

INDEPENDENT ENVIRONMENTAL AUDIT REPORT: AVONLIE SOLAR FARM (SSD 9031)

April 2022

Auditee: Avonlie Solar Project Co Pty Ltd (proponent)

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This Independent Environmental Audit report has been certified by Toby Hobbs, Lead Auditor (Exemplar Global) and Director of Vantage Environmental Management Pty Ltd.

Report Revision	Date	Comments	Prepared by	Approved for issue by
Draft	07 Apr 2022	Draft for review	T. Hobbs S. Price	T. Hobbs
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GLOSSARY

Term	Definition
ACHAR	Aboriginal Cultural Heritage Assessment Report (NGH Environmental, 2017)
AES	Accommodation and Employment Strategy
BCD	Biodiversity and Conservation Division of the Department of Planning and Environment
BDAR	Biodiversity Development Assessment Report
BMP	Biodiversity Management Plan
CHMP	Cultural Heritage Management Plan
Council	Narrandera Shire Council
(the) Department	Department of Planning and Environment
DP&E	Department of Planning and Environment
DPIE	Department of Planning, Industry and Environment (DP&E known as DPIE from July 2019 to December 2021)
EIS	Environmental Impact Statement
EMP	Emergency Management Plan
EP&A Act 1979	Environmental Planning & Assessment Act 1979
Development Consent	Development Consent (under Section 4.38 of the <i>Environmental Planning & Assessment Act 1979</i>) Application No. 9031 consolidated with Modification 1 (November 2020) and Modification 2 (May 2021)
EMS	Environmental Management Strategy
EPA	NSW Environment Protection Authority
FRNSW	Fire and Rescue NSW
IAPAR	Independent Audit Post Approval Requirements (DP&E, May 2020)
IEA	Independent Environmental Audit
NLALC	Narrandera Local Aboriginal Land Council
PMO	Project Management Office
(the) Project	Avonlie Solar Farm
Proponent	Avonlie Solar Project Co Pty Ltd
RFS	Rural Fire Service
Secretary	Planning Secretary under the EP&A Act 1979, or nominee
SMP	Stormwater Management Plan
SSD	State Significant Development
TMP	Traffic Management Plan
Vantage	Vantage Environmental Management Pty Ltd (Auditor)
WHSEMP	Construction Environmental Management Plan

1 EXECUTIVE SUMMARY

This report presents the findings of an Independent Environmental Audit (IEA) that was undertaken to assess the environmental performance and compliance status of the Avonlie Solar Farm (NSW Department of Planning and Environment [DP&E]: Application Number SSD 9031), herein referred to as the “Project”. The IEA covers the period of commencement of construction (06 December 2021) to the date of the site visit on 02 March 2022.

The Audit was undertaken by Vantage Environmental Management Pty Ltd in accordance with the requirements of Schedule 4, Condition 7 (including Conditions 7A-7E) of the Project’s Development Consent (as modified in November 2020 and May 2021) and conducted in accordance with DP&E’s *Independent Audit Post Approval Requirements* (May, 2020).

There were two (2) non-compliances identified with Development consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (ASF-IEA-22-NC1):** 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; and
- **Non-compliance No. 2 (ASF-IEA-22-NC2):** 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.

Based on the non-compliances identified during the audit program the following recommendations are made:

- **Recommendation No. 1 (ASF-IEA-22-R1):** In response to Non-compliance No. 1 the following actions are recommended:
 - a) Advise DP&E and relevant stakeholders of salvage outcomes; and
 - b) The Cultural Heritage Management Plan (CHMP) should be revised to reflect the findings of the 2019 Aboriginal Cultural Heritage Salvage Report; and
- **Recommendation No. 2 (ASF-IEA-22-R2):** In response to Non-compliance No. 2 the following action is recommended:
 - a) Seek feedback from FRNSW as a matter of priority and update EMP as necessary, if required.

In addition to the above noted recommendations, the following continual environmental management improvement opportunity was identified during the audit:

- Review email, website links and phone numbers in Section 5 of the Environmental Management Strategy (EMS) and update as necessary to ensure current Project contact information is presented.

Overall, the standard of environmental management evident during the completion of the audit was high with several examples of innovative and best-practice management noted. Construction works and associated management plans, records and monitoring documentation were deemed to be generally consistent with Development consent conditions and associated plans and strategies.

The proponent is to be commended for completing additional upgrades to Muntz Road which were noted by Narrandera Shire Council to result in reduced environmental impacts.

The Project team has been proactive in trying to recruit local workers and businesses, meeting with Narrandera Shire Council, the Solar Reference Group, local Indigenous community representatives, TAFE NSW, Sureway Employment and Training Narrandera. In addition, they have employed two local Aboriginal Community Engagement Officers to support local employment within the Indigenous community.

It is considered that the management strategies in place to mitigate potential construction impacts were generally appropriate and the impacts observed on site were consistent with those identified in the EIS. The standard of record keeping associated with required environmental monitoring was high. The Project team were well resourced with appropriately qualified and experienced personnel and appeared focussed on minimising potential construction impacts and achieving good compliance outcomes.

There were no complaints received by the Project during the audit period and no (0) environmental incidents were reported by the Project within the audit period.

In accordance with Section 3 and Section 4.3.2 of the *Independent Audit Post Approval Requirements* (DPIE, 2020), the proponent must submit their response to the audit findings to the Department in a separate document to this report within two (2) months of the commencement of the audit, i.e. by 02 May 2022. The proponent must respond to all audit findings, including recommendations and opportunities for improvement.

2 INTRODUCTION

2.1 Background

This report presents the findings of an Independent Environmental Audit (IEA) that was undertaken by Vantage Environmental Management Pty Ltd (Vantage) to assess the environmental performance and compliance status of the Avonlie Solar Farm (NSW Department of Planning and Environment [DP&E] Application Number: SSD 9031), herein referred to as the “Project”. The IEA is a requirement of Schedule 4, Condition 7 (including Conditions 7A-7E) of the Project’s Development Consent (as modified in November 2020 and May 2021) and was conducted in accordance with DP&E’s *Independent Audit Post Approval Requirements* (IAPAR, May 2020).

The Project is an approximately 245MW solar farm located off Muntz Road in Sandigo, New South Wales (approximately 20km south-east of Narrandera) within the Narrandera Shire Council local government area. The scope of works includes installation of approximately 450,000 solar panels mounted on a single axis tracking systems with associated inverter stations. In addition, a 100MW / 100M hours direct current (DC) coupled lithium-ion battery system will be installed. Other works include development of access tracks, construction of an electrical substation, installation of overhead and sub-surface cables for electricity reticulation, site fencing and security systems. The Project site covers an area of approximately 581 hectares which is mostly cleared and was previously used for cropping and grazing.

The Project proponent is Avonlie Solar Project Co. Pty Ltd (a subsidiary of Iberdrola Australia Limited) and the contractor responsible for construction of the Project is Beon Energy Solutions (Beon). To assist in Project delivery a Project Management Office (PMO) has been established by Jacobs (Australia) on behalf of the proponent.

2.2 Audit Team

The Vantage audit team consisted of Toby Hobbs as the Lead Auditor and Susannah Price as an assistant Auditor. Endorsement of the audit team was provided by DPIE via the correspondence of 18 February 2022, a copy which is included within Appendix A of this report.

Toby Hobbs, MEnvMgmt, is an Exemplar Global-certified Lead Environmental Auditor and has undertaken significant auditor roles in the capacity of the independent Environmental Representative role on major infrastructure projects in southern Australia since 2005.

Susannah Price, MSc, is an Exemplar Global-certified Environmental Auditor and has worked as an auditor on major infrastructure projects in southern Australia since 2007.

2.3 Audit Objectives

The objective of the IEA was to obtain an independent and objective assessment of the environmental performance and compliance status of the Project in accordance with Schedule 4, Condition 7 (including Conditions 7A-7E) of the Project’s Development Consent and the *Independent Audit Post Approval Requirements* (DPIE, 2020). The audit scope, discussed below in section 2.4, provides further detail of the audit objectives.

2.4 Audit Scope

The audit scope consisted of:

1. An assessment of compliance with:
 - a. Development Consolidated Consent for SSD 9031, including Modification 1 (November 2020) and Modification 2 (May 2021);

- b. Post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of the following plans during the construction phase:
 - Final Layout Plans;
 - Traffic Management Plan;
 - Biodiversity Management Plan;
 - (Cultural) Heritage Management Plan;
 - Stormwater Management Plan;
 - Emergency Plan;
 - Accommodation and Employment Strategy;
 - Environmental Management Strategy;
2. An assessment of the environmental performance of the development, including an assessment of:
 - Actual impacts compared to predicted impacts documented in the Environmental Impact Statement and associated amendments;
 - The physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;
 - Incidents, non-compliances and complaints that occurred or were made during the audit period;
 - The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and
 - Any feedback received from the DP&E, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period.
3. The status of implementation of previous Independent Audit findings, recommendations and actions (if any);
4. A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
5. Any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

Further information regarding relevant matters raised by DP&E and other agencies are discussed within Section 3.6 of this report and have been addressed during completion of the IEA.

2.5 Audit Period

This IEA covers the period of commencement of construction (06 December 2021) to the date of the audit closing meeting on 07 April 2022.

2.6 Audit Opening and Closing Meetings

As part of the IEA program, Audit Opening and Audit Closing meetings were held as noted in Table 1, below.

TABLE 1: Audit Meeting Attendance Register

Meeting Type/ Date of Meeting	Personnel Present
Audit Opening Meeting 24 February 2022	Vaidee Kalpathy (QHSE Manager – Iberdrola Australia) Jarrad Rosser (PMO Project Manager – Jacobs) Barry Brown (PMO Site Manager – Jacobs) Damien Wagner (PMO Environmental Lead – Jacobs) Enis Ruzdic (PMO Environmental Lead – Jacobs) Baz Tuppin (PMO HSE Lead – Jacobs) Kirsten Lee (Compliance, Sustainability and Stakeholder Lead - Beon) Mark Whitehouse (Construction Manager – Beon) Irene Shyshko (Project Manager – Beon) Toby Hobbs (Vantage – Lead Auditor) Susannah Price (Vantage – Auditor)
Audit Closing Meeting 07 April 2022	Vaidee Kalpathy (QHSE Manager – Iberdrola Australia) Andy Wang (Construction Project Manager – Iberdrola Australia) Donald Richmond (Project Manager – Jacobs) Barry Brown (Site Manager – Jacobs) Enis Ruzdic (Environmental Lead – Jacobs) Kirsten Lee (Compliance, Sustainability and Stakeholder Lead - Beon) Greg Benvenuti (Senior Project Manager – Beon) Mark Whitehouse (Construction Manager – Beon) Irene Shyshko (Project Manager – Beon) Toby Hobbs (Vantage – Lead Auditor) Susannah Price (Vantage – Auditor)

3 AUDIT METHODOLOGY

3.1 Selection and Endorsement of Audit Team

The audit team was selected by the proponent on 11 January 2022 and endorsed by DP&E via their correspondence of 18 February 2022, a copy of which is included within Appendix A of this report.

3.2 Independent Audit scope development

Prior to the commencement of the audit, the scope was developed in accordance with Schedule 4, Condition 7 of the Project’s Development Consent and the *Independent Audit Post Approval Requirements* (DPIE, 2020). On 18 February 2022, Vantage issued the proposed audit scope to DP&E, Narrandera Shire Council and NSW Environment Protection Authority (EPA) for comment.

Discussions with DP&E on 30 March 2022 confirmed that the Department were generally satisfied with the audit scope and additional feedback was provided, which is listed within Section 3.6 of this report.

Correspondence received from the Narrandera Shire Council Deputy General Manager on 09 March 2022 advised that Council believed the scope of the audit was adequate and addressed their requirements. NSW EPA advised via correspondence dated 22 February 2022 that they did not have any comments regarding the scope of the audit as they were not the appropriate regulatory authority.

Copies of correspondence related to consultation undertaken as part of the audit scope are presented within Appendix B of this report.

3.3 Compliance Evaluation

In order to evaluate Project compliance, the following process was followed:

- Desktop audit of the documents provided by the contractor/proponent;
- Collection of further information from the contractor/proponent as required; and
- Assessment of documents for compliance and reporting in this audit report.

3.4 Site Personnel Interviews

Interviews were held with the following site personnel on 02 March 2022 as part of the Project site visit for the audit:

- Kirsten Lee (Beon – Compliance, Sustainability and Stakeholder Lead);
- Mark Whitehouse (Beon – Construction Manager);
- Graham Ervin (Beon – Project HSE Manager);
- Barry Brown (Jacobs – PMO Site Manager);
- Damien Wagner (Jacobs – PMO Environmental Lead); and
- Baz Tuppin (Jacobs – PMO HSE Lead).

The site interviews provided the auditor with an opportunity to obtain relevant evidence regarding the compliance status and environmental performance of the Project to support the desk-based audit review process. It is noted that site personnel interviewed were most willing to assist the auditor and provided full and prompt disclosure with respect to the auditor's queries.

