



Darlington Point Solar Farm

Independent Audit

Prepared for:
Signal Energy Australia

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Name	Signature	Date
Claire Driessen		12 November 2019

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1. EXECUTIVE SUMMARY

The Darlington Point Solar Farm (DPSF) is approaching six months into construction. Once completed, the DPSF will cover an area of approximately 710ha, comprise approximately 826,850 solar panels and supply up to 275 MW via an upgraded TransGrid substation located adjacent to the site.

The solar panels are installed on ground-mounted single axis tracking frames. The direct current (DC) electricity generated from the panels will be inverted to alternating current (AC) via skid-mounted above the ground power conversion units (PCUs). The PCUs located within the site will feed AC electricity into an onsite power reticulation system before the power is centrally collected and dispatched to the local electricity distribution network via the TransGrid transmission network.

Darlington Point Solar Farm Pty Ltd (the Owner) engaged Signal Energy Australia Pty Ltd (as the Engineering Procurement Construction – EPC contractor) to construct the approved Darlington Point Solar Farm consistent with SSD 8392.

The objective of the audit was to determine Signal Energy's environmental performance and compliance with the SSD 8392 Development Consent conditions, Schedule 4, Condition 7 that requires an Independent Environmental Audit. This audit is required within 6 months of construction to assess the environmental performance of the solar farm construction.

The Echo Auditor attended the Signal Energy construction operations at Darlington Point over the 18th and 19th of September, 2019.

1.1 Summary of Findings

The Audit found a total of five (5) non-compliances and ten (10) improvement opportunities. Additionally, fourteen (14) consent conditions were not triggered at the time of the audit. There were no non-compliances that were considered to have potential for material impacts on the environment or community and it appears that at this stage of construction, the impacts were consistent with those predicted within the EIS.

Indeed, three of the non-compliances raised in this Audit relate to the four deficiencies detected in the Pre-Construction Compliance Report completed on behalf of Signal Energy in June 2019, after construction had commenced. Those four non-compliances concerned administrative conditions (such as failure to provide final layout plans to the Secretary prior to construction) and have not had a material impact on the environment or community. Two of those non-compliances were addressed (shortly after being raised), however continue to be documented as non-compliances (in this Audit) as they continue to reflect the outcome that such administrative conditions were not met prior to construction commencement. One of the non-compliances related to access to information on the website. That non-compliance has not been fully addressed and remains a non-compliance in this Audit report. The remaining non-compliance from the Pre-Construction Compliance Report is now recorded as compliant as it has been addressed and is not confined to pre-construction timing, therefore ongoing compliance with the condition (at all times) should be documented accordingly.

Non-compliances assessed in this Audit were noted in regard to the following aspects:

- The Final Layout Plans were not provided to the Secretary prior to construction commencement – this has been addressed (Schedule 2, Condition 6) (**Unique ID 2-6A**).
- The independent dilapidation survey for the local road network was not completed prior to the commencement of the road upgrade (or prior to construction commencement) – this has been addressed (Schedule 3, Condition 7b) (**Unique ID 3-7B**).
- Dust generating activities were not being managed appropriately (Schedule 3, Condition 15) (**Unique ID 3-15A**).
- Updating of plans requires attention to accurately reflect all current modifications to the conditions of consent (Schedule 4, Condition 3) (**Unique ID 4-3A**).

- Website is missing some required documents and information has not been kept up to date. (Schedule 4, Condition 8) (**Unique ID 4-8A**).

In some instances, the audit determined the conditions were satisfactorily addressed however, some elements of the implementation or administration (e.g. management plans) would benefit from improvement. Recommendations to address the above non-compliances and improvement opportunities have been detailed below. Most recommendations are prescriptive to provide a clear suggestion, however they are recommendations only and other solutions may be considered more practical or better fit to address detected deficiencies.

- Land management: Signal Energy's approach to rehabilitating areas progressively to achieve recovery (e.g. roadsides, grass areas, trenches) as areas are completed should be included in the CEMP to document the process for staging rehabilitation.
- Dust: Increase the number of water trucks onsite at any given time to better manage dust generation activities. Do not have all water trucks offsite at the same time to refill – stagger the refill trips offsite.
- Lighting: installed at various locations around compound had not been verified as compliant with AS4282. Signal Energy should undertake the assessment to confirm the lighting complies with AS4282.
- Soil and Water – the practice of opening up all cable trenching and stockpiling of topsoil and sand (for backfill) at same time is not ideal. This increases the risk of sedimentation, loss of soils, and potential de-watering from trenches following rainfall. Signal Energy is encouraged to push the contractor to close trenches in stages to reduce the area of trenching open at any given time
- Nilsen uses a self-contained shipping container in compound to store all chemical, fuels and oils. SDSs for most items in container were found in a folder inside however, the folder was missing SDSs of several items in container. This should be easily rectified with a review of items and cross-checking SDSs.
- In one of the waste collection areas, used 200L drums with holes cut for lifting points were found – sharp edges were evident and pose a risk. Use of these altered drums for waste (or other) collection should be reviewed to prevent risk of injury.
- Updating Strategies and Plans (3 improvement opportunities are captured in this summary): A review of the following plans (it is recommended to review all plans) to amend and accurately reflect current conditions of consent and practices employed on the project is required:
 - Accommodation & Employment Strategy
 - Environmental Management Strategy
 - CEMP
 - TMP
- The two missing required documents - final layout plans for the development; and compliance reports (Pre-Construction Compliance Report was completed in June 2019) – should be added to the Edify Energy DPSF website. The website would benefit from routine or regular updates on the project progress and any relevant changes, such as more recent media release/s and updated photos included in the 'Project gallery' section of the page. Updated (latest versions) approved plans should replace existing plans on website as relevant.

2. INTRODUCTION

Darlington Point Solar Farm Pty Ltd (the Owner) engaged Signal Energy Australia Pty Ltd (as the EPC contractor) to construct the approved Darlington Point Solar Farm consistent with SSD 8392. Signal Energy Australia Pty Ltd engaged Echo Consultants Pty Ltd to conduct the Independent Environmental Audit for the Darlington Point Solar Farm consistent with Schedule 4, Condition 7 of the SSD 8392.

2.1 Background

The Darlington Point Solar Farm (DPSF) is a State Significant Development (SSD) approved on 7 December, 2018. The project 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).

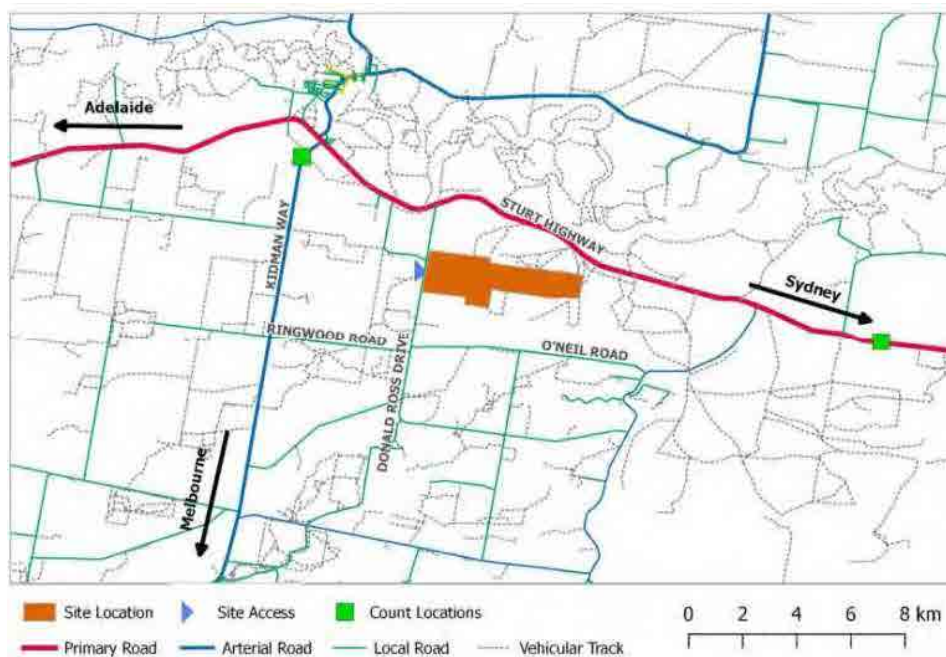


Figure 1 – DPSF Location

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. The site is situated approximately 1.6 km south of the Murrumbidgee River. There are no mapped watercourses within the site, and it is largely comprised of flat, open grasslands with some discrete pockets of remnant native vegetation.

The total project area assessed within the Environmental Impact Statement (EIS) covers approximately 1,042ha, with a development footprint for the solar farm over approximately 710ha of that total area. The project area includes the existing TransGrid Darlington Point Substation. 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.

The DPSF is proposed to accommodate 275MW (AC) of solar generated electricity, including the provision for battery technology for energy storage and resupply during peak demand. The DPSF will connect to the adjacent TransGrid Darlington Point 330 kV substation (the Darlington Point Substation) and supply power to the National Electricity Market (NEM).

The DPSF, as described in the EIS, comprises the following infrastructure components:

- 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

It is expected that the construction phase for the Project will take approximately 12 months from initial site works through to commissioning. Construction of the Battery Energy Storage System (BESS) is expected to follow immediately after the 12-month solar farm construction period, taking 3-6 months to complete. The DPSF is anticipated to have a 30-year operational life span. During construction there will be up to 300 staff and contractors employed (with up to 20 personnel during the 3-6-month BESS construction period), while during operations there will be up to five staff for maintenance and monitoring activities. The Project has been designed to avoid sensitive features (where possible) to ensure the impacts of the development are minimised.

At the conclusion of the Project (i.e. 30 years), all site infrastructure will be removed, and the site rehabilitated to enable agricultural activities to resume. The development has a capital investment cost up to \$170 million.

Key milestones relevant to the project include:

- SSD 8394 was approved 8 December 2018
- Letter from DPI&E re: Darlington Point Solar Project (SSD 8392) Construction Hours Extension, dated 17 December 2018
- Letter from DPI&E re: Darlington Point Solar Farm Endorsement of Grassland Expert, Secretary endorsement of the grassland expert, dated 9 January 2019
- Letter from DPI&E re: Darlington Point Solar Farm (SSD 8392) Environmental Management System, Secretary approval of Darlington Point Solar Farm Environmental Management System, dated 20 March 2019
- Letter from DPI&E re: Darlington Point Solar Farm (SSD 8392) Biodiversity Management Plan, Secretary approval of revised Darlington Point Solar Farm Biodiversity Management Plan (Version 7 dated 20 March 2019), dated 20 March 2019
- Letter from Signal Energy Australia re: Notification to Department – Commencement of Construction for Darlington Point Solar, dated 20 March 2019 for construction commencement date of 22 March 2019
- Email from Murrumbidgee Council advising Council satisfaction of completed works at Donald Ross Drive, dated 9 May 2019
- Letter/Email from Red-Gum Environmental Consulting re: Ecologist Report for Clearing Operations – Darlington Point Solar Farm, confirming clearing of habitat trees with zero rescues or sightings, dated 5 June 2019
- Email from Signal Energy Australia to compliance@planning.nsw.gov.au re: DPSF (SSD 8392) Pre-Construction Compliance Report (completed 25 June 2019), dated 27 June 2019

- Letter from DPI&E re: Darlington Point Solar Project (SSD 8392) Heavy Vehicle Movements, Secretary approval to temporarily increase heavy vehicle movements for 8 consecutive weeks from date of letter, dated 28 June 2019
- Aboriginal Site Impact Recording Form for AHIMS site ID: 49-5-0152 completed by Kelleher Nightingale Consulting, and accompanying Lithics Spreadsheet, dated 10 July 2019
- Letter/Email from Kleinfelder Australia re: Tree removal supervision – Darlington Point Solar Farm, confirming clearing of hollow-bearing trees with four rescues/relocations and zero fauna injury or fatality, dated 10 September 2019
- Letter/Email from Kleinfelder Australia re: September 2019 Weed Management at the Darlington Point Solar Farm, summarising weed management as a result of monthly biodiversity monitoring in accordance with the DPSF Biodiversity Management Plan, dated 10 September 2019
- Letter from Signal Energy Australia re: Darlington Point Solar Farm – Extended Working Hours Request, to request works to be performed between 6am and 12am (midnight) Monday to Sunday through 30 November 2019, dated 17 September 2019
- Independent Environmental Audit conducted within 6 months of construction commencement (this Audit on 18-19 September 2019).

2.2 Audit Details

Audit Dates	Wednesday 18 & Thursday 19 September, 2019
Weather Conditions	Fine, sunny, windy (more so on Thursday)
Audit Team	Lead Auditor - Claire Driessen
Auditee Contact/Reps	Chris Stewart (Signal), Brad Deane (Kleinfelder)
Project Status at Time of Audit	Construction

2.3 Performance of the Audit

Signal Energy as the EPC for the project have commissioned this Independent Environmental Audit (Audit) to address Schedule 4, Condition 7 which states:

Within 6 months of the commencement of construction, or as directed by the Secretary, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must:

- a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018);*
- b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- c) be carried out in consultation with the relevant agencies;*
- d) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and*
- e) 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 must 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 of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.

The purpose of the Independent Environmental Audit was to obtain an independent and objective assessment of the environmental performance and compliance status of the DPSF. The Audit was conducted in accordance with the requirements of the NSW Government *Independent Audit Post Approval Requirements, June 2018* document.

The structure of the Audit was conducted with regard to the requirements of *AS/NZS ISO 19011:2014 Guidelines for Auditing Management Systems*. The Audit was conducted as a sampling exercise of systems and activities of the DPSF construction as a snapshot in time. This report is based on objective evidence and is not reliant upon hearsay.

The auditor encountered no significant difficulties during the Audit.

2.4 Report Structure

The audit report has been prepared as follows:

- Executive Summary, including opportunities to improve performance against the DC conditions of SSD 8394
- Introduction
- Audit Methodology
- Audit Findings, incorporating assessment of actual vs. predicted impacts, and audit findings summary identifying non-compliances and recommended improvement opportunities
- Audit Findings table comprising detailed findings against all DC condition of SSD 8394
- Appendix A – Site Inspection Photographs
- Appendix B – Correspondence/Consultation
- Appendix C – Planning Secretary Lead Auditor Approval
- Appendix D – Independent Audit Declaration Form

3. AUDIT METHODOLOGY

3.1 Audit Process

Key aspects of the Audit included:

- Off-site planning for the site audit;
- Collection of relevant background documentation, and initial data review;
- Consultation with key stakeholders to refine audit scope;
- An opening meeting;
- Collection of audit evidence through information gathering, observations and interviews;
- Site inspections;
- A close out meeting;
- Evaluating project/management documentation;
- Feedback from Signal Energy Australia; and
- Compiling this audit report.

