

# ENVIRONMENTAL MANAGEMENT STRATEGY

## Darlinton Point Solar Farm Solar Farm

### Amendment Record

Date	Description	Prepared by	Reviewed by	Approved by
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## 1. Key Acronyms and Abbreviations

Acronym or Abbreviation	Meaning
AEMO	Australian Energy Market Operator
EMS	Environmental Management Strategy
COA	Conditions of Approval
DPE	NSW Department of Planning and Environment
DPSF	Darlington Point Solar Farm
EIS	Environmental Impact Statement
EMS	Environmental Management System
OEH	Office of Environment and Heritage
NER	National Energy Regulator
RAP's	Registered Aboriginal Stakeholders
RMS	NSW Roads and Maritime Services
SSD	State Significant Project

## 2. Introduction

This EMS has been prepared by Signal Energy for the applicant (Darlington Point Solar Farm Pty Ltd) to meet the requirements set out in Schedule 4 - Environmental Conditions – Environmental Management and Reporting of the Development Consent (Application # SSD 8392).

This Strategy has been developed to identify and provide the strategic framework for environmental Management for expected environmental impacts arising from the construction and operation of the Darlington Point Solar Farm (DPSF).

The purpose of this EMS is to provide the framework for environmental management of the construction and operation phases of the Project. It is the responsibility of the EPC Contractor (Signal Energy) and the O&M Contractor (project personnel, contractors and subcontractors) to comply with the objectives and requirements of this EMS and related documents where required by their respective scope of works.

The EMS provides a strategic framework for all environmental management plans as required by the Development Consent (SSD 8392), including but not limited to:

- Biodiversity Management Plan
- Chance Finds Protocol
- Traffic Management Plan (including, where relevant, management of Dust and Noise);
- Accommodation and Employment Strategy.
- Other environmental management and mitigation measures set out in the Environmental Impact Statement (EIS as referred to in the Development Consent – SSD 8392) where relevant to construction activities.

The EMS is the overarching document in the Environmental Management System (EMS) for the project that includes a number of plans and procedures described in Section 2.8.

Specifically, this document:

- Provides the strategic framework for environmental management of the Project, including management of environmental aspects not specifically required by the Development Consent (SSD 8392);
- Sets the environmental objectives or standards to be achieved in compliance with legislations, standards and guidelines and in accordance with the EIS and the Development Consent;
- Identifies relevant legal requirements and Conditions of Approval (COA);

- Refers to the EIS to identify environmental aspects of the construction activities and operation and the potential environmental impacts which may result;
- Describes the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project for Signal Energy and their respective Contractors;
- Describes strategies to ensure site personnel (Signal Energy and their respective Contractors) are aware of the environmental risks associated with the activity, and are trained in the measures and contingency plans to deal with them;
- Details the monitoring and review program to evaluate environmental performance and ensure the effectiveness of environmental controls and contingency plans in accordance with commitments set out in the EIS;
- Outlines the mechanisms for communication of environmental information throughout the organisation and other stakeholders;
- Describes the procedures that would be implemented to:
  - Keep the local community and relevant agencies informed about the operation and environmental performance of the development;
  - Receive, handle, respond to, and record complaints;
  - Resolve any disputes that may arise;
  - Respond to any non-compliance;
  - Respond to emergencies;
  - Measures to mitigate potential environmental impacts and protect any special environmental characteristics of the site;

## **2.1 Signal Energy Australia Overview**

Signal Energy is an Australian Engineering, Procurement and Construction (EPC) Company specialising in the construction of renewable energy projects.

Headquartered in Sydney, Signal Energy has a highly experienced management team of energy infrastructure, engineering, procurement and construction professionals with specific experience in the construction of utility-scale renewable energy projects in Australia and internationally.

Signal Energy recognises the importance of conducting business operations in an environmentally responsible, sustainable and safe manner. Signal Energy are committed to health and safety, innovation and service excellence, being a responsible business and supporting the communities in which we work

## **2.2 Project Background**

Darlington Point Solar Farm Pty Ltd, received planning approval on 7 December 2018 for the construction and operation of a solar farm and ancillary infrastructure at Darlington Point, NSW. Darlington Point Solar Farm (SSD 8392) is a State Significant Development project. It will be an important contribution to renewable energy generation in NSW. Darlington Point Solar Farm will assist in reducing the greenhouse gas emission of NSW's electricity generation.

The project is located on a 1,042 ha site that is zoned RU1 – Primary Production under the Murrumbidgee Local Environmental Plan (LEP) 2013. The site is comprised of flat, open grasslands (with pockets of remnant vegetation) that has historically been cleared for agricultural grazing purposes.

The land surrounding the site is also zoned RU1 and is used for industrial and agricultural purposes. There are seven non-associated residences located within 2 km of the site boundary, and several poultry farms opposite the site on the western side of Donald Ross Drive.

The development footprint covers circa 710 ha within the site. The footprint is irregular in shape as it was designed to avoid easements and minimise biodiversity and heritage impacts.

The EIS for Darlington Point Solar Farm summarised the key findings of the assessment, including the impacts of the construction and operation of the Project. It identified the potential for minor impacts on biodiversity during construction associated with removal of vegetation, weed invasion, and erosion. The EIS proposed the implementation of mitigation and management measures to minimise these impacts which have been captured within this EMS and will be further dealt with in the identified subplans, in particular the Biodiversity Management Plan which has been prepared with the assistance of a recognised grassland ecologist.

## 2.3 Project Overview

Signal Energy have been engaged by Darlington Point Solar Farm Pty Ltd to construct 275 megawatts of solar PV on land to the east of Donald Ross Drive. The Darlington Point Solar Farm (DPSF) project area comprises the existing TransGrid Darlington Point Substation and the proposed DPSF site, which includes:

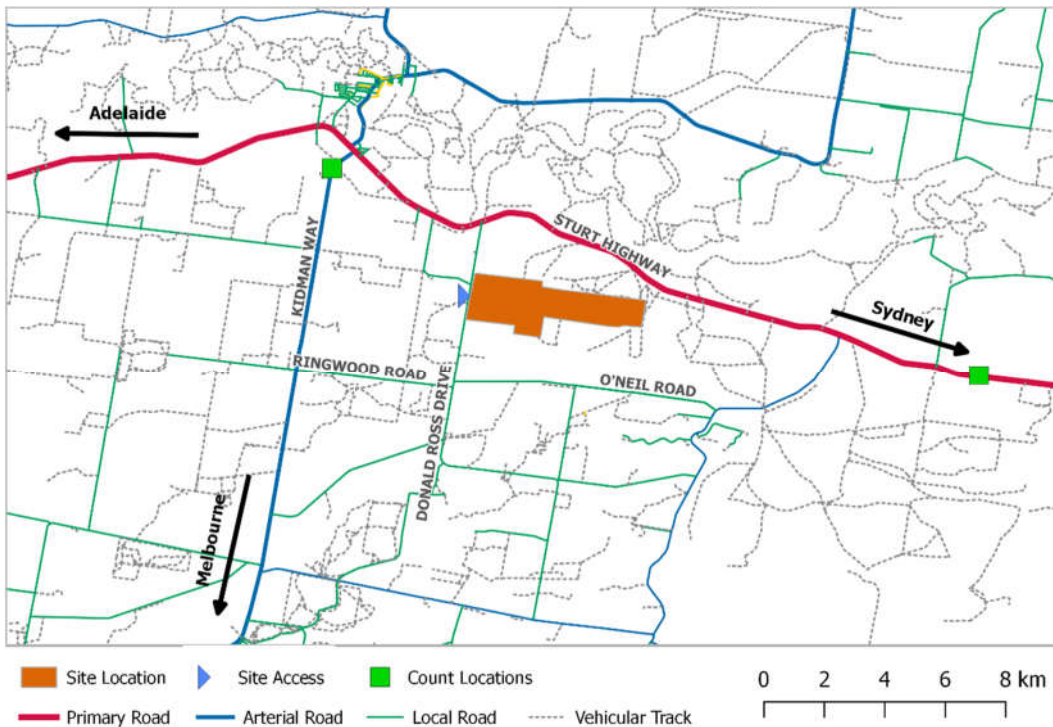
- Lot 160 of DP 821551 (referred to as 'Anderson property').
- Lots 41, 42 and 64 of DP 750903, Lot 2 of DP 542215, Lots 18, 35 and 36 of DP 750903 and Lot 3 of DP 1148975 (referred to as 'Tubbo Station').
- Lot 2 of DP 628785 (being the TransGrid substation site to which DPSF will connect, which is included within the DA in accordance with TransGrid's connection policy to facilitate any substation augmentation works that may be necessary as part of the development).

The DPSF site and surrounding lands are zoned as RU1 – Primary Production under the Murrumbidgee Local Environmental Plan 2013 (Murrumbidgee LEP), with adjacent properties accommodating farming, agribusiness, poultry farms and a small number of private residences. The DPSF site is used for livestock grazing. A 330 kV and two 132 kV TransGrid overhead transmission lines cross the site from west to east, and a 33 kV Essential Energy overhead transmission line runs north-south near the eastern boundary of the site. Key development and infrastructure components of the DPSF is proposed to include:

- Photovoltaic (PV) solar panels
- Steel mounting frames with piled foundations
- A single-axis tracking system
- Direct current (DC) / alternating current (AC) inverter stations
- Medium voltage (33kV) electrical reticulation network
- A 33/132kV switchyard, including an internal 33kV switch-room
- Internal access tracks for operational maintenance and housekeeping, to be largely located in bushfire set-back zones
- Security perimeter fencing
- Staff car park and small amenities building
- Battery energy storage system facility.