3.5 Site Inspections

A site inspection was undertaken by the Lead Auditor, Toby Hobbs, on 02 March 2022. The purpose of the site visit was to discuss the compliance status of the Project with relevant site personnel, view environmental management records, view the status of on-site environmental controls and observe general environmental performance and Development Consent (and associated management plans and strategies) compliance for the Project.

The site visit also provided the auditor with an opportunity to obtain appropriate evidence regarding the compliance status and environmental performance of the Project to support the desk-based audit review process. It is noted that all areas of the site were accessible to the auditor at the time of the site visit.

3.6 Consultation

Consultation associated with completion of this audit involved issue of the proposed audit scope to DP&E, Narrandera Shire Council and NSW Environment Protection Authority (EPA) for comment on 18 February 2022. A request for feedback on the environmental performance of the project was also issued to the above-referenced stakeholders on 18 February 2022 and the Narrandera Local Aboriginal Land Council on 03 March 2022.

Feedback on the proposed audit scope is discussed within Section 3.2 of this report.

Additional feedback regarding the audit scope was received by DP&E's Team Leader of Compliance and listed within Table 2, below, along with a reference to where each item is discussed in this audit report.

TABLE 2: Summary of Agency Comments and Report Reference

Agency	Comment	Section of this report discussing the comment
NSW Department of Planning and Environment (DP&E)	Status of traffic management including heavy vehicle movements	Section 4.7: EMP, Sub-plans and Compliance Documents Section 4.11: Actual verses Predicted Environmental Impacts Appendix C: Audit Table
DP&E	Outcomes of road upgrades, including monitoring and maintenance	Section 4.11: Actual verses Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table Appendix D: Site Inspection Photographs
DP&E	Status of management plan approvals	Section 4.7: EMP, Sub-plans and Compliance Documents Appendix C: Audit Table
DP&E	Erosion and sediment control management	Section 4.7: EMP, Sub-plans and Compliance Documents Section 4.11: Actual verses Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table Appendix D: Site Inspection Photographs
DP&E	Status of vegetation fencing	Section 4.7: EMP, Sub-plans and Compliance Documents Appendix C: Audit Table Appendix D: Site Inspection Photographs
DP&E	Status of heritage management	Section 4.7: EMP, Sub-plans and Compliance Documents Section 4.11: Actual verses Predicted Environmental Impacts from Environmental Impact Statement Appendix C: Audit Table
Biodiversity Conservation Division (BCD) of DP&E	Status of Threatened Flora Surveys: In the EIS a commitment was made to survey for three threatened species, Sandhill Spider Orchid, Oaklands Diurus and the threatened grass <i>Austrostipa wakoolica</i> before clearing commenced. BCD indicated they did not have a record of the results of any such surveys and, as such, sought additional information.	Section 4.7.2: Biodiversity Management Plan Appendix C: Audit Table

Agency	Comment	Section of this report discussing the comment
BCD	<p>Additional Clearing:</p> <p>On 22 December 2021, BCD was contacted by NGH to clarify a situation regarding a Callitris tree that had not been assessed in the Biodiversity Development Assessment Report (BDAR), but that required clearing. BCD advised that any such additional clearing would require a formal Modification. BCD had not received any further correspondence about this at the time of their response on 15 March 2022.</p>	Section 4.7.2: Biodiversity Management Plan Appendix C: Audit Table
NSW Environment Protection Authority (EPA)	On 22 February 2022 NSW EPA advised that they did not have any comments regarding the environmental performance of the site as they were not the appropriate regulatory authority.	N/A
Narrandera Local Aboriginal Land Council (NLALC)	<p>On 03 March 2022 a representative of NLALC provided the following information:</p> <p><i>“Narrandera LALC have concerns regarding the construction of the project.</i></p> <p><i>We welcome the opportunity to raise our concerns, particularly to the significant discovery of artefacts on the site and the monitoring of those significant Cultural Artefacts.</i></p> <p><i>This includes the impact to flora, fauna and waterways. We would like to review current reports and the Aboriginal Cultural Report submitted for Development Application/s.”</i></p>	Section 4.9: Complaints Appendix C: Audit Table
Narrandera Shire Council	<p>On 09 March 2022, Council’s Deputy General Manager provided the following information:</p> <p>The developers of the project had decided to undertake additional sealing upgrades of Muntz Road due to the dust generated during traffic movements along that road. Council considered this an enhancement to the project as it resulted in a reduction of environmental impacts; and Council had not received any complaints regarding the site operations or development to date.</p>	N/A

Copies of correspondence related to consultation undertaken as part of the audit program are presented within Appendix B of this report.

3.7 Compliance Status Descriptors

The compliance status of each Development Consent condition presented in the audit table in Appendix C has been determined in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020). The compliance status was recorded as one of the following:

- Compliant – 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 – 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; or
- Not triggered – A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

4 AUDIT FINDINGS

4.1 Approvals and Documents Audited

The following construction-related approvals and documents were considered as part of this IEA:

- Development Consent for SSD 9031 as modified (inclusive of Modification 1 of November 2020 and Modification 2 of May 2021);
- Final Layout Plans;
- Traffic Management Plan;
- Biodiversity Management Plan;
- Heritage Management Plan;
- Stormwater Management Plan;
- Emergency Management Plan;
- Accommodation and Employment Strategy; and
- Environmental Management Strategy.

4.2 Compliance Performance

There are a total of 56 conditions within the Development Consent of the Project as modified (Modification 1, 11 October 2019) and all 56 conditions were assessed for environmental compliance as part of this IEA. 39 conditions were determined to be compliant, two (2) were determined to be non-compliant and 15 were not triggered as part of this IEA. Detailed audit outcomes are presented within Appendix C (Audit Table of Development Consent Conditions). In accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020) the audit table presents the following information:

- Development Consent condition (Approval ID);
- Development Consent requirements;
- Audit evidence collected;
- Audit findings and recommendations; and
- Compliance status.

4.3 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

As far as the auditor of this report is aware, no agency notices, orders, penalty notices or prosecutions have been issued for the Project.

4.4 Non-compliances

There were two (2) non-compliances identified with the Development consent conditions and associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (ASF-IEA-22-NC1):** 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; and
- **Non-compliance No. 2 (ASF-IEA-22-NC2):** The Emergency Management Plan (EMP) was not developed prior to the commencement of construction. In addition, feedback was not received from FRNSW and the RFS regarding their level of satisfaction with the EMP prior to the commencement of construction.

4.5 Opportunities for Improvement

There were no (0) opportunities for improvement identified with the Development consent conditions and associated management plans and strategies reviewed during the audit program.

4.6 Previous Audit Recommendations

As far as the auditor is aware, there have not been any previous environmental audits undertaken for the Project.

4.7 Compliance Documents

The Development Consent for the Project required that specific post approval documents be prepared and submitted to the Department prior to the commencement of construction. As part of this audit, the following post approval documents were assessed to determine if they had been developed and implemented in accordance with the conditions of consent and their content was generally adequate:

- Traffic Management Plan;
- Biodiversity Management Plan;
- (Cultural) Heritage Management Plan;
- Stormwater Management Plan;
- Emergency (Management) Plan;
- Accommodation and Employment Strategy; and
- Environmental Management Strategy.

The adequacy of the documents was determined on the basis of whether there were any non-compliances resulting from the implementation of the document or whether there were any opportunities for improvement. A technical review of the documents was not undertaken as part of this audit.

4.7.1 Traffic Management Plan

The Traffic Management Plan (TMP) was prepared by Jacobs and the most recent version viewed as part of this audit was Revision 2 dated 26 June 2021. The TMP was approved by DPIE on 15 July 2022, prior to commencement of construction.

The TMP was developed in consultation with Transport for NSW and Narrandera Shire Council as discussed in Section 1.6 of the TMP.

The auditor considers the TMP has been generally developed in accordance with the Development Consent conditions and relevant approvals and that the content is generally adequate and being implemented on site.

Further information regarding the implementation of the TMP is discussed in the Independent Audit Table in Appendix C.

4.7.2 Biodiversity Management Plan

The Biodiversity Management Plan (BMP) was prepared by NGH Consulting and the most recent version viewed as part of this audit was Final V5.0 dated 28 June 2021. The BMP was approved by DPIE on 15 July 2021, prior to commencement of construction.

The BMP was developed in consultation with BCD as discussed in Section 1.8 of the BMP.

The auditor considers the BMP has been developed in general accordance with the Development Consent conditions and relevant approvals and that the content is adequate and generally being implemented on site.

During completion of this audit, comment was received from BCD regarding the status of threatened flora species including the Sandhill Spider Orchid, Oaklands Diurus and the threatened grass *Austrostipa wakoolica* before clearing commenced. Based on information provided by the proponent, it is understood that no surveys for these species were conducted and they were assumed to be present for precautionary purposes during calculation of vegetation offset credits (as discussed within the approved BMP). In addition, BCD commented that as of 15 March 2022 they had not received any further information regarding a Callitris tree that had not been assessed in the Biodiversity Development Assessment Report (BDAR), but that required clearing. Subsequent to 15 March 2022, the proponent confirmed that an updated Biodiversity Development Assessment Report (BDAR) had been prepared for submission to DP&E and a visit to the Project site with BCD and DP&E representatives was conducted on 31 March 2022.

Further information regarding the implementation of the BMP is discussed in the Independent Audit Table in Appendix C.

4.7.3 (Cultural) Heritage Management Plan

The Cultural Heritage Management Plan (CHMP) was prepared by NGH Consulting and the most recent version viewed as part of this audit was Final 1.3 dated 08 July 2021. The CHMP was approved by DPIE on 15 July 2022, prior to commencement of construction.

The CHMP was developed in consultation with Heritage NSW/BCD and Aboriginal Stakeholders (Registered Aboriginal Parties) as shown by comments provided in Section 4 of the CHMP.

The auditor considers the CHMP has been generally developed in accordance with the Development Consent conditions and relevant approvals and that the content is generally adequate and being implemented on site. Notwithstanding, it is recommended that the Plan is revised to reflect the noted non-compliance issue (Section 4.4) and associated recommendations to address the non-compliance (Section 5.1).

Further information regarding the implementation of the CHMP is discussed in the Independent Audit Table in Appendix C.

4.7.4 Stormwater Management Plan

The Stormwater Management Plan (SMP) was prepared by Jacobs and the most recent version viewed as part of this audit was Revision D dated 28 June 2021. The SMP was approved by DPIE on 16 July 2021, prior to commencement of construction.

The auditor considers the SMP has been developed in accordance with the Development Consent conditions and relevant approvals and that the content is adequate and generally being implemented on site.

Further information regarding the implementation of the SWMP is discussed in the Independent Audit Table in Appendix C.

4.7.5 Emergency (Management) Plan

The Emergency Management Plan (EMP) was prepared by NGH Consulting and the most recent version viewed as part of this audit was Final V1.3 dated 04 March 2022. The EMP was not required to be approved by DPIE.

The EMP was finalised on 15 December 2021 (Final V1.0), which is after the date of commencement of construction of 06 December 2021. The most recent version (V1.3 dated 04 March 2022) includes consultation with NSW Rural Fire Service, however there is no evidence of consultation with Fire and Rescue NSW.

The auditor considers the EMP has been developed in accordance with the Development Consent conditions and relevant approvals and that the content is adequate and generally being implemented on site aside from the compliance matter discussed within Section 4.4 of this report.

Further information regarding the implementation of the EMP is discussed in the Independent Audit Table in Appendix C.

4.7.6 Accommodation and Employment Strategy

The Accommodation and Employment Strategy (AES) was prepared by Jacobs and the most recent version viewed as part of this audit was Revision E dated 29 June 2021. This version of the AES was approved by DPIE on 14 July 2021, prior to commencement of construction.

The AES was developed in consultation with Council as discussed in Section 1.2 of the AES.

The auditor considers the AES has been generally developed in accordance with the Development Consent conditions and relevant approvals and that the content is generally adequate and being implemented on site.

Information obtained during the audit program indicates that the Project team has been proactive in trying to recruit local workers and businesses, meeting with Narrandera Shire Council, the Solar Reference Group, local Indigenous community representatives, TAFE NSW, Sureway Employment and Training Narrandera. In addition, local Aboriginal Community Engagement Officers have been employed to support local recruitment within the Aboriginal community.

Further information regarding the implementation of the AES is discussed in the Independent Audit Table in Appendix C.

4.7.7 Environmental Management Strategy

The Environmental Management Strategy was prepared by Siemens Gamesa and the most recent version viewed as part of this audit was Revision I dated 26 June 2021. This version of the EMS was approved by DPIE on 16 July 2021, prior to commencement of construction.

The auditor considers the EMS has been generally developed and implemented in accordance with the Development Consent conditions and relevant approvals and that the content is adequate.

As discussed in Section 5.2 of this report, a review of the email, website links and phone numbers in Section 5 of the EMS should be undertaken and updated as necessary to ensure current Project contact information is presented.

Further information regarding the implementation of the EMS is discussed in the Independent Audit Table in Appendix C.