3.2 Audit Team Approval

The Lead Auditor for this Audit, Claire Driessen, was approved by the Department of Planning, Industry & Environment (DPI&E) on 27 August, 2019 (refer to **Appendix C**). No other resources were necessary to provide a team for this Audit.

3.3 Audit Criteria

Compliance Outcome	Definition
Compliant – C	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant – NC	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered – NT	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

3.4 Consultation

During the Planning and Design phases of the development Edify Energy undertook engagement with a range of stakeholders regarding the proposed DPSF development. During this engagement and consultation Edify Energy representatives provided information on the proposal to allow for identification and resolution of raised issues or concerns. Consultation has been undertaken with relevant Government agencies, Council, local residents especially those located adjacent to the development site, the local Aboriginal community, and businesses through meetings drop-in sessions, community night (and job fair), public exhibition, interviews, and distribution of project fact sheets/information.

Prior to completing this Audit, Echo Consultants liaised with relevant stakeholders as follows (Note: copies of correspondence and responses, where received, are included in **Appendix B**):

- Murrumbidgee Council, 5 September 2019.

Response: A Council representative advised the message was passed onto the relevant manager, however no further response was received from Council at the time of the Audit

and finalisation of this Audit report. It was assumed there were no specific concerns or issues from Council.

- Road and Maritime Service (RMS), 5 September 2019.

Response: The RMS representative requested a phone discussion, which occurred on 17 September 2019. During that discussion the RMS representative indicated there were no specific concerns, but requested an assessment of compliance with the Traffic Management Plan which was already included in the scope of this Audit.

- Department of Planning, Industry & Environment (DPI&E) – Planning & Assessment and Environment, Energy & Science (Biodiversity & Conservation (formerly OEH)), 5 September 2019.

Response: DPI&E requested the following areas for consideration in the Audit: traffic management/movements, vegetation management/fencing, offsets, aboriginal/heritage site management, dust/erosion and sediment control, waste management, administration conditions such as having all plans/upgrades completed and/or approved prior to start date.

3.5 Opening Meeting

The opening meeting was held at the Site office on Wednesday 18 September 2019. The opening meeting was attended by Claire Driessen of Echo Consultants (Lead Auditor), Chris Stewart (Signal Energy Safety & Environment Manager), Brad Deane (Kleinfelder, Environmental Representative consulting to Signal), Chris Eccles (Signal Energy Project Manager), Bevan Cassells (Signal Energy Construction Manager), Dylan La Cioppa (Signal Energy Assistant Construction Manager), and Charlotte Van Rooyen (Signal Energy Contract Expeditor).

An explanation of the independent audit process was provided in the meeting and it was emphasised the audit would not address compliance status of contractors undertaking work outside of Signal Energy's control. It was also specified that the audit report would be based on objective evidence.

3.6 Audit

Site inspections were undertaken by Claire Driessen on 18 and 19 September 2019, and included observations of the following areas:

- Signal Energy Construction Compound and laydown area/s;
- Solar Array area;
- Waste storage area for cardboard, timber and plastic packaging materials;
- Main access road and internal Site roads;
- Retained/ protected vegetation areas;
- Retained/ protected Cultural Heritage areas;
- Vehicle refuelling area;
- Site entrance and exit;
- PCU locations.

Chris Stewart and Brad Deane provided assistance by supplying relevant project documentation and providing other documented evidence relating to the consent conditions.

3.7 Closing Meeting

The closing meeting was conducted on Thursday 19 September 2019, prior to departing the Site, and included a discussion on the preliminary audit findings. Claire Driessen of Echo Consultants, Chris Stewart (Signal Energy Safety & Environment Manager), Brad Deane (Kleinfelder, Environmental Representative consulting to Signal), Chris Eccles (Signal Energy Project

Manager), Bevan Cassalls (Signal Energy Construction Manager), and Brian Tuite (Signal Energy DPSF HSEQ Manager) attended the meeting.

A summary of the main findings was provided in the meeting and a general view that overall the project appears to be well managed and employing good practices with respect to the Conditions of Consent.

3.8 Review of the Draft Audit Report

Consistent with the audit guideline, a copy of the draft report (Version 1.0) was provided to Signal Energy for review on 3 November, 2019 for comment. On the basis of the comments received and additional information or evidence supplied, the audit report was updated to produce this Final Report (Version 2.0).

3.9 Audit Report

Edify Energy is required to publish details of the outcome and a copy of this Independent Environmental Audit on its website for public access.

4. AUDIT FINDINGS

4.1 Status of Complaints and Incident Management

It was noted that since construction commenced there have been no incidents or complaints reported or recorded.

4.2 Assessment of Actual vs. Predicted Impacts

During the development of the Environmental Impact Statement (EIS), impacts were predicted and risk assessed. An assessment of the comparison of the actual against the expected impacts is included below.

4.2.1 Accommodation and Employment

Employment requirements for the project are summarised in the Accommodation and Employment Strategy as:

- Civil: 25 personnel (10-15 local target)
- Piling: 50 personnel (10-25 local target)
- Mechanical: 100 personnel (50 local target)
- Electrical: 150 personnel (50-75 local target)

With a predicted peak of 350 staff, preference is to be given to workers from the local area for approximately 50% of the workforce. Non-local specialised contractors would utilise accommodation in Darlington Point, Coleambally, Griffith and surrounding areas.

Compliance:

At the time of the audit approximate numbers of local workers was 98 workers or 23% local content. There was a level of confidence that this number may increase with the scaling up of labour activities (e.g. tracker and module installation) over the subsequent months. A monthly survey is emailed to all individuals who have been inducted on the DPSF project and a database is maintained to filter companies, locals, etc. A job fair and community forum was held in Darlington Point in February 2019, which was advertised through multiple local media mediums. Regular meetings were to be held with Murrumbidgee Council representatives, however no meetings had occurred since February 2019.

The project has resulted in positive economic and social impacts in the local community with an estimated spend (up to end of October 2019) of approximately \$700,000 on Local Accommodation; \$45,000 on General Supplies, such as office and electrical items (e.g. computer monitors, radios, fridges, etc.), PPE, etc.; \$2.2M in payments to Local Contractors; \$4.5M on Local Suppliers/Materials, such as of sand, rock, etc. (quarry materials). The project is estimated to have engaged up to 100 local workers, has engaged with local contracting companies, has used local plumbers, and local caterers for onsite food and beverages. Furthermore, Signal Energy has provided donations to local events/groups such as \$12,500 to Motor Neurone Disease Foundation and \$3,000 to the Rural Fire Service, as well as the donations of recyclables for refunds to the Darlington Point Men's Shed.

4.2.2 Biodiversity

The EIS identified that the DPSF impact would likely include both direct and indirect impacts. Direct impacts predicted for the project included the removal (and habitat loss) of up to 58ha of grassland, 8.3ha of woodland, and 1.92ha of aquatic habitat (being six farm dams), as well as the removal of up to six isolated hollow-bearing trees.

The potential indirect impacts of the project included: disturbance of threatened species/fauna, fauna injury and mortality through potential collision with construction machinery and vehicles; fire buffer clearing potentially impacting on fauna habitat, foraging and breeding; fauna movement impacts; erosion and sedimentation – runoff containing excessive amounts of sediment can impact waterways, altering water quality and adversely affecting aquatic life; potential increase in weeds

and pests; noise generated by vehicle and equipment during construction may cause change in fauna behaviour, impact on fauna communication, navigation, foraging and detecting prey/danger.

Compliance:

Discussions and observations during the Audit indicated that the DPSF Biodiversity Management Plan includes mitigation measures to comply with Schedule 3, Condition 12(a) of the Development Consent (SSD 8392) which includes: minimising native vegetation clearing and loss of fauna habitat, managing potential impact on threatened fauna, rehabilitate and revegetate temporary disturbance areas protect key fauna habitat outside the disturbance areas, salvage vegetative and soil resources for reuse on site, control weeds and pests, protect and promote growth of native plants and control growth of exotic ground cover.

The project is being constructed on disturbed farming land. Vegetation clearing was completed in consultation with a suitably qualified ecologist, who provided an Ecologist Report for Clearing Operations and confirmed no fauna rescues or sightings were recorded during the clearing performed on 4/06/2019. A second supervised tree clearing operation was performed between 4-5 September 2019, which was attended by another suitably qualified ecologist. This activity was followed by the provision of a report to Signal Energy confirming four (4) fauna were relocated during the vegetation removal period, with no fauna injury or fatality. The site boundary is mostly fenced and there are few reports of large native animal entry to the property. A site inspection checklist, incorporating the key environmental aspects and mitigation measures is being completed weekly by the SHEQ Manager, Construction Manager and/or nominated delegate to measure the effectiveness of environmental mitigation measures. Vegetation Exclusion Zones (VEZs) were fenced with star pickets and high visibility flagging tape and sign-posted to prevent intrusion. The project induction included sufficient information about the VEZs and awareness about minimising disturbance. No material stockpiles, vehicle parking and machinery storage was observed (or recorded via an incident) within the areas of retained native vegetation or driplines of trees.

Some concerns were raised regarding the extent of open cable trenches, with respect to increasing the risk of erosion and sedimentation onsite, and not allowing for progressive rehabilitation. However, regular egress ramps were observed which would reduce likelihood of fauna becoming trapped in trenches.

4.2.3 Traffic and Access

A Traffic Impact Assessment (TIA) was prepared to support the EIS to determine the likely impact of the development from construction and operational traffic generation and impact on the existing road network. The TIA considered impacts associated with increased traffic generation, site access and routes, parking, intersection performance and safety.

Compliance:

As a key condition in the Development Consent, a construction Traffic Management Plan was developed for the DPSF project. An assessment was completed resulting in the need to. An approval was sought for an increase in the allowable Heavy Vehicle (HV) movements per day from 80 to 110 on 21 June 2019. A letter from DPI&E dated 28/06/2019 approved the increase. Records in Lucidity showed there had been only four occasions when the HV movements in a day exceeded 80, and the highest number of HV movements in one day was recorded as 107 only once.

Local staff are transported to site by bus to reduce light vehicle (LV) traffic movements on the road network. Indeed, no more than four light vehicles were parked in the compound LV parking area at any time during the audit visits. It is believed this mitigation measure has resulted in lower volumes of LV traffic being generated per day by construction activities than was predicted in the EIS.

4.2.4 Cultural Heritage

An Aboriginal Cultural Heritage Assessment (ACHA) was prepared to support the EIS to determine potential impacts to Aboriginal heritage from the development. Aboriginal community consultation

was also undertaken for the project. The ACHA identified nine Aboriginal archaeological sites and one potentially culturally modified tree within the study area. The early identification of Aboriginal heritage and archaeological sensitive areas (remnant vegetation) resulted in the avoidance of impact to eight Aboriginal archaeological sites and one potentially culturally modified tree. One Aboriginal archaeological site was unavoidable due to the scale of the project. The archaeological significance of the remaining site (within the project footprint), known as 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 monitoring program comprising the collection of surface artefacts was to be undertaken prior to any activities which may harm Aboriginal objects at the site location.

Compliance:

Aboriginal and Cultural Heritage Management occupies a significant section of the CEMP. The section clearly outlines the mitigation measures to be employed, including the surface collection of artefacts by a suitably qualified and experienced Archaeologist (and subsequent recording and reporting requirements), preparation of a construction heritage site map identifying Tubbo AFT 01 site, inclusion of Aboriginal heritage management in the site induction, and a Chance Finds Protocol (CFP).

Aboriginal Site Impact Recording Form for AHIMS site ID: 49-5-0152 completed by Kelleher Nightingale Consulting, and accompanying Lithics Spreadsheet (dated 10 July 2019) documenting the salvage collection of Tubbo AFT 01/AHIMS 49-5-0152 was submitted to OEH. All staff and contractors have been made aware of the Chance Finds Protocol (via the project induction). The CFP had not been triggered up to the time of the Audit.

4.2.5 Noise and Vibration

A Noise and Vibration Assessment (NVA) was undertaken to assess the potential noise impacts associated with the development. Background and ambient noise monitoring was undertaken for the assessment showing measurements of less than 29-30 dBL_{A90} (5-minute) during the day and 28-29 dBL_{A90} (5-minute) during the night. The NVA concluded those measurement support the NSW *Industrial Noise Policy 2000* (INP) approach using minimum standard background noise criteria of 30 dBL_{A90} (5-minute) is applicable for the DPSF site.

Noise Management Levels (NML) for the project were determined during the preparation of the EIS, being a NML of 40 LAeq(15-minute) for residential properties, 70 LAeq(15-minute) for Commercial Properties and 75 LAeq(15-minute) for Industrial properties.

The NVA predicted noise levels during construction finding the noise impacts are expected to exceed the NML for residential receivers in most scenarios. Given that construction noise levels were predicted to exceed the relevant limits, the construction Noise and Vibration Management Plan (NVMP) includes a number of noise mitigation measures to minimise impacts on receptors.

Compliance:

No complaints were reported regarding noise or vibration impacts, which may indicate noise and vibration management has been sufficient. Close to 50% of the piling had been completed at the time of the audit, so the potential for noise disturbance would continue for some time following the audit.

4.2.6 Visual

A Visual Impact Assessment (VIA) was prepared for the EIS to identify potential landscape and visual effects that could arise from the development. The existing site was used for sheep and cattle grazing and is surrounded by farming, agribusiness and some private residences. The existing landscape was characterised as primarily low-lying, flat open grassland pastoral landscape, with roadside buffer vegetation limiting views towards the site from road users travelling along the Sturt Highway.

Thirteen representative viewsheds were assessed for potential visual impact from the development. All thirteen views were assessed to be minor adverse to negligible during operation

and to have a low impact (Magnitude of Change). No potential reflected glare impacts or solar reflection impacts were anticipated for glare receptors in surrounding residences.

The low profile of the proposed solar array infrastructure combined with the ability of existing woodland vegetation to screen views from the surrounding area was determined to result in the development not causing a dominant or unacceptable contrast to the surrounding landscape. The potential visual impacts from the temporary additional traffic during construction should be managed through the Traffic Management Plan.