## 2.4 Site Location

The DPSF site is located approximately 10 km south of the township of Darlington Point along Donald Ross Drive (3.5 km south of the Sturt Highway / Donald Ross Drive intersection, see Figure 1)



**Figure 1 – DPSF Location**

## 2.5 Conditions of Approval

The below table outlines how this Strategy meets the requirements of Condition 1 (Schedule 4) of the Development Consent (Application # SSD 8392)

Condition	Relevant Section of the EMS
Provide the strategic framework for environmental management of the development	Section 9 Significant Environmental and Social Impacts
Identify the statutory approvals that apply to the development	Section 2.6 Approvals, Licenses and Permits
Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development	Section 7 (Signal Energy Organisational Structure and Responsibilities)
Describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>receive, handle, respond to, and record complaints;</li> <li>resolve any disputes that may arise;</li> <li>respond to any non-compliance;</li> <li>respond to emergencies; and</li> </ul>	Section 9.12 (Socio-Economic Mitigation Measures)  Section 11.4 (Complaints and Complaints Response)  Section 11 (Emergency Planning and Response)
Include: <ul style="list-style-type: none"> <li>references to any plans approved under the conditions of this consent; and</li> <li>A clear plan depicting all the monitoring to be carried out in relation to the development.</li> </ul>	Section 2.7 (Environmental Plans)  Section 10 (Implementation)



## 2.6 Approvals, Licenses, Permits

Conditions of Approvals are clearly set-out in the Development Consent (Application # SSD8392). The below Management plans have been developed to meet the specific conditions: -

- Accommodation and Employment Strategy (Schedule 3 - Item 28)
- Traffic Management Plan (Schedule 3 - Item 7)
- Chance Finds Protocol (Schedule 3 - Item 20)
- Biodiversity Management Plan (Schedule 3 - Item 12)

In the event that works are required in addition to the specified Scope of Works, dependent on the scope, Signal Energy will seek the necessary approvals.

As outlined in Schedule 4 – Item 2 and 3 of Development Consent (Application # SSD 8392) Signal Energy will:

- *Update the strategies, plans or programs required under the Development Consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and*
- *Review and, if necessary, revise the strategies, plans or programs required under the Development Consent to the satisfaction of the Secretary within 1 month of the:*
  - *submission of an incident report under condition 4 of Schedule 4;*
  - *submission of an audit report under condition 6 of Schedule 4; or*
  - *any modification to the conditions of this consent.*
- *To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, Signal Energy may at any time submit revised strategies, plans or programs to the Secretary for approval.*
- *With the agreement of the Secretary, Signal Energy may prepare any revised strategy, plan or program without undertaking consultation with all parties referred to under the relevant condition of this consent.*

### Notes:

- *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.*

## 2.7 Environmental Plans

The following Plans (required by the Development Consent) are to be read in conjunction with this EMS: -

- Accommodation and Employment Strategy
- Traffic Management Plan
- Chance Find Protocol
- Biodiversity Management Plan

In compliance with the EIS commitments and where relevant to Signal Energy Management System requirements the following plans will be developed but not limited to: -

- Construction Environmental Management Plan that includes: -
  - Weed and Pest Management Plan



- Soil and Water Use Management Plan
- Erosion and Sediment Control Plan
- Waste Management Plan
- Vegetation and Land Management Plan
- Construction Noise Management Plan
- Emergency Management Plan
- Bushfire Mitigation Plan
- Safety and Health Management Plan
- Quality Management Plan

## **2.9 Contractual Obligations**

Signal Energy will ensure that the following requirements are adhered to by all Sub-Contractors in accordance the Contract:

- Compliance with all conditions of approval relevant to the Project;
- Suitably qualified environmental resources will be provided to undertake environmental duties relevant to the Project, including the implementation of the EMS and sub-plans as required;
- Mechanisms will be established and implemented to ensure continual improvement; and
- Compliance with any reasonable direction given by a referral Agency representative to improve or rectify the Project's environmental practices is adhered to.

The Sub-Contractors' Environmental Management Plans will also address all relevant requirements detailed in the Signal Energy environmental documentation, including all relevant project approvals, licences and permits

## **3. Scope of Works (Construction)**

### **3.1 Signal Energy (Construction)**

The scope of work includes all Site investigations, the design, manufacture, procurement, supply, workshop testing, transporting, construction, installation, commissioning, testing (including all Commissioning Tests, Performance Tests and acceptance testing), documentation, and repair of all Defects during the Defects Notification Period and all work incidental thereto whether specified in detail or not, necessary for the safe and efficient operation of the Facilities.

Generally, the Works shall include, but not be limited to, the following major equipment and packages:

- Solar PV panel modules;
- Solar PV panel module single axis tracking mounting structures, foundations and associated equipment;
- Power Conversion Units (PCUs) comprising inverter units, transformers and associated equipment based on a skid mounted solution;
- Power Plant Controller (PPC);
- Buildings and structures for housing of equipment and personnel;
- Footings and foundations as required for all equipment as well as any walkways and permanent access structures required for the Facility in accordance with AS1657



- Balance of plant electrical, mechanical, structural, civil, SCADA and communications works and equipment;
- All consumables for the erection, installation, Commissioning and maintenance up to the time for Completion and completion of all Commissioning Tests (including R2 Testing).

The Facility shall be completed in well defined, repeatable blocks of solar arrays of a consistent capacity. Where a consistent layout is not possible due to topographical, geotechnical and other Site restrictions, variations in layout and sub array wiring shall be clearly identified and detailed in the design documentation.

The Facility layout shall allow for vehicle access for maintenance and repair work to all components of the solar array and inverter installation, including all combiner boxes, transformers and MV reticulation equipment. All Works shall be installed to comply with the material suppliers' installation and operation manuals and should not impact or void any future warranty claims.

### **3.3 O&M Contractor Scope of Works**

The scope of the O&M Works will be defined prior to operation with a revision of this EMS.

## 4. Environmental Policies

### 4.1 Signal Energy Environmental Policy

Signal Energy Australia Pty Ltd (Signal Energy) and its Officers (Directors and General Manager) are committed at all levels to sustainable development during the engineering, procurement and construction (EPC) of renewable energy projects. Signal Energy is committed to implementing and maintaining environmentally sustainable practices that demonstrate a high standard of responsible Environmental Management.

Signal Energy strives to preserve resources by focusing their construction activities in the renewable energy sector which assists in the conservation of energy produced by non-renewable resources, and by methods which do not pollute the environment.

Signal will demonstrate a high standard of responsible Environmental Management by:

- Communicating and encouraging the teaching of the Signal Energy Environmental Policy and procedures to all employees;
- Making business decisions that work towards achieving sustainable development and minimise pollution - noise, visual impact, odour and the accumulation of waste;
- Responding to the environmental challenges in all areas of our business;
- Ensuring that our employees, subcontractors, suppliers and consultants are aware of and comply with their environmental obligations with respect to Signal Energy operations and activities under their control;
- Striving to reduce our impact on the environment by minimising waste generation through reduction, reuse and recycling;
- Working with our clients and other stakeholders to help them achieve their environmental objectives and obligations;
- Eliminating or minimising adverse environmental effects and risks by reducing and, where possible, eliminating the use of harmful substances and ensuring the correct and safe disposal of all substances;
- Addressing environmental concerns in all planning decisions and encourage design and procurement procedures that adhere to the principles of the Environmental Policy;
- Periodically review and revise our Environmental Policy and procedures to maintain their relevance; and
- Complying with all applicable environmental laws, regulations, statutory obligations and relevant voluntary codes of practice;

The Signal Energy Integrated Management System is designed to exceed the requirements of ISO 14001:2015. It has the full support of the Signal Energy Management Team and its successful implementation and maintenance is a commitment by them. This Policy will be communicated to all employees and made available to the public and interested parties.

Adherence to the Environmental Policy, as well as active participation in reducing the overall environmental impact is a requirement of all employee's and Subcontractors at Signal Energy.

Our success is driven by the value we bring to our projects. It is our commitment to ensure that this policy is implemented in a cooperative and consultative work environment.

**Robbin Russell**  
General Manager  
Signal Energy Australia

**July 2018**

## 5. Legal and Other Requirements

The Project shall be delivered in compliance with all applicable Acts and Regulations relevant to the scope of works. A General Register of legal and other requirements for this Project is contained in the table below. This register will be reviewed at regular intervals e.g. during management reviews and updated with any applicable changes. Any changes to the legal requirements register will be communicated to the wider team where necessary through toolbox talks, specific training and other communication methods.

Regulatory and Other Requirements	Description and Relevance
<i>Environmental Planning and Assessment Act 1979 (NSW)</i>	The NSW <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act) is the core legislation relating to planning and development activities in NSW. It is the principal law overseeing the assessment and determination of development proposals, and all development in NSW is assessed in accordance with the provisions of the EP&A Act.
<i>State Environmental Planning Policy (State and Regional Development) 2011</i>	The Project triggers SSD in accordance with Division 4.1 of Part 4 of the EP&A Act, as it is a type of development listed in Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011. Pursuant to Clause 8 of the SEPP.  <u>As the DPSF will have a capital investment cost estimate of more than \$30 million, the proposal classifies as "State Significant Development" and is subject to assessment under Part 4 of the EP&amp;A Act.</u>
<i>Protection of the Environment Operations Act 1997 (NSW)</i>	<i>The Protection of the Environment Operations Act 1997</i> (POEO Act) establishes the State's environmental regulatory framework and includes licensing requirements for certain Operations and is administered by the EPA.
<i>Crown Lands Act 1989 (NSW)</i>	The <i>Crown Lands Act 1989</i> , administered by the Minister for Crown Lands, regulates the management of Crown land for the benefit of the people of New South Wales
<i>Local Land Service Amendment Act 2016 (NSW)</i>	The <i>Local Land Service Amendment Act</i> provides a framework for the management and conservation of native vegetation in NSW, in accordance with Ecologically Sustainable Design principles, with an aim of preventing broad scale clearing unless it improves the condition of high conservation value native vegetation and encourage rehabilitation of the land.
<i>Biodiversity Conservation Act 2016 (NSW)</i>	The <i>Biodiversity Conservation Act 2016</i> (BC Act) governs the management and conservation of biodiversity in NSW, which includes all flora, fauna and ecological communities, consistent with principles of ecologically sustainable development of the <i>Protection of the Environment Administration Act 1991</i> (NSW).
<i>Biodiversity Conservation Regulation 2017 (NSW)</i>	Section 6.8 of the <i>Biodiversity Conservation Regulation 2017</i> (the BC Regulation) requires that a Biodiversity Development Assessment Report (BDAR) for a development application must include details of offsets for impacts, including the number and classes of biodiversity credits required to be retired in accordance with the like-for-like requirements of the offset rules. The credentials of the assessors that established these offsets and the date of the assessment is also required under the BC Regulation.
<i>Fisheries Management Act 1994 (NSW)</i>	The broad objective of the <i>Fisheries Management Act 1994</i> (FM Act) is to conserve, develop and share the fishery resources of the State for the benefit of present and future generations.
<i>Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)</i>	The <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and