4.8 Environmental Performance

Based on the review of activities undertaken during the current audit program, it is considered that the mitigation measures detailed in the DP&E-approved Environmental Management Strategy, as well as other strategies and plans required within the Development Consent are generally appropriate and effective in minimising impacts associated with construction of the Project.

Following completion of the auditor's interviews and site visit of 02 March 2022, it was deemed that an appropriate range of environmental controls were in place to assist in managing and mitigating potential environmental risks associated with the construction activities that were in progress. Key environmental protection measures observed during the site visit included:

- Environmental controls to assist in the management of potential erosion and/or sedimentation;
- Posting of speed limits and signage in accordance with the Traffic Management Plan;
- Tracking and documentation of heavy vehicle and over-dimensional movements;
- Tracking and documentation of plant and equipment maintenance;
- Provision of appropriately stocked and secured spill kits as well as containment bunding at the site of the Project's fuel storage area;
- Use of watercarts, vegetation retention and progressive stabilisation to minimise potential dust generation;
- Signage and exclusion zone fencing for protection of heritage and vegetation areas; and
- Appropriate management and tracking of waste and recyclable materials.

4.9 Complaints

As of 02 March 2022, the Project team reported that no complaints had been received that related to environmental management matters during construction.

It is noted that a Narrandera Local Aboriginal Land Council (NLALC) representative raised concerns regarding the Project during consultation associated with this audit. In response to those concerns, the audit team referred the NLALC representative to the Project complaint logging and handling system so that appropriate Project personnel could directly address the concerns. It was further reported that Beon representatives met with the NLALC representative at the Project site on 05 April 2022 to discuss and assist with resolution of their concerns.

Based on the information obtained during the audit it is considered that an appropriate complaints management and handling system is in place for the Project.

It is noted that the Project website (<https://www.iberdrola.com.au/our-assets/development-assets/avonlie-solar-farm/>) contains information to allow for members of the community to seek further information and share concerns/complaints for the Project via an email enquiry form.

4.10 Incidents

At the time of completion of this audit, no (0) reportable environmental incidents had been recorded during construction of the Project.

4.11 Actual versus Predicted Environmental Impacts from Environmental Impact Statement

A detailed environmental risk assessment was undertaken in the Project Environmental Impact Statement (EIS, ngh environmental, Draft 0.2, June 2018) and the following environmental risks were identified:

- Biodiversity;
- Aboriginal heritage;
- Land use and resources
- Visual amenity; and
- Traffic Noise.

As part of this audit, specific potential impacts listed in the EIS within each of the identified environmental risks areas were considered and comment provided on the actual impacts during construction (see Table 3, below). Comment is not provided regarding potential operational impacts as the Project was under construction at the time of the audit and, therefore, an assessment of operational phase impact management was beyond the scope of the audit.

It is considered that the management strategies in place to mitigate potential construction impacts were appropriate and the impacts observed on site were generally consistent with those identified in the EIS. Table 3, below, presents a summary of audit observations associated with above-noted environmental risks.

TABLE 3: Actual versus Predicted Environmental Impacts

Potential/Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
BIODIVERSITY		
Habitat clearance for permanent and temporary construction facilities	Clearing was completed in accordance with approved designs and flora/fauna protection measures.	Environmental protection measures in place as per the DP&E-approved Biodiversity Management Plan (BMP). Clearing minimised to greatest extent practicable. Cleared vegetation retained for habitat and biodiversity enhancement.
Displacement (or injury or death) of resident fauna	Clearing conducted in accordance with BMP. Fauna recovered by ecologists and transferred to care of WIRES.	Environmental protection measures in place as per the DPIE-approved BMP. Project ecologists present during tree clearing. Coarse woody debris retained for on-site habitat enhancement.
Removal of habitat features, e.g. hollow-bearing trees	Clearing minimised as much as possible. Vegetation fencing and exclusion zones in place. Boundary fencing occurring.	Cleared vegetation has been retained for future habitat enhancement (coarse woody debris).
Shading and microclimate effects of solar infrastructure	N/A	Only relevant during operation phase

Potential/Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
Existence of permanent solar infrastructure	N/A	Only relevant during operation phase
ABORIGINAL CULTURAL HERITAGE		
Removal, breakage or displacement of artefacts during construction	<p>Project Archaeologist completed salvage in December 2020 in accordance with EIS and Consent conditions.</p> <p>Not all previously identified heritage items within construction footprint could be located due to disturbance from prior site-based activities and other environmental factors.</p>	<p>Salvage and relocation of Aboriginal heritage items occurred between 21/10/19 and 24/10/19.</p> <p>Impact site cards have been submitted to AHIMS for the sites salvaged within the approved development footprint for the Project.</p> <p>Salvage items were reburied in a fenced and protected area and a new site card has been submitted and approved for the location of the reburied artefacts (AHIMS #49-6-0237).</p> <p>Weekly environmental inspection checklists document that heritage sites protection is in place.</p> <p>Cultural heritage content is presented as part of the general site induction and other site-based training.</p>
LAND USE AND RESOURCES		
Limited resources loss for the lifetime of the solar farm	The land upon which the solar farm will be developed was unavailable for agricultural cropping at the time of the site visit. Environmental protection measures were noted to be in place to minimise potential impacts on adjoining agricultural land. Grazing will be permitted once construction is complete and the Project is operational.	Strategies in place to ensure appropriate rehabilitation and maximise future agricultural use, where and when possible. Infrastructure is considered to be “low impact” and unlikely to result in land degradation once construction phase is complete.
Changes in biosecurity	No significant weed and/or pest infestations associated with construction were observed on the Project site at the time of the audit.	Plant/equipment inductions are conducted that incorporate inspections for the presence of weeds and pests. The site is monitored for presence of weeds as part of routine environmental inspection.
VISUAL AMENITY		
Visual impact to surrounding viewpoints, both public and private including the Sturt Highway	No permanent buildings were constructed at the time of the audit. Temporary facilities associated with the site compound were present and set back from Muntz Road and Sandigo Road to minimise visual impact. Monitoring of	Project designs incorporate a subdued colour palette for permanent infrastructure that is consistent with the surrounding rural setting. Non-reflective materials will be used where possible/practicable to minimise glare and reflections.

Potential/Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
	light-spill conducted to minimise potential impact to nearby properties.	Vegetation has been retained where possible to provide visual screening to surrounding viewpoints.
NOISE		
Construction noise impacts: earthworks, trenching, piling and building works.	Excessive and/or high-noise generating activities were not observed at the time of the audit. Works are not conducted outside of approved construction hours.	Strategies are in place to minimise noise generation including detailed induction and monitoring of plant/equipment to ensure it is well maintained and operated to manufacturer's specifications. Monitoring for excessive noise generation is conducted on a routine basis.
During construction additional traffic and dust generation could induce cumulative visual impacts.	Reduced speed limits noted to be in place within Project site to assist in minimising potential dust. Watercarts observed to be present on site to assist with dust suppression. Muntz Road will be sealed to provide additional dust impact mitigation.	Strategies are in place to minimise dust generation and limit vehicle movements. A register of vehicle movements is maintained and reviewed, along with dust mitigation measures, as part of routine environmental monitoring.

4.12 Site Inspection

A site inspection was conducted by the Lead Auditor, Toby Hobbs, on 02 March 2022. The site was noted to have recently commenced construction with only a limited range of activities occurring that included development of access tracks, construction and commissioning of the main site compound (offices, amenities, stores, etc.) and installation of perimeter fencing.

The weather at the time of the inspection was partly cloudy with moderate winds and a temperature of approximately 20°C. It is noted that there had been approximately 75mm of rainfall in the 48hr period prior to the site visit (Narrandera Airport Bureau of Meteorology monitoring station). All required areas of the site were accessible to the auditor at the time of the site visit.

Evidence for the audit collected during the site inspection is presented within the column titled "Evidence Collected" in the Independent Audit Table (Appendix C). In addition, site inspection photographs are presented within Appendix D.

4.13 Site Interviews

As mentioned previously, interviews were held with the following senior Project personnel on 02 March 2022 as part of the site visit for the audit:

- Kirsten Lee (Beon – Compliance, Sustainability and Stakeholder Lead);
- Mark Whitehouse (Beon – Construction Manager);
- Graham Ervin (Beon – Project HSE Manager);

- Barry Brown (Jacobs – PMO Site Manager);
- Damien Wagner (Jacobs – PMO Environmental Lead); and
- Baz Tuppin (Jacobs – PMO HSE Lead).

Evidence for the audit collected during the site interviews is presented within the column titled “Evidence Collected” in the Independent Audit Table (Appendix C).

4.14 Previous Annual Review or Compliance Report Recommendations

The auditor understands that there have not been any annual reviews associated with the Project up until completion of this audit.

4.15 Key Strengths and Commendations

The standard of environmental management evident during completion of the Independent Environmental Audit was considered to be high with several key strengths as noted below:

- There was a proactive focus on reducing potential Project impacts associated with dust generation and erosion/sedimentation that involved minimising ground disturbance and implementing work schedules in a staged manner to reduce the amount of non-stabilised areas to greatest extent practicable;
- The entire Project team appeared committed to ensuring compliance with Development Consent conditions;
- Project personnel, inclusive of those from the proponent and contractor teams, were well resourced, suitably qualified, dedicated, and experienced;
- Innovative waste management strategies were being investigated early in the construction phase to maximise resource recovery and reuse;
- An additional commitment and cost allocation had been made to seal Muntz Road to ensure it was more durable and potential dust impacts from traffic movements were minimised during construction.

The following commendations were identified in the Independent Audit Table (Appendix C):

- To provide additional resources for site protection from potential fires during construction of the Project, the team have brought forward the installation program for the required operational fire fighting equipment noted under Development Consent Schedule 3 Condition 25(b): “20,000 L water supply tank fitted with a 65 mm Storz and a FRNSW compatible fitting located adjacent to the internal access road”;
- It is considered that the Project team has been proactive in trying to recruit local workers and businesses, meeting with Narrandera Shire Council, the Solar Reference Group, local Aboriginal community representatives, TAFE NSW, Sureway Employment and Training Narrandera. In addition, they have employed two local Aboriginal Community Engagement Officers to support local employment within the Aboriginal community; and
- The on-site Environmental Inspection Checklists provided a high level of relevant detail and directly referenced Consent conditions and EMS content. All viewed checklists were fully completed with accurate information.

5 RECOMMENDATIONS

5.1 Non-compliances

There were two (2) non-compliances identified with Development consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (ASF-IEA-22-NC1):** 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; and
- **Non-compliance No. 2 (ASF-IEA-22-NC2):** The Emergency (Management) Plan was not developed prior to the commencement of construction. In addition, feedback was not received from FRNSW and the RFS regarding their level of satisfaction with the EMP prior to the commencement of construction.

Based on the non-compliances identified during the audit program the following recommendations are made:

- **Recommendation No. 1 (ASF-IEA-22-R1):** In response to Non-compliance No. 1 the following actions are recommended:
 - c) Advise DP&E and relevant stakeholders of salvage outcomes; and
 - d) The CHMP should be revised to reflect the findings of the 2019 Aboriginal Cultural Heritage Salvage Report.
- **Recommendation No. 2 (ASF-IEA-22-R2):** In response to Non-compliance No. 2 the following action is recommended:
 - b) Seek feedback from FRNSW as a matter of priority and update EMP as necessary, if required.

5.2 Opportunities for Improvement

Based on the outcomes of the IEA the following continual environmental management improvement opportunity was identified:

- 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.

6 CONCLUSION

Vantage Environmental Management Pty Ltd has conducted an Independent Environmental Audit (IEA) to assess the environmental performance and compliance status of the Avonlie Solar Farm (NSW Department of Planning and Environment [DP&E] Application Number: SSD 9031), herein referred to as the “Project”. The IEA is a requirement of Schedule 4, Condition 7 (including Conditions 7A-7E) of the Project’s Development Consent (as modified in November 2020 and May 2021) and was conducted in accordance with DP&E’s *Independent Audit Post Approval Requirements* (IAPAR, May 2020).

There were two (2) non-compliances identified with Development Consent conditions and the associated management plans and strategies reviewed during the audit program. Recommendations to address the identified non-compliances have been presented by the auditor. In addition, some revision and update of the project Environmental Management Strategy was identified as a continual environmental management improvement opportunity.

Overall, the standard of environmental management evident during the completion of the audit was high with several examples of innovative and best-practice management noted. Construction works and associated management plans, records and monitoring documentation were deemed to be generally consistent with Development consent conditions and associated plans and strategies.

The proponent is to be commended for completing additional upgrades to Muntz Road which were noted by Narrandera Shire Council to result in reduced environmental impacts.

It is considered that the Project team has been proactive in trying to recruit local workers and businesses, meeting with Narrandera Shire Council, the Solar Reference Group, local Indigenous community representatives, TAFE NSW, Sureway Employment and Training Narrandera. In addition, they have employed two local Aboriginal Community Engagement Officers to support local employment within the Aboriginal community.

It is considered that the management strategies in place to mitigate potential construction impacts were generally appropriate and the impacts observed on site were consistent with those identified in the EIS. The standard of record keeping associated with required environmental monitoring was high. The Project team were well resourced with appropriately qualified and experienced personnel and appeared focussed on minimising potential construction impacts and achieving good compliance outcomes.