Compliance:

It should be noted that DPI&E (OEH) specified no vegetation planting (landscaping) would be allowed along the site fence line adjacent to Donald Ross Drive. Therefore, the Landscape Management Plan for the DPSF does not provide for planting vegetation around the boundary of the development, but focusses on rehabilitation and maintenance of groundcover as well as management of weeds and pests.

The CEMP outlines dust control, night lighting and progressive rehabilitation of disturbed areas as visual impact mitigation measures. During the audit inspections, dust plumes were visible. Night lighting was observed around the construction compound and at the Security Hut (site entrance). The construction site, compound and waste areas were kept tidy and well maintained.

4.2.7 Soil and Water

A Flood Impact Assessment was prepared to support the EIS to determine existing and post-development flood levels and assess current and future flood risks. The FIA concluded the post-development scenario the increase in flood level compared to the pre-development scenario was negligible and less than 0.001m. The EIS assessed the issues relating to soils and land contamination associated with the project as a desktop exercise. The EIS found the risk of erosion to be low and indicated sediment laden run-off from the site should be minimal, given the site is relatively flat and would expect this should be managed through the adoption of erosion and sediment control measures during construction. Further, the EIS found no known areas of contaminated land occur within the development area.

Compliance:

A construction Soil and Water Management Plan (SWMP) has been developed for the DPSF. There is no stand-alone Erosion and Sediment Control Plan (ESCP), which is considered reflective of the low erosion risk. The SWMP includes hazardous substances management mitigation measures.

The audit site inspections indicated no particular areas of erosion were evident. Erosion and sediment controls were installed in the drains located at the site entrance (off Donald Ross Drive) and appeared adequate. The audit identified some concern regarding the extent of open cable trenches, with respect to increasing the risk of erosion and sedimentation onsite. The topsoil stockpiles lined along the open trenches was not properly controlled. Fuels, oils and chemicals appeared to be properly stored in a self-bunded shipping container. A refuelling diesel self-bunded tank was located at the construction compound and not within 50m of any water body or constructed drainage line.

All staff are trained through the project induction and toolbox talks, and machinery and plant is inspected daily (pre-start checklist) to check for fuel leaks or other visible damage that may pose a risk to the operation.

4.2.8 Waste

Waste management at the DPSF is to be undertaken following the hierarchy of controls being: avoidance of unnecessary resources consumption, resource recovery (including reuse, reprocessing, recycling and energy recovery), and disposal. Through adopting these principles, the DPSF should be able to minimise environmental harm, reduce costs associated with waste generation and disposal, and maximise efficiency in resource use. A Waste Management Plan

(WMP) has been developed for the DPSF, which outlines that waste management should be undertaken following the hierarchy of controls.

Compliance:

During the audit inspections, minimal volumes of waste streams had begun to accumulate on site. A discussion on site revealed the project had a good plan to manage the various waste streams that will increase in volume over the coming months through the peak of construction. Waste management measures include:

- Cardboard & General Waste – collected in skips, cardboard to be recycled
- Metal strapping collected in metal recycling skips
- Mixed recycling (cans, etc.) being donated to Men's Shed – collection units are delivered by utility vehicle/s to the Men's Shed by Signal Energy staff as loads are ready
- Septic – Contractor (Yenda) currently completing daily pump out
- Timber – plan to have woodchipper set up on site at end of project to complete all chipping, expect to take ~3 weeks to complete chipping. Also expect some timber pallets to be donated to Men's Shed
- Panel install was just commencing – waste collated in piles in situ (at point of installation) for collection and removal from site

Modified 200L drums were being used to collect metal bolts, however the holes cut to facilitate lifting points were considered to be a safety issue for risk of injury (cut).

4.3 Previous Annual Review or Compliance Report Recommendations

This Independent Environmental Audit (third party) is the first Audit conducted under the Development Consent SSD 8392, Schedule 4, Condition 7.

A Pre-Construction Compliance Report was completed in June 2019 by Kleinfelder on behalf of Signal Energy to meet the compliance criteria as established under Schedule 4, Condition 6 of SSD 8392 conditions of approval:

The applicant must provide regular compliance reporting to the Department on the development in accordance with the relevant Compliance Reporting Requirements

The purpose of the Compliance Report was to assess compliance with SSD 8392 conditions for works required prior to the commencement of construction. Four non-compliances were detected, of which three had been addressed at the time of this Audit.

The fourth non-compliance was relating to Schedule 4, Condition 8a – Access to information. Whilst most of the information and links have been added to the Darlington Point Solar Farm website, there are still required documents missing (i.e. final layout plans for the development; and compliance reports (Pre-Construction Compliance Report was completed in June 2019). Furthermore, it is a requirement of the development consent to keep the required information up to date. The assessment made during this Audit is the website would benefit from routine or regular updates on the project progress and any relevant changes, such as more recent media release/s and updated photos included in the 'Project gallery' section of the page. To summarise, this non-compliance has not been fully addressed and it remains a non-compliance in this Audit report. Refer to **Unique ID 4-8A**.

4.4 Assessment of Adequacy of Post Approval Documents

The DPSF SHEQ Manager provided the following management plans, which have been determined to adequately control environmental risk during the construction phase:

- Environment Management Strategy
- Construction Environmental Management Plan (CEMP)

- Biodiversity Management Plan (BMP)
- Traffic Management Plan (TMP)
- Soil and Water Management Plan (SWMP)
- Cultural Heritage Management Plan – Chance Finds Protocol
- Noise and Vibration Management Plan (NVMP)
- Landscape Management Plan (LMP)
- Waste Management Plan (WMP)
- Accommodation and Employment Strategy.

The Environmental Management Strategy indicated plans that would be developed (e.g. Emergency Management Plan and Bushfire Mitigation Plan) as well as topics that would be included within the CEMP (e.g. Soil and Water Use Management Plan, Erosion and Sediment Control Plan). Those mentioned plans have not been developed (as stand-alone documents/plans) (or at least not provided to the Auditor), but have been included as topics in the CEMP. Given the level of risk associated with the project, and not having received any complaints, there seems little justification for preparing those plans at this stage. Some of the sub-headings or topics listed for inclusion within the CEMP have been reworded or merged into different topics, but essentially those listed sub-headings have been adequately covered.

The following comments apply to all management plans and strategies reviewed as part of this audit:

- Version number, status and date should be clearly shown and cross referenced. While each plan had elements of this, several were unclear or could be improved. Examples noted as follows:
 - The Accommodation and Employment Strategy does not have a version number on the document, however the file name shows the document is version 4 and still shows the document file name in draft
 - The TMP number of amendment records do not align with the version number of the current document – 3 amendment records, plan is version 4
- It would be helpful to include a copy of the approval documentation with each plan to verify the version approved.
- The BMP includes actions with various wording re: wash down and inspection as per Traffic Management Procedure. It was confirmed there is no such procedure or anything relating to vehicle wash downs in the TMP, SWMP or CEMP. It should be determined where best to document the current process being employed (through the DPSF Plant Delivery Checklist in the Lucidity Asset Register) on the project to assess weed and seed inspections and amend the current plans to reflect that process, and remove current incorrect references.
- The plans and strategies generally provide a comprehensive list of controls to be implemented across the project. In some cases, these controls have not been implemented due to a low risk or other reason. Where deviations from a plan occur, these should be noted and justified, and updated with DPI&E as soon as practical.

4.5 Audit Findings Summary

The Audit noted fourteen (14) Consent Conditions were not triggered at the time of the audit, being SCH2-5, SCH2-7, SCH2-8, SCH2-10, SCH2-11, SCH2-12, SCH3-6, SCH3-9, SCH-10, SCH3-11, SCH3-19, SCH3-23, SCH3-24, SCH3-29, which dealt with staging of development, upgrading of infrastructure, work as executed plans, structural adequacy, demolition, protection of public infrastructure (other than road network), unformed Crown Roads, biodiversity offsets, discovery of human remains, operating conditions, fire safety study, and decommissioning and rehabilitation.

The Audit found a total of five (5) non-compliances and ten (10) improvement opportunities. The Audit identified three non-compliances that were also previously found in the Pre-Construction

Compliance Report (which itself was not completed prior to construction commencement). Two of the non-compliances were addressed shortly after being raised, however they are 'Pre-construction' conditions, thus must continue to be documented as non-compliances to reflect the outcome that the conditions were not met prior to construction commencement. For this reason, there are no relevant improvement opportunities that can be recommended. The two relevant non-compliances with no improvement opportunity are:

1. **Schedule 2, Condition 6 – Final Layout Plans.** This was rated as **Non-Compliant** due to the fact that the Final Layout Plans were not provided to the Secretary prior to construction commencement.
2. **Schedule 3, Condition 7(b) – Traffic Management Plan.** This was rated as **Non-Compliant** due to the fact that the independent dilapidation survey for the local road network was not completed prior to the commencement of the road upgrade (or prior to construction commencement).

The *improvement opportunities* recommended to address both compliant and non-compliant findings are identified in the following:

1. **Schedule 3, Condition 8 – Land Management.** This was assessed as **Compliant**. However, improvements to the CEMP to document the process for staging rehabilitation are required to reflect Signal Energy's approach to rehabilitating areas progressively to achieve recovery (e.g. roadsides, grass areas, trenches) as areas are completed.
2. **Schedule 3, Condition 15 – Dust.** This was assessed as **Non-Compliant** due to visible dust plumes in multiple locations on the project site during the audit. It was noted the turn-around time for the truck refilling process is quite long, however only two water trucks were present on site over the audit dates. Given there were dust generating activities being performed in multiple locations over the project area, and the refill process time, more than two trucks should be engaged to manage dust levels. There should also be consideration of staggering the refill trips offsite so the project doesn't end up with most of the water trucks offsite at the same time.
3. **Schedule 3, Condition 17 – Lighting.** This was assessed overall as **Compliant**. However, a verification step had not been completed. It appeared the lighting installed around the compound was sufficient for security purposes and not excessive or obtrusive, however Signal Energy had not verified the lighting complies with *Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting*, or its latest version.

At the time of the Audit, Signal Energy was preparing correspondence to DPI&E to request a temporary increase in working hours which would include night work requiring lighting towers. This is raised in this Audit to prompt the verification of compliance against AS4282 of such additional lighting if installed onsite.

4. **Schedule 3, Condition 22 – Soil & Water – Operating Conditions.** This was assessed overall as **Compliant**. However, the practice of opening up all cable trenching and stockpiling of topsoil and sand (for backfill) at same time is not ideal. This increases the risk of sedimentation, loss of soils, and potential de-watering from trenches following rainfall. Signal Energy is encouraged to push the contractor to close trenches in stages to reduce the area of trenching open at any given time.
5. **Schedule 3, Condition 25 – Storage and Handling of Dangerous Materials.** This was assessed overall as **Compliant**. However, an improvement in SDS management is required. Nilsen self-contained shipping container in compound stores all chemical, fuels and oils. SDSs for most items in container were found in a folder inside however, the folder was missing SDSs of several items in container. This should be easily rectified with a review of items and cross-checking SDSs.
6. **Schedule 3, Condition 27 – Waste.** This was assessed overall as **Compliant**. However, an improvement in waste management is required. Auditor observed modified used 200L

drums with holes cut for lifting points located in a waste collection area. Sharp edges were evident at the cut sites and pose a safety risk. Use of these altered drums for waste (or other) collection should be reviewed to prevent risk of injury.

7. **Schedule 3, Condition 28(a) – Accommodation and Employment Strategy.** This was assessed overall as **Compliant**. However, an improvement in document control of the Accommodation and Employment Strategy document is required. There are two recorded amendments in the cover page 'Amendment Record'. However, the title of the file, *Accommodation and Employment Strategy – DPSF_Draft_V4*, indicates there may have been more amendments. The document itself does not include a version number either. These details should all align leaving the reader in no doubt that the latest version is being used/accessed.
8. **Schedule 4, Condition 1(a) – Environmental Management Strategy.** This was assessed overall as **Compliant**. However, an improvement in document control of the Environmental Management Strategy document is required. The document details provided in the document header include: Version #: Version 1, Date of Issue: December 2018, however there are three recorded amendments in the cover page 'Amendment Record'. The first date of amendment aligns with the initial issue date in December, while the third date of amendment is recorded as 14 March 2019. The version number and date of issue details in the header of the document should reflect the amended document.
9. **Schedule 4, Condition 3 – Updating and Staging of Strategies Plans and Programs.** This was assessed as **Non-Compliant** due to a number of document control deficiencies detected during the Audit. A review of the following plans (it is recommended to review all plans) to amend and accurately reflect current conditions of consent and practices employed on the project is required:
 - Environmental Management Strategy – see above improvement opportunity 7
 - CEMP – see improvement opportunity 1 (relating to Land Management)
 - TMP – current plan is version 4, cover page only shows 3 amendment records; Section 8.2 had not been updated to reflect the approved increase of HV movements per day (plan still reflected original consent condition)
 - Accommodation & Employment Strategy – see improvement opportunity 6
 - Online Induction – The online Induction could be reviewed for accuracy of information – e.g.
 - refers to strict washdown procedures will be implemented, but there is no specific washdown procedure employed onsite with the requirement for clean plant/equipment and vehicles expected prior to arrival to site.
 - refers to noise monitoring programme but this had not been implemented.
10. **Schedule 4, Condition 8 – Access to Information.** This was rated as **Non-Compliant** due to the fact that the website is missing some required documents and information has not been kept up to date. The two missing required documents - final layout plans for the development; and compliance reports (Pre-Construction Compliance Report was completed in June 2019) – should be added to the website. Furthermore, it is a requirement of the development consent to keep the required information up to date. Therefore, the website would benefit from routine or regular updates on the project progress and any relevant changes, such as more recent media release/s and updated photos included in the 'Project gallery' section of the page. Updated (latest versions) approved plans should replace existing plans on website as relevant.

5. AUDIT FINDINGS

Detailed findings and evaluation of the compliance with the audit scope are presented in the following tables, **Table 3, 4 and 5**. The scoring is consistent with Section xx above, as per 3.8 of the *Independent Audit Post Approval Requirements* document. Where applicable, improvement opportunities/recommendations, **highlighted in blue**, are shown in the recommendations column.