	<p>heritage places — defined in the EPBC Act as Matters of National Environmental Significance (MNES). The purpose of the EPBC Act is to ensure that actions likely to cause a significant impact on MNES undergo an assessment and approval process. Under the EPBC Act, an ‘action’ includes a project, undertaking, or activity. An action that ‘has, will have or is likely to have a significant impact on a matter of national environmental significance’ is deemed to be a ‘controlled action’ and may not be undertaken without prior approval from the Commonwealth Minister for the Environment (the Minister).</p> <p><u>A referral has been submitted to the Commonwealth Department of the Environment and Energy, and DPSF is deemed to be ‘not a controlled action’.</u></p>
<i>National Parks &amp; Wildlife Act 1974 (NSW)</i>	<p>The National Parks &amp; Wildlife Act 1974 (NPW Act) protects Aboriginal heritage (places, sites and objects) within NSW. Protection of Aboriginal heritage is outlined in s86 of the Act, as follows:</p> <ul style="list-style-type: none"> <li>• “A person must not harm or desecrate an object that the person knows is an Aboriginal object” s86(1),</li> <li>• “A person must not harm an Aboriginal object” s86(2)</li> <li>• “A person must not harm or desecrate an Aboriginal place” s86(4).</li> </ul>
<i>National Parks &amp; Wildlife Regulation 2009 (NSW)</i>	<p>The National Parks and Wildlife Regulation 2009 (“NPW Regulation”) provides a framework for undertaking activities and exercising due diligence in respect to Aboriginal heritage. The NPW Regulation 2009 outlines the recognised due diligence codes of practice which are relevant to this report, but it also outlines procedures for Aboriginal Heritage Impact Permit (AHIP) applications and Aboriginal Cultural Heritage Consultation Requirements (ACHCRs); amongst other regulatory processes.</p>
<i>Heritage Act 1977 (NSW)</i>	<p>The NSW Heritage Act 1977 makes provisions to conserve the State’s historic heritage. It provides for;</p> <ul style="list-style-type: none"> <li>• The identification and registration of items of State heritage significance;</li> <li>• The interim protection of items of State heritage significance; and</li> <li>• Constitutes the Heritage Council of New South Wales.</li> </ul>
<i>Native Title Act 1993 (Commonwealth)</i>	<p>The Native Title Act provides a national framework for the recognition and protection of native title i.e. the rights and interests, recognised by common law, possessed under traditional laws and customs of Aboriginal and Torres Strait Islander people. The Act recognises the ownership of land or waters by Aboriginal and Torres Strait Islander groups prior to European settlement and provides a mechanism for determining where native title exists, who holds it, and identifies compensation for actions affecting it. The Act establishes ways in which future dealings affecting native title may proceed and sets standards for those dealings.</p> <p><u>A Native Title search has been undertaken for the development and it has been determined that there are no registered claims over the Project area.</u></p>
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth)</i>	<p>The Aboriginal and Torres Strait Islander Heritage Protection Act 1984 enables the Australian Government to respond to requests to protect areas and objects of particular significance to Aboriginal people, if it appears that state or territory laws have not provided effective protection.</p> <p><u>Review of background information, Aboriginal community consultation and an archaeological survey has resulted in the identification of ten (10) Aboriginal archaeological sites within the DPSF project boundary. One</u></p>



	<p><u>surface artefact scatter will be directly affected by the DPSF project area, however, mitigation measures to remove the scatter prior to the commencement of construction have been developed in consultation and agreement with the Griffith Local Aboriginal Land Council</u></p>
<p><i>Aboriginal Cultural Heritage Consultation Requirements for Proponents (2010)</i></p>	<p>The purpose of the guidelines is to establish the requirements for consultation with the registered Aboriginal parties as part of the heritage assessment process to determine potential impacts of proposed activities on Aboriginal objects and places and to inform decision making for any application for an Australian Heritage Impact Permit (AHIP).</p>
<p><i>Code of Practice for Archaeological Investigations of Objects in NSW (2010)</i></p>	<p>The purpose of this Code of Practice is to:</p> <ul style="list-style-type: none"> <li>• establish the requirements for undertaking test excavation as a part of archaeological investigation without an AHIP; and</li> <li>• establish the requirements that must be followed when carrying out archaeological investigation in NSW where an application for an AHIP is likely to be made.</li> </ul>
<p><i>Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (2011)</i></p>	<p>The purpose of this document is to provide:</p> <ul style="list-style-type: none"> <li>• Guidance on the process for investigating and assessing Aboriginal cultural heritage in NSW and</li> <li>• OEH's requirements for an Aboriginal cultural heritage assessment report.</li> </ul>
<p><i>Biosecurity Act 2015 (NSW)</i></p>	<p>The <i>Biosecurity Act 2015</i> establishes a system for the identification and control of noxious weeds in NSW. The Biosecurity Act divides noxious weeds into five categories which determine the level of control required. Responsibility for the control of noxious weeds lies with the owner and/ or occupier of private land and crown land, local councils and other public authorities.</p>
<p><i>Water Management Act 2000 (NSW)</i></p>	<p>The objectives of the <i>Water Management Act 2000</i> are to provide for the sustainable and integrated management of the water sources of NSW for the benefit of both present and future generations.</p>
<p><i>Roads Act 1993 (NSW)</i></p>	<p>The <i>Roads Act 1993</i> (Roads Act) provides a framework for the management of roads in NSW. It provides for the classification of roads and the declaration of the Roads and Maritime Services (RMS) and other public authorities for both classified and unclassified roads. The Roads Act confers functions on RMS and other roads authorities and allows distribution of such functions between RMS and other roads authorities.</p>
<p><i>State Environmental Planning Policy (Infrastructure) 2007</i></p>	<p>The DPSF site and surrounding lands are zoned as RU1 – Primary Production under the Murrumbidgee Local Environmental Plan 2013 (Murrumbidgee LEP). Under RU1 zoning electricity generating works or solar energy systems are prohibited, however under the State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) development of electricity generation works or solar energy systems is permissible on any land with consent within a 'prescribed rural zone'.</p> <p><u>Accordingly, the proposed development satisfies Clause 34 of the ISEPP and is permitted within zone RU1 Primary Production.</u></p>
<p><i>State Environmental Planning Policy No:33 – Hazardous and Offensive Development</i></p>	<p>Provides definitions for hazardous and offensive industry based on the likely impacts of the proposal. A potentially hazardous industry is defined within SEPP 33 as "a development for the purpose of any industry which, if the development were to operate without employing any measures to reduce or minimise its impact, would pose a significant risk to human health, life or property, or to the biophysical environment".</p> <p><u>The development has been designed such as to avoid significant risk to human health, life, property or the biophysical environment through either avoidance of sensitive areas or the employment of mitigation measures. It</u></p>



	<u>is considered that SEPP 33 is not relevant to the DPSF due to its non-hazardous and non-offensive nature, however this aspect of the EMS will be reviewed and revised prior to the construction of the Battery Energy Storage System.</u>
<i>State Environmental Planning Policy (Rural Lands) 2008</i>	<p>The aims of State Environmental Planning Policy (Rural Lands) 2008 are to:</p> <ul style="list-style-type: none"> <li>• Facilitate the orderly and economic use and development of rural lands for rural and related purposes;</li> <li>• Identify Rural Planning Principles and the Rural Subdivision Principles so as to assist in the proper management, development and protection of rural lands for the purpose of promoting the social, economic and environmental welfare of the State;</li> <li>• Implement measures designed to reduce land use conflicts;</li> <li>• Identify State significant agricultural land for the purpose of ensuring the ongoing viability of agriculture on that land, having regard to social, economic and environmental considerations; and</li> <li>• Amend provisions of other environmental planning instruments relating to concessional lots in rural subdivisions.</li> </ul> <p><u>It is considered that the development is consistent with the aims of the SEPP, and is also not identified as state significant agricultural land</u></p>
<i>Murrumbidgee Local Environment Plan 2013</i>	The Murrumbidgee LEP 2013 governs land use within the Murrumbidgee Shire LGA. The Murrumbidgee LEP provides local environmental planning provisions for land in Murrumbidgee in accordance with the relevant standard environmental planning instrument under section 33A of the EP&A Act.

## 6. Signal Energy Environmental Objectives and Targets

Environmental objectives and targets for Signal Energy are established by the Project Management Team in consultation with Subcontractors and employees. Objectives and targets are recorded within this Plan and are continually monitored through the Management Review function and by review of project specific monthly reporting.

Signal Energy continually monitors all shortcomings or opportunities for improvement that have been identified. Opportunities for improvement goals set by Management for the business may be identified through any of the following;

- Management Bi-annual Review;
- Significant non-conformances and corrective actions reviewed weekly;
- Project Specific Meetings and Toolbox Talks held on a weekly basis;
- Daily Pre-Start Meetings
- Client and Contract Meetings to be held as directed on a monthly basis;
- Internal and external audit reports (Please refer to Section 10 below);
- Incidents and near miss investigations; and
- Identified Environmental impacts reviewed monthly.

The EMS Objectives and Targets are aligned to the overarching policies documented within the COA's summarised below.