In accordance with Sections 3 and 4.3.2 of the *Independent Audit Post Approval Requirements* (DPIE, 2020), the proponent must submit their response to the audit findings to the Department in a separate document to this report within two (2) months of the commencement of the audit, i.e. by 02 May 2022. The proponent must respond to all audit findings, including recommendations and opportunities for improvement.

Appendix A

DPIE Audit Team Endorsement



Mr Andy Wang
Construction Project Manager
IBERDROLA AUSTRALIA LIMITED
LEVEL 17 56
PITT STREET
SYDNEY 2000

18/02/2022

Dear Mr Wang

**Avonlie Solar Farm – SSD-9031
Independent Environmental Audit – Audit Team approval request**

I refer to your request (SSD-9031-PA-21) submitted to the Department of Planning and Environment (the Department) on 10 February 2022 for the Secretary's approval of suitably qualified persons to prepare the Independent Environment Audit (the Audit) in accordance with Schedule 4 condition 7A of SSD 9031 (the Consent) for the Avonlie Solar Farm (the Project).

The Department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, in accordance with Schedule 4 condition 7A of the consent and the Independent Audit Post Approval Requirements, the Secretary has agreed to Mr Toby Hobbs (Lead Auditor) and Ms Susannah Price (Assistant Auditor) of Vantage Environmental Management, to undertake the Audit and prepare the Audit Report.

Please ensure this correspondence is appended to the Audit Report. This approval is conditional on the audit team members being independent of the Project.

The Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. 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 audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.



Department of Planning and Environment

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

Yours sincerely

Katrina
Team Leader
Compliance
As nominee of the Planning Secretary

O'Reilly
Compliance

Appendix B

Consultation



Department of Planning and Environment

Ms Susannah Price
Project Manager/ Auditor
Vantage Environmental Management
PO Box 378
ALBURY NSW 2640

Our ref: DOC22/174884

Senders ref: SSD9031

Via email: sprice@venv.com.au

15 March 2022

Dear Ms Price

Subject: Avonlie Solar Project (SSD9031) - Independent Environmental Audit

Thank you for your email dated 3 March 2022 about the above audit seeking comments from the Biodiversity and Conservation Division (BCD) of the Department of Planning and Environment.

BCD has statutory responsibilities relating to biodiversity (including threatened species, populations, ecological communities, or their habitats) and flooding.

BCD provides the following comments that you may consider appropriate to consider in your audit. Details are in **Attachment A**.

Threatened Flora Surveys

In the EIS a commitment was made to survey for three threatened species, Sandhill Spider Orchid, Oaklands Diurus and the threatened grass *Austrostipa wakoolica* before clearing commenced. BCD does not have a record of the results of any such surveys.

Additional Clearing

On 22 December 2021, BCD was contacted by NGH to clarify a situation regarding a *Callitris* tree that had not been assessed in the Biodiversity Development Assessment Report (BDAR), but that required clearing. BCD advised that any such additional clearing would require a formal Modification. BCD has not received any further correspondence about this.

If you have any questions about this advice, please contact Michael Todd, Senior Conservation Planning Officer, via rog.southwest@environment.nsw.gov.au or 03 5021 8915.

Yours sincerely

Andrew Fisher
Senior Team Leader Planning
South West Branch
Biodiversity and Conservation Division
Department of Planning and Environment

ATTACHMENT A – Detailed comment on Avonlie Solar Project (SSD9031) - Independent Environmental Audit

ATTACHMENT A Detailed comment on Avonlie Solar Project (SSD9031) - Independent Environmental Audit

Threatened Flora Surveys

In the EIS (Section 9.2.3, page 88) a commitment was made to survey for the two threatened orchid species, Sandhill Spider Orchid and Oaklands Diurus, in Spring 2018 and November 2018 respectively, before clearing commenced. In addition, the threatened grass *Austrostipa wakoolica* was listed as potentially occurring but remained unsurveyed for at the time of the EIS. A commitment was made to survey for this species before clearance began (Page 1-11, BDAR). The areas of concern were along Muntz Road and Sandigo-Boree Creek Road. The results of any surveys have not been forwarded to BCD and it would be appropriate for an audit to investigate this.

Additional Clearing

On 22 December 2021, BCD was contacted by NGH to clarify a situation regarding a *Callitris* tree that required clearing but had not been assessed in the BDAR. NGH was informed by BCD (by email on the 24 December 2021) that as this was an approved Major Project with conditions that include a stated credit obligation, for the approved clearing to be changed a formal Modification would be required.

The proposed change would result in impacts on biodiversity values that were not assessed in the original approval, and so are considered to constitute an increase in impacts. The Modification application would need to include an updated BDAR (not an addendum) to reflect this change (development footprint maps, credit table etc) and a new parent case in the Biodiversity Offsets and Agreements Management System.

BCD has not received any further correspondence in relation to this matter and it is not known what approach the proponent has taken. It would be appropriate for the auditor to investigate this matter.

From: [Jessica Creed](#)
To: [Susannah Price](#)
Subject: RE: Proposed Audit Scope - Avonlie Solar Project (south of Narrandera)
Date: Tuesday, 22 February 2022 10:30:36 AM
Attachments: [image002.png](#)

Hi Susannah,

The EPA is not the appropriate regulatory authority for this site and have no comment on either the audit scope or on the environmental performance of the site.

Regards

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



www.epa.nsw.gov.au @NSW_EPA

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

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

From: Susannah Price <sprice@venv.com.au>
Sent: Friday, 18 February 2022 1:19 PM
To: EPA RSD Riverina Far West Region Mailbox <riverina.farwest@epa.nsw.gov.au>
Cc: INFOEnvironment <info@environment.nsw.gov.au>
Subject: Proposed Audit Scope - Avonlie Solar Project (south of Narrandera)

Hi,

Our company, Vantage Environmental Management, is undertaking an Independent Environmental Audit of the Avonlie Solar Project (south of Narrandera), which has commenced construction. I believe this site lies within the "Riverina Farwest" EPA area, otherwise could you please forward to the relevant EPA office.

The scope of our audit currently includes:

- An assessment of compliance with Development Consent for SSD 9031, including Modification 1 (November 2020) and Modification 2 (May 2021), and post approval documents prepared to satisfy the conditions of consent
- An assessment of the environmental performance of the development, including an assessment of:
 - Actual impacts compared to predicted impacts documented in the Environmental

- Impact Statement and associated amendments
- The physical extent of the development in comparison with the approved boundary, and any potential off-site impacts
- Incidents, non-compliances and complaints that occurred or were made during the audit period
- The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
- Any feedback received from the Department, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period
- 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 taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

As required by the NSW Department of Planning, Industry and Environment (DPIE), we are seeking input from EPA as to whether you have any concerns regarding the following:

- The scope of the audit
- Any concerns with the environmental performance of the construction of the Avonlie Solar Farm project or whether you have received any complaints.

Thanks in advance for your time.

Regards
Susannah

SUSANNAH PRICE

Project Manager/Auditor

Vantage Environmental Management Pty Ltd

PO Box 378 Albury NSW 2640

T (02) 6021 8655 M 0421 871 433

www.venv.com.au



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From: [Narrandera Local Aboriginal Land Council](#)
To: [Susannah Price](#)
Cc: chris@jarrah.net.au
Subject: RE: Independent Environmental Audit - Avonlie Solar Project (South of Narrandera)
Date: Thursday, 3 March 2022 11:18:17 AM
Attachments: [E600BA02978A49B9A506892435A888B8f144891691.png](#)

Hi Susannah,

Thank you for your email.

Narrandera LALC have concerns regarding the construction of the project.

We welcome the opportunity to raise our concerns, particularly to the significant discovery of artefacts on the site and the monitoring of those significant Cultural Artefacts.

This includes the impact to flora, fauna and waterways. We would like to review current reports and the Aboriginal Cultural Report submitted for Development Application/s.

Please feel free to contact me in the first instance regarding this email.

Regards

Warren Ingram
Chief Executive Officer

Narrandera Local Aboriginal Land Council

172 East Street

P.O Box 544

Narrandera, 2700

[*nlalc14@bigpond.com*](mailto:nlalc14@bigpond.com)

Ph: 02 6959 1823



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From: [Susannah Price](#)

Sent: Thursday, 3 March 2022 9:50 AM

To: nlalc14@bigpond.com

Subject: Independent Environmental Audit - Avonlie Solar Project (south of Narrandera)

Good morning,

Vantage Environmental Management has been endorsed the NSW Department of Planning and Environment to undertake an Independent Environmental Audit of the Avonlie Solar Project (south of Narrandera), which has commenced construction.

As part of the audit we are seeking input from the Narrandera LALC as to whether they have any environmental concerns regarding the construction of the project.

Please feel free to email or call to discuss further.

Thanks in advance for your time.

Regards
Susannah

SUSANNAH PRICE

Project Manager/Auditor

Vantage Environmental Management Pty Ltd

PO Box 378 Albury NSW 2640

T (02) 6021 8655 **M** 0421 871 433

www.venv.com.au

From: [Wilson, Shane](#)
To: [Susannah Price](#)
Cc: [Hugo, Bridey](#)
Subject: RE: Proposed Audit Scope - Avonlie Solar Project
Date: Wednesday, 9 March 2022 1:08:21 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi Susannah

Sorry for the delay in my reply.

I have reviewed the proposed scope of the audit and believe that it adequately addresses the requirements of Narrandera Shire Council.

The developers have decided to undertake additional upgrades byway of seal of Muntz Road, do to the dust generated during traffic movements along this road. This is considered as an enhancement to the project and reduction in environmental impacts.

Council has received no complaints regarding the site operations or the development to date.

Please feel free to contact me directly for any future feedback or enquiries.

Regards

Shane Wilson

Deputy General Manager - Infrastructure

PH: (02) 6959 5503 | Fax: (02) 6959 1884 | Email: shane.wilson@narrandera.nsw.gov.au



Narrandera Shire Council acknowledges the traditional owners of the lands of Narrandera Shire, the Wiradjuri people.

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From: Susannah Price <sprice@venv.com.au>
Sent: Wednesday, 9 March 2022 11:52 AM
To: Council Emails. <council@narrandera.nsw.gov.au>
Subject: FW: Proposed Audit Scope - Avonlie Solar Project
Importance: High

Good morning,

I sent an email (see below) a few weeks ago but have not yet heard back and was hoping you could re-send it to your planning department as we are currently undertaking our audit.

Regards
Susannah

SUSANNAH PRICE

Project Manager/Auditor

Vantage Environmental Management Pty Ltd

PO Box 378 Albury NSW 2640

T (02) 6021 8655 M 0421 871 433

www.venv.com.au

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From: Susannah Price

Sent: Friday, 18 February 2022 1:24 PM

To: council@narrandera.nsw.gov.au

Subject: Proposed Audit Scope - Avonlie Solar Project

Hi,

Our company, Vantage Environmental Management, is undertaking an Independent Environmental Audit of the Avonlie Solar Project (south of Narrandera), which has commenced construction.

The scope of our audit currently includes:

- An assessment of compliance with Development Consent for SSD 9031, including Modification 1 (November 2020) and Modification 2 (May 2021), and post approval documents prepared to satisfy the conditions of consent
- An assessment of the environmental performance of the development, including an assessment of:
 - Actual impacts compared to predicted impacts documented in the Environmental Impact Statement and associated amendments
 - The physical extent of the development in comparison with the approved boundary, and any potential off-site impacts
 - Incidents, non-compliances and complaints that occurred or were made during the audit period
 - The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when

- developing the scope of the audit
- Any feedback received from the Department, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period
- 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 taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

As required by the NSW Department of Planning, Industry and Environment (DPIE), we are seeking input from Council as to whether you have any concerns regarding the following:

- The scope of the audit (as discussed above)
- Any concerns with the environmental performance of the construction of the Avonlie Solar Farm project or whether you have received any complaints.

Thanks in advance for your time.