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
SCHEDULE 2 – ADMINSTRATIVE CONDITIONS						
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT						
2-A1	SCH2-1	In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	At all times		C	
TERMS OF CONSENT						
2-A2	SCH2-2	The Applicant must carry out the development: a) generally in accordance with the EIS; and b) in accordance with the conditions of this consent.	At all times	Both documents reviewed for this audit	C	
2-A3	SCH2-3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	At all times		C	
2-A4	SCH2-4	The Applicant must comply with any requirement/s of the Secretary arising from the Department's assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this consent; b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and c) the implementation of any actions or measures contained in these documents.	At all times		C	

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
STAGING OF THE DEVELOPMENT						
2-5A	SCH2-5	The Applicant may construct, operate and decommission the development in stages. Where staging of the development is proposed, the conditions of this consent are only required to be complied with at the relevant time and to the extent that they are relevant to the specific stage(s).	At all times (as relevant to each phase)		NT	No staging of development
FINAL LAYOUT PLANS						
2-6A	SCH2-6	Prior to the commencement of construction, the Applicant must submit detailed plans of the final layout of the development to the Secretary, including details on the siting of solar panels and ancillary infrastructure. <i>Note: If the construction of the development is to be staged, then the provision of these plans may be staged.</i>	Pre-Construction	Pre-Construction Compliance Report, June 2019	NC	Pre-Construction Compliance Report reported this as a non-compliance, which was rapidly addressed and noted in the report as such. The non-compliance stands because it still reflects the failure to meet this condition prior to construction commencement.
UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE						
2-7A	SCH2-7	Over time, the Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.	Operations		NT	
WORK AS EXECUTED PLANS						
2-8A	SCH2-8	Prior to the commencement of operations, or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development to the Department.	Pre-Operations		NT	
NOTIFICATION OF DEPARTMENT						
2-9A	SCH2-9	Prior to the commencement of the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant	At all times (as relevant)	Sighted letter from Signal signed by Robert Elliot, Project	C	Notification in writing to DPE of construction phase commencement on 22/03/2019

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
		must notify the Department in writing of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	to each phase)	Manager, to NSW DPE dated 20/03/2019 advising construction phase commencement on 22/03/2019.		
STRUCTURAL ADEQUACY						
2-10A	SCH2-10	The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the <i>Building Code of Australia</i> . Notes: <ul style="list-style-type: none"> Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. 	Construction		NT	
DEMOLITION						
2-11A	SCH2-11	The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	At all times		NT	
PROTECTION OF PUBLIC INFRASTRUCTURE						
2-12A	SCH2-12	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: <ul style="list-style-type: none"> a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.	At all times		NT	

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
OPERATION OF PLANT AND EQUIPMENT						
2-13A	SCH2-13	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	At all times		C	Details of plant/equipment recorded in Pre-inspection form in Lucidity
SCHEDULE 3 – ENVIRONMENTAL CONDITIONS – GENERAL						
TRANSPORT						
3-1A	Over-Dimensional and Heavy Vehicle Restrictions SCH3-1	The Applicant must ensure that the: a) development does not generate more than: • 80 heavy vehicle movements a day during construction, upgrading or decommissioning; • 15 over-dimensional vehicle movements during construction, upgrading or decommissioning; and • 10 heavy vehicle movements a day during operations; on the public road network; and b) length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 26 metres, unless the Secretary agrees otherwise.	Construction	Viewed approval letter from DPI&E dated 28/06/2019 (amendment requested by Signal Energy 21/06/2019)	C	Changed condition approved by DPI&E 28/06/2019 – was amended to up to 110 heavy vehicle movements a day Viewed records in Lucidity: - <80 heavy vehicle movements in day only 4 times - 107 HV movements in one day is highest volume recorded thus far
3-2A	SCH3-2	The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering and leaving the site each day.	Construction	Security Logs folder in Security Hut	C	Security Log folder – logs all truck entry/exit to/from site, refer to Photograph 30 Procore – electronic truck log for all deliveries
3-3A	Designated Over-Dimensional and Heavy Vehicle Access Route	All over-dimensional and heavy vehicles associated with the development must travel to and from the site via the Sturt Highway, Donald Ross Drive and the approved site access point (shown in Appendix 1). <i>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.</i>	Construction	Sighted DPSF Heavy Vehicle/Light Vehicle Site Access Information Logistics Management Plan	C	Site access routes detailed in DPSF Heavy Vehicle/Light Vehicle Site Access Information – pdf provided to all delivery suppliers Details also included in Logistics Management Plan

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
	SCH3-3					
3-4A	Site Access SCH3-4	Prior to the commencement of construction, the Applicant must upgrade the site access point off Donald Ross Drive (shown in Appendix 1) with a Rural Property Access type treatment to cater for the largest vehicle accessing the site, including sealing the on-site access road a minimum of 30 m from its intersection with Donald Ross Drive, in accordance with the <i>Austroads Guide to Road Design</i> (as amended by RMS supplements), to the satisfaction of Council.	Pre-Construction	Sections 9.1 and 9.5 of Traffic Management Plan Sighted email from Murrumbidgee Council to Perry Stafford of Brefni, dated 09/05/2019 advising works on Donald Ross Drive have been completed to the satisfaction of Council	C	Email from Murrumbidgee Council to Perry Stafford of Brefni, dated 09/05/2019 advising works on Donald Ross Drive have been completed to the satisfaction of Council
3-5A	Operating Conditions SCH3-5	The Applicant must ensure: a) the internal roads are constructed as all-weather roads; b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; c) the capacity of the existing roadside drainage network is not reduced; d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and e) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the sealed public road network.	Construction		C	Very small number of LVs parked in parking area of compound Minor level of dirt/dust at entry/exit intersection onto Donald Ross Drive
3-6A	Unformed Crown Roads SCH3-6	The Applicant must ensure any unformed Crown road reserves affected by the development are maintained for future use, unless otherwise agreed with DoI – L&W.	Construction		NT	
3-7A	Traffic Management Plan	Prior to the commencement of any road upgrades required under this consent, the Applicant must prepare	Pre-Construction	Section 9.6 of Traffic Management Plan	C	Site access routes detailed in DPSF Heavy Vehicle/Light Vehicle Site Access

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
	SCH3-7 (a)	a Traffic Management Plan for the development in consultation with RMS and Council, and to the satisfaction of the Secretary. This plan must include: a) details of the transport route/s to be used for all development-related traffic, including the location of access points;		Sighted DPSF Heavy Vehicle/Light Vehicle Site Access Information Logistics Management Plan		Information – pdf provided to all delivery suppliers Details also included in Logistics Management Plan
3-7B	SCH3-7 (b)	b) a protocol for undertaking independent dilapidation surveys to assess the: <ul style="list-style-type: none"> existing condition of local roads on the transport route/s prior to construction, upgrading or decommissioning activities; and condition of local roads on the transport route/s following construction, upgrading or decommissioning activities; 	Pre-Construction	Pre-Construction Compliance Report, June 2019 Section 10.2 of Traffic Management Plan	NC	Pre-Construction Compliance Report (CR) reported this as a non-compliance due to the late conduct of the dilapidation survey – completed in June 2019, not prior to commencement of road upgrade. A non-compliance notification was subsequently sent to DPI&E with a copy of the CR and Dilapidation Survey, which in effect addressed the detected NC. The non-compliance stands because it still reflects the failure to meet this condition prior to construction commencement.
3-7C	SCH3-7 (c)	c) a protocol for the repair of any local roads identified in the dilapidation surveys to have been damaged during construction, upgrading or decommissioning works;	Pre-Construction	Section 9.5, 10.2 of Traffic Management Plan Sighted Preliminary Road Assessment reports (June and August 2019)	C	Preliminary Road Assessment (June and August 2019) report – assessment of road and intersection conditions and if appear to be deteriorating, recommendations for repairs if relevant
3-7D	SCH3-7 (d)	d) details of the measures that would be implemented to minimise traffic safety issues and disruption to local users of the transport route/s during construction, upgrading or decommissioning works, including: <ul style="list-style-type: none"> performance criteria, measures and indicators for shuttle bus utilisation and car-pooling in accordance with the commitments in the EIS; 	Pre-Construction	Section 7.2, 9, 9.5, 11.2 and Appendix 3 of Traffic Management Plan Logistics Management Plan	C	Details also included in Logistics Management Plan Site access routes, travel exclusion times, etc. detailed in DPSF Heavy Vehicle/Light Vehicle Site Access Information – pdf provided to all delivery suppliers

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
		<ul style="list-style-type: none"> temporary traffic controls, including detours and signage; notifying the local community about project-related traffic impacts; procedures for receiving and addressing complaints from the community about development-related traffic; minimising potential for conflict with school buses and other motorists as far as practicable; scheduling of haulage vehicle movements to minimise convoy length or platoons; responding to local climate conditions that may affect road safety such as fog, dust and wet weather; responding to any emergency repair or maintenance requirements; and a traffic management system for managing over-dimensional vehicles; 		Sighted DPSF Heavy Vehicle/Light Vehicle Site Access Information		
3-7E	SCH3-7 (e)	e) driver's code of conduct that addresses: <ul style="list-style-type: none"> travelling speeds; driver fatigue; procedures to ensure that drivers adhere to the designated transport route/s; and procedures to ensure that drivers implement safe driving practices; and 	Pre-Construction	Appendix 4 of Traffic Management Plan	C	Info included in Induction
3-7F	SCH3-7 (f)	f) a flood response plan detailing procedures and options for safe access to the site in the event of flooding. Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.	Pre-Construction	Appendix 5 of Traffic Management Plan	C	
LAND MANAGEMENT						
3-8A	SCH3-8	Following any construction or upgrading on the site, the Applicant must: <ul style="list-style-type: none"> a) restore the ground cover of the site as soon as practicable; 	At all times		C	Discussion with Signal Energy on approach to rehabilitating areas progressively to achieve recovery (e.g. roadsides, grass areas, trenches) as areas are completed. CEMP is to be updated to

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations																												
		b) maintain the ground cover with appropriate perennial species; and c) manage weeds within this ground cover.				document the process for staging rehabilitation. Such rehabilitation is to be included in Monthly Reports and Quarterly Weed Assessments																												
BIODIVERSITY																																		
3-9A	Biodiversity Offsets SCH3-9	<p>Within two years of commencing construction under this consent, unless the Secretary agrees otherwise, the Applicant must retire biodiversity credits of a number and class specified in Column (a) in Table 1 below, to the satisfaction of OEH.</p> <table><tr><td colspan="4">Table 1: Biodiversity Credit Requirements</td></tr><tr><td>Vegetation Community</td><td>PCT ID</td><td>Column (a): Minimum Credits Required</td><td>Column (b): Maximum Credits Required</td></tr><tr><td>Black Box grassy open woodland wetland of rarely flooded depressions in south western NSW (mainly Riverina Bioregion and Murray Darling Depression Bioregion)</td><td>PCT 16</td><td>294</td><td>294</td></tr><tr><td>Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South Western Slopes Bioregion</td><td>PCT 45</td><td>3,435</td><td>6,973</td></tr><tr><td>Yellow Box - White Cypress Pine grassy woodland on deep sandy-loam alluvial soils of the eastern Riverina Bioregion and western NSW South Western Slopes Bioregion</td><td>PCT 75</td><td>7</td><td>7</td></tr><tr><td>Species</td><td>Species ID</td><td>Credits Required</td><td>Credits Required</td></tr><tr><td>Superb Parrot (Polytelis swainsonii)</td><td>10645</td><td>60</td><td>60</td></tr></table> <p><small>Note: Following repeal of the Threatened Species Conservation Act 1995 on 25 August 2017, credits created under that Act are taken to be "biodiversity credits" under the Biodiversity Conservation Act 2016 by virtue of clause 22 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.</small></p>	Table 1: Biodiversity Credit Requirements				Vegetation Community	PCT ID	Column (a): Minimum Credits Required	Column (b): Maximum Credits Required	Black Box grassy open woodland wetland of rarely flooded depressions in south western NSW (mainly Riverina Bioregion and Murray Darling Depression Bioregion)	PCT 16	294	294	Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South Western Slopes Bioregion	PCT 45	3,435	6,973	Yellow Box - White Cypress Pine grassy woodland on deep sandy-loam alluvial soils of the eastern Riverina Bioregion and western NSW South Western Slopes Bioregion	PCT 75	7	7	Species	Species ID	Credits Required	Credits Required	Superb Parrot (Polytelis swainsonii)	10645	60	60			NT	Discussion with Signal Energy on approach to rehabilitating areas progressively to achieve recovery (e.g. roadsides, grass areas, trenches) as areas are completed. Measurement of offsetting credits required will be finalised as part of the staged approach.
Table 1: Biodiversity Credit Requirements																																		
Vegetation Community	PCT ID	Column (a): Minimum Credits Required	Column (b): Maximum Credits Required																															
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Species	Species ID	Credits Required	Credits Required																															
Superb Parrot (Polytelis swainsonii)	10645	60	60																															
3-10A	SCH3-10	<p>The retirement of credits must be carried out in accordance with the <i>NSW Biodiversity Offsets Policy for Major Projects</i> and can be achieved by:</p> <p>a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; b) making payments into an offset fund that has been developed by the NSW Government; or c) providing supplementary measures.</p>				NT																												
3-11A	SCH3-11	In the period between 2 years and 3 years from the commencement of operations, unless the Secretary	Operations			NT																												

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
		<p>agrees otherwise, the Applicant must commission an independent review of the impacts of the development on PCT45 and submit a subsequent report to the Secretary. This review and report must be undertaken by a suitably qualified, experienced and independent grasslands expert endorsed by the Secretary.</p> <p>The expert must:</p> <ul style="list-style-type: none"> a) consult with OEH and the Applicant; b) compare the actual impacts on PCT45 against that predicted in the EIS; c) if the review concludes that the impacts on PCT45 are greater than that predicted in the EIS, calculate any additional biodiversity offset credit liabilities for the development over and above that specified in Column (a) of Table 1 above, in accordance with the NSW Biodiversity Offsets Policy for Major Projects, d) document the findings in its report. <p>If the Secretary determines, after reviewing the expert's report, that the Applicant must retire additional biodiversity credits for PCT45, the Applicant must retire the additional credits within 12 months of the Secretary's determination, up to an aggregate maximum of that specified in Column (b) of Table 1 above.</p>				
3-12A	Biodiversity Management Plan SCH3-12 (a)	Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with OEH, and to the satisfaction of the Secretary. This plan must:	Pre-construction	Biodiversity Management Plan Sighted letter from NSW DPE to Signal Energy, dated 20/03/2019 advising Secretary approval of the DPSF Biodiversity Management Plan (Version 7, dated 20/03/2019).	C	Lucidity DPSF Species Register – 4 species found during clearing activities, 4 records in Register