**Below is the specific Environmental, Safety and Quality Objectives and Targets for the DPSF Project:**

-

Objective	Target	Indicator	Monitoring Frequency	Responsibility
Construction of the project in accordance with COA's and relevant permits and licenses	Compliance to Statutory Approvals	Internal and Independent Audit Feedback.  Results from monitoring regime implemented for review of	Monthly	Project Manager, Construction Manager and Project HSE Manager
Construction of the project in accordance with approved Environmental Management Plans and Sub-Plans outlined in section 2.7 of this Strategy.	Compliance to approved Management Plans	Internal and Independent Audit Feedback	Ongoing	Project Manager, Construction Manager and Project HSE Manager
Construction of the project will be aligned to Objectives and Targets set in the BMP.	No degradation of , endangered ecological communities or threatened species habitat	Internal and Independent Audit Feedback.  Damaged exclusion zone fencing or signage	Please refer to Biodiversity Management Plan	Construction Manager and Project HSE Manager
There is Nil Environmental Harm from Signal Energy (including Subcontractors) work activities	Nil Environmental Harm	All environmental impacts are analysed and responded too to ensure no Environmental Harm	Daily	Construction Manager and Project HSE Manager
Appropriate rehabilitation activities will occur during construction as ground disturbance is completed	Rehabilitation of all disturbed areas not required for the operation of DPSF	Revegetation of disturbed areas will have 70% ground cover over 90% of disturbed areas	Monthly	Construction Manager and Project HSE Manager
Achieve Continual Client satisfaction	Customer Service feedback (Daily/Weekly and Monthly) from Client	Positive customer feedback through Client meetings	Daily	Signal Energy Management Team
Client and Public complaints are rectified 100% of the time	100% Rectification	Customer complaints, NCR's and OFI's will be closed out as per the assigned dates	Daily	Construction Manager and Project HSE Manager



Signal Energy Design and Plan works to achieve sustainable development and minimise pollution (e.g. noise, waste and Dust)	Meet Client and public Expectations Adhere to COA's	Client, Internal and Independent Audit Feedback	Ongoing	Signal Energy Management Team
Signal Energy are to work with clients and communities within the Murrumbidgee Shire Council to ensure that impact on locals is mitigated to ALARP	To have minimal impact on local communities in which their projects are situated	Public Feedback, Complaints Registers.	Ongoing	Signal Energy Management Team
Continuous system improvement	Complete Internal Audits and relevant Corrective Actions within assigned timeframes	Audits completed and Corrective Actions Closed out.	Ongoing	Construction Manager and Project HSE Manager

## **7. Structure and Responsibilities**

### **7.1 Darlington Point Solar Farm Pty Ltd**

Darlington Point Solar Farm Pty Ltd is responsible for the overall implementation of this Environmental Management Strategy and all Management Plans listed in this EMS.

#### **Darlington Point Solar Farm Pty Ltd Representative**

The Project Director/Project manager will be responsible for:

- Ensuring all relevant Management Plans are in place,
- Establishing a rigid management and reporting structure to implement and monitor these plans,
- Ensuring compliance with this Management Plan.

#### **Environmental Management representative**

The Environmental Management representative/HSE Manager will be responsible for:

- Aiding and giving advice to Contractors listed in this document in order for this EMS to be implemented properly,
- Review of this Environmental Management Strategy in consultation with the EPC Contractor, the O&M Contractor and TransGrid,
- Carrying out inspections, monitoring each condition and reporting any findings,
- Providing project-wide advice to ensure consistent approach and outcomes are achieved, including communication between the Contractors where required by Environmental Management Plans and/or Development Consent conditions,
- Liaising with the Secretary and contacting the relevant Agencies where required by legislations, Development Consent conditions and Management Plans as listed in this EMS,

### **7.2 Signal Energy Australia**

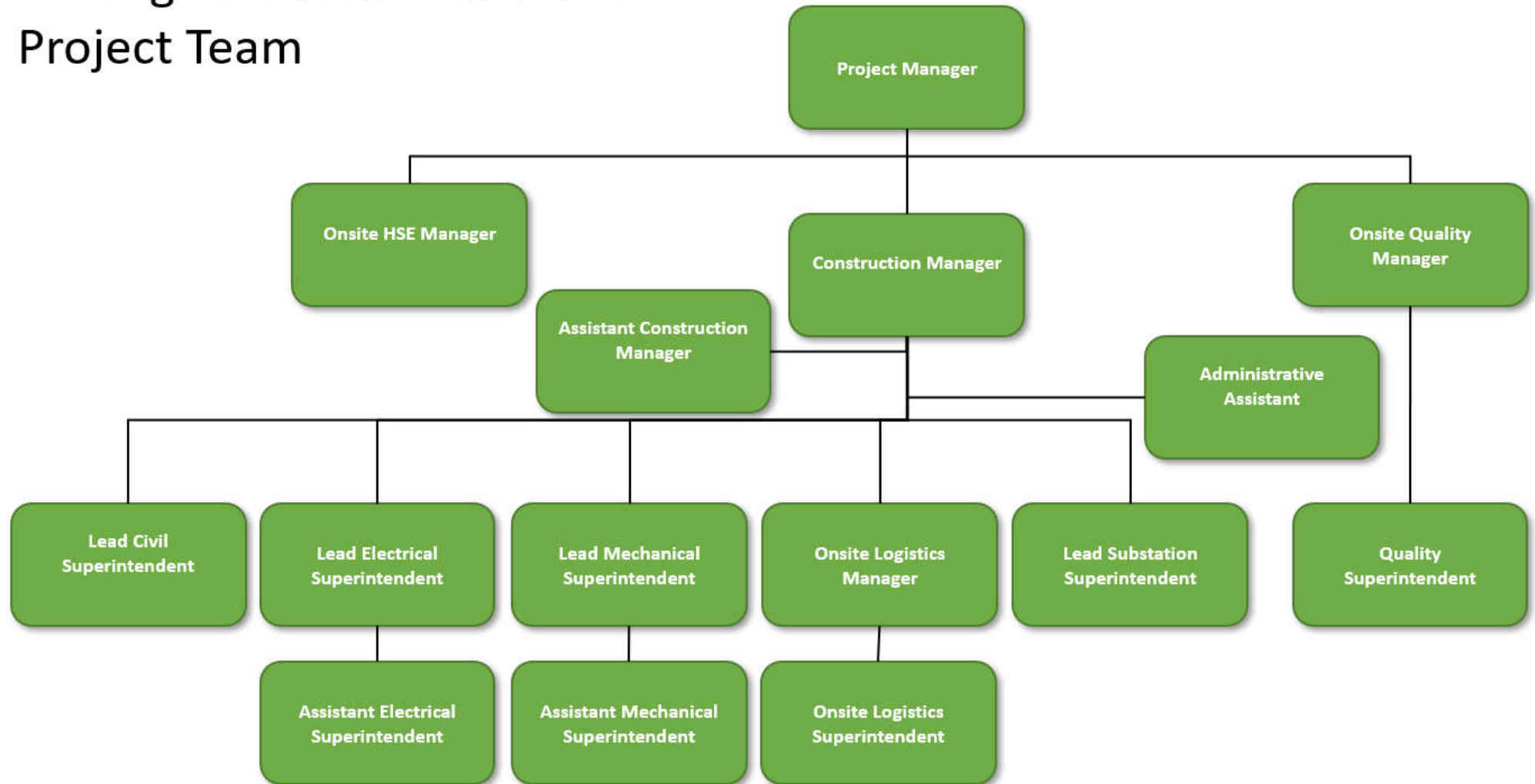
The project specific organisational structure is provided below.

All Signal Energy personnel (including subcontractors) have a general environmental duty of care as defined in the Environmental Protection Act and are responsible for their own environmental performance whilst on site.

The general structure of authority and reporting flow paths is shown in Figure 2.

Figure 2 Signal Energy Project Team

## Darlington Point Solar Farm Project Team



Role	Responsibilities
<p><b>Signal Energy Senior Management</b></p>	<ul style="list-style-type: none"> <li>• Understanding and fulfilling the customer needs and expectations. Not only the stated needs as in the customer order and contract, but also the implied needs;</li> <li>• Determining the organisation’s Environmental policies, targets and objectives;</li> <li>• Continually reviewing the implementation of all Management Systems applicable to the project.</li> <li>• Establishing procedures that ensure adequate levels of communication within the organisation;</li> <li>• Ensure that the organisation’s legal obligations are met. Including addressing any potential environmental aspects of any products and services; and</li> <li>• Ensuring project specific objectives will always include adopting “Alliance” like principles when managing the project to achieve harmonious and non-adversarial contract relations.</li> </ul>
<p><b>Project Manager</b></p>	<ul style="list-style-type: none"> <li>• Ensuring all relevant Management Plans are in place.</li> <li>• Establishing a rigid management and reporting structure to implement and monitor these plans.</li> <li>• Ensuring compliance with this EMS.</li> <li>• Promote Environmental performance, at every opportunity as a core value of the organisation.</li> <li>• Ensure there is adequate and efficient resources available.</li> <li>• Be familiar with, understand, and enforce the legislative duties and Signal Energy company and project specific regulations and requirements, as well as other pertinent and accepted work practices.</li> <li>• Exercise stop work responsibility when Environmental Aspects present themselves.</li> <li>• Work closely with and support the Construction Manager for the execution of this Strategy.</li> </ul>
<p><b>Construction Manager</b></p>	<ul style="list-style-type: none"> <li>• Overall project environmental management and due diligence on-site.</li> <li>• Allocation of resources.</li> <li>• Promote environmental incident avoidance.</li> <li>• Respond to environmental incidents.</li> <li>• Corrective and preventative action.</li> <li>• Emergency preparedness and response.</li> </ul>
<p><b>SHEQ Manager/Adviser</b></p>	<ul style="list-style-type: none"> <li>• Aiding and giving advice to Subcontractors in order for this EMS to be implemented properly.</li> <li>• Carrying out inspections, monitoring each condition and reporting any findings.</li> <li>• Management Plans and/or Development Consent conditions.</li> </ul>