Regards
Susannah

SUSANNAH PRICE

Project Manager/Auditor

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Appendix C

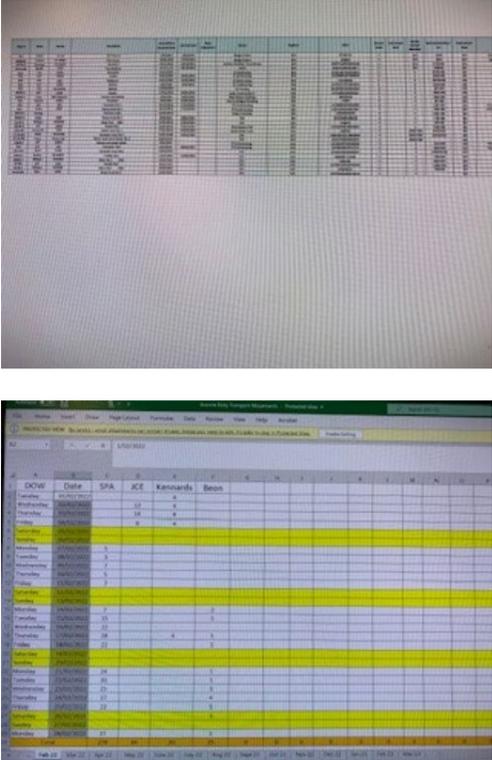
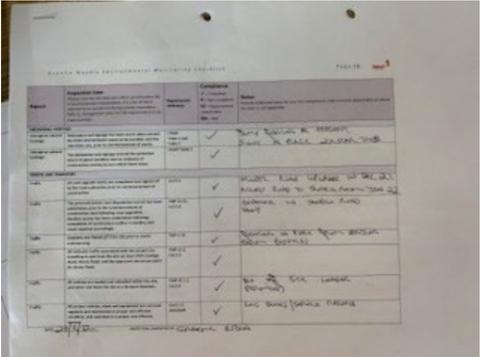
Independent Audit Table

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
SCHEDULE 2: ADMINISTRATIVE CONDITIONS				
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
Schedule 2 Condition 1	In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	<ul style="list-style-type: none"> - All evidence collected and observations made during this audit (for construction phase of development). - Evidence was not collected regarding the operation, upgrading or decommissioning phases of the development as these phases have not yet occurred. 	The environmental management and mitigation measures in place for construction of the Project were deemed to be generally suitable and consistent with Consent conditions.	Compliant (Construction phase only)
TERMS OF CONSENT				
Schedule 2 Condition 2	<p>The Applicant must carry out the development:</p> <p>(a) generally in accordance with the EIS; and</p> <p>(b) in accordance with the conditions of this consent.</p> <p><i>Note: The general layout of the development is shown in Appendix 1.</i></p>	The findings of this audit	The development is being carried out generally in accordance with the EIS and the conditions of this Development Consent. No significant adverse impacts associated with construction were identified during the audit.	Compliant
Schedule 2 Condition 3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	N/A	There have been no reported inconsistencies between the plans and documentation referred to in this condition.	Not triggered
Schedule 2 Condition 4	<p>The Applicant must comply with any requirement/s of the Secretary arising from the Department's assessment of:</p> <p>(a) any strategies, plans or correspondence that are submitted in accordance with this consent;</p> <p>(b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and</p> <p>(c) the implementation of any actions or measures contained in these documents.</p>	- All evidence collected and observations made during this audit	The proponent has complied with requests and requirements from the Secretary.	Compliant
FINAL LAYOUT PLANS				
Schedule 2 Condition 5	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Secretary, including details on the siting of solar panels and ancillary infrastructure.	<ul style="list-style-type: none"> - Avonlie Solar Farm - Site Equipment Layout, Solar Farm Area plan (Rev. OC, 22/11/21) - DPIE post approval lodgement email dated 26/11/21 confirming upload of Final Layout Plans - Correspondence dated 26/11/21 from DPIE acknowledging submission of Final Layout Plans (Rev. OC, 22/11/21) 	Detailed Final Layout Plans were first lodged with DPIE on 26/11/21 which included details on the location of the solar panels and ancillary infrastructure. The plans were lodged prior to commencement of construction.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE				
Schedule 2 Condition 6	Over time, the Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.	N/A	Not relevant as upgrade has not occurred	Not triggered
WORK AS EXECUTED PLANS				
Schedule 2 Condition 7	Prior to commencing operations, or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development to the Department.	N/A	Not relevant as operation phase not yet commenced	Not triggered
NOTIFICATION OF DEPARTMENT				
Schedule 2 Condition 8	<p>Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing of the date of commencement, or cessation, of the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>	- Correspondence to DPIE dated 26/11/21 from proponent providing date of commencement of construction as 06/12/21	<p>Commencement of construction notified to DP&E prior to on site commencement of construction.</p> <p>The proponent does not intend to stage any of the phases of development.</p>	Compliant
STRUCTURAL ADEQUACY				
Schedule 2 Condition 9	<p>The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the <i>Building Code of Australia</i>.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> - Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development. - Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. 	- Narrandera Shire Council Construction Certificate No. 1 – CC-022-2021-2022 for construction of boundary fence (dated 07/02/22)	The proponent has obtained a Construction Certificate for the boundary fence	Compliant
DEMOLITION				
Schedule 2 Condition 10	The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	N/A	The proponent is not undertaking any demolition work as part of this development	Not triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
PROTECTION OF PUBLIC INFRASTRUCTURE				
Schedule 2 Condition 11	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>(b) 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>This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.</p>	N/A	No evidence of damage or relocation of any public infrastructure identified during audit.	Not triggered
OPERATION OF PLANT AND EQUIPMENT				
Schedule 2 Condition 12	<p>The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<p>- Plant and Vehicle Acceptance Inspection Checklists and registers are held on-site. Checklists and registers contain relevant information including details of last and next service, maintenance requirements, risk assessment, operating manuals, etc. Daily pre-start checklist is also completed.</p>	<p>Completed register/inspections/maintenance records held on site. All relevant information presented within the registers. Information was current to date of audit site visit. No evidence of defective or poorly maintained/operated plant and equipment was noted during the audit.</p>	Compliant
SUBDIVISION PLAN				
Schedule 2 Condition 13	<p>The Applicant may subdivide the site to create three new allotments, as identified in the figure in Appendix 3 and in accordance with the requirements of the EP&A Act and EP&A Regulation.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> - Under Part 6 of the EP&A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision. - Division 4 of Part 8 of the EP&A Regulation sets out the application requirements for subdivision certificates 	<ul style="list-style-type: none"> - Two (2) lot plans as proof of 2ha TransGrid subdivision (Lot 1/1258998 and Lot 2/1258998) - Correspondence regarding upcoming 48ha property Subdivision 	<p>TransGrid 2ha subdivision has been completed and 48ha property subdivision is underway.</p>	Compliant
SCHEDULE 3: ENVIRONMENTAL CONDITIONS - GENERAL				
BATTERIES				
Battery Storage Restriction				
Schedule 3 Condition 1	<p>The capacity of the battery storage system must not exceed 100 MW / 100 MW hours and be generally in accordance with the figure in Appendix 1.</p> <p><i>Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage system in the future.</i></p>	<p>- Latest version of Environmental Management Strategy (Rev. 1, 29/06/21) refers to 100 MW / 100 MW hours battery storage system</p>	<p>Capacity of battery storage is in accordance with this condition.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
TRANSPORT				
Over-Dimensional and Heavy Vehicle Restrictions				
Schedule 3 Condition 2	<p>The Applicant must ensure that the:</p> <p>(a) development does not generate more than:</p> <ul style="list-style-type: none"> • 35 heavy vehicle movements a day during construction, upgrading and decommissioning; • 3 over-dimensional vehicle movement during construction, upgrading and decommissioning; and • 2 heavy vehicle movements a day during operations; <p>on the public road network;</p> <p>(b) length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 19 metres, unless the Secretary agrees otherwise.</p>	<p>- Traffic Management Plan, Avonlie Solar Farm, June 2021 (Rev. 2, 26/06/21) prepared by Jacobs</p> <p>- DP&E approval letter of Traffic Management Plan (Rev. 2, 26/06/21) dated 15/07/21</p> <p>- A register of heavy (HV) and over-dimensional (OD) vehicles is maintained by the Project team. The registers are periodically reviewed and results documented on the environmental inspection checklist.</p> <p>- At the time of the audit site visit, the maximum number of daily HV movements had been 31 of the allowable 35. Typically, HV movements were approximately 22-28 per work day.</p> <p>- No OD vehicles movements had occurred since the commencement of construction, however due to a design change, an application to DP&E to increase the number of OD movements was noted to be in progress.</p> <p>- Project management team conducts ongoing intersection monitoring. Road and intersection upgrades have been conducted to facilitate safer truck movements.</p>	<p>Heavy vehicle movements were appropriately tracked and consistent with Development Consent conditions.</p>	<p>Compliant</p>
Schedule 3 Condition 3	<p>The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering or leaving the site each day for the duration of the project.</p>	<p>- Traffic Management Plan, Avonlie Solar Farm, June 2021 (Rev. 2, 26/06/21) prepared by Jacobs</p> <p>- DP&E approval letter of Traffic Management Plan (Rev. 2, 26/06/21) dated 15/07/21</p> <p>- Environmental Inspection Checklists and heavy (HV) and over-dimensional (OD) vehicle tracking register viewed on site. HV volumes were confirmed to range between 3 and 31 movements per day. No OD</p>	<p>Heavy vehicle movements were appropriately tracked and consistent with Development Consent conditions.</p>	<p>Compliant</p>

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>movements had occurred since the commencement of construction.</p> 		
Access Route				
<p>Schedule 3 Condition 4</p>	<p>All vehicles associated with the development must travel to and from the site via the Sturt Highway, Sandigo Road, Muntz Road and the site access point on Muntz Road, as identified in the figure in Appendix 1.</p> <p><i>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.</i></p>	<ul style="list-style-type: none"> - Traffic Management Plan, Avonlie Solar Farm, June 2021 (Rev. 2, 26/06/21) prepared by Jacobs - DP&E approval letter of Traffic Management Plan (Rev. 2, 26/06/21) dated 15/07/21 - Environmental Inspection Checklists include relevant information to confirm requirements 	<p>All vehicles were noted to be adhering to the travel and entry requirements of this condition at the time of the audit.</p>	<p>Compliant</p>

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Road Upgrades and Site Access				
Schedule 3 Condition 5	<p>Unless otherwise agreed with the Secretary, prior to commencing construction, the Applicant must:</p> <p>(a) upgrade the intersection of the Sturt Highway and Sandigo Road, including BAR/AUL(s) treatments;</p> <p>(b) upgrade the intersection of Sandigo Road and Muntz Road, including BAR treatment with minimum 200 mm compacted gravel (CBR of 30) and 20/14 seal;</p> <p>(c) upgrade Sandigo Road from the Sturt Highway to 100 m past Muntz Road, including sealing to a width of 7 m with minimum 200 mm compacted gravel (CBR of 30), 20/14 seal and 1 m gravel shoulders;</p> <p>(d) upgrade Muntz Road between Sandigo Road and the site access point, including a gravel surface to a width of 6.2 m with 0.5 m shoulders; and</p> <p>(e) design the site access point off Muntz Road (shown in Appendix 1) with a Rural Property Access type treatment to cater for the largest vehicle accessing the site, as identified in the figure in Appendix 5.</p> <p>These upgrades must comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), be generally in accordance with the figures in Appendix 5 and be carried out to the satisfaction of the relevant roads authority.</p>	<p>- Correspondence (email) from the Narrandera Shire Council, dated 23/12/21, confirming that all requirements regarding this condition had either been completed to the relevant road authority standards or Narrandera Shire had been engaged to completed the required works</p> <p>- Letter of Practical Completion (for Avonlie Solar Farm) dated 23/12/21.</p>	<p>Road upgrade and site access works were carried out to the satisfaction of the relevant roads authority.</p> <p>Narrandera Shire Council noted that the proponent had undertaken additional upgrades of Muntz Road and this was an enhancement to the project which was commendable.</p>	Compliant
Operating Conditions				
Schedule 3 Condition 6	<p>The Applicant must ensure:</p> <p>(a) the internal roads are constructed as all-weather roads;</p> <p>(b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site;</p> <p>(c) the capacity of the existing roadside drainage network is not reduced;</p> <p>(d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and</p> <p>(e) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the sealed public road network.</p>	<p>- Traffic Management Plan, Avonlie Solar Farm, June 2021 (Rev. 2, 26/06/21) prepared by Jacobs</p> <p>- DP&E approval letter of Traffic Management Plan (Rev. 2, 26/06/21) dated 15/07/21</p> <p>- Environmental Inspection Checklists</p> <p>- Auditor's site visit</p>	<p>Assumed triggered for both construction and operation phase.</p> <p>Relevant environmental protection measures were noted to be implemented on site and are regularly monitored.</p>	Compliant
Traffic Management Plan				
Schedule 3 Condition 7	<p>Prior to commencing the development, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Secretary. This plan must include:</p> <p>(a) details of the transport route to be used for all development-related traffic;</p> <p>(b) a protocol for undertaking independent dilapidation surveys to assess the:</p> <ul style="list-style-type: none"> existing condition of Sandigo Road and Muntz Road prior to construction, upgrading or decommissioning activities; and condition of Sandigo Road and Muntz Road following construction, upgrading or decommissioning activities; <p>(c) a protocol for the repair of Sandigo Road and Muntz Road if dilapidation surveys identify these roads to be damaged during construction, upgrading or decommissioning works;</p> <p>(d) details of the road upgrade works required by condition 5 of Schedule 3 to this consent;</p> <p>(e) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including:</p>	<p>- Traffic Management Plan, Avonlie Solar Farm, June 2021 (Rev. 2, 26/06/21) prepared by Jacobs</p> <p>- DP&E approval letter of Traffic Management Plan (Rev. 2, 26/06/21) dated 15/07/21</p> <p>- Environmental Inspection Checklists</p> <p>- Vehicle tracking registers</p> <p>- Toolbox training records</p> <p>- Site Induction (reviewed 28/02/22)</p>	<p>The Traffic Management Plan (TMP) was prepared prior to the commencement of construction.</p> <p>DP&E stated that they had carefully reviewed the TMP and were satisfied that the plan met the requirements of condition 7 of Schedule 3.</p> <p>The TMP was developed in consultation with TfNSW and Council as discussed in Section 1.6 of the TMP.</p> <p>During the Auditor's site visits and interviews of 02/03/22, evidence of implementation of the TMP was confirmed including records of traffic movement, car-pooling, posting of speed limits, measures to limit mud-tracking, tool-box records, etc.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> • temporary traffic controls, including detours and signage; • notifying the local community about project-related traffic impacts; • procedures for receiving and addressing complaints from the community about development-related traffic; • minimising potential for conflict with school buses and other motorists as far as practicable; • implement measures to minimise dirt tracked onto the public road network from development-related traffic; • details of the employee shuttle bus service and measures to encourage employee use of this service; • scheduling of haulage vehicle movements to minimise convoy length or platoons; • responding to local climate conditions that may affect road safety such as fog, dust and wet weather; • responding to any emergency repair or maintenance requirements; and • a traffic management system for managing over-dimensional vehicles; <p>(f) a driver’s code of conduct that addresses:</p> <ul style="list-style-type: none"> • travelling speeds; • driver fatigue; • procedures to ensure that drivers adhere to the designated transport routes; and • procedures to ensure that drivers implement safe driving practices; and <p>(g) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan.</p> <p>Following the Secretary’s approval, the Applicant must implement the Traffic Management Plan.</p>	<p>- Signage</p>		
LAND MANAGEMENT				
Schedule 3 Condition 8	<p>Following any construction or upgrading on the site, the Applicant must:</p> <p>(a) restore the ground cover of the site as soon as practicable;</p> <p>(b) maintain the ground cover with appropriate perennial species; and</p> <p>(c) manage weeds within this ground cover.</p>	<p>- Biodiversity Management Plan, Avonlie Solar Farm, December 2020 (Rev. Final V4, 28/06/21) prepared by NGH Environmental</p> <p>- DPIE approval letter of Biodiversity Management Plan (Rev. Final V4, 28/06/21) dated 15/07/21</p> <p>- Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. O.G, 14/02/22) prepared by beon.</p>	<p>Not relevant until after construction (or upgrading) is completed.</p> <p>Removal of groundcover has been minimised during construction to help ensure adequate groundcover.</p>	Not triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
BIODIVERSITY				
Vegetation Clearance				
Schedule 3 Condition 9	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	<ul style="list-style-type: none"> - Viewing of project boundary fencing and exclusion zone flagging/signage - Viewing of retained vegetation from clearing for use in habitat enhancement during site visit - Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. O.G, 14/02/22) prepared by beon. - Environmental Inspection Checklists 	<p>No evidence of clearing of any native vegetation or fauna habitat located outside of the approved disturbance areas described in the EIS was noted during the audit program.</p> <p>Weekly inspections of boundaries occur, exclusion zones are in place and induction/tool-box training emphasises that no unapproved clearing/habitat disturbance is permitted.</p> <p>Section 15.9 of the WHSEMP lists biodiversity management measures.</p>	Compliant
Biodiversity Offsets				
Schedule 3 Condition 10	<p>Within two years of commencing the development under this consent, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below, unless the Secretary agrees otherwise.</p> <p>The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by:</p> <ul style="list-style-type: none"> (a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; (b) making payments into an offset fund that has been developed by the NSW Government; or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. 	<ul style="list-style-type: none"> - Biodiversity Management Plan, Avonlie Solar Farm, December 2020 (Rev. Final V4, 28/06/21) prepared by NGH Environmental - DPIE approval letter of Biodiversity Management Plan (Rev. Final V4, 28/06/21) dated 15/07/21 	Not relevant at this stage of development as biodiversity credits do not need to be retired until 06/12/23, i.e. within two years of commencement of construction.	Not triggered