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
3-12B	SCH3-12 (b)	<p>a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • minimising the amount of native vegetation clearing within the approved development footprint; • minimising the loss of key fauna habitat; • managing potential indirect impacts on threatened and migratory species, including: <ul style="list-style-type: none"> – flora species, including Weeping Myall Woodland and Sandhill Pine Woodland; and – fauna species, including Grey-crowned Babbler and Superb Parrot; • rehabilitating and revegetating temporary disturbance areas; • protecting native vegetation and key fauna habitat outside the approved disturbance areas; • maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and • controlling weeds and feral pests; • protecting and promoting the growth of native plant species (including PCT45) and controlling the growth of exotic ground cover; 	Pre-construction	<p>Section 4 of Biodiversity Management Plan</p> <p>Sighted 2x Ecologist reports following two vegetation removal operations</p> <p>Sighted Compliance Spreadsheet used by Env Rep</p> <p>Sighted Monthly Report Monitoring of disturbed adjacent vegetated areas</p> <p>Observed multiple VEZs appropriately delineated for protection</p>	C	<p>Ecologist reports from veg removals confirming no fauna injuries or fatalities</p> <p>Monthly Report includes details of monitoring of disturbed adjacent vegetated areas – only noted if issues are detected</p> <p>Refer to Photographs 9 & 55-57 for clearly delineated and protected Vegetation Exclusion Zones (VEZs)</p>
3-12C	SCH3-12 (c)	<p>b) include a seasonally-based program to monitor and report on the effectiveness of these measures against the detailed performance and completion criteria; and</p>	Pre-construction	<p>Section 4 and 8.3 of Biodiversity Management Plan</p>	C	<p>Quarterly Weed Monitoring scheduled – to commence in first week of October to conduct assessment</p>
3-12D	SCH3-12 (d)	<p>c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following the Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p><i>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan</i></p>	Pre-construction	<p>Section 8, 8.3 of Biodiversity Management Plan</p> <p>Sighted August report</p>	C	<p>Biodiversity Monitoring Report – monthly Report for August discussed, Signal currently preparing September report</p>

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
		does not need to include any of the matters that are covered under the Biodiversity Stewardship Agreement.				
AMENITY						
3-13A	Construction, Upgrading and Decommissioning Hours SCH3-13	Unless the Secretary agrees otherwise, the Applicant may only undertake construction, upgrading or decommissioning activities on site between: a) 7 am to 6 pm Monday to Friday; b) 8 am to 1 pm Saturdays; and c) at no time on Sundays and NSW public holidays. The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary: <ul style="list-style-type: none"> the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or emergency work to avoid the loss of life, property and/or material harm to the environment. 	Construction	Sighted DPI&E approval on 17/12/18 of amended hours Sighted Signal Energy request to DPI&E for temporary extension of construction hours, with supporting documentation	C	Construction hours were amended to 7am to 6pm Monday to Sunday, with no work on public holidays. This was approved by DPI&E 17/12/2018 after request from Edify Energy. Works to date have complied with these approved hours (although the Conditions of Consent were not amended thus this condition does not reflect the approval). Signal Energy has submitted a new request to DPI&E to seek a temporary extension of construction hours
3-14A	Noise SCH3-14	The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version.	At all times	Results of noise monitoring	C	No complaints received. Advised monitoring scheduled for 20 September
3-15A	Dust SCH3-15	The Applicant must minimise the dust generated by the development.	At all times	Dust generating activities not being managed appropriately	NC	Two water trucks were on site over the audit dates. It was noted trucks refill offsite and the turn-around time for this means that trucks are not onsite as much as perhaps needed. Activities were occurring in multiple locations, causing dust generation, however no water trucks were observed in those work areas to suppress dust. It is recommended to increase the number of water trucks to manage dust generating activities. Refer to Photograph 8.

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
3-16A	Visual SCH3-16	The Applicant must: c) minimise the off-site visual impacts of the development, including the potential for any glare or reflection from the solar panels; d) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and e) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	At all times		C	Site is visible from Donald Ross Drive, however it is noted DPI&E (OEH) specified no landscaping would be allowed in this section. There is no reason to expect complaints regarding visual impact of the DPSF from motorists/users of Donald Ross Drive, however if this becomes a concern visual screening options may include UV rated shade cloth installed on fencing.
3-17A	Lighting SCH3-17	The Applicant must: a) minimise the off-site lighting impacts of the development; and b) ensure that any external lighting associated with the development: • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; and • complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.	At all times	Sighted responses from neighbours endorsing temporary increase to working hours	C	Security in attendance on site 24hrs/day. Lights installed at various locations around compound <u>although Signal Energy uncertain if the lighting complies with AS4282. This was to be verified ASAP.</u> Signal Energy has approval from all 8 neighbours (sensitive receptors) for a temporary increase in working hours which will require night work lighting. Lighting installed shown in Photographs 38-40 & 52.
HERITAGE						
3-18A	Protection of Heritage Items SCH3-18	Prior to the commencement of construction, the Applicant must salvage Aboriginal heritage item number AFT01 and transfer to the Griffith Local Aboriginal Land Council, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> (DECCW, 2010), or its latest version. <i>Note: The location of the Aboriginal heritage item referred to in this condition is shown in the figure in Appendix 1.</i>	Pre-Construction	Environmental Management Strategy Chance Finds Protocol Sighted Aboriginal Site Impact Recording Form and accompanying	C	Aboriginal Site Impact Recording Form for AHIMS site ID: 49-5-0152 completed by Kelleher Nightingale Consulting, and accompanying Lithics Spreadsheet (dated 10 July 2019) documenting the salvage collection of Tubbo AFT 01/AHIMS 49-5-0152 was submitted to OEH. Archaeological Sites shown in Photographs 5-7 & 53-54.

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
				Lithics Spreadsheet (dated 10 July 2019)		
3-19A	Discovery of Human Remains SCH3-19	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.	At all times	Human remains information covered in Online Induction	NT	No human remains discovered.
3-20A	Chance Finds Protocol SCH3-20	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 OEH's approval, the Applicant must implement the Chance Finds Protocol.	Pre-Construction	Chance Finds Protocol Sighted Letter from OEH endorsing	C	Sighted endorsement letter from OEH
SOIL & WATER						
3-21A	Water Pollution SCH3-21	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	At all times		C	ESC at front entrance suitable. Refer to Photographs 42-51 ESC around large sand stockpile near front entrance satisfactory, refer to Photographs 65-66
3-22A	Operating Conditions SCH3-22	The Applicant must: a) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version; b) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and c) implement appropriate flood management practices to ensure post-development flows from the site are limited to pre-development flows for all storms up to and including the 90-year Average Recurrence Interval event.	At all times	Observed existing drainage channel unaltered for installation of structure and panels	C	Design and placement of piles to suit existing drainage – noted existing drainage channel traversing under installed panels near to front of site (refer to Photographs 60-61). The practice of opening up all cable trenching and stockpiling of topsoil and sand (for backfill) at same time is not ideal. This increases the risk of sedimentation, loss of soils, and potential de-watering from trenches following rainfall. Signal Energy is encouraged to push the contractor to close trenches in stages to

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
						reduce the area of trenching open at any given time. Refer to Photographs 2-3 & 58-59
HAZARDS						
3-23A	Operating Conditions SCH3-23 (a)	The Applicant must: a) minimise the fire risks of the development; b) ensure that the development: • includes at least a 10 metre defendable space around the perimeter of the solar array area that permits unobstructed vehicle access; • manages the defendable space and solar array area as an Asset Protection Zone; • complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2006 (or equivalent) and Standards for Asset Protection Zones; • is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65mm Storz fitting located adjacent to the internal access road;	At all times	Observed 10m defendable space around perimeter Tank position noted	C	Design allows for 10m defendable space around perimeter 20,000L water supply tank located beside Security Hut – this is the final location for the tank Refer to Photograph 52
3-23B	SCH3-23 (b)	c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and d) notify the relevant local emergency management committee following construction of the development, and prior to the commencement of operations.			NT	
3-24A	Fire Safety Study SCH3-24	At least one month prior to the construction of the battery storage facility (excluding pre-construction minor works), unless otherwise agreed by the Secretary, the Applicant must prepare a Fire Safety Study of the development, to the satisfaction of the Secretary. The study must be consistent with the: a) Department's <i>Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study'</i> guideline; and	Pre-Construction (Battery storage facility)		NT	

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
		<p>b) New South Wales Government's <i>Best Practice Guidelines for Contaminated Water Retention and Treatment Systems</i>.</p> <p>Construction of the battery storage facility, other than pre-construction minor works, must not commence until the Secretary has approved the Fire Safety Study.</p>				
3-25A	Storage and Handling of Dangerous Materials SCH3-25	<p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <p>a) the requirements of all relevant Australian Standards; and</p> <p>b) the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> if the chemicals are liquids.</p> <p>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	At all times		C	<p>Nilsen self-contained shipping container in compound to store all chemical, fuels and oils. SDSs for most items in container found in folder, <u>noted missing SDSs of several items in container – this should be easily rectified.</u></p> <p>Refer to Photographs 24-26</p>
3-26A	Emergency Plan SCH3-26	<p>Prior to the commissioning of development, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry points at all times. The plan must:</p> <p>a) be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning';</p> <p>b) be prepared in consultation with Fire and Rescue NSW and NSW Rural Fire Service to their satisfaction;</p> <p>c) identify the fire risks and controls of the development; and</p> <p>d) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site.</p>	Pre-Operations	<p>Emergency Plan on notice board and soft copy</p> <p>Comments received by NSW RFS – indicating endorsement</p>	C	<p>Emergency Plan – available electronically and hard copy on notice board</p> <p>Emergency Plan endorsed by NSW RFS</p> <p>Refer to Photographs 31-34</p>
WASTE						
3-27A	SCH3-27	<p>The Applicant must:</p> <p>a) minimise the waste generated by the development;</p> <p>b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);</p>	At all times		C	<p>Waste management on the project managed by Damien Smith from Nilsen. Damien advised a full-time contractor from</p>

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
		<p>c) store and handle all waste on site in accordance with its classification;</p> <p>d) not receive or dispose of any waste on site; and</p> <p>e) remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal.</p>				<p>Country Waste Services was about to commence onsite.</p> <p>Cardboard & General Waste – CWS will have a resource onsite - truck operator to load and transport - who will manage the ongoing removal. (Refer to Photographs 20 and 21)</p> <p>Septic – Yenda currently completing daily pump out of IBC containers (refer to Photograph 23)</p> <p>Timber – plan to have woodchipper set up on site at end of project to complete all chipping, expect to take ~3 weeks to complete chipping. Also expect some timber pallets to be donated to Men's Shed. (refer to Photographs 13 and 14)</p> <p>Mixed recycling (cans, etc.) being donated to Men's Shed – collection units are delivered by utility vehicle/s to the Men's Shed by Signal Energy staff as loads are ready (refer to Photograph 23)</p> <p>Metal strapping collected in metal recycling skips (refer to Photographs 10-12)</p> <p>Panel install just commencing – waste collated in piles in situ for collection (refer to Photograph 62-64)</p> <p>Observed used 200L drums with holes cut for lifting points – sharp edges were evident and pose a risk (refer to Photograph 15). <u>Use of these altered drums for waste (or other) collection</u></p>

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
						should be reviewed to prevent risk of injury.
ACCOMMODATION AND EMPLOYMENT STRATEGY						
3-28A	SCH3-28 (a)	<p>Prior to the commencement of construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Secretary. This strategy must:</p> <p>a) propose a strategy to facilitate the accommodation of the workforce associated with the development;</p>	Pre-Construction	<p>Section 4 of Accommodation and Employment Strategy</p> <p>Lucidity showed zero complaints</p>	C	<p>There are two recorded amendments in the cover page 'Amendment Record'. However, the title of the document, Accommodation and Employment Strategy – DPSF_Draft_V4, indicates there may have been more amendments. The document itself does not include a version number either. These details should all align leaving the reader in no doubt that the latest version is being used/accessed.</p> <p>The second amendment record indicates Council has been consulted.</p>
3-28B	SCH3-28 (b)	b) investigate options for prioritising the employment of local workers for the construction and operation of the development where feasible; and	Pre-Construction	Section 3.4 of Accommodation and Employment Strategy	C	
3-28C	SCH3-28 (c)	<p>c) include a program to monitor and review the effectiveness of the strategy over the life of the development.</p> <p>Following the Secretary's approval, the Applicant must implement the strategy.</p>	Pre-Construction	<p>Section 5 of Accommodation and Employment Strategy</p> <p>September survey sent to 320 people with over 100 responses at time of audit visit</p>	C	A monthly survey is emailed to all individuals who have been inducted on the DPSF project – data is used to filter companies, locals, etc.
DECOMMISSIONING AND REHABILITATION						
3-29A	SCH3-29	Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Secretary.	Post-Operations		NT	

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations										
		<p>This rehabilitation must comply with the objectives in Table 2.</p> <p><i>Table 2: Rehabilitation Objectives</i></p> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Project site</td><td><ul style="list-style-type: none">Safe, stable and non-pollutingMinimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use</td></tr><tr><td>Solar farm infrastructure</td><td><ul style="list-style-type: none">To be decommissioned and removed, unless the Secretary agrees otherwise</td></tr><tr><td>Land use</td><td><ul style="list-style-type: none">Restore land capability to pre-existing use</td></tr><tr><td>Community</td><td><ul style="list-style-type: none">Ensure public safety</td></tr></table>	Feature	Objective	Project site	<ul style="list-style-type: none">Safe, stable and non-pollutingMinimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use	Solar farm infrastructure	<ul style="list-style-type: none">To be decommissioned and removed, unless the Secretary agrees otherwise	Land use	<ul style="list-style-type: none">Restore land capability to pre-existing use	Community	<ul style="list-style-type: none">Ensure public safety				
Feature	Objective															
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Land use	<ul style="list-style-type: none">Restore land capability to pre-existing use															
Community	<ul style="list-style-type: none">Ensure public safety															
SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT AND REPORTING																
ENVIRONMENTAL MANAGEMENT																
4-1A	Environmental Management Strategy SCH4-1 (a)	<p>Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <p>a) provide the strategic framework for environmental management of the development;</p>	Pre-Construction	<p>Section 9 of Environmental Management Strategy, March 2019</p> <p>Section 1.1 of Biodiversity Management Plan CEMP</p>	C	<p>The document details provided in the document header include: Version #: Version 1, Date of Issue: December 2018, however there are three recorded amendments in the cover page 'Amendment Record'. The first date of amendment aligns with the initial issue date in December, while the third date of amendment is recorded as 14 March 2019. The version number and date of issue details in the header of the document should reflect the amended document.</p>										
4-1B	SCH4-1 (b)	<p>b) identify the statutory approvals that apply to the development;</p>	Pre-Construction	<p>Section 2.6 of Environmental Management Strategy</p> <p>Section 1.1 of Biodiversity Management Plan CEMP</p> <p>Lucidity records</p>	C											

