

# Snowy 2.0 Transmission Connection Project - Independent Environmental Audit Construction Audit 2

Proponent Responses



**Snowy 2.0 Transmission Connection Project Independent Environmental Audit – Construction Audit 2**

**Proponent Responses - Non-compliances**

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
<b>Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1</b>							
<b>SCHEDULE 2</b>							
<b>PART A ADMINISTRATIVE CONDITIONS</b>							
<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>							
<b>TERMS OF APPROVAL</b>							
A2.	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>	<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 .  (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) 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>	The Proponent acknowledges the Independent Audit Findings and Recommendations and associated non-compliance for Condition A2.	N/A
<b>PART B ENVIRONMENTAL CONDITIONS – GENERAL</b>							
<b>SOIL AND WATER</b>							
<b>Water Supply</b>							
B9.	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.	Non-Compliance Notification – Water Access Licence Detailed Report dated 07/08/2024 UGL Water Access Licence Detailed Investigation Report 07/08/2024	<b>Non-compliant</b>	<b>NC-02:</b> Surface water was taken from Paddy’s River pursuant to WAL 44762 without a water allocation.  Confirmed in the Initial Construction Audit the development holds two water access licences which include: • WAL44782 • WAL44788.  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	<b>NC-02</b>	The Proponent acknowledges the Independent Audit Findings and Recommendations and associated non-compliance for Condition B9.	N/A

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				(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.			
<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	<p><b>NC- 03:</b> Two incidents were reported involving the discharge of turbid water. Refer to Section 4.3 for further detail.</p> <p>During the audit period two incidents were reported involving the discharge of turbid water. An overview of the incidents is provided below:</p> <p><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></p> <p><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.</p> <p>Both events were reported to relevant agencies as required with further details provided in Condition C7 of this Infrastructure Approval Table.</p>	NC-03	The Proponent acknowledges the Independent Audit Findings and Recommendations and associated non-compliance for Condition B11.	N/A
<b>BIODIVERSITY</b>							
<b>Biodiversity Management Plan</b>							

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
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>• Caladenia montana;</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>i) collect seeds within the approved disturbance area for use in the ecological rehabilitation of the</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</p> <p>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>	Non-compliant	<p>NC-04: A Partial Clearance Verification Report has not been prepared to inform vegetation clearance processes.</p> <p>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.</p> <p>The removal of weeds did not occur prior to vegetation clearing for construction.</p> <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). 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>	NC-04	<p>Proponent Response:</p> <p>The Proponent disagrees with the audit findings in relation to Condition B21 (c) (viii) which links the monitoring of partial clearing to within three months of the commencement of construction to determine if any changes are required to the construction vegetation clearing protocols. The proponent notes clearing had not commenced within three (3) months of the commencement of construction, being 4 December 2023, and provides the following additional detail.</p> <p>The Approved BMP Table 2-1 Compliance Table states that B21 (c) (viii) is addressed in BMP Appendix B Clearing Procedure.</p> <p>BMP Appendix B states that assessments of vegetation integrity will be completed under the Operation Vegetation Management Plan (OVMP) over a four to six year management cycle; and for the preparation of a post-clearing survey report. The post clearing monitoring report is also included in the Table 2 of the Biodiversity Monitoring Program in BMP Appendix A. The timing of the post clearing report in Table 2 is 'at the completion of clearing'. The residual vegetation scores are therefore not linked to the timeframe for monitoring partial clearing under B21 (c)(viii) and will be completed at the completion of clearing, unless staging of the post clearing reports is proposed. This is not outlined in the current revision of the Approved BMP.</p> <p>UGL have complied with the monitoring of the partial clearing through the monthly tracking of partial clearing in the monthly reports. This monitoring of the extent of clearing has allowed UGL to determined if any changes are required to the clearing protocols to maintain the areas of each clearing zone assumed in the BDAR and Project Approval.</p> <p>As an opportunity for improvement, UGL have complied with a request from BCS to completed post construction vegetation integrity score monitoring progressively following clearing through the site. Clearing commenced in within the Maragle Substation and surrounding asset protection zone in February 2024. This area is a total clearing zone and therefore no post construction monitoring is required. Clearing of</p>	30/12/2024