	<ul style="list-style-type: none"> <li>• Liaising with the Secretary and contacting the relevant Agencies where required by legislations, Development Consent conditions and Management Plans as listed in this EMS.</li> <li>• Ensuring that all project personnel receive appropriate environmental inductions and additional training as required.</li> <li>• Ensure that relevant Audit tools and schedules are developed and adhered to.</li> <li>• Monitoring of performance of this EMS and Subplans.</li> <li>• Maintenance of up-to-date EMS and documents at the site.</li> </ul>
<p><b>Other Managers and Superintendents</b></p>	<ul style="list-style-type: none"> <li>• Support the Construction Manager to ensure project environmental management and due diligence.</li> <li>• Assist in allocation of resources.</li> <li>• Ensuring that all site personnel receive appropriate environmental inductions and additional training as required.</li> <li>• Reporting on this EMS.</li> <li>• Promote environmental incident avoidance.</li> <li>• Respond to environmental incidents.</li> <li>• Corrective and preventative action.</li> <li>• Emergency preparedness and response.</li> <li>• Approval of any chemicals or other hazardous materials entering the site.</li> <li>• Emergency response manager.</li> <li>• Compliance with permits, local council guidelines and regulatory requirements.</li> <li>• Monitoring of subcontractor compliance with the EMP.</li> </ul>
<p><b>Subcontractors Supervisors</b></p>	<ul style="list-style-type: none"> <li>• Contractors shall be required to comply with the specific COA's, performance objectives of the contract, and EMS.</li> <li>• Submit an applicable Construction Environmental Management Plan to Signal Energy for review and approval before the commencement of any work on-site.</li> <li>• Participate in the implementation of this EMS and their own CEMP;</li> <li>• Work with site supervisors to ensure their activities are undertaken in a manner which does not cause environmental harm.</li> <li>• Rectify environmental controls removed or damaged by their activities.</li> <li>• Report situations that have or may result in environmental harm.</li> </ul>
<p><b>All On-Site Personnel</b></p>	<ul style="list-style-type: none"> <li>• Report any activity that has resulted in or has the potential to result in an environmental incident immediately to the Site Manager, Project Manager and SHEQ Adviser.</li> <li>• Where necessary, ensuring environmental inspections are undertaken and any environmental records are kept.</li> <li>• Carry out all activities in accordance with this EMS.</li> </ul>

	<ul style="list-style-type: none"> <li>Identify and report non-conformances.</li> <li>Implement corrective and preventative action.</li> <li>Work with the project team in planning and implementing environmental requirements.</li> </ul>
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## 8. Environmental Risk Assessment

Environmental aspects as referred to in this document are those activities associated with the Project that have the potential to cause, or result in, environmental harm.

An environmental risk management assessment has been utilised to identify and assess the environmental aspects associated with the Project, and to recommend appropriate mitigation strategies to minimise the likelihood of environmental risks associated with each aspect to be included in an Environmental Management Plan where required. This process involves:

- Identifying the risk/aspect;
- Analysing the risk/aspect (determining likelihood and consequence);
- Evaluating the risk/aspect; and
- Treating the risk.

Risk Matrix					
Severity	Exposure				
	E - Remote	D - Unlikely	C - Possible	B - Likely	A - Certain
1 - Slight	1	1	1	2	3
2 - Minor	1	2	2	3	3
3 - Moderate	1	2	3	4	4
4 - Major	2	3	4	5	5
5 - Extreme	3	3	4	5	5

EXPOSURE – How likely is this event to happen?		
CODE	DESCRIPTOR	DEFINITION
A	Certain	Is expected to occur in most circumstances
B	Likely	Will probably occur in most circumstances
C	Possible	Might possibly occur at some time
D	Unlikely	Could occur at some time but doubtful
E	Remote	May occur but only in exceptional circumstances
SEVERITY – If this does happen, how severe would the outcome be?		
COD E	DESCRIPTOR	DEFINITION
5	Extreme	Fatality/ multiple serious injuries, environmental disaster, huge cost

4	<b>Major</b>	Serious/life threatening injury, severe environmental damage, major cost
3	<b>Moderate</b>	Injury requiring medical treatment, contained environmental impact, moderate cost
2	<b>Minor</b>	First aid treatment, some environmental/financial impact
1	<b>Slight</b>	No injury, low environmental/financial impact
<b>Risk Level Code</b>	<b>Description</b>	<b>Actions</b>
5	<b>EXTREME</b>	<b>Do not undertake task.</b> Modify process / design.
4	<b>VERY HIGH</b>	<b>Do not undertake task.</b> Modify process / design, Action plan required including controls to manage risk. Requires senior management attention
3	<b>HIGH</b>	Action plan required including controls to manage risk. Requires senior management attention
2	<b>MEDIUM</b>	Specify management responsibility
1	<b>LOW</b>	Manage by routine procedures

## 9. Significant Environmental and Social Impacts

Using the DPSF EIS (Summary of Management and Mitigation Measures) and the above Risk Assessment, the significant environmental impacts have been listed below, with a summary of control measures to be implemented and monitored. Detailed mitigation measures are defined in relevant Environmental Sub-Plans and the Construction Environmental Management Plan.

All environmental mitigation shall be communicated through the DPSF Site Induction. Relevant Audit Tools will also be developed in accordance with the performance objectives below and the mitigation measures outlined in the relevant Sub-Plans and the CEMP.

### 9.1 Biodiversity

#### Issues

The site is dominated by plains grassland habitat that has historically been cleared for agricultural grazing purposes. Fragmented areas of grassy woodland and open forest also occur within the project boundary.

The project has been designed to minimise clearing of native woodland vegetation and threatened species habitats. In this regard, the development footprint comprises only circa 710 ha of the 1,042 ha project area, primarily to minimise biodiversity impacts.

The approved layout has ensured the retention of:

- The majority of woodland and open forest vegetation of high importance
- Threatened communities listed as endangered under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) and/ or the *Biodiversity Conservation Act 2016* (BC Act)

In addition, a range of mitigation and measurement measures to address potential indirect impacts on threatened species and communities will include:

- Preparation of and adherence to a Biodiversity Management Plan (BMP), developed with specialist input from a recognised grassland ecologist.
- Land management including selective mowing, managed grazing (if deemed to be value-add) and herbicide applications at appropriate intervals to proportion of groundcover being exotic weeds.
- For under-panel microclimate impacts, ensuring that the adaptive management plan is implemented for the management of the native grassland under the solar panels, as per the BMP.
- Minimising vehicle movements on native grassland.
- Installing perimeter fencing, eradicating feral animals and undertaking ongoing weed and pest control.

While direct and indirect impacts on biodiversity have been minimised by the project design and mitigation and management measures residual impacts on the native grassland and woodland vegetation are unavoidable; these will be subject to appropriate biodiversity offset provisions.

### **Environmental Performance Objectives**

The DPSF Biodiversity Management Plan contains the mitigation measures to adhere to Schedule 3 - condition 12 of the Development Consent (SSD 8392): which includes: -

- Controls and procedures to be implemented during site establishment, construction, and road work to avoid, minimise and manage impacts to biodiversity within and adjacent to the project area.
- Appropriate rehabilitation activities to occur during construction as ground disturbance is completed.
- Controls and procedures during operations will minimise and manage potential impacts to biodiversity within and adjacent to the project area.
- Appropriate action will be used to address the mitigation measures detailed in the CoA and EIS.
- A monitoring regime will be used to assess the effectiveness of mitigation measures employed and avoid continued impacts on biodiversity. The monitoring regime will assess rehabilitation of impacted areas. The monitoring program will be used to make recommendations to improve rehabilitation outcomes over the first three to five years of operation.
- An additional impact assessment will be undertaken by an independent grassland ecologist within 2-3 years of commercial operation, biodiversity offset credits may be adjusted accordingly, and ongoing recommendations will be implemented.
- Measures will be implemented to ensure compliance with all relevant legislation and requirements described in the biodiversity Management Plan.

The purpose of Biodiversity Management Plan is to describe how impacts on biodiversity will be minimised and managed during construction and operation of the Project.

## **9.2 Traffic and Access**

### **Issues**

A Traffic Management Plan has been prepared to describe how traffic, transport and access impacts are minimised within the scope permitted by the Development Consent during the construction of DPSF, which will only be accessed by all personnel (employees, contractors and deliveries) via Donald Ross Drive. The Traffic Impact Assessment completed by ARUP Pty Ltd in March 2018 and updated on 9 August 2018 in response to submissions has demonstrated that the greatest traffic impact of the project will occur during the construction period of the development. Traffic generated during this phase will consist of construction related heavy vehicle movements and employee transport between the site and accommodation facilities in Darlington Point and Griffith.

### **Environmental Performance Objectives**

- A Traffic Management Plan (TMP) has been prepared in consultation with Murrumbidgee Council, RMS and in accordance with the RMS Traffic Control at Worksites Manual (2010).
- TMP is to comply with Condition 7 (Schedule 3) of the Development Consent.
- Vehicle and Haulage limits and routes to be aligned to the requirements set-out in the EIS and Traffic Management Plan that has been approved by RMS, Murrumbidgee Council and the DPE.

- To enable the swept paths of a B-Double to adequately enter and exit the DPSF site, the site access will be upgraded before construction commences, for which a construction certificate has been obtained from Murrumbidgee Council.
- Minimising Traffic Delays and avoiding school bus times.
- Maintaining satisfactory property access.
- Minimising disturbance to the receiving environment.
- Signal Energy and their engaged Subcontractors will use a Bus Service to transport construction workers to and from the site.

### 9.3 Flooding and Hydrology

#### Issues

The project site is located within the floodplain of the Murrumbidgee River. At the time of the EIS, Site topographical data was used to estimate potential river flooding contours for the site. The flood assessment consisted of a desktop hydraulic analysis based on historical flood evidence sourced from the Murrumbidgee River Flood Atlas and existing ground survey of the site to estimate flood levels and velocities.

The flood depth across the site for a 90-year Average Recurrence Interval (ARI) flood event based on the 1974 flood event found that the flood depth across the DPSF site for the existing case was generally less than 0.25 metres, with the maximum depth noted to the south of the site reaching 0.75 metres.