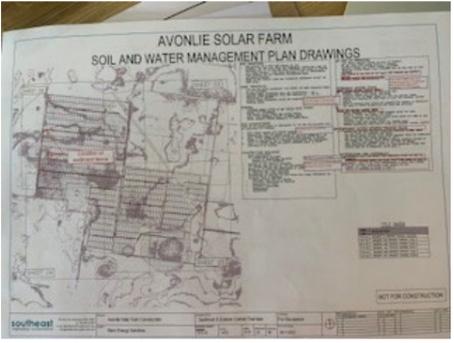
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	<p><i>Table 1: Ecosystem Credit Requirements</i></p> <table border="1" data-bbox="394 346 1359 436"> <thead> <tr> <th>Vegetation Community</th> <th>PCT ID</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td>Western Grey Box – White Cypress Pine tall woodland on loam soil on alluvial plains of NSW South Western Slopes Bioregion and Riverina Bioregion</td> <td>80</td> <td>76</td> </tr> </tbody> </table> <p><i>Table 2: Species Credit Requirements</i></p> <table border="1" data-bbox="394 478 1359 657"> <thead> <tr> <th>Species Credit Species</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td>Sand-hill Spider Orchid (Caladenia Arenaria)</td> <td>40</td> </tr> <tr> <td>Oaklands Diuris (Diuris sp.)</td> <td>40</td> </tr> <tr> <td>Pine Donkey Orchid (Diuris tricolor)</td> <td>21</td> </tr> <tr> <td>A Spear Grass (Austrostipa wakoolica)</td> <td>27</td> </tr> <tr> <td>Superb Parrot (Polytelis swainsonii)</td> <td>6</td> </tr> <tr> <td>Major Mitchell Cockatoo (Lophochroa leadbeateri)</td> <td>6</td> </tr> </tbody> </table>	Vegetation Community	PCT ID	Credits Required	Western Grey Box – White Cypress Pine tall woodland on loam soil on alluvial plains of NSW South Western Slopes Bioregion and Riverina Bioregion	80	76	Species Credit Species	Credits Required	Sand-hill Spider Orchid (Caladenia Arenaria)	40	Oaklands Diuris (Diuris sp.)	40	Pine Donkey Orchid (Diuris tricolor)	21	A Spear Grass (Austrostipa wakoolica)	27	Superb Parrot (Polytelis swainsonii)	6	Major Mitchell Cockatoo (Lophochroa leadbeateri)	6			
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Schedule 3 Condition 11	<p>Prior to commencing the development, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> (i) protecting vegetation and fauna habitat outside the approved disturbance areas; (ii) managing the remnant vegetation and fauna habitat on site; (iii) minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; (iv) minimising the impacts to fauna on site and implementing fauna management protocols; <ul style="list-style-type: none"> • avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna; • rehabilitating and revegetating temporary disturbance areas with species that are endemic to the area; (v) maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and (vi) controlling weeds and feral pests; and <p>(b) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following the Secretary’s approval, the Applicant must implement the Biodiversity Management Plan.</p> <p><i>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biodiversity Stewardship Agreement.</i></p>	<ul style="list-style-type: none"> - Biodiversity Management Plan, Avonlie Solar Farm, June 2021 (Rev. Final V4, 28/06/21) prepared by NGH Environmental - DPIE approval letter of Biodiversity Management Plan (Rev. Final V4, 28/06/21) dated 15/07/21 - Pre & Post-Clearing Reports (NGH Environmental [NGH], 04/11/21 & 24/12/22 - Site Induction (Reviewed 28/02/22) and toolbox records - Environmental Inspection Checklists 	<p>The Biodiversity Management Plan (BMP) was prepared prior to the commencement of construction.</p> <p>DP&E stated that they had carefully reviewed the BMP and were satisfied that it was consistent with this condition.</p> <p>The BMP was developed in consultation with BCS as discussed in Section 1.8 of the BMP.</p> <p>The BMP included a description of measures that would be implemented.</p> <p>Sections 8 of the BMP discuss the roles and responsibilities for monitoring, reviewing and implementation of the BMP.</p> <p>Pre-clearing survey were undertaken by ecologists from NGH in accordance with the BMP. Clearing of habitat trees was undertaken in October and December 2021 by NGH ecologists.</p> <p>The salvage of vegetative and soil resources has been maximised and the auditor noted the following during the site visit:</p> <ul style="list-style-type: none"> • The project has been designed to require only minimal earthworks associated with access road construction. In particular, no cut/fill activities will occur • Removal of surface vegetation has been minimised as a key measure to reducing potential erosion • Cleared vegetation has been retained for future reuse in habitat enhancement <p>Site induction contains information regarding flora and fauna management and additional tool-boxing has been completed.</p> <p>Weekly inspection records contain relevant biodiversity management content.</p>	Compliant																				
AMENITY																								

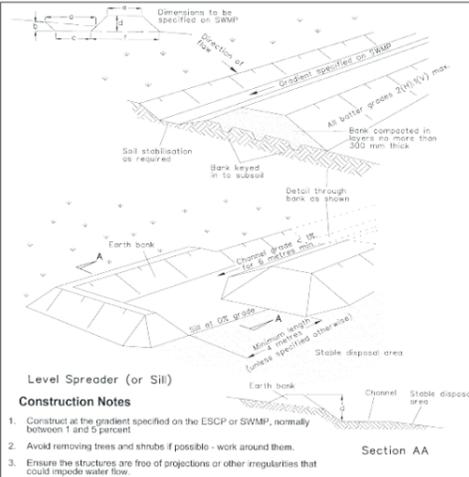
Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Construction, Upgrading and Decommissioning Hours				
Schedule 3 Condition 12	<p>Unless the Secretary agrees otherwise, the Applicant may only undertake construction, upgrading or decommissioning activities on site between:</p> <p>(a) 7 am to 6 pm Monday to Friday; (b) 8 am to 1 pm Saturdays; and (c) at no time on Sundays and NSW public holidays.</p> <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary:</p> <ul style="list-style-type: none"> the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or emergency work to avoid the loss of life, property and/or material harm to the environment. 	<p>- Avonlie Solar Farm Environmental Management Strategy (EMS) (Rev. I, 26/06/21) prepared by Siemens AG</p> <p>- DP&E approval letter of Environmental Management Strategy (Rev. I, 29/06/21) dated 16/07/21</p> <p>- Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. O.G, 14/02/22) prepared by beon</p> <p>- Site Induction (Rev 11, 14/02/22) and toolbox records</p> <p>- Interviews with site personnel</p>	<p>Approved construction hours are listed within Section 1.6 of the WHSEMP.</p> <p>Site induction lists construction hours in accordance with this condition.</p> <p>Approved construction hours are monitored by Construction Manager and HSE Advisor. During the site visit and interviews of 02/03/22, the Auditor confirmed site personnel were aware of permitted construction hours.</p> <p>Approved construction hours are discussed a part of the toolbox training content.</p>	Compliant
Noise				
Schedule 3 Condition 13	The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version.	<p>- Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. O.G, 14/02/22) prepared by beon.</p> <p>- Site Induction (Rev 11, 14/02/22) and toolbox records</p> <p>- Environmental Inspection Checklists</p>	<p>Noise management and mitigation measures are discussed in Section 15.11 of the WHSEMP.</p> <p>Site works deemed to be consistent with relevant WHSEMP mitigation measures. No high-noise generating activities noted during the site visit 02 /03/22.</p>	Compliant
Dust				
Schedule 3 Condition 14	The Applicant must minimise the dust generated by the development.	<p>- Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. O.G, 14/02/22) prepared by beon.</p> <p>- Environmental Inspection Checklists</p> <p>- Site Induction (Rev 11, 14/02/22) and toolbox records</p>	<p>Dust (and air quality) management and mitigation measures are discussed in Section 15.12 of the WHSEMP.</p> <p>Site works deemed to be consistent with relevant Environmental Management Strategy mitigation measures. No significant dust emissions noted during site visit of 02/03/22. Four (4) full time water carts were noted to be available for on-site use at the time of the audit.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
				