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	<p>site;</p> <p>ii) 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>iii) 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>iv) minimise the light spill from night works, including using directional and LED lighting; and</p> <p>v) minimise bushfire risk.</p> <p>(a) include construction clearing and operation vegetation management protocols</p> <p>(b) 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>(c) 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>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.</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>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 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.</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 Thesium australe confirmed as Stackhousia monogyna</li> <li>• Potential Caladenia concolor 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</b></p>		<p>the transmission line from the substation heading eastward was completed between the 4 April to the 6 May. The post clearing VI monitoring was completed in this area on the 11 July 2024. On the east side at Lobs Hole, clearing was also completed from the 4 April to the early May. The post clearing VI monitoring was completed in this area on the 9-10 July 2024.</p> <p>The data from the post clearing VI monitoring will be included in the Post Clearing Report that will be prepared at the completion of clearing in accordance with the BMP. BCS have requested the data from the monitoring be made available which the Proponent will provide via the format of an interim memo detailing post clearing VI monitoring results prior to 30 December 2024.</p> <p>The Proponent acknowledges the audit findings regarding MON14. The Proponent confirms weed monitoring has been undertaken in accordance with the Weed and Pathogen Control Monitoring Program. A weed control program is currently in development with initial weed management activities to commence prior to 30 December 2024.</p>	

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				<p>the BMP can be identified and implemented.</p> <p>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.</p> <p>Recommendation: It is recommended weed monitoring and management is undertaken in accordance with BMP MON14 and completed prior to completing clearing works.</p> <p>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:</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>			
<b>TRAFFIC AND TRANSPORT</b>							
<b>Designated Heavy and Heavy Vehicles Requiring Escort Routes</b>							
B25.	<p>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.</p> <p>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.</p>	<p>Utilities Transmission Line Traffic And Transport Management Plan (Rev 0.18) dated 14/06/2024</p> <p>Pre-Arrival Safety Flyer dated 20/09/2024</p> <p>Incident Report - Over size mass vehicles not having escorts - 1 May 2024 dated 26/06/2024</p>	<b>Non-compliant</b>	<p><b>NC- 05:</b> Third-party transport company failed to identify and abide by the conditions of the NVHR Permits.</p> <p>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).</p> <p>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.</p> <p>However 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</p>	<b>NC-05</b>	The Proponent acknowledges the Independent Audit Findings and Recommendations and associated non-compliance for Condition B25.	N/A

Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
				on the 2 May 2024, as required with further details provided against Condition C7 in these tables.			

## HAZARD AND RISK

### Operating Conditions

B41.	<p>The Proponent must:</p> <p>(a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;</p> <p>(b) ensure that the development;</p> <p>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;</p> <p>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;</p> <p>iii) incorporates the recommendations of a fire risk assessment as per Transgrid's design standards;</p> <p>(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;</p> <p>(d) ensure any fire trails or asset protection zones associated with the development are wholly contained within the approved disturbance area;</p> <p>(e) develop procedures to manage potential fires on site, in consultation with the RFS, FRNSW, FCNSW and NPWS;</p> <p>(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</p> <p>(g) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.</p>	<p>Bushfire Plan (Rev 0.06) dated 30/08/2023</p> <p>Emergency Plan (Rev 0.07) dated 25/06/2024</p>	Non-compliant	<p><b>NC- 06:</b> The water supply tank located at the UGL Lobs Hole Compound was empty.</p> <p>(a) Confirmed during the Initial Construction Audit, Bushfire mitigation measures for the development are included in Section 5 of the Bushfire Plan</p> <p>(b)</p> <p>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).</p> <p>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></p> <p>iii) The development is still subject to detailed design (J. Snape pers. comm)</p> <p>(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)</p> <p>(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).</p> <p>(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</p> <p>(f) Noted</p> <p>(f) Not triggered during this audit period.</p> <p><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></p> <p><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></p>	NC-06	<p>The Proponent confirms all water tanks inclusive of the water supply tank located at the UGL Lobs Hole Compound are filled with water and a minimum 20,000L supply is maintained at each construction compound.</p> <p>Signage including the following text "Fire Fighting Water Tank" will be installed before 30/12/2024.</p>	30/12/2024
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Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
<b>Part A – Conditions Specific to Action</b>							
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	Non-compliant	<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.  Condition C1 is compliant. <b>Condition B21 was triggered non-compliant in relation to partial clearing monitoring, verification reporting and weed monitoring and management 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.	NC-07	The Proponent does not agree on the assessment of Condition B21 as non-compliant. Refer to response to NC-04 for B21 above in relation to non-compliant in relation to partial clearing monitoring.  The proponent acknowledges the assessment of Condition B41 with proposed actions as per response to NC-06 above.	30/12/2024
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	<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 Table 4.1 for further detail.  Implementation of the BMP has commenced and is ongoing. Non-compliance issues have been identified in relation to partial clearing monitoring, verification reporting and weed monitoring and management under the BMP. <b>Please refer to Condition B21 of the Infrastructure Approval Table for further detail.</b>	NC-08	The Proponent does not agree on the assessment of Condition B21 as non-compliant. Refer to response to NC-04 for B21 above in relation to non-compliant in relation to partial clearing monitoring.	30/12/2024
<b>Part B – Administrative Conditions</b>							
<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	Non-compliant	<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.  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>DCCEEW were not notified until the 26 August 2024 which is greater than 2 business days of formally proposing a change.</b>	NC - 09	The Proponent acknowledges the Independent Audit Findings and Recommendations and associated non-compliance for Condition 34.	N/A
<b>Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))</b>							
<b>Water</b>							
W7	For the Snowy 2.0 T2 Tailbay site and Paddys River water uptake site: • A water extraction licence will be sought prior to the extraction of any water from Talbingo Reservoir and the Paddy's River • 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 • During water extraction from Talbingo Reservoir and Paddy's River, slow velocities of water pumping and screens on the hoses will be used	Non-Compliance Notification – Water Access Licence Detailed Report dated 07/08/2024 UGL Water Access Licence Detailed Investigation Report 07/08/2024	Non-compliant	Confirmed during the Initial Construction Audit the Project only holds two water access licences which include: • WAL44782 • WAL44788. <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	NC - 10	The Proponent acknowledges the Independent Audit Findings and Recommendations and associated non-compliance for W7.	N/A