The flood modelling for the post-development scenario indicated that the predicted changes in flood levels due to the DPSF project are less than 0.001m and are therefore considered minor.

Subsequent to the EIS, a more detailed flood study has been undertaken to inform the detailed design.

#### Environmental Performance Objectives

- The project layout will be designed to not be impacted by potential River flooding of the site and is also not expected to have an adverse impact on adjacent properties.
- An Emergency Response Plan for the site shall include measures of what to do in the event of flood (e.g. cease work and recommence once it is safe to do so).
- Following any flood event, any debris build-up against the security perimeter fence will be removed promptly and any necessary fence repairs effected.

### 9.4 Aboriginal and Cultural Heritage Management

#### Issues

Ten previously unrecorded cultural heritage archaeological sites within the DPSF site were identified during a survey undertaken as part of the Cultural Heritage Assessment Report (CHAR) process. These comprised six culturally modified trees, two earth mound/hearth and modified tree, one earth mound/hearth and one surface artefact scatter.

Early identification of Aboriginal heritage and archaeological sensitive areas (remnant vegetation) during the archaeological assessment process resulted in the avoidance of impact to eight Aboriginal archaeological sites and one potential culturally modified tree. One Aboriginal archaeological site remains located within proposed impact area: Tubbo AFT 01, namely a surface scatter of quartz over a small area in the south-east corner of the Site. Impact to this area is unavoidable due to the scale of the project and requirements for the proposal.

Archaeological significance of the identified Aboriginal sites was defined by the information exhibited by each site. The archaeological significance of Tubbo AFT 01 was determined to be moderate due to the site's location. Due to the absence of subsurface archaeological deposit at Tubbo AFT 01, a mitigation program comprising the collection of surface artefacts will be undertaken in conjunction with the Griffith Local

Aboriginal Land Council (GLALC) prior to any activities which may harm Aboriginal objects at the site location.

### **Environmental Performance Objectives**

The Chance Finds Protocol is a Subplan to the Environmental Management Strategy (EMS) for the Darlington Point Solar Farm (the Project). This protocol has been prepared to meet the requirements set out in Item 20 (Schedule 3 - Environmental Conditions – General) of the Development Consent (Application # SSD 8392). The Chance Finds Protocol includes the below: -

#### **Discovery of Human Remains**

If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Applicant must notify the NSW Police and OEH as soon as possible following the discovery, and work must not recommence in the area until this is authorised by OEH.

#### **Chance Finds**

Prior to the commencement of construction, the Applicant must prepare a Chance Finds Protocol for the development in consultation with the Aboriginal stakeholders, and to the satisfaction of OEH. Following approval, the Applicant must implement the Chance Finds Protocol. This Protocol was developed by an independent archaeologist in consultation with GLALC during the preparation of the CHAR.

## **9.5 Air Quality**

### **Issues**

The most common pollution generating sources in the area include vehicle emissions, dust from unsealed roads, agricultural activities (cropping, stock movement, earth moving), and wood fuelled fires.

Emissions to the atmosphere from the Project during construction will be temporary, and restricted to dust caused by land disturbance, and vehicle, plant and equipment exhaust emissions.

Dust emissions during operation are not expected to be significant.

### **Environmental Performance Objectives**

- Minimal dust moving off-site and minimum dust on-site;
- No complaints from neighbouring properties;
- Construction equipment operating according to manufacturer's specifications;
- Compliance with the relevant regulation; and
- Compliance with Condition 15 (Schedule 3) of the Development Consent.

## **9.6 Noise and Vibration**

### **Issues**

A Noise Impact Assessment (NIA) has been undertaken to assess the potential construction, operational and traffic noise impacts associated with the project.

An assessment of the construction noise impacts of the development in accordance with the Interim Construction Noise Guideline (ICNG) and operational noise impacts in accordance with the NSW Industrial Noise Policy (INP), shows construction noise is likely to exceed applicable criteria at various Noise Sensitive Receivers (NSR's) when construction activity is conducted near to the project boundary. Given the size of the project site, it is likely that the majority of construction works will be undertaken at a greater distance from residential receivers resulting in lower noise levels.

Given that construction noise levels are predicted to exceed the relevant limits at various NSR's, noise management mitigation measures will be included in the CEMP to ensure that construction noise from the Project is appropriately managed and minimised.



Heavy vehicle deliveries will be restricted to approved construction hours only, in order to minimise road-borne noise impacts to local residents.

The establishment and operation of the solar farm is unlikely to have a long-term impact on fauna within the project area due to increased noise. Inverter stations will be set-back a minimum of 80m from the project boundary to mitigate operational noise impacts to sensitive receptors.

### **Environmental Performance Objectives**

- Signal Energy must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009).
- Construction activities will only occur between site specified hours as per below: -

#### **Monday to Sunday 7am-6pm; Public Holidays – No Work**

- Where practicable, Signal Energy will endeavour not to undertake noise emitting work proximate to the Donald Ross Drive boundary on the western and south-western portion of the Site between 1-6pm on Saturdays and 7am-6pm on Sundays.
- Signal Energy will develop and implement a Construction Noise and Vibration Management Plan (CNVMP) as part of the CEMP.
- Maintain compliance with the conditions of the Development Consent and legislation relating to noise.
- Provide a protocol for monitoring and assessing construction noise impacts on surrounding private receptors.
- Effective communication with the local community and regulators regarding construction of the proposed project.
- Compliance with condition 13 and 14 (Schedule 3) of the Development Consent.

## **9.7 Soil and Water Quality**

### **Issues**

The DPSF site is situated approximately 1.6 kilometres south of the Murrumbidgee River within a topographical depression within the Murrumbidgee plains. Shallow drainage lines and natural depressions intercept the low-relief alluvial clay and loamy landscape.

The development is anticipated to have minimal impacts on the surrounding surface water environment, flow regimes (flooding), quality, quantity, features, or local or regional hydrology. Although some of the possible impacts may include: -

- Inadvertent contamination from sediment and unintended spillages of fuel, lubricants, herbicides, sewage and other chemicals.
- Increased soil compaction through additional access tracks and other hardstand areas changing runoff characteristics and potential for concentrated flows.
- Increased imperviousness of the site through installation of solar panels.

### **Environmental Performance Objectives**

During construction, operation and decommissioning of the project, activities with the potential for adverse soil impacts would be managed through the development and implementation of site-specific sediment control plans and spill controls.

To ensure that impacts are minimised an Erosion, Sediment and Stormwater Control Sub-Plan (ESCP) will be prepared, implemented and monitored during the construction and decommissioning of the proposed site in accordance with the Managing Urban Stormwater: Soils and Construction, volume 1, 4th edition (Landcom, 2014) covering items such as:

- Primary erosion and sediment controls shall be installed prior to any site disturbance, vegetation clearance or service installation e.g. sediment fences etc.
- Regularly inspect erosion and sediment controls, particularly following storm and rainfall events.
- Maintain an inspection register that records monitoring data on the effectiveness of the ESCP, and maintenance record of the erosion and sediment capture measures.
- Ensure that machinery arrives on site in a clean, washed condition and is in good working order (to avoid fluid leaks).
- Any machinery leaving site is to be visually checked before leaving the site to ensure it is in a clean condition to avoid tracking of sediment onto public roads.
- For excavation activities, separate subsoils and topsoils and ensure that they are replaced in their natural configuration to assist revegetation.
- Stockpile topsoil appropriately so as to minimise weed infestation, maintain soil organic matter, maintain soil structure and microbial activity.
- In areas of disturbed soil, the site would be progressively rehabilitated as soon as possible after completing works.
- Refuelling of plant and machinery to be done at least 50m away from water bodies.
- All fuels, chemicals and other potential contaminants to be storage at least 50 m from water bodies in an impervious bunded area.
- Procedures for the testing, treatment and discharge of construction waste water to be established and implemented.
- All solid and liquid waste to be appropriately stored in containers awaiting collection and disposal to approved facilities off site

## **9.8 Waste Management**

### **Issues**

There will be various waste streams from the construction phase of the project including the following: -

- Workforce general waste;
- Packaging materials (i.e. cardboard, plastic, timber pallets, metal strapping);
- Excess building materials;
- Scrap metal and cabling materials (i.e. steel, aluminium, copper);
- Plastic and masonry products;
- Waste concrete products;
- Excavation of topsoils and scalping of vegetation; and
- Temporary ablutions waste.

### **Environmental Performance Objectives**

Waste management for the development will be undertaken consistent with the waste management hierarchy in the following order of priority from most desirable to least desirable:

- **Avoid:** Waste avoidance by reducing the quantity of waste being generated. This is the simplest and most cost-effective way to minimise waste. It is the most preferred option in the waste management hierarchy.

- **Re-use:** Reuse occurs when a product is used again for the same or similar use with no reprocessing. Reusing a product more than once in its original form reduces the waste generated and the energy consumed, which would have been required to recycle.
- **Recycle:** Recycling involves processing waste into a similar non-waste product consuming less energy than production from raw materials. Recycling spares the environment from further degradation, saves landfill space and saves resources.
- **Dispose:** Removing waste from worksites and dumping on a licensed landfill site, or other appropriately licensed facility.

Waste generated from the construction and operation of the proposed facility will be managed efficiently to ensure that the diversion of waste from landfill is maximised. A Waste Management Sub-Plan (WMP) will be included in the CEMP to ensure that waste on site is suitably segregated, sorted, and recycled prior to sending any residual wastes to landfill.

## 9.9 Weed and Pest Management

### Issues

The DPSF development will result in the increased movement of vehicles and people to the Project site, particularly during the construction phases. As a result, the primary risk to biosecurity is the spread of weeds that may result from the increased movement of vehicles in and out of the site. Weed seeds can be dispersed easily on the tyres and undercarriages of vehicles and on the clothing of construction personnel. Twenty-seven species of weed were recorded within the project area. None of these species are listed on either the BS Act and/or are weeds of national significance. Other invasive weeds that were recorded include *Xanthium spinosum* (Bathurst Burr) and *Marrubium vulgare* (Horehound). The increase in weeds degrades the habitat for flora and fauna species and ecological communities. Invasion of native plant communities by exotic perennial grass is a key threatening process (KTP) under the BC Act. The project has the potential to further spread weeds throughout the project area and exacerbate this KTP, if not appropriately mitigated.