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
4-1C	SCH4-1 (c)	c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Pre-Construction	Section 7 of Environmental Management Strategy	C	
4-1D	SCH4-1 (d)	d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the development; receive, handle, respond to, and record complaints; resolve any disputes that may arise; respond to any non-compliance; respond to emergencies; and 	Pre-Construction	Section 9.2, 11 and 11.4 of Environmental Management Strategy Section 1.1 of Biodiversity Management Plan Sighted letter/survey of the neighbours to seek approval to increase working hours	C	Signal Energy has consulted with sensitive receptors regarding latest request for temporary change/increase to working hours
4-1E	SCH4-1 (e)	e) include: <ul style="list-style-type: none"> references to any plans approved under the conditions of this consent; and a clear plan depicting all the monitoring to be carried out in relation to the development. Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.	Pre-Construction	Section 2.7, 6 and 10 of Environmental Management Strategy Section 1.1 of Biodiversity Management Plan Lucidity records Monitoring reports/ datasheets	C	
4-2A	Revision of Strategies Plans and Programs	The Applicant must: <ul style="list-style-type: none"> a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and 	At all times	Environmental Management Strategy, March 2019	C	Some reviews and updates to relevant plans has occurred following modification of the conditions of consent (e.g. TMP updated to reflect increased working hours approved by DPI&E Nov 2019)

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
	SCH4-2	<p>b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:</p> <ul style="list-style-type: none"> • submission of an incident report under condition 4 of Schedule 4; • submission of an audit report under condition 6 of Schedule 4; or • any modification to the conditions of this consent. 		CEMP		
4-3A	<p>Updating and Staging of Strategies Plans and Programs</p> <p>SCH4-3</p>	<p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all parties referred to under the relevant condition of this consent.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • <i>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.</i> • <i>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.</i> 	At all times	<p>TMP</p> <p>CEMP</p> <p>Accommodation & Employment Strategy</p>	NC	<p>Updating of plans requires attention to accurately reflect all current modifications to the conditions of consent.</p> <p>There were some discrepancies with the TMP – current plan is version 4, cover page only shows 3 amendment records; Section 8.2 had not been updated to reflect the approved increase of HV movements per day (plan still reflected original consent condition).</p> <p>Accommodation & Employment Strategy had similar version issue – the document does not include a version number (although the file name does) and there doesn't appear to be enough amendment records to align with version number 4.</p> <p>CEMP does not include process for staging rehabilitation as areas are completed – this was discussed as the approach, but is not documented in relevant plan/s.</p> <p>The online Induction could be reviewed for accuracy of information – e.g.</p> <ul style="list-style-type: none"> • refers to strict washdown procedures will be implemented, but there is now specific washdown procedure employed onsite with the requirement for clean

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
						<p>plant/equipment and vehicles expected prior to arrival to site.</p> <ul style="list-style-type: none"> refers to noise monitoring programme but this had not been implemented. <p>A further review of relevant plans may be required if working hours extension request is approved by DPI&E</p>
COMPLIANCE						
4-4A	Incident Notification SCH4-4	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.	At all times	Lucidity search for incident reports	C	The project has not had any incidents recorded or reported.
4-5A	Non-compliance Notification SCH4-5	The Department must be notified in writing to compliance@planning.nsw.gov.au within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this 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.	At all times	Email (dated 27 June 2019) from Signal Energy to DPI&E providing details of the four NCs raised in the CR.	C	<p>Four NCs were raised in the Pre-Construction Compliance Report (CR) – following this, notification was issued to DPI&E by Signal Energy.</p> <p>Viewed email from Chris Stewart to DPI&E compliance email.</p>
4-6A	Compliance Reporting SCH4-6	The Applicant must provide regular compliance reporting to the Department on the development in accordance with the relevant <i>Compliance Reporting</i> requirements (DPE 2018).	At all times	<p>Pre-Construction Compliance Report, June 2019</p> <p>Non-compliance notification correspondence to DPI&E and response indicating</p>	C	<p>Pre-Construction Compliance Report (CR) reported this as a non-compliance due to the late undertaking of the CR – completed in June 2019, not prior to commencement of construction.</p> <p>A non-compliance notification was subsequently sent to DPI&E with a copy of the CR, which in effect addressed the detected NC.</p>

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
				compliance achieved		Signal is now compliant with this condition and the status reflects this because the previous non-compliance only related to the failure to meet this condition prior to construction commencement, which was addressed.
INDEPENDENT ENVIRONMENTAL AUDIT						
4-7A	SCH4-7 (a)	Within 6 months of the commencement of construction, or as directed by the Secretary, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must: a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018); b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; c) be carried out in consultation with the relevant agencies; d) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and e) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.	At all times		C	This audit is the first Independent Environmental Audit to be conducted within 6 months of the commencement of construction.
4-7B	SCH4-7 (b)	Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must 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.	At all times		NT	

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
		The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.				
ACCESS TO INFORMATION						
4-8A	SCH4-8	<p>The Applicant must:</p> <p>a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> the EIS; the final layout plans for the development; current statutory approvals for the development; approved strategies, plans or programs required under the conditions of this consent; the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; how complaints about the development can be made; a complaints register; compliance reports; any independent environmental audit, and the Applicant's response to the recommendations in any audit; and any other matter required by the Secretary; and <p>b) keep this information up to date.</p>	At all times	<p>Website review</p> <p>http://edifyenergy.com/projects/darlingtonpoint/</p>	NC	<p>Website review determined the following documents were available:</p> <ul style="list-style-type: none"> The EIS – via a link to NSW Planning Portal, Major Projects; as well as a link to a pdf copy of the EIS Main report Darlington Point Solar – Development Consent via link Approved strategies, plans or programs – <ul style="list-style-type: none"> Accommodation and Employment Strategy Biodiversity Management Plan Chance Find Protocol Environmental Management Strategy Traffic Management Plan Proposed staging plans not relevant, though the website does advise that current construction relates to installation of the solar farm only, and installation of proposed battery storage facility may be constructed at future date. How complaints can be made – information on website covering Community Feedback and Complaints with email address to use and other contact details Complaint register – via link embedded in website Independent environmental audit – link to Audits is available on website, however this Audit is the first independent environmental audit so it was expected

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
						<p>the link should be 'blank'. This Audit report should be added to the link on the website once final copy is completed, with response to recommendations.</p> <p>The following information was also found on the website:</p> <ul style="list-style-type: none"> • General project information • Project gallery showing some photographs of the site (pre-construction) • Two media release documents dated 14 and 18 December 2018 respectively; • Link to 'Employment expressions of interest' site managed by WorkPac, and two email addresses to make contact; and • 'Community consultation' section advertising community events, with the most recent shown being: 'Job Fair / Community Night' scheduled for 28 February 2019. This section also provides a 'Get in touch' electronic form for users to make an enquiry. <p>Documents and/or information required by the development consent that are not available on the website (missing items) include:</p> <ul style="list-style-type: none"> • the final layout plans for the development; and • compliance reports (Pre-Construction Compliance Report was completed in June 2019) <p>The website is accessible and clear and contains most of the required documents. However, the absence of the two items listed above (required documents) should be addressed.</p>

Unique ID	Schedule-Condition	Requirement/ Condition	Phase/ Timing	Evidence Sighted/ Reference	Compliance Status	Audit Findings/ Comments and Recommendations
						<p>The website would also benefit from routine or regular updates on the project progress and any relevant changes. Keeping the required information up to date is a requirement of the development consent, thus it would be reasonable to expect more recent media release/s and updated photos included in the 'Project gallery' section of the page.</p> <p>For these reasons (missing documents and information not up to date) this condition is assessed as non-compliant.</p>

APPENDIX A: SITE INSPECTION PHOTOGRAPHS

The photographs below provide an illustration of the observations from the site inspections undertaken.

1. PHOTOGRAPHIC LOG

The photographs below provide an illustration of areas of key audit findings as well as a general impression of the site conditions and management at the time of site inspections.

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Photograph 1: Collection of waste vegetation, Auditor advised there would be a check for habitat logs prior to mulching/disposal



Photograph 2: Open cable trenches and uncontrolled stockpiles, benched ramp for access/egress



Photograph 3: Typical view of open cable trenches throughout the site, benched access/egress ramps visible



Photograph 4: PCU area prepared for lifting/mounting PCU, Note: pile installation in background



Photograph 5: Archaeological Site Location, not impacted by development, established as an Exclusion Zone to avoid inadvertent impacts. Farm fence behind scar tree. Discussion during audit visit to potentially maintain the Exclusion Zone by installing a return from each end of the farm fence to the site boundary fence to enclose the area and protect from inadvertent impact from farming operations – see photos below for further detail



Photograph 6: Archaeological Site Location – view to east with site boundary fencing in distance. Discussion during audit visit to potentially maintain the Exclusion Zone by installing a return from the farm fence (left of photo) to the site boundary fence to enclose the area



Photograph 7: Archaeological Site Location – view to west with site boundary fencing in foreground (see the two fences running parallel). Discussion during audit visit to potentially maintain the Exclusion Zone by installing a return from the farm fence (right of photo) to the site boundary fence to enclose the area and protect from inadvertent impact from farming operations



Photograph 8: Example of dust generating activity with no water truck for dust suppression in use, view towards south-west (transmission powerline in background), view of pile installation.



Photograph 9: Example of Vegetation Exclusion Zone (VEZ), flagging tape clearly delineates area



Photograph 10: Laydown area, with two metal waste skips



Photograph 11: Metal waste skip with metal strapping in bin



Photograph 12: Inside of metal waste skip with metal strapping in bin



Photograph 13: Laydown area, piles of waste from module packaging from install of 'Golden Row' (first area completed to refine installation process and provide sample for workers)



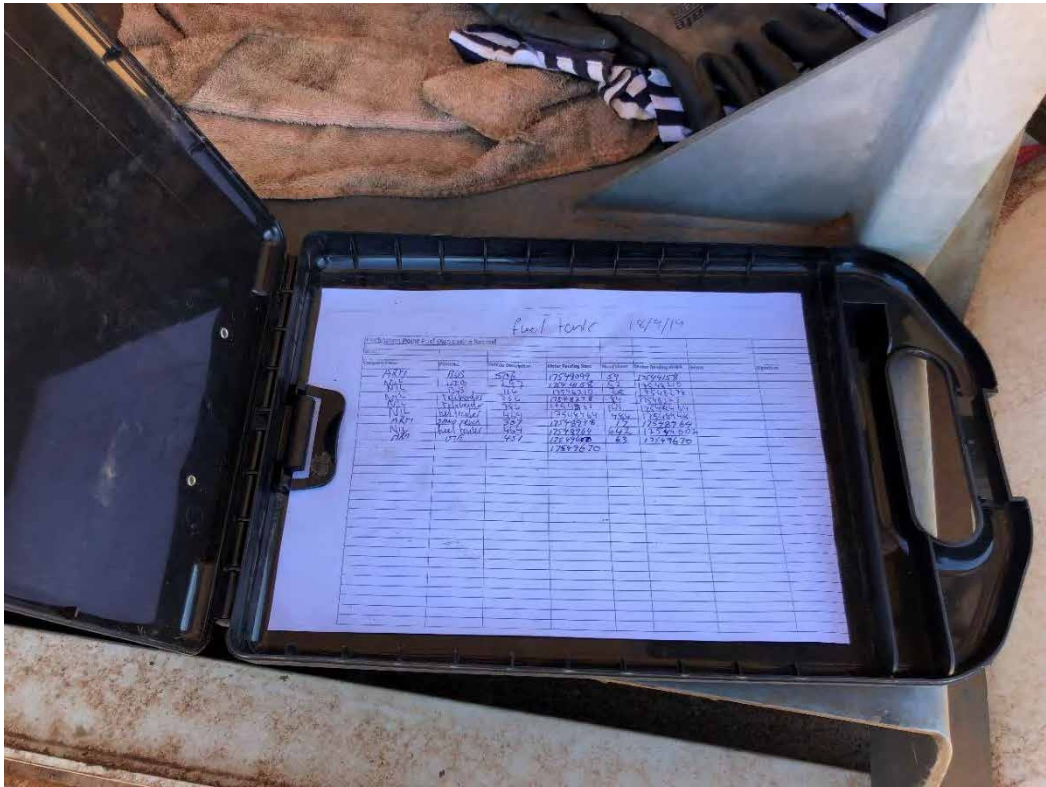
Photograph 14: Closer view of piles of waste, in laydown area, from module packaging from install of 'Golden Row'. Other stacks of timber waste.