Visual				
Schedule 3 Condition 15	The Applicant must: (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	- No additional signage present at time of site visit on 02/03/22 apart from that required for identification and/or safety purposes - Proponent confirmed Project designs have incorporated relevant measures to address potential visual impacts	Confirmation of as-built conditions will occur upon commencement of project operation.	Compliant
Lighting				
Schedule 3 Condition 16	The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: <ul style="list-style-type: none"> is installed as low intensity lighting (except where required for safety or emergency purposes); does not shine above the horizontal; and complies with <i>Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version. 	- Proponent confirmed Project designs have incorporated relevant measures to address potential lighting impacts, although at the time of the audit the lighting design had not been finalised for construction. - Construction lighting is monitored to minimise potential light-spill	Minimal lighting is proposed and will include down-lights on sensors to minimise potential off-site impacts.	Compliant
HERITAGE				
Protection of Heritage Items				
Schedule 3 Condition 17	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 4 or located outside the approved development footprint. Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 4, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location on site, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version. <i>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 4.</i>	- Cultural Heritage Management Plan (CHMP), Avonlie Solar Farm, September 2020 (Rev. Final 1.3, 08/07/21) prepared by NGH Environmental - DPIE approval letter of Cultural Heritage Management Plan (Rev. 1.3, 08/07/21) dated 15/07/21 - Aboriginal Cultural Heritage Salvage Report (Rev. Final 16/12/19) - Site Induction (Reviewed 28/02/22) - Environmental Inspection Checklists	Salvage and relocation of Aboriginal heritage items occurred between 21/10/19 and 24/10/19. Impact site cards have been submitted to AHIMS for the sites salvaged within the approved development footprint for the project Salvage items were reburied in a fenced and protected area and a new site card has been submitted and approved for the location of the reburied artefacts (AHIMS #49-6-0237). Cultural heritage content is presented as part of the general site induction and other site-based training.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>- Site visit of 02/03/22</p>	<p>Appropriate exclusion zone signage fencing observed during site visit of 02/03/22.</p> <p>Heritage mitigation measures were noted to have been assessed and recorded within Weekly Environmental Inspection checklists</p> <p>Non-compliance No. 1 (ASF-IEA-22-NC1): 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>Recommendation No. 1 (ASF-IEA-22-R1): In response to Non-compliance No. 1 the following action is recommended:</p> <ol style="list-style-type: none"> a) Advise DP&E and relevant stakeholders of salvage outcomes; and b) The CHMP should be revised to reflect the findings of the 2019 Aboriginal Cultural Heritage Salvage Report. 	
Heritage Management Plan				
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> <p>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</p> <p>(b) be prepared in consultation with Heritage NSW and Aboriginal Stakeholders;</p> <p>(c) include a description of the measures that would be implemented for:</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>- Cultural Heritage Management Plan (CHMP), Avonlie Solar Farm, September 2020 (Rev. Final 1.3, 08/07/21) prepared by NGH Environmental</p> <p>- DPIE approval letter of Cultural Heritage Management Plan (Rev. 1.3, 08/07/21) dated 15/07/21</p> <p>- Site Induction (Reviewed 28/02/22)</p>	<p>The CHMP was prepared prior to the commencement of construction.</p> <p>DP&E stated that they had carefully reviewed the CHMP and were satisfied that it was consistent with the conditions of consent.</p> <p>The CHMP was developed in consultation with Heritage NSW/BCD and Aboriginal Stakeholders (Registered Aboriginal Parties) as shown by comments provided in Section 4 of the CHMP.</p> <p>Proponent and their contractor reported that no chance finds have been identified on site.</p>	Compliant

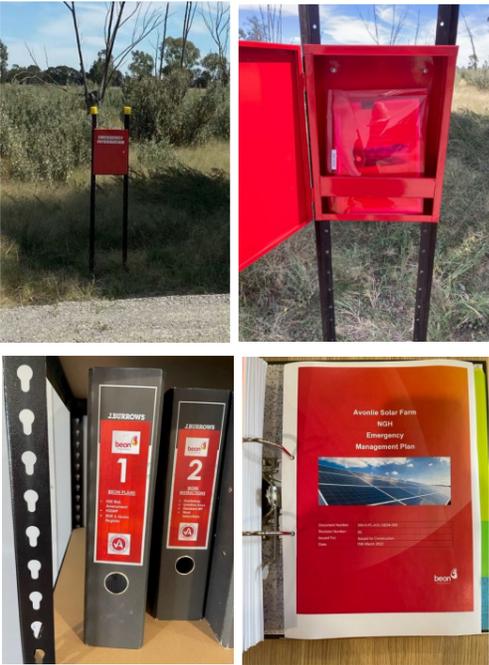
Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and ongoing consultation with Aboriginal stakeholders during the implementation of the plan; <p>(d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>		<p>The general site induction was reviewed during the audit program and it was noted that it contained appropriate content regarding Aboriginal Heritage management including:</p> <ul style="list-style-type: none"> Cultural acknowledgement of Traditional Custodians Discussion of "No go" zones, i.e. exclusion zones around heritage sites A map of the site showing the protected sites What to do if there is a discovery of a suspected Aboriginal object, historic relic or human skeletal remains Photographic examples of Aboriginal stone artefacts <p>Salvage and relocation of Aboriginal heritage items occurred between 21/10/19 and 24/10/19.</p> <p>Impact site cards have been submitted to AHIMS for the sites salvaged within the approved development footprint for the project.</p> <p>Salvage items were reburied in a fenced and protected area and a new site card has been submitted and approved for the location of the reburied artefacts (AHIMS #49-6-0237).</p>	
SOIL AND WATER				
Water Supply				
Schedule 3 Condition 19	<p>The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.</p> <p><i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.</i></p>	<ul style="list-style-type: none"> Project personnel confirmed that no water licence was currently required for construction Potable water purchased from Narrandera Shire Council is held within on-site tanks Water from rainfall was retained for re-use 	<p>The scale of the development was considered to be consistent with available water supply. In general, water use requirements were not considered to be significant due to the minimal earthworks that will occur.</p>	Compliant
Water Pollution				
Schedule 3 Condition 20	<p>The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.</p>	<ul style="list-style-type: none"> Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. O.G, 14/02/22) prepared by beon. Stormwater Management Plan (Rev B, 28/06/21) – Section 4.4 – Mitigation and Management Measures DPIE approval letter of Stormwater Management Plan (Rev. B, 28/06/21) dated 16/07/21 	<p>Erosion/sedimentation controls observed were consistent with Soil and Water Management Plan Drawings during site visit.</p> <p>No evidence of off-site flows of sediment-laden water and/or erosion and/or sedimentation were observed during the site visit.</p> <p>A high degree of groundcover was noted to have been retained across the site as no cut/fill type bulk earthworks were required for the Project.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> - Primary Erosion and Sediment Control Plan inc. drawings - Environmental Inspection Checklists - On-site environmental controls were viewed during site visit 		
Operating Conditions				
Schedule 3 Condition 21	<p>The Applicant must:</p> <p>(a) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual, or its latest version; and</p> <p>(b) ensure all works (including watercourse crossings) are undertaken in accordance with the following, unless DPIE Water agrees otherwise:</p> <ul style="list-style-type: none"> • <i>Guidelines for Controlled Activities on Waterfront Land</i> (NRAR, 2018), or its latest version; and • <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (2004), or its latest version. 	<ul style="list-style-type: none"> - Avonlie Solar Farm Environmental Management Strategy (EMS) (Rev. I, 26/06/21) prepared by Siemens AG - DP&E approval letter of Environmental Management Strategy (Rev. I, 29/06/21) dated 16/07/21 - Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. O.G, 14/02/22) prepared by beon - Stormwater Management Plan (Rev B, 28/06/21) - DPIE approval letter of Stormwater Management Plan (Rev. B, 28/06/21) dated 16/07/21 - Environmental inspection checklists - Site visit of 02/03/22 	<p>DP&E-approved EMS has been developed with reference to relevant guidelines and requirements.</p> <p>Erosion/sedimentation controls observed were consistent with Soil and Water Management Plan during site visit.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Stormwater Management				
Schedule 3 Condition 22	<p>Prior to commencing construction, the Applicant must prepare a detailed Stormwater Management Plan for the site to the satisfaction of the Secretary.</p> <p>Following the Secretary's approval, the Applicant must implement the Stormwater Management Plan.</p>	<ul style="list-style-type: none"> - Stormwater Management Plan (Rev B, 28/06/21) - DPIE approval letter of Stormwater Management Plan (Rev. B, 28/06/21) dated 16/07/21 - Avonlie Solar Farm Environmental Management Strategy (EMS) (Rev. I, 26/06/21) prepared by Siemens AG - DP&E approval letter of Environmental Management Strategy (Rev. I, 29/06/21) dated 16/07/21 - Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. O.G, 14/02/22) prepared by beon. - Environmental inspection checklists - Site visit of 02/03/22 	<p>DP&E-approved EMS has been developed with reference to relevant guidelines and requirements.</p> <p>Erosion/sedimentation controls observed were consistent with the Stormwater Management Plan during site visit.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
HAZARDS				
Fire Safety Study				
Schedule 3 Condition 23	<p>Prior to commencing construction of the battery storage facility or systems, unless the Secretary agrees otherwise, the Applicant must prepare a Fire Safety Study of the development, in consultation with FRNSW and RFS, and to the satisfaction of the Secretary. The study must:</p> <p>(a) be consistent with the:</p> <ul style="list-style-type: none"> Department's <i>Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study'</i> guideline; and NSW Government's <i>Best Practice Guidelines for Contaminated Water Retention and Treatment Systems</i>; and <p>(b) describe the final design of the battery storage facility or systems.</p> <p>Following the Secretary's approval, the Applicant must implement the measures described in the Fire Safety Study.</p>	N/A	Commencement of battery storage facility has not commenced	Not triggered
Storage and Handling of Dangerous Materials				
Schedule 3 Condition 24	<p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> if the chemicals are liquids.</p> <p>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	<p>- Avonlie Solar Farm Environmental Management Strategy (EMS) (Rev. 1, 26/06/21) prepared by Siemens AG</p> <p>- DP&E approval letter of Environmental Management Strategy (Rev. 1, 29/06/21) dated 16/07/21</p> <p>- Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. 0.G, 14/02/22) prepared by beon.</p> <p>- Environmental Inspection Checklists</p> <p>- Interviews and site visit</p> 	<p>Status of spill prevention and clean-up measures documented in weekly Environmental Inspection Checklists.</p> <p>Appropriately stocked spill kits were present at the Project site.</p> <p>Bunded storage containers present for flammable and combustible liquids.</p> <p>Safety Data Sheets held on-site.</p> <p>Portable bunds present at location where fuelling occurs.</p> <p>Housekeeping was of a high standard.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
				
Operating Conditions				
Schedule 3 Condition 25	<p>The Applicant 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> <ul style="list-style-type: none"> includes at least a 10 metre defendable space around the perimeter of the solar array area and battery storage facility that permits unobstructed vehicle access; manages the defendable space and solar array areas as an Asset Protection Zone; complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2006 (or equivalent) and Standards for Asset Protection Zones; is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65mm Storz and a FRNSW compatible fitting located adjacent to the internal access road; <p>(c) assist the RFS 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 construction of the development, and prior to commencing operations.</p>	N/A	<p>This condition discusses operating conditions and must be complied with prior to commencement of operations and is therefore not relevant to this audit.</p> <p>Commendation: To provide additional resources for site protection from potential fires during construction of the Project, the team have brought forward the installation program for the required operational fire fighting equipment noted under Development Consent Schedule 3 Condition 25(b): "20,000 L water supply tank fitted with a 65 mm Storz and a FRNSW compatible fitting located adjacent to the internal access road".</p>	Not triggered
Emergency Plan				
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. 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>(b) identify the risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;</p> <p>(c) list works that should not be carried out during a total fire ban;</p> <p>(d) include availability of fire suppression equipment, access and water;</p> <p>(e) include procedures for the storage and maintenance of any flammable materials;</p> <p>(f) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;</p>	<p>- Avonlie Solar Farm Emergency Management Plan (Rev. V1.3, 04/03/22) prepared by NGH</p> <p>- Email correspondence from RFS dated 01/03/22 stating their satisfaction with the EMP (Appendix B of EMP Rev. V1.3)</p> <p>- One copy of the EMP is located in the Emergency Information Cabinet at the site entrance and one is held within the site office (see pictures below)</p>	<p>The Emergency (Management) Plan (EMP) was not developed prior to commencement of construction.</p> <p>The first draft of the EMP (Draft V1.0) was dated 08/12/21, prior to the date of commencement of construction (06/12/21) and there was no evidence of correspondence from FRNSW and the RFS regarding the EMP being developed to their satisfaction.</p> <p>A subsequent version of the EMP (V1.3) dated 04 March 2022 contained endorsement of the Plan from RFS.</p> <p>Non-compliance No. 2 (ASF-IEA-22-NC2): The Emergency (Management) Plan was not developed prior to the commencement of construction. In addition, feedback was not received from FRNSW and the RFS regarding their level of</p>	Non-compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>(g) include a figure showing site infrastructure, Asset Protection Zone and the fire fighting water supply; (h) include location of hazards (physical, chemical and electrical) that may impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations; (i) include details of the location, management and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone; (j) include bushfire emergency management planning; (k) include details of how RFS would be notified, and procedures that would be implemented in the event that:</p> <ul style="list-style-type: none"> • there is a fire on-site or in the vicinity of the site; • there are any activities on site that would have the potential to ignite surrounding vegetation; or • there are proposed activities to be carried out during a bushfire danger period. <p>Following approval, the Applicant must implement the Emergency Plan.</p>		<p>satisfaction with the EMP prior to the commencement of construction.</p> <p>Recommendation No. 2 (ASF-IEA-22-R2): In response to Non-compliance No. 2 the following action is recommended: a) Seek feedback from FRNSW as a matter of priority and update EMP if required</p>	
WASTE				
Schedule 3 Condition 27	<p>The Applicant must:</p> <p>(a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version); (c) store and handle all waste on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal.</p>	<ul style="list-style-type: none"> - Avonlie Solar Farm Environmental Management Strategy (EMS) (Rev. 1, 26/06/21) prepared by Siemens AG - DP&E approval letter of Environmental Management Strategy (Rev. 1, 29/06/21) dated 16/07/21 - Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. 0.G, 14/02/22) prepared by beon. - Waste registers - Environmental Inspection Checklists - Site visits and interviews 	<p>Evidence of required waste management, including appropriate segregation, sorting and storage, was noted during the site visit.</p> <p>Housekeeping was of a very high standard across the entire Project site.</p> <p>An electronic register of waste streams was maintained by the contractor.</p> <p>Innovative systems were in place to ensure wastes were appropriately and effectively managed. In particular, detailed forward planning to implement recycling, reuse and management strategies for the various construction-phase related waste streams had been conducted to ensure the site was appropriately managed.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
				