Rubbish bins containing food scraps and other perishable waste can potentially attract pest animals at the Project site, including rats, cats, and foxes.

### Environmental Performance Objectives

The spread of weeds and pest management will generally be controlled through

- Preparation a Pest and Weed Sub-Plan to be included in the CEMP to manage the occurrence of noxious weeds and pest species across the site during construction and operation. This plan will be prepared in accordance with Murrumbidgee Council and NSW DPI requirements. Where possible, integrate weed and pest management with adjoining landowners.
- Confining vehicle and machinery movements (where possible) to formed access tracks during all phases of the Project.
- A vehicle wash down procedure will also be implemented for vehicles entering and exiting the development site.
- Management measures would focus on early identification of invasive weeds, effective management controls, and a regular maintenance program.
- Rubbish bins containing food wastes will be covered and serviced on a regular basis.
- Rabbit, wild dog, and fox numbers would be controlled through targeted pest management during the operational phase of the Project.

## 9.10 Bushfire

### Issues

The DPSF site is relatively flat, with patches of native remnant vegetation occurring in grazing paddocks and along drainage depressions. It is expected that grasses will continue to grow within the project area under

the solar panels and that a maintenance regime will be required to manage fuel load within the Asset Protection Zone (APZ) and to maintain the 10m firebreak around the development

The proposed development is not located within a bushfire prone land mapped area, however there is still a risk of possible grass fires/bushfire risk over surrounding lands.

Ignition sources for the proposed site could include machinery movement in long grass (eg slashing, mowing and petrol-powered tool use), lightning strikes, storage of fuels/chemicals, hot welding activities, and cigarette butts thrown from cars travelling along surrounding roads.

Site access will be formalised at the beginning of the construction stage, which would improve the ability to access and suppress any fire onsite.

### **Environmental Performance Objectives**

A Bushfire Management Plan will be prepared for the DPSF covering construction, operations and decommissioning with input from RFS, and include but not be limited to:

- Complying with the requirements of Planning for Bush Fire Protection 2006 including:
  - Identifying asset protection zones
  - Providing adequate egress/access to the site
  - Emergency evacuation measures
  - Adequate setbacks included in the design (e.g. 10m from fence line before commencement of solar arrays, and 20m setback from wooded areas and 'Vegetation and Heritage Protection Exclusion Zones').
- Management of site activities with a risk of fire ignition, including all vehicle and plant movements beyond formed roads and trafficable hard stand areas will be restricted to diesel, not petrol vehicles.
- Storage and maintenance of firefighting equipment, including ensuring fire extinguishers are available in all site vehicles.
- Daily monitoring of the bushfire status through the RFS website (<http://www.rfs.nsw.gov.au>) during the bushfire season and communicated to site personnel.
- All fuel or flammable liquids be stored on-site are in designated area and will be signposted 'Fuel Storage Area'. A register will be maintained that confirms the quantities and location of any flammable material stored on-site along with the applicable Material Safety Data Sheet (MSDS).
- No burning of vegetation or any waste materials will be undertaken on site.
- Implement a bushfire management regime for grass land management.
- Provision of multiple fire-fighting water tanks across the site.
- Operational procedures relating to mitigation and suppression of bushfire relevant to the solar farm.
- Location of hazards (physical, chemical, and electrical) that will impact on firefighting operations and procedures to manage identified hazards during firefighting operations.
- The local branch of the Rural Fire Service shall be informed of the project, regarding its operation, water supplies, and layout.

## **9.11 Visual Amenity**

### **Issues**

During construction, it is expected that there would be minor visual impacts to residents along Donald Ross Drive. The additional traffic impact is most likely the greatest potential for visual impacts during construction. The visual impact of increased traffic movements to the site would be predominately limited to the solar farm construction (approximately 12 months), at a reduced intensity and duration for the construction of the BESS facility, and decommissioning phases.

Through the combination of the low profile of the proposed solar array infrastructure, the proposed BESS facility, the existing overhead transmission lines present throughout the site and the existing industrial infrastructure, it can be assumed that the proposed infrastructure would not be dominant or present an unacceptable contrast to the surrounding landscape.

### **Environmental Performance Objectives**

- As part of the detailed design, the materials and colour of the site infrastructure will, where practical, be non-reflective and in keeping with the materials and colouring of existing infrastructure or of a colour that will blend with the landscape, including:
  - Pole mounts will be non-reflective
  - Security fencing posts and wire would be non-reflective
  - Screening vegetation and landscaping options will be considered and agreed with adjacent landowners and in discussion with Murrumbidgee Council if required.
- Dust will be controlled in response to visual cues.
- Night lighting would be minimised to the maximum extent possible (i.e. manually operated safety lighting at the main component locations). It would be directed away from Donald Ross Drive, so as not to cause light spill that may be hazardous to drivers
- Areas of soils disturbed by the project would be rehabilitated progressively or immediately post construction and decommissioning, reducing views of bare soil.

## **9.12 Socio-Economic (Including Cumulative impacts)**

### **Issues**

It is anticipated that the DPSF will provide positive social and economic outcomes for the Darlington Point region and the wider Murrumbidgee region through employment generation. The project promotes renewable energy as an alternative to traditional coal-fired power generation and will also contribute to the national targets for the development of large-scale renewable energy projects.

The construction of the DPSF is estimated to require a construction workforce peak of approximately 350 staff.

The cumulative impact for the DPSF proposal relates to the combined potential effects from the individual environmental and social issues detailed previously (e.g. construction noise, dust emissions, visual) as well as any potential interaction with other proposals in the local area. Note that cumulative impacts may occur concurrently or sequentially.

A review of the projects proposed within a 50-kilometre radius from the DPSF site has been undertaken and these projects' indicative construction programs (sourced from their project's EIS or project website) has indicated that there are negligible overlaps of the proposed DPSF program with other nearby projects. It is not expected that the DPSF construction program would overlap with other projects in the area, however, there is the potential for currently unknown projects to come online in the future.

The key potential social and economic benefits and impacts that may result from construction of the proposed development include:

- Increased employment – there is the potential for employment to be generated during the construction phase through the use of local contractors and labour hire;
- Increased traffic on local roads and hazards associated with construction traffic;
- Influx of workers putting pressure on local accommodation and public services; and
- Short term air quality, noise and visual impacts.

### **Environmental Performance Objectives**

- Providing regular Project updates to the community and businesses;
- Providing a schedule of activities when there may be heavy vehicles accessing the Project site or when noisy activities may occur;
- Establishment of a complaints handling procedure and a response protocol;

- Preparation of regular project factsheets for distribution to the surrounding residents;
- Ongoing liaison with local community and business representatives to ensure the use of local contractors, labour, materials, and services during construction and operations;
- Liaison with local businesses and services to determine accommodation options and availability so as local tourism is not affected, particularly during the construction phase, as outlined within the Employment and accommodation Plan; and
- Liaison with tourism representatives to ensure local events are not impacted by accommodation short falls; and Continued engagement with Murrumbidgee Council to discuss community and business concerns.

### **9.13 Electro Magnetic Fields**

#### **Issues**

During construction of the DPSF, it is expected that there would be minimal EMF impacts. However, construction staff would be intermittently exposed to EMFs in areas near the overhead transmission lines and when working near the existing Darlington Point substation. It is expected that any potential effects from EMFs would be short term in nature and negligible.

#### **Environmental Performance Objectives**

- All designs shall be in accordance with the Guidelines for limiting exposure to Time varying Electric, Magnetic and Electromagnetic Fields (ICNIRP, 1998) & (ICNIRP, 2010b) and relevant codes and industry best practice standards in Australia.
- The security system for the site, including safety fencing and closure of gates, shall be maintained throughout the construction and operation, to provide safe exposure distances to the public.

### **9.14 Hazardous Materials**

**To be included for construction of the Battery Storage**

## **10. Implementation**

### **10.1 Training and Awareness**

All Darlington Point Solar Farm Pty Ltd and Signal Energy personnel and/or subcontractors shall be formally inducted and provided with specific awareness training in relation to the environmental aspects and mitigation methods outlined above (Section 9), as they apply to each activity.

Signal Energy and their Contractors shall ensure that all project personnel are aware of and understand the environmental requirements of the project relevant to their role and responsibilities. This includes regulatory requirements, any contractual environmental requirements and associated procedures.

### **10.2 Site Induction**

Prior to commencing works on site, all personnel shall undertake a site-specific induction addressing the environmental management risks and requirements for the construction of the DPSF. The environmental induction shall include as a minimum:

- The relevant environmental legislation;
- General environmental duties;
- Conditions of the relevant licences and approvals;
- Locations of environmentally sensitive areas, and weed infestations;
- Permit to work process (including Ground Disturbance Permit);



- DPSF Traffic Management Plan outlining movement restrictions within the site;
- The environmental aspects and mitigation strategies provided in section 9 above; and
- Definitions and management of environmental incidents and complaints.

### **10.3 Daily Pre-Start Meetings**

Pre-Start Meetings shall be conducted on a daily basis and shall include the discussion of required environmental controls as required. From time to time specific Environmental risks may be discussed to ensure that employees on the DPSF site are continually reminded of their environmental responsibilities.

### **10.4 Toolbox Training**

Toolbox training shall be conducted on a weekly basis and shall include environmental risks and responsibilities where required. The Signal Energy SHEQ Adviser may from time to time provide additional toolbox topic training materials or require environmental stand-down toolbox training to occur in response to specific high-risk issues identified on the project.

### **10.5 Daily Site Inspections and Surveillance**

Inspections and surveillance of construction and upgrading activities (including subcontractors) will be undertaken on a day-to-day basis. These inspections will not be documented unless significant non-conformances with the EMS are identified; ie. exceptions based reporting.