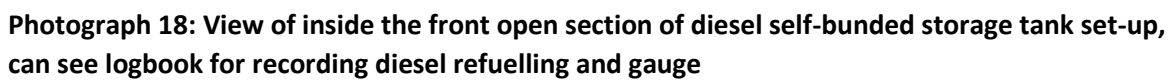
Photograph 15: 200L drums with holes cut for lifting points – sharp edges evident and pose a risk



Photograph 16: Diesel self-bunded storage tank, located at edge of compound



Photograph 17: Logbook for recording diesel refuelling from self-bunded storage tank, located inside the front open section of tank set-up





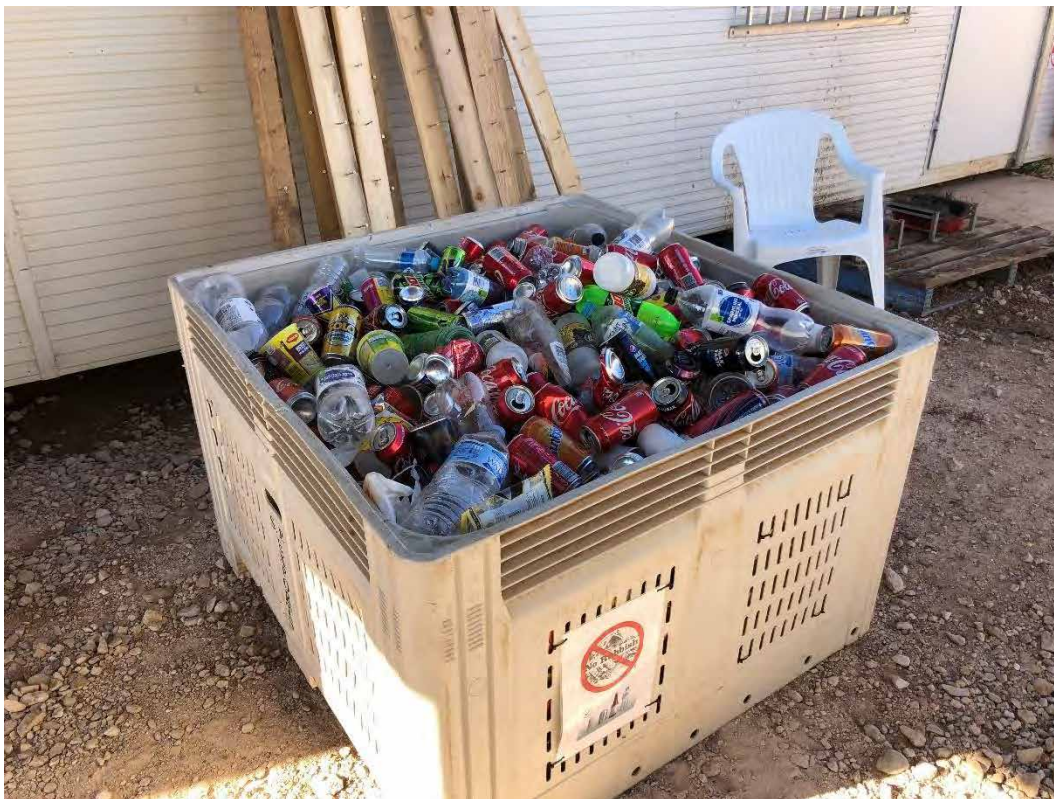
Photograph 20: General waste skip, covered



Photograph 21: Covered general waste skip, contents



Photograph 22: IBCs plumbed to toilets to collect septic waste



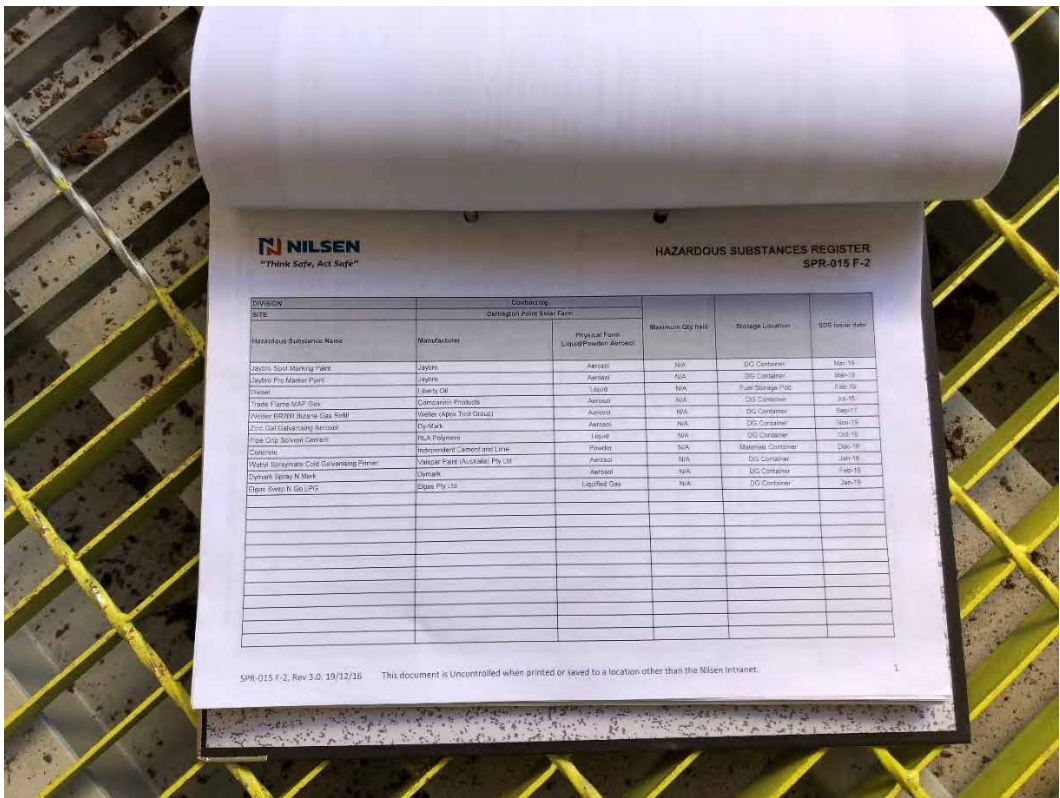
Photograph 23: Mixed recycling collection unit, minor cross-contamination



Photograph 24: Items stored inside Nilsen self-contained shipping container



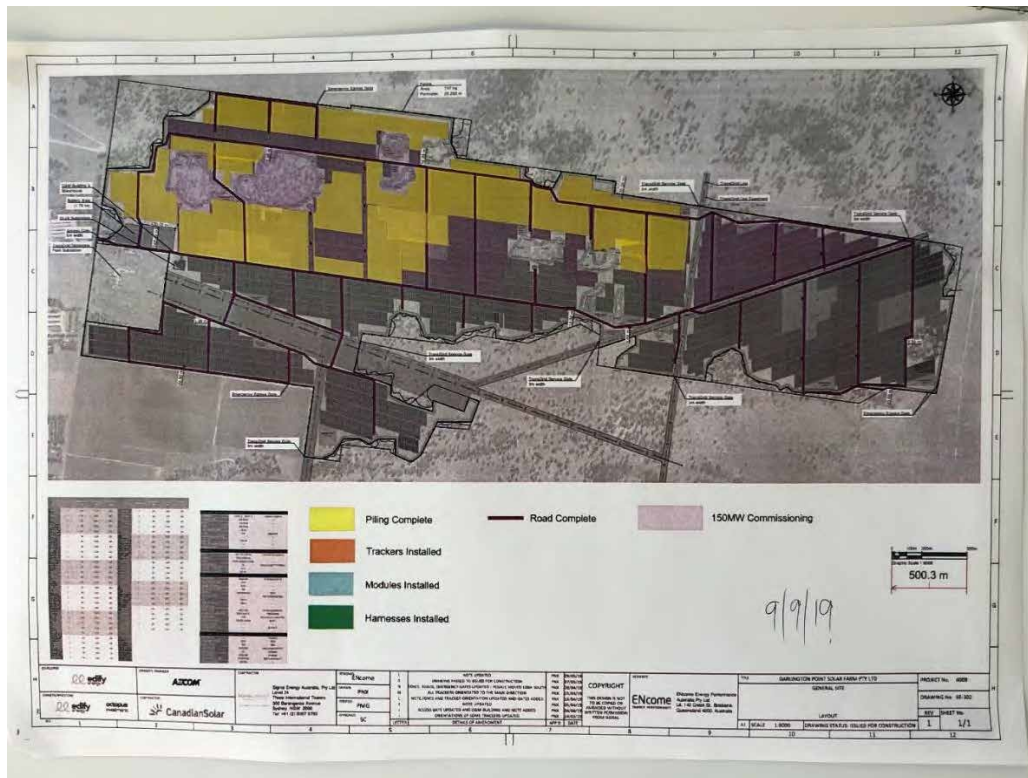
Photograph 25: Items not found in SDS Folder, stored inside Nilsen self-contained shipping container



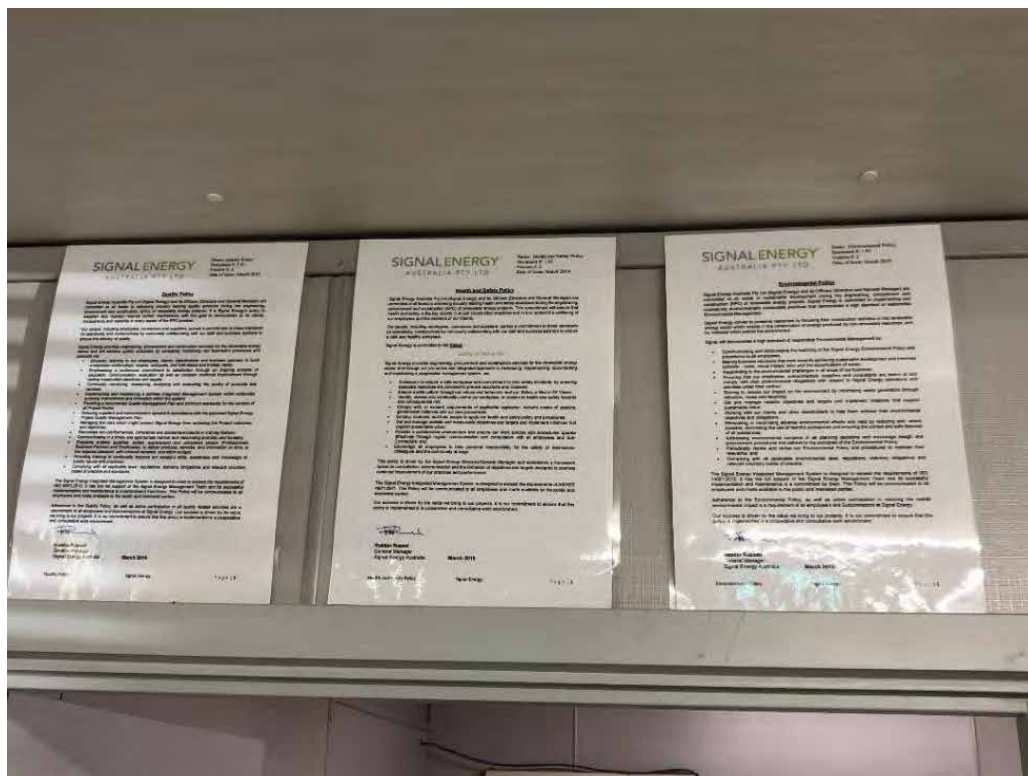
Photograph 26: SDS Folder inside Nilsen self-contained shipping container



Photograph 27: Project Site Layout board at entrance of Site Office, communication of key information



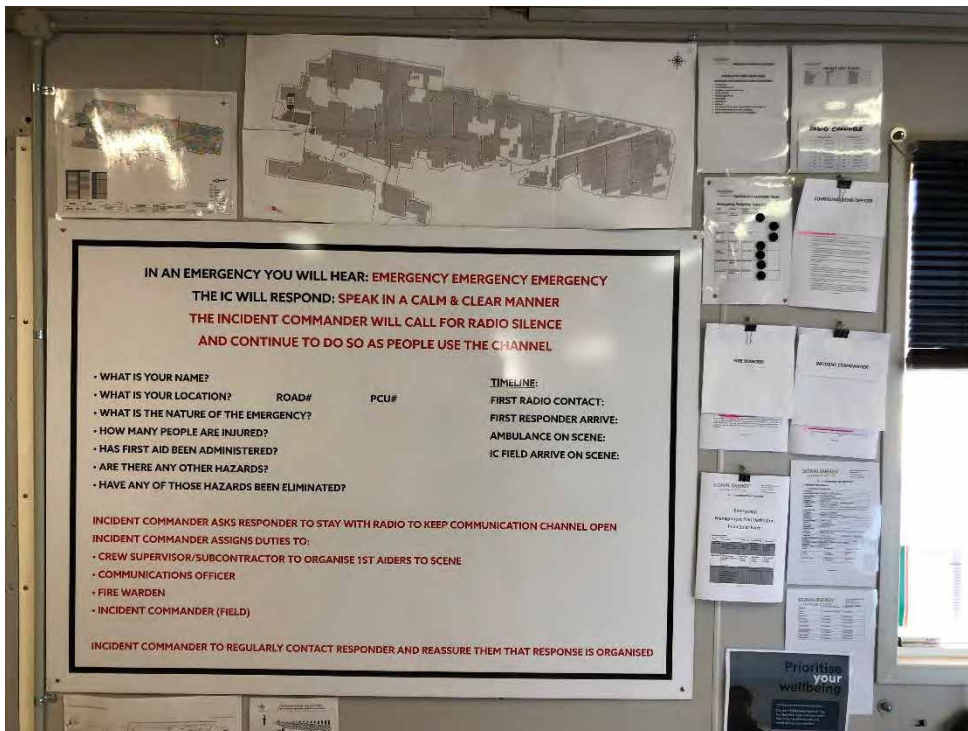
Photograph 28: Site layout plan showing completed areas and other key information, current as of 9 September, 2019



