) dated 01/11/2023	Compliant	Confirmed during the Initial Construction Audit requirements of this condition are included in the Waste Management Strategy.	
<b>WR5</b>	Operational waste will be managed in accordance with TransGrid Waste Management Procedures and associated Work Instructions.		Not triggered	Conditions relate to the Operational phase of the Project.	
Cumulative Impacts					
<b>CI1</b>	<ul style="list-style-type: none"> <li>Regular consultation will be carried out with nearby/adjoining projects and key stakeholders during the detailed design and construction phase to review potential cumulative impacts and timing of activities that have potential cumulative impacts</li> <li>As far as practical construction activities will be coordinated and staggered with Snowy Hydro to minimise cumulative impacts in the project area west</li> <li>Engagement with Snowy Valleys Council and Snowy Monaro Regional Council will be ongoing regarding impacts on local infrastructure (including accommodation, services)</li> </ul>	Stakeholder and Community Engagement Plan dated August 2023 Interface Management Plan dated 26/09/2023	Compliant	Confirmed during the Initial Construction Audit, consultation responsibilities are outlined in the Stakeholder and Community Engagement Plan. Additionally, an Interface Management Plan has also been prepared detailing the regular consultation requirements concerning nearby/adjoining projects and key stakeholders during the construction phase. It is noted that interface meetings are scheduled weekly to provide all stakeholders visibility of work scope activities and plan strategies to develop best solutions and prevent stoppages of work for all parties.	



## APPENDIX 5

### Site Inspection Photographs



**Plate 1: Potential glider poles that have been retained located within Track 1 (25/09/2024).**



**Plate 2: Areas of partial clearing located within Track 12 (11/09/2024).**





**Plate 3: Areas of partial clearing showing persistent groundcover vegetation located within Track 12 (11/09/2024).**



**Plate 4: Areas of post-vegetation clearing showing poor ground visibility located within Track 9 (11/09/2024).**





**Plate 5: Erosion and sediment control devices e.g. coir logs installed alongside roadside (25/09/2024).**



**Plate 6: Erosion and sediment control devices e.g. rock checks and berms installed adjacent to Lobbs Hole Project Construction Compound (25/09/2024).**





**Plate 7: Erosion and sediment control devices e.g. rock checks and sandbagging installed within Track 8 (25/09/2024).**



**Plate 8: Spill kits located near Sheep Station Creek Construction Area (26/09/2024).**





**Plate 9: waste organised in respective bins located within the Maragle Project Construction Compound (25/09/2024).**



**Plate 10: Chemicals were stored in appropriate bunded areas located within Maragle Substation Project Area (25/09/2024).**





**Plate 11: Firefighting equipment were readily available located within Maragle Substation Project Area (25/09/2024).**



**Plate 12: Water supply tank (not signposted) for firefighting purposes located within Maragle Project Construction Compound (25/09/2024).**





**Plate 13: Sediment basin located within Maragle Substation Project Area (25/09/2024).**



**Plate 14: Overview of the Maragle Substation Project Construction Pad (25/09/2024).**





**Plate 15: Materials are organised into neat and tidy stockpiles located within Maragle Substation Project Area (25/09/2024).**



**Plate 16: Signposting of stockpiles located within Maragle Substation Project Area (25/09/2024).**





**Plate 17: Equipment appear to be well maintained and in good condition located within the Maragle Substation Project Area (25/09/2024).**



**Plate 18: Wheel washing station located within Maragle Project Construction Compound (25/09/2024).**





**Plate 19: Rubber mats located at various access points. Rubber mat above located within Track 1 (25/09/2024).**



**Plate 20: Signage for management areas impacted by *Phytophthora sp.* located within Track 10 (11/09/2024).**





**Plate 21: Chemical and hydrocarbon storage containers were observed to be well organised and well maintained located within Lobbs Hole Project Construction Compound (25/09/2024).**



**Plate 22: Recycling programs were observed to be well implemented at the Lobbs Hole Project Construction Compound (25/09/2024).**



**Plate 23: An overview of the temporary bridge located at Sheep Station Creek (25/09/2024).**