### **10.6 Weekly Site Environmental Inspection**

The effectiveness of environmental mitigation measures outlined in section 9 of the EMS and other Management Plans referenced in Section 2.7 of this EMS will be assessed weekly by the Construction Manager, SHEQ Adviser, or a nominated delegate, unless otherwise specified. A site environmental inspection checklist will be developed within the Lucidity Inform Module (Signal Energy's preferred SHEQ platform) addressing the key environmental impacts and mitigation measures which have the potential to arise during construction activities.

Actions identified in weekly inspections are to be closed out prior to the subsequent inspection, in accordance with the allocated action priority report. However, in certain circumstances only and upon consultation with the Construction Manager, an extended timeline to close out particular actions may be established.

### **10.7 Environmental Records**

The SHEQ Adviser will maintain the following records:

- The EMS and associated sub-plans;
- Relevant approvals, regulatory licences and permits;
- Inspection records and checklists;
- Environmental monitoring results;
- Environmental accident/incident/emergency reports;
- Non-conformance documentation;
- Environmental complaint reports;
- Waste reports;
- Audit reports; and
- Management review minutes and action taken.

Where hard copy records are provided, they will be scanned and available electronically. Each set of records will be allocated a register/index for easy reference and filing. Records will be maintained for at least the minimum period specified by the Client and/or relevant legislation; and will be available to Client Representatives and authorised Government officers as required.

## 10.8 External Reviews

As per the COA's, within 6 months of the commencement of construction, Signal Energy will commission an Independent Environmental Audit (Audit) of the development. The audit will:

- Be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
- Be carried out in consultation with the relevant agencies;
- Assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and
- Recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.

Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report will be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Secretary

Signal Energy has also scheduled Best Practice Certification to complete a surveillance audit aligned with ISO14001:2015 to be conducted within the first 6 months of construction commencing. All recommendations and actions assigned from this third-party audit will be implemented as required by Signal Energy

## 11. Emergency Planning and Response

Environmental management will include planning for potential emergencies at the site. The organisational structure, responsibilities and on-site contact details for all emergencies is specified in the Emergency Management Plan.

Emergency response documents, and the contact details of all relevant stakeholders, will be housed at the Project site office and displayed on site. The procedure for environmental emergencies shall also form part of the project Safety and Health Management Plan.

As per requirements of Condition 26 (Schedule 3) of the Development Consent (Application # SSD 8392) two copies of the Emergency Management Plan will be kept on-site in the security hut adjacent to the site entry point at all times. This plan must: -

- (a) be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 1 'Emergency Planning';*
- (b) be prepared in consultation with Fire and Rescue NSW and NSW Rural Fire Service to their satisfaction;*
- (c) identify the fire risks and controls of the development; and*
- (d) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site.*

All personnel will receive training in appropriate Emergency Response Procedures associated with the ERP as part of the site induction.

### 11.1 Environmental Incident Levels

Environmental Incidents/Non-Conformances is classified into three levels as detailed below:

Level 3 – Major	Level 2 - Major	Level 1 - Minor
Level 3 Environmental Incidents create permanent or long-term damage to the environment. This damage will result in the environment taking 12 months or more to return to pre-existing conditions.	Level Two Environmental Incidents create short to medium term damage to the environment. This damage will result in the environment taking up to 12 months to return to pre-existing conditions	Level Three Environmental Incidents typically cause short term or nuisance damage. The damage is easily rectified usually within one day. Class 3 incidents do not cause medium- or long-term damage.
<b>Parameters</b>		
<ul style="list-style-type: none"> <li>• Serious or material environmental harm or damage.</li> <li>• Reportable prosecution - &gt; \$50,000</li> </ul>	<ul style="list-style-type: none"> <li>• Potential or actual material environmental harm or damage reportable as per State regulation</li> <li>• Prosecution &lt;= \$50,000</li> <li>• Notice to provide records to regulatory authority as other notice &gt; \$5,000</li> <li>• Infringement Notices</li> </ul>	<ul style="list-style-type: none"> <li>• Environmental Pollution</li> <li>• No mandatory external reporting</li> <li>• Typically &lt;\$5,000</li> </ul>
<b>Examples</b>		
<ul style="list-style-type: none"> <li>• Sediment basin/containment pond fails</li> <li>• Breaking an Environmental Protection Order / Notice / Licence conditions</li> <li>• Wilful discharge or disposal of contaminated materials/liquids off site or waterways</li> <li>• Wilful damage/destruction to native vegetation</li> <li>• Wilful damage/destruction of cultural/heritage artefacts or significant places</li> </ul>	<ul style="list-style-type: none"> <li>• Damage to cultural/heritage items, i.e. controlled discharge from concrete saw cutting.</li> <li>• Complete failure of Erosion Sediment Controls where run off leaves the site.</li> <li>• Wilful or negligent damage to Erosion Sediment Controls – conc. off site</li> <li>• Working outside of hours nominated in the Development Consent</li> <li>• Deliberate discharge of water outside of approved limits offsite, i.e. into stormwater</li> <li>• Damage to external property as a result of construction vibration</li> <li>• Any fuel/oil/chemical leaks/spills to waterways.</li> <li>• Any fuel/oil/chemical spills contained on site 5 L – 1000 L</li> <li>• Damage of loss to treated/vulnerable/ endangered species, i.e. protected by Legislation</li> <li>• Litter leaving the site</li> </ul>	<ul style="list-style-type: none"> <li>• Oil Leak &lt;=5 L, i.e. hydraulic oil leak</li> <li>• Fuel leak/spill &lt;=5 L, i.e. from refuelling equip.</li> <li>• Chemical leak/spill &lt;=5 L, i.e. curing compound radiator fluid.</li> <li>• Sediment Control:               <ul style="list-style-type: none"> <li>- Damage or partial failure</li> <li>- Where run-off does not leave the site</li> <li>- Wilful or negligent damage to Erosion Sediment Controls</li> </ul> </li> <li>• Dust emission (remaining visible at 20 m from site – or visible at a sensitive receptor, whichever is less, e.g. dust settlement on surrounding properties.)</li> <li>• Lights – unwanted illumination of neighbouring properties.</li> <li>• Complaints – record all unless validated.</li> <li>• Damage to vegetation to be retained/ protected</li> </ul>

Level 3 – Major	Level 2 - Major	Level 1 - Minor
	<ul style="list-style-type: none"> <li>• Overflow from on-site sewage collection tanks</li> <li>• Disposal of waste at an unapproved facility:               <ul style="list-style-type: none"> <li>- Construction waste</li> <li>- Spoil material</li> <li>- Liquid waste</li> </ul> </li> <li>• Incorrect storage of regulated/contaminated or hazardous waste:               <ul style="list-style-type: none"> <li>- Oils</li> <li>- Contaminated material</li> <li>- Sewage</li> <li>- Asbestos</li> </ul> </li> <li>• Not having required licence permits or approvals</li> <li>• Sediment/containment ponds breached</li> <li>• Complaints relating to odour</li> <li>• Transport and disposal of fire ant items outside of fire ant restricted area</li> <li>• Supplying plant material containing pest plant reproductive material</li> </ul>	<ul style="list-style-type: none"> <li>• Not covering loads on truck carrying material off site.</li> </ul>

### 11.2 Environmental Incident Investigation and Close-out

For all incidents, an Incident Report shall be raised within the Lucidity SHEQ system (Signal Energy and Subcontractors), and for all Level 2 and 3 Incidents, a detailed Investigation Report will be completed using the Lucidity Incident Reporting module.

Where a Level 3 Incident has occurred, the SHEQ Manager will initiate the investigation and allocate responsibilities and an external consultant may be engaged. Legal privilege shall be established if required.

For all environmental incidents, the Client Representative shall be notified immediately (within 2 hours of the incident occurring). Signal Energy in consultation with Darlington Point Solar Farm Pty Ltd will make the determination to notify the relevant authority. The relevant site personnel shall work with the Client Representative as required during incident investigation activities.

### 11.3 Reporting Incidents to Regulatory Authorities

Environmental Incident is defined as “a set of circumstances that causes or threatens to cause material harm to the environment.” **Material Harm:** -

- Involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)

### **Environmental Incident Report**

The Department must be notified in writing to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) immediately after Signal Energy becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development) and set out the location and nature of the incident.

### **Non-Compliance Notification**

The Department must be notified in writing to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) within 7 days after Energy becomes aware of any non-compliance with the Conditions of Consent. The 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 noncompliance (if known) and what actions have been done, or will be, undertaken to address the noncompliance.

### **Release of contaminants**

Any release of contaminants must be reported to the appropriate regulatory body in accordance with the above protocol for Environmental Incident or Non-Compliance. Where a release involves stormwater and has not, or will not, result in material environmental harm the incident shall be reported to the relevant local authority (e.g. Murrumbidgee Council). The release shall be reported as soon as practicable, after becoming aware of the release.

A written notice detailing the following information must be provided to the relevant authority of any spill or release of contaminants:

- The name of the operator, including their registration certificate number;
- The name and telephone number of a designated contact person;
- Quantity and substance released;
- Person(s) involved;
- The location and time of the release;
- The suspected cause of the release;
- A description of the effects of the release;
- The results of any monitoring performed in relation to the release;
- Actions taken to mitigate any environmental harm caused by the release; and
- Proposed actions to prevent a recurrence of the release.

## **11.4 Complaints and Complaints Response**

Complaints shall be registered, tracked and responded to in accordance with the following timeframes:

- Complaint entered into Lucidity Incident Module (Signal Energy and their sub-contractors)
- Initial response provided to the complainant and Client within 24 hours indicating the matter is being addressed; and
- Detailed response including details of the complaint and the action taken / further action planned to alleviate the problem provided to the client within ten working days.



The following details will be recorded as a minimum:

- Date;
- Issue / Complaint;
- Affected Neighbours;
- Activity Date;
- Follow up / complaints – Actions; and
- Follow up / complaints – date.

An outline of the Signal Energy Complaints procedure and register will be made publicly available through the Darlington Point Solar Farm Website. The Address of this website will be updated in February 2019.