Photograph 29: Signal Energy Australia Policies inside Site Office

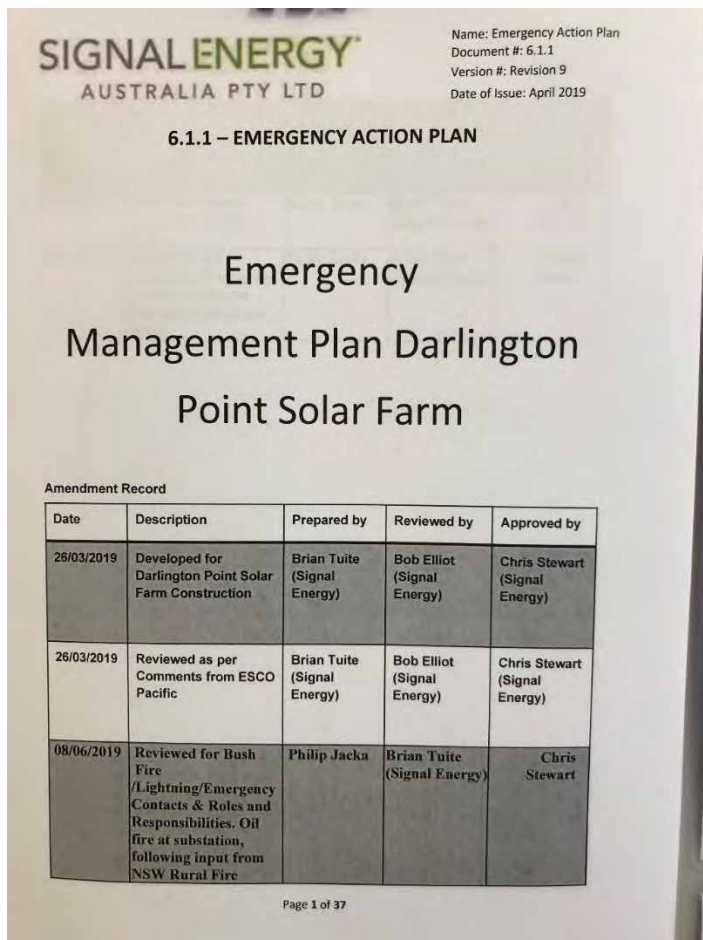
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15/7/19	11:23	XN181Z	BREFNI	GRAVEL	12:00
15/7/19	11:30	CP4404	SIGNAL	TORQUE	12:57
15/7/19	11:52	CD42WJ	BREFNI	GRAVEL	12:58
15/7/19	12:02	CDT 401	BREFNI	GRAVEL	12:30
15/7/19	12:05	BT 0007	BREFNI	GRAVEL	12:31
15/7/19	12:05	3 SEACO	SIGNAL	TORQUE	12:57
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15/7/19	12:05	XNS9CN	BREFNI	GRAVEL	13:01
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15/7/19	12:36	AU58LK	BREFNI	GRAVEL	13:11
15/7/19	12:36	ES 45 NC	BREFNI	GRAVEL	13:11
15/7/19	12:40	XN126GC	SIGNAL	GRAVEL	13:45
15/7/19	12:43	CP46EU	BREFNI	GRAVEL	13:13
15/7/19	12:43	BU 75 KE	BREFNI	GRAVEL	13:19
15/7/19	12:43	GRAY 13	SIGNAL	TORQUE	14:41
15/7/19	12:53	XN25DG	BREFNI	GRAVEL	13:77
15/7/19	13:01	XN137G	SIGNAL	PANNELS	16:26
15/7/19	13:05	XN211Z	SIGNAL	PANNELS	14:00
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15/7/19	14:07	XN 18TZ	BREFNI	GRAVEL	14:43
15/7/19	14:24	CDT 401	BREFNI	GRAVEL	14:55
15/7/19	14:24	BT 0007	BREFNI	GRAVEL	14:55
15/7/19	14:27	CD1RBT	BREFNI	GRAVEL	15:45
15/7/19	14:40	CD43WT	BREFNI	GRAVEL	15:14
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15/7/19	15:27	XN 01 T2	SIGNAL	GRAVEL	16:00
15/7/19	15:43	XN21DG	BREFNI	GRAVEL	16:13
BREFNI - 54 TRUCKS.					
SIGNAL - 24 TRUCKS.					
CPP - 2 TRUCKS.					
NILSEN - 3 TRUCKS.					
83 TRUCKS TOTAL.					

Photograph 30: Security Log – logs all track entry/exit to site, Logistics staff tally daily totals per contractor and total trucks for the day

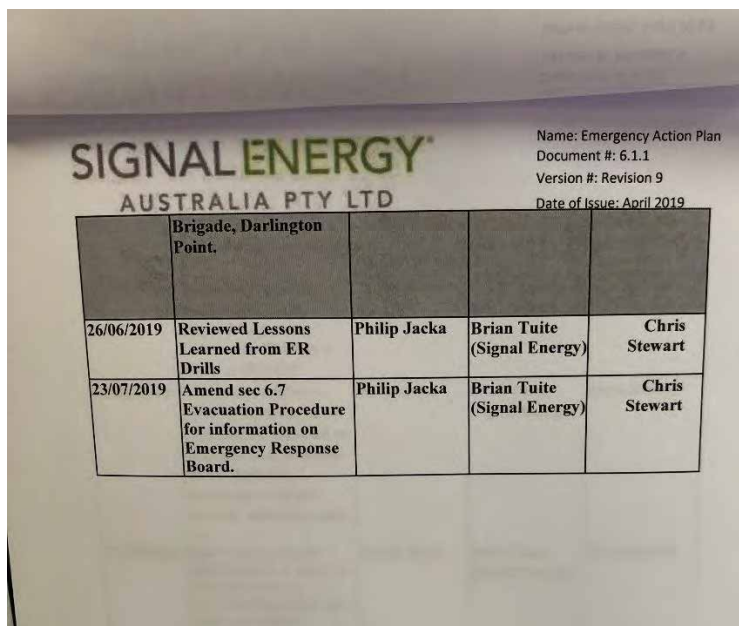


Photograph 31: Emergency information inside Site Office

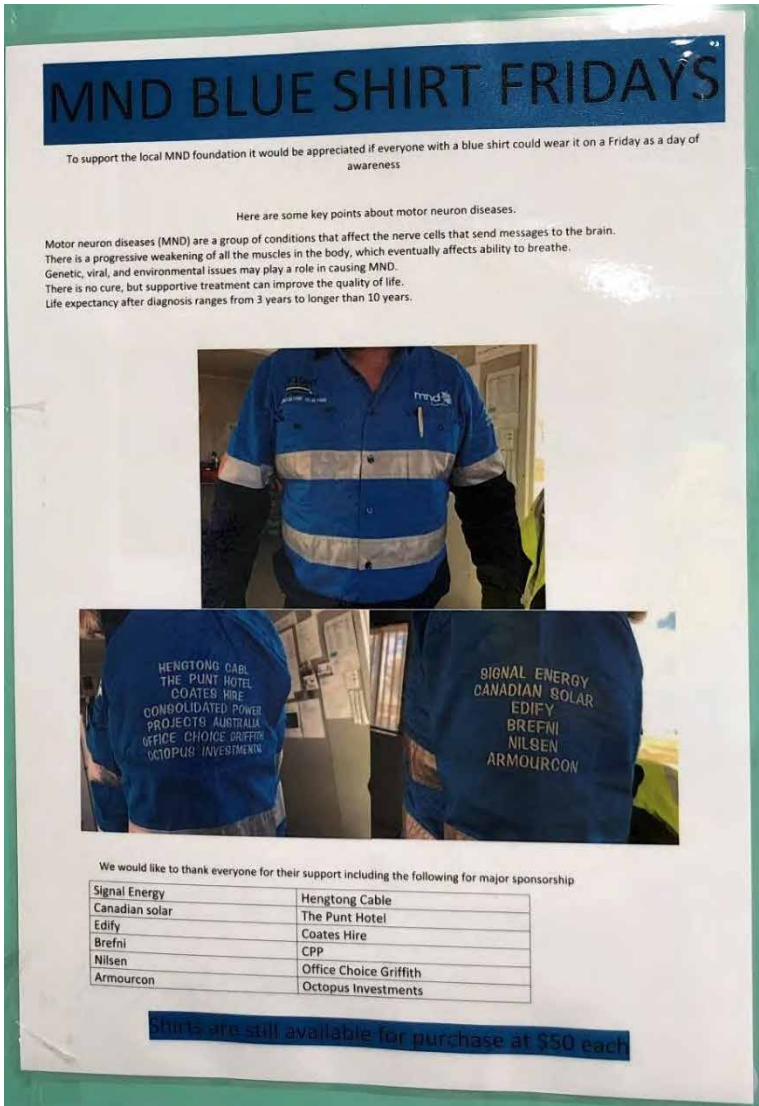




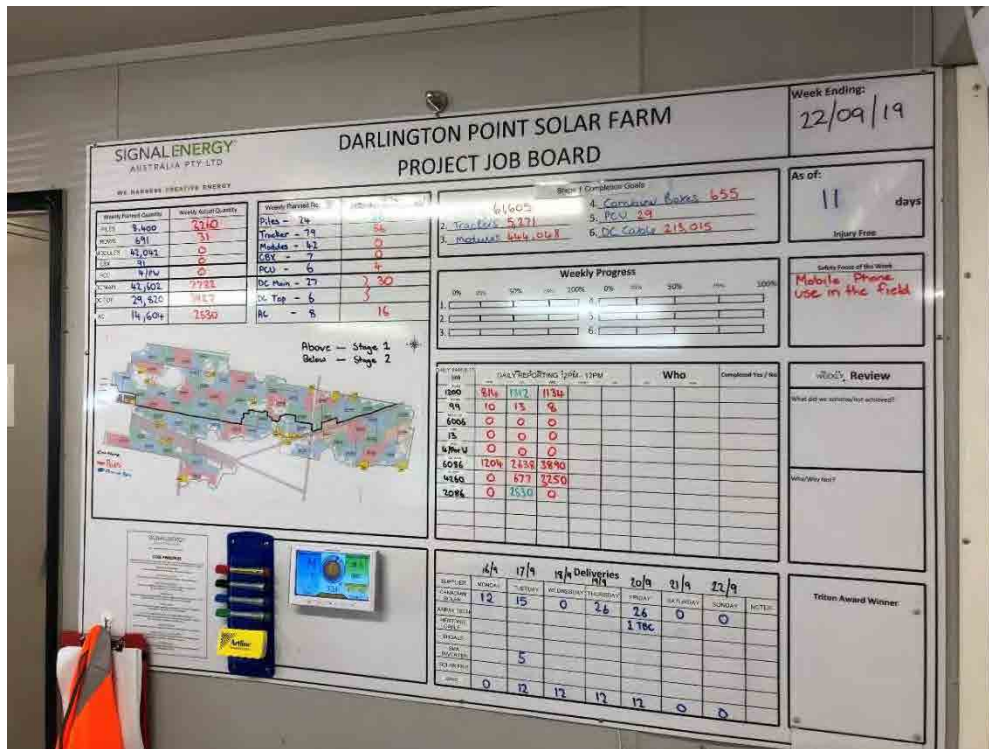
Photograph 33: Emergency Management Plan (inside Site Office) showing amendments, including review following input from NSW Rural Fire Brigade, Darlington Point



Photograph 34: Emergency Management Plan (inside Site Office) showing amendments



Photograph 35: Evidence of community and social benefit from project activities – Motor Neurone Diseases ‘Blue Shirt Fridays’ to raise awareness and money for MND



Photograph 36: Project Job Board inside Site Office, displays key information and stats on project


Pot holes in ground

REVIEWED BY: Brian Tuite DATE OF REVIEW 19/6/2019

Page 1 of 1

Page 1 of 1

LESSONS LEARNT

PROJECT IMPROVEMENT NUMBER: 3	LESSONS LEARNT PROJECT IMPROVEMENT	DATE OF ISSUE: 16/11/2018
Name: Brian Tuite		
<input type="checkbox"/> Design <input type="checkbox"/> Procurement <input checked="" type="checkbox"/> Construction <input type="checkbox"/> Commissioning <input type="checkbox"/> Pre Contract <input type="checkbox"/> Scope <input type="checkbox"/> Resources <input type="checkbox"/> Other		
WHAT WAS THE ISSUE / TASK:	Lessons learnt from previous projects Placing Piles on ground where snakes can enter / hide under pile	
IMPROVEMENT IDENTIFIED:	Reduce the opportunities for exposure: Place pile on flat edge to prevent snakes from hiding under pile and reduce risk of bite encounters	
IMPROVEMENT OUTCOME:	Reduction in snake hiding areas and accidental bite.	
FUTURE IMPROVEMENT S:	Capture feedback from future projects and implement prior to project start up Add to existing Pile SWMS	
DIAGRAMS / PICTURES:		
REVIEWED BY: Brian Tuite	DATE OF REVIEW	16/11/2018

Photograph 37: Lessons Learnt information inside Site Office, shows continual improvement efforts



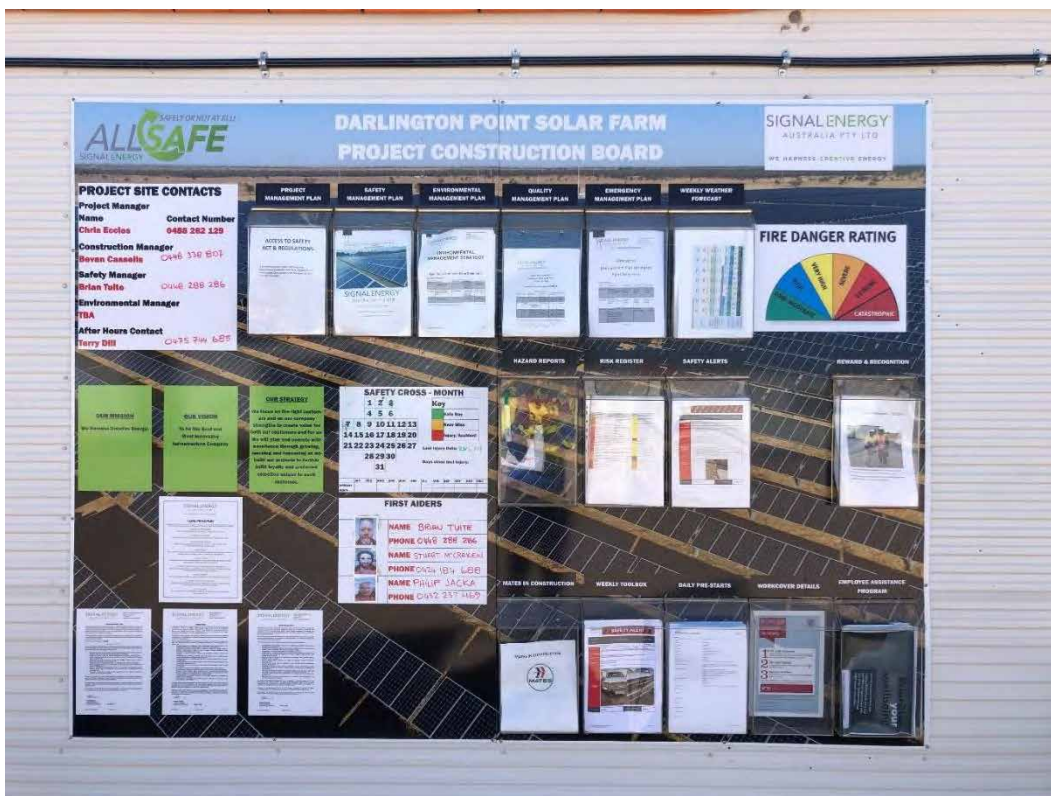
Photograph 38: Lighting on