



IBERDROLA

ISSUING BODY: **Avonlie Solar Farm**

SUBJECT: IEA Action Response Plan

REFERENCE: IIIN-E-PL-AVL-GE22-900

DATE: 2nd May 2022

REV: 01

Report

Renewable Business

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Avonlie Solar Farm (SSD 9031)

Independent Environmental Audit Action Response Plan

May 2022





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Edited

Enis Ruzdic (Jacobs PMOE
Environment)

Reviewed

Damien Wagner (Jacobs
PMOE Environment Lead)

Approved

Andy Wang (Iberdrola Avonlie
Solar Farm Project Manager)

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1. INTRODUCTION / BACKGROUND

Avonlie Solar Project Co Pty Ltd, the proponent of the Avonlie Solar Farm (NSW Department of Planning and Environment (DP&E): Application Number SSD 9031), herein referred to as the “Project” has prepared this Audit Response Plan to the findings as detailed in the Independent Environmental Audit (IEA) report (April 2022) undertaken by Vantage Environmental Management Pty Ltd. This IEA covered the period of commencement of construction (06 December 2021) to the date of the IEA site visit on 02 March 2022.

Section 2 below and corresponding tables provides the proponents response and actions for closure to the IEA findings as presented in the above mentioned report.



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2. IEA ACTION RESPONSE

Outlined in **Table 1** below is Iberdrola's action responses to the IEA **non-conformance findings** with specified time frames for closure.

Outlined below in **Table 2** below is Iberdrola's action response to the IEA **opportunity for improvement findings** with specified time frames for closure.



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Table 1 Iberdrola response to IEA Non-Conformance Items

| Condition Number | Compliance Requirement | Independent Audit Findings | Independent Audit Recommendation | Proponent's Proposed Action/Action taken/Response (as applicable) | Proposed Action Due Date |
|-------------------------|--|---|--|---|--------------------------|
| Schedule 3 Condition 18 | <p>Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> • protecting the Aboriginal heritage items identified in Table 1 of Appendix 4 or outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction; • salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 4; • a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - previously unidentified heritage items are found; or - Aboriginal skeletal material is discovered; | <p>Not all Aboriginal heritage items identified in Table 2 of Appendix 4 (and referred to in Schedule 3, Condition 18) of the Development Consent could be identified and recovered at the time of salvage works between 21/10/19 and 24/10/19 as additional site disturbance from non-Project related activities (including prior agricultural ground disturbance, fire-break construction, taphonomic factors and other environmental factors) had occurred between the time the Aboriginal Cultural Heritage Assessment Report [ACHAR] (NGH Environmental, 2017) was prepared, which listed the heritage items, and the commencement of salvage works. The proponent was not in possession and/or control of the Project site for the time period between when the ACHAR was prepared, and the salvage program was completed. Notwithstanding this, it is considered that the proponent should have informed DP&E and any other relevant stakeholders who were not informed at the time of the salvage program that some previously identified heritage items could not be relocated at the time of the salvage program.</p> | <p>Advise DP&E and relevant stakeholders of salvage outcomes</p> | <p>The project aboriginal heritage salvage report will be issued to DPE with summary letter detailing the outcomes of the salvage program</p> | <p>10th June 2022</p> |
| | | | <p>The CHMP should be revised to reflect the findings of the 2019 Aboriginal Cultural Heritage Salvage Report.</p> | <p>The CHMP will be updated to reflect the findings of the 2019 Aboriginal Cultural Heritage Salvage Report</p> | <p>10th June 2022</p> |



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| Condition Number | Compliance Requirement | Independent Audit Findings | Independent Audit Recommendation | Proponent's Proposed Action/Action taken/Response (as applicable) | Proposed Action Due Date |
|-------------------------|---|--|---|--|---------------------------|
| Schedule 3 Condition 26 | <p>Prior to commencing construction, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, to the satisfaction of FRNSW and the RFS. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry points at all times.</p> <p>The plan must:</p> <p>(a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent);</p> | <p>The Emergency Management Plan (EMP) was not developed prior to the commencement of construction. In addition, feedback was not received from Fire and Rescue NSW (FRNSW) and the Rural Fire Service (RFS) regarding their level of satisfaction with the EMP prior to the commencement of construction.</p> | <p>Seek feedback from FRNSW as a matter of priority and update EMP as necessary, if required.</p> | <p>Communication has been made to the FRNSW to seek endorsement of the project EMP. As outlined in the EMP, NGH were provided verbal advice from FRNSW (pg. 3 & 4) advising that written consent/advice would be provided via the planning portal, through the DPE consultation process.</p> <p>The project team will (in consultation with DPE) issue the EMP FRNSW through the project DPE portal for FRNSW to comment on.</p> | 31 st May 2022 |



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Table 2 Iberdrola response to IEA Opportunity for Improvement Items

| Condition Number | Compliance Requirement | Independent Audit Observation/Opportunity for Improvement | Audit Recommendations Proponent's Proposed Action or reason to not implement measures/changes | Proposed Action Due Date (if applicable) |
|------------------------|--|---|---|--|
| Schedule 4 Condition 1 | <p>1. Prior to commencing the development, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <p>(a) provide the strategic framework for environmental management of the development;</p> <p>(b) identify the statutory approvals that apply to the development;</p> <p>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p> <p>(d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise; • respond to any non-compliance; • respond to emergencies; and <p>(e) include:</p> <ul style="list-style-type: none"> • references to any plans approved under the conditions of this consent; and • a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p> | Review email, website links and phone numbers in Section 5 of the EMS and update as necessary to ensure current Project contact information is presented. | The project team will undertake a review of the EMS and where necessary make required updates to email, website links and phone numbers as detailed in Section 5. | 31st May 2022 |