Condition No.	Requirement	Evidence Collected	Compliance Status	Independent Audit Findings and Recommendations	Unique ID on NC	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
	to minimise small aquatic fauna been inadvertently picked up.			from the Paddys River Fill Point. During the audit period rubber mats were observed to be available on site.			

## Snowy 2.0 Transmission Connection Project Independent Environmental Audit – Construction Audit 2

### Proponent Responses - Observations/Opportunities for Improvement

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
<b>Infrastructure Approval</b>				
<b>B16</b>	<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</p>	<p>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.</p>	<p>Existing TARPs will be reviewed and amended accordingly to cover general pollution incidents and discharge of sediment laden water within 3 months of the submission of this Independent Audit in accordance with SSI-9717 Condition C2.</p>	26/02/2025
		<p>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.</p>	<p>Regular toolbox talks and site training as appropriate to ensure all staff are aware of the requirements for enhanced ERSED controls for the project has been held by UGL.</p> <p>Requirements for enhanced erosion controls and examples of what these entail will be reviewed in existing TARPs within 3 months of the submission of this Independent Audit in accordance with SSI-9717 Condition C2.</p>	26/02/2025

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
	<p>are complied with; and (c) managing flood risk during construction.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Water Management Plan.</p>			

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
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>• Caladenia montana;</li> <li>• Gang-gang Cockatoo;</li> <li>• Masked Owl;</li> <li>• Eastern Pygmy-possum;</li> </ul>	<p>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.</p>	<p>As per response to NC-04, the Proponent notes the following detail.</p> <p>Condition B21 (c) (viii) links the monitoring of partial clearing to within three months of the commencement of construction to determine if any changes are required to the construction vegetation clearing protocols. The proponent notes clearing had not commenced within three (3) months of the commencement of construction, being 4 December 2023, and provides the following additional detail.</p> <p>The Approved BMP Table 2-1 Compliance Table states that B21 (c) (viii) is addressed in BMP Appendix B Clearing Procedure.</p> <p>BMP Appendix B states that assessments of vegetation integrity will be completed under the Operation Vegetation Management Plan (OVMP) over a four to six year management cycle; and for the preparation of a post-clearing survey report.</p> <p>The post clearing monitoring</p>	<p>30/12/2024</p>

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
	<ul style="list-style-type: none"> <li>• Yellow-bellied Glider; and</li> <li>• Booroolong Frog</li> </ul> iv) minimise the potential indirect impacts on threatened flora and fauna species, migratory species and 'at risk' species; v) minimise potential fauna strike in sensitive habitat areas on the road network within the site, including reducing speed limits between sunset and sunrise; vi) minimise the impacts on fauna on site, including undertaking pre-clearance surveys; vii) protect native vegetation and key fauna habitat outside the approved disturbance area; 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; 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; i) collect seeds within the approved		<p>report is also included in the Table 2 of the Biodiversity Monitoring Program in BMP Appendix A. The timing of the post clearing report in Table 2 is 'at the completion of clearing'. The residual vegetation scores are therefore not linked to the timeframe for monitoring partial clearing under B21 (c)(viii) and will be completed at the completion of clearing, unless staging of the post clearing reports is proposed. This is not outlined in the current revision of the Approved BMP.</p> <p>UGL have complied with the monitoring of the partial clearing through the monthly tracking of partial clearing in the monthly reports. This monitoring of the extent of clearing has allowed UGL to determine if any changes are required to the clearing protocols to maintain the areas of each clearing zone assumed in the BDAR and Project Approval.</p> <p>As an opportunity for</p>	