ACCOMMODATION AND EMPLOYMENT STRATEGY				
Schedule 3 Condition 28	<p>Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Narrandera Shire Council, and to the satisfaction of the Secretary. This strategy must:</p> <p>(a) propose a strategy to ensure there is sufficient accommodation for the workforce associated with the development;</p> <p>(b) consider the cumulative impacts associated with other State significant development projects in the area;</p> <p>(c) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible;</p> <p>(d) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction.</p> <p>Following the Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.</p>	<p>- Avonlie Solar Farm Accommodation and Employment Strategy (AES) (Rev. E, 29/06/21) prepared by Jacobs</p> <p>- DP&E approval letter of AES (Rev. E, 29/06/21) dated 14/07/21</p> <p>- Evidence of actions to encourage local employment (as listed in Table 6-1) of AES included:</p> <ul style="list-style-type: none"> • Two local Aboriginal Community Engagement Officers have been employed to support local employment • Community employment session held in Narrandera in February • Project procurement session held for local businesses and listed on ICN • Correspondence between Beon and Chandler McLeod (labour recruiting provider) regarding recruitment reporting and the training and employment program • Correspondence with TAFE NSW regarding pre-employment training and Electrotechnology (Career Start) Certificate II • List of stakeholder engagement from November 2021 to March 2022 	<p>The Accommodation and Employment Strategy (AES) was prepared prior to the commencement of construction.</p> <p>DPIE stated that they had carefully reviewed the AES and were satisfied that it was consistent with this condition.</p> <p>The AES was developed in consultation with Narrandera Shire Council as discussed in Section 4 of the AES.</p> <p>Commendation: It is considered that the Project team has been proactive in trying to recruit local workers and businesses, meeting with Narrandera Shire Council, the Solar Reference Group, local Aboriginal community representatives, TAFE NSW, Sureway Employment and Training Narrandera. In addition, they have employed two local Aboriginal Community Engagement Officers to support local employment within the Aboriginal community.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		 		

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status										
														
DECOMMISSIONING AND REHABILITATION														
Schedule 3 Condition 29	<p>Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 3.</p> <p><i>Table 3: Rehabilitation Objectives</i></p> <table border="1" data-bbox="371 1207 1365 1423"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>Site</td> <td> <ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use </td> </tr> <tr> <td>Solar farm infrastructure</td> <td> <ul style="list-style-type: none"> To be decommissioned and removed, unless the Secretary agrees otherwise </td> </tr> <tr> <td>Land use</td> <td> <ul style="list-style-type: none"> Restore land capability to pre-existing use </td> </tr> <tr> <td>Community</td> <td> <ul style="list-style-type: none"> Ensure public safety </td> </tr> </tbody> </table>	Feature	Objective	Site	<ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use 	Solar farm infrastructure	<ul style="list-style-type: none"> To be decommissioned and removed, unless the Secretary agrees otherwise 	Land use	<ul style="list-style-type: none"> Restore land capability to pre-existing use 	Community	<ul style="list-style-type: none"> Ensure public safety 	N/A	This condition is relevant to a period after cessation of operations and is therefore not relevant to this audit.	Not triggered
Feature	Objective													
Site	<ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use 													
Solar farm infrastructure	<ul style="list-style-type: none"> To be decommissioned and removed, unless the Secretary agrees otherwise 													
Land use	<ul style="list-style-type: none"> Restore land capability to pre-existing use 													
Community	<ul style="list-style-type: none"> Ensure public safety 													

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
SCHEDULE 4 - ENVIRONMENTAL MANAGEMENT AND REPORTING				
ENVIRONMENTAL MANAGEMENT				
Environmental Management Strategy				
Schedule 4 Condition 1	<p>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>	<ul style="list-style-type: none"> - Avonlie Solar Farm Environmental Management Strategy (EMS) (Rev. I, 26/06/21) prepared by Siemens AG - DP&E approval letter of Environmental Management Strategy (Rev. I, 29/06/21) dated 16/07/21 - Proof of newspaper advertisement providing Project contact information - Copy of Narrandera Council newsletter providing Project contact information - Avonlie Solar Farm Complaint Documentation Register (viewed 02/03/22) - Environmental Inspection Checklists - Site visit and interviews - Project website and community notifications  <div data-bbox="1478 1654 1792 1959" style="border: 1px solid black; padding: 5px;"> <p>Iberdrola Australia and Beon Energy Solutions are pleased to announce that construction has commenced on the AVONLIE SOLAR FARM. If you have any questions regarding the Project, please contact 1800 770 191, email info@beon-es.com.au or visit http://www.avonlie-solarfarm.com/</p>  </div>	<p>A copy of the approved Environmental Management Strategy (EMS) as well as other required plans and strategies was held within a clearly marked location at the Project site office. Site personnel were familiar with the content of the strategy and evidence of implementation was observed during the interviews and site visit.</p> <p>A number of completed Environmental Inspection Checklists were reviewed by the Auditor and all were noted to be correctly filled out and contained information that was directly relevant to and consistent with the EMS.</p> <p>Commendation: The on-site Environmental Inspection Checklists provided a high level of relevant detail and directly referenced Consent conditions and EMS content. All viewed checklists were fully completed with accurate information.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Revision of Strategies and Plans				
Schedule 4 Condition 2	<p>The Applicant must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:</p> <ul style="list-style-type: none"> • submission of an incident report under condition 4 of Schedule 4; • submission of an audit report under condition 7 of Schedule 4; or • any modification to the conditions of this consent. 	<ul style="list-style-type: none"> - Avonlie Solar Farm Environmental Management Strategy (EMS) (Rev. I, 26/06/21) prepared by Siemens AG - DP&E approval letter of Environmental Management Strategy (Rev. I, 29/06/21) dated 16/07/21 - Avonlie Solar Farm Complaint Documentation Register (viewed 02/03/22) - Environmental Inspection Checklists - Site visit and interviews - Project website and community notifications 	<p>Based on review and implementation of the EMS the following continual environmental management improvement opportunity was identified during the audit:</p> <ul style="list-style-type: none"> • 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. 	Compliant
Updating and Staging of Strategies, Plans or Programs				
Schedule 4 Condition 3	<p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 	N/A	<p>No strategies, plans or program are currently required by this consent on a progressive basis.</p> <p>Based on review and implementation of the EMS the following continual environmental management improvement opportunity was identified during the audit:</p> <ul style="list-style-type: none"> • 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. 	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
COMPLIANCE				
Incident Notification				
Schedule 4 Condition 4	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 6.	<ul style="list-style-type: none"> - Avonlie Solar Farm Environmental Management Strategy (EMS) (Rev. I, 26/06/21) prepared by Siemens AG - DP&E approval letter of Environmental Management Strategy (Rev. I, 29/06/21) dated 16/07/21 - Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. O.G, 14/02/22) prepared by beon - At the time of the audit interviews and site visit, the proponent and their contractor confirmed that there had not been any reportable incidents identified since the commencement of construction 	It was reported by the proponent and their contractor that there had not been any incidents since the commencement of construction.	Not triggered
Non-Compliance Notification				
Schedule 4 Condition 5	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	<ul style="list-style-type: none"> - Avonlie Solar Farm Environmental Management Strategy (EMS) (Rev. I, 26/06/21) prepared by Siemens AG - DP&E approval letter of Environmental Management Strategy (Rev. I, 29/06/21) dated 16/07/21 - Avonlie Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. O.G, 14/02/22) prepared by beon. - At the time of the audit interviews and site visit, the proponent and their contractor confirmed that there had not been any non-compliance matters identified since the commencement of construction 	It was reported by the proponent and their contractor that there have not been any non-compliances since the commencement of construction.	Compliant
Schedule 4 Condition 5A	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	N/A	See comments for Schedule 4 Condition 5	Not Triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 4 Condition 5B	A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	N/A	See comments for Schedule 4 Condition 5	Not Triggered
Schedule 4 Condition 6	(Deleted)	N/A	N/A	N/A
INDEPENDENT ENVIRONMENTAL AUDIT				
Schedule 4 Condition 7	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: (a) within 3 months of commencing construction; and (b) within 3 months of commencement of operations.	- This Independent Environmental Audit (IEA) report - DP&E Approval of Audit Team (18/02/22)	The IEA site visit was conducted within three (3) months of commencing construction. It is noted that another IEA is due within 3 months of commencing operation. The Audit has been conducted in accordance with relevant DP&E Post Approval Requirements.	Compliant
Schedule 4 Condition 7A	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	- DP&E Approval of Audit Team (18/02/22)	The Audit Team was endorsed via the DP&E correspondence of 18/02/22	Compliant
Schedule 4 Condition 7B	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 7 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.	N/A	N/A	Not Triggered
Schedule 4 Condition 7C	In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements (2020)</i> , the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition 7 of Schedule 4 of this consent, or condition 7B of Schedule 4 where notice is given by the Planning Secretary (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. unless otherwise agreed by the Planning Secretary.	N/A	N/A	Compliant
Schedule 4 Condition 7D	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approvals Requirements (2020)</i> unless otherwise agreed by the Planning Secretary.	- This Independent Environmental Audit (IEA) report	Report submitted within two (2) months of the audit site inspection (02/03/22)	Compliant
Schedule 4 Condition 7E	Notwithstanding the requirements of the <i>Independent Audit Post Approvals Requirements (2020)</i> , the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	N/A	N/A	Not Triggered
ACCESS TO INFORMATION				

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 4 Condition 8	<p>The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> • the EIS; • the final layout plans for the development; • current statutory approvals for the development; • approved strategies, plans or programs required under the conditions of this consent; • the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; • how complaints about the development can be made; • a complaints register; • any independent environmental audit, and the Applicant’s response to the recommendations in any audit; and • any other matter required by the Secretary; and <p>(b) keep this information up to date.</p>	<p>Project website: https://www.iberdrola.com.au/our-assets/development-assets/avonlie-solar-farm/</p>	<p>All relevant information and documents were located on the Project website, when viewed on 09/03/22, and management plans were noted to be the latest revisions. The following information was identified:</p> <ul style="list-style-type: none"> • EIS and all appendices • Development layout • Project Approval and Modification 1 and 2 • Traffic Management Plan and DPIE Approval • Biodiversity Management Plan and DPIE Approval • (Cultural) Heritage Management Plan and DPIE Approval • Stormwater Management Plan and DPIE Approval • Accommodation and Employment Strategy and DPIE Approval • Environmental Management Strategy and DPIE Approval • Link to form to submit feedback or complaint • Complaints register (no complaints) 	Compliant

Appendix D

Site Inspection Photographs (02 March 2022)



Plate 1: View of the upgraded intersection of the Sturt Highway and Sandigo Road looking towards the north.



Plate 2: View of the upgraded intersection of Sandigo Road and Muntz Road. In addition to the required upgrades listed within Development Consent SSD 9031, the proponent has also committed to sealing of Muntz road to reduce the potential for erosion and dust generation.



Plate 3: View of the vegetation buffer zone where previously cleared vegetation associated with Project works had been placed to facilitate habitat and biodiversity enhancement in accordance with Development Consent Schedule 3, condition 11(a).



Plate 4: View of sensitive area protection signage and fencing installed in accordance with Development Consent biodiversity and heritage management conditions.



Plate 5: View of the main site compound and surrounds showing gravel hardstand area constructed to reduce potential for erosion and/or sedimentation in this area.



Plate 6: View of the site banded fuelling area at the time of the auditor's site visit on 02/03/22. An appropriately stocked and secured spill kit was noted to be present.



Plate 7: View of a site-based watercart in use as part of the strategy to manage air quality during construction. No significant dust emissions were noted during the site visit of 02/03/22.



Plate 8: View of the south-east portion of the site where segregated construction wastes and re-usable materials were noted to be stored prior to re-use and/or off-site transport for

Appendix E

Independent Audit Declaration Form

INDEPENDENT AUDIT REPORT DECLARATION FORM

(Template from DPIE Independent Audit Post Approval Requirements, May 2020).

Project Name	Avonlie Solar Farm
Consent Number	SSD 9031
Description of Project	Solar farm
Project Address	off Muntz Road, Sandigo
Proponent	Avonlie Solar Project Co Pty Ltd
Title of Audit	Independent Audit Report: Avonlie Solar Farm SSD 9031 (April 2022)
Date	22 April 2022

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

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

- a) *Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The 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*
- b) *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	Toby Hobbs
Signature	
Qualification	MEnvMgmt, Lead Auditor (Exemplar Global)
Company	Vantage Environmental Management Pty Ltd
Company Address	PO Box 378, Albury NSW 2640