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
	<p>disturbance area for use in the ecological rehabilitation of the site;</p> <p>ii) 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>iii) 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>iv) minimise the light spill from night works, including using directional and LED lighting; and</p> <p>v) minimise bushfire risk.</p> <p>(a) include construction clearing and operation vegetation management protocols</p> <p>(b) 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>(c) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.</p> <p>Following the Planning Secretary's</p>		<p>improvement, UGL have complied with a request from BCS to completed post construction vegetation integrity score monitoring progressively following clearing through the site. Clearing commenced in within the Maragle Substation and surrounding asset protection zone in February 2024. This area is a total clearing zone and therefore no post construction monitoring is required. Clearing of the transmission line from the substation heading eastward was completed between the 4 April to the 6 May. The post clearing VI monitoring was completed in this area on the 11 July 2024. On the east side at Lobs Hole, clearing was also completed from the 4 April to the early May. The post clearing VI monitoring was completed in this area on the 9-10 July 2024.</p> <p>The data from the post clearing VI monitoring will be included in the Post Clearing Report that will be prepared at the completion of clearing in</p>	



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	approval, the Proponent must implement the Biodiversity Management Plan.		accordance with the BMP. BCS have requested the data from the monitoring be made available which the Proponent will provide via the format of an interim memo detailing post clearing VI monitoring results prior to 30 December 2024.	

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
		<p>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.</p>	<p>The Proponent and UGL will address the auditor recommendations accordingly in consultation with NPWS, BCS, FCNSW and DCCEEW in accordance with Condition B21 and within 3 months of the submission of this Independent Audit in accordance with SSI-9717 Condition C2.</p>	<p>26/02/2025</p>
		<p>It is recommended weed monitoring and management is undertaken in accordance with BMP MON14 and completed prior to completing clearing works.</p>	<p>The Proponent confirms weed monitoring has been undertaken in accordance with the Weed and Pathogen Control Monitoring Program. A weed control program is currently in development with initial weed management activities to commence prior to 30 December 2024.</p>	<p>30/12/2024</p>

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
		<p>A number of measures to improve the management of partial clearing which should be investigated as part of the verification report include:</p> <p>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</p> <p>Completion of rapid monitoring of partial clearing areas within three months of clearing for individual clearing permit areas.</p> <p>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.</p> <p>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.</p> <p>Consideration of whether any restrictions or amendments to mulch spreading rates or locations are required to improve or support</p>	<p>The Proponent and UGL will address the auditor recommendations accordingly in consultation with NPWS, BCS, FCNSW and DCCEE in accordance with Condition B21 and within 3 months of the submission of this Independent Audit in accordance with SSI-9717 Condition C2.</p>	<p>26/02/2025</p>

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
		<p>vegetation regeneration outcomes. 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.</p> <p>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.</p>		
B24	<p>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:</p> <p>(a) be prepared in consultation with Heritage Council, Heritage NSW, NPWS and Aboriginal Stakeholders;</p>	<p>It is recommended Transgrid continue to provide consolidated project updates and updated Aboriginal site mapping to RAPs.</p>	<p>The Proponent and UGL actively engage with RAPs from the Brungle-Tumut Local Aboriginal Land Council (LALC) including project updates and location of unexpected finds and associated mapping. The Proponent will continue to provide consolidated project updates and updated Aboriginal site mapping to RAPs.</p>	<p>28/02/2025</p>

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
	<p>(b) include a description of the measures that would be implemented for:</p> <p>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;</p> <p>ii) salvaging and relocating the heritage items identified in condition B23;</p> <p>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;</p> <p>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;</p> <p>v) a contingency plan and reporting procedure if:</p> <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> </ul>	<p>Invitation for RAPs/identified knowledge holders to provide feedback on the distribution of sites and cultural understanding.</p>	<p>The Proponent and UGL actively engage with RAPs from the Brungle-Tumut Local Aboriginal Land Council (LALC) including project updates, location of unexpected finds and associated mapping and engagement for cultural understanding. The Proponent will continue to invite RAPs/identified knowledge holders to provide feedback on the distribution of sites and cultural understanding.</p>	<p>28/02/2025</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>The Proponent and UGL actively engage with RAPs and members from the Brungle-Tumut Local Aboriginal Land Council (LALC) including Aboriginal site/object management protocols and will continue to invite RAPs/identified knowledge holders to comment on the effectiveness of Aboriginal site/object management protocols.</p>	<p>28/02/2025</p>

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	<ul style="list-style-type: none"> <li>• Aboriginal skeletal material is discovered;</li> <li>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</li> <li>vii) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and</li> <li>(c) include a program to monitor and publicly report on the effectiveness of these measures and any heritage impacts of the development; and</li> <li>(d) include a program to publish;</li> <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> <p>Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan.</p>			
B41	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>(a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;</li> <li>(a) ensure that the development;</li> <li>i) complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset</li> </ul>	<p>It is recommended UGL ensure all water tanks are filled with water prior the dedicated bushfire danger season.</p>	<p>The Proponent confirms all water tanks inclusive of the water supply tank located at the UGL Lobs Hole Compound are filled with water and a minimum 20,000L supply is maintained at each construction compound.</p>	<p>N/A</p>



Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
	<p>Protection Zones;</p> <p>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;</p> <p>iii) incorporates the recommendations of a fire risk assessment as per Transgrid's design standards;</p> <p>(b) 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;</p> <p>(a) ensure any fire trails or asset protection zones associated with the development are wholly contained within the approved disturbance area;</p> <p>(b) develop procedures to manage potential fires on site, in consultation with the RFS, FRNSW, FCNSW and NPWS;</p> <p>(c) 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</p> <p>(d) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.</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>	<p>Signage including the following text "Fire Fighting Water Tank" will installed before the 30/12/2024.</p>	<p>30/12/2024</p>

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
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 docket retained for audit purposes.	It is recommended moving forward Transgrid seek to attain waste docket from JR Richards and Bellettes.	The Proponent confirms UGL is presently receiving monthly reports from <i>Bellettes</i> , which confirm that all waste generated from its operations on the western side of the project is being disposed of in accordance with the EPA's Waste Classification Guidelines. These reports ensure transparency and compliance with regulatory requirements. However, please note this is a dynamic space, and UGL is actively reviewing the current arrangement to ensure it remains suitable and effective as project needs and regulatory landscapes continue to develop. This review will occur over the coming weeks and help identify any potential improvements or adjustments required.	30/01/2025
C2	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;	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.	Action completed - register developed and will be available for review during next Independent Environmental Audit.	N/A

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	(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.			
<b>EPBC Conditions</b>				
<b>Part B 25</b>	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.	It is recommended relevant plans including the BMP and EMS are updated to reflect DCCEEW comments outlined regarding notification reporting in correspondence dated 4 October 2024.	Relevant plans including the BMP and EMS will be reviewed and amended accordingly to reflect AG DCCEEW comments outlined regarding notification reporting in correspondence dated 4 October 2024 within 3 months of the submission of this Independent Audit in accordance with SSI-9717 Condition C2.	26/02/2025
<b>EIS Commitments</b>				
<b>B1</b>	Detailed design of the project will focus on the retention of managed shrub and groundcover vegetation zones, within the ECZ, HCZ 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. Final design for permanent creek crossing structures on access roads will implement a design option to ensure stream flow is unaffected (e.g. single	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.	Consistency assessment review in progress with WSP to address auditor comments. ETA for finalisation of assessment no later than 30 January 2025.	30/01/2025

Condition Number (ID)	Commitment	Independent Audit Observation/Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
	<p>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>			
W10	<p>Waterway crossing and access tracks will be inspected as part of the maintenance inspections to ensure all crossings remain in good condition.</p>	<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>	<p>Environmental inspection weekly checklist and the pre- and post- rainfall inspection checklists will be reviewed and updated as necessary 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 within 3 months of the submission of this Independent Audit in accordance with SSI-9717 Condition C2.</p>	<p>26/02/2025</p>

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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>o 4WD Striker with slip-on water unit, equipped with diesel pump and hoses</li> <li>o Extinguishers</li> <li>o Knap sacks</li> <li>o 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>	<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>	<p>The Proponent confirms UGL will action revision of Ocon Refuelling Procedure to include a minimum of 40 metres clearance required between fuel/chemical storage points and woody vegetation within 3 months of the submission of this Independent Audit in accordance with SSI-9717 Condition C2.</p>	<p>26/02/2025</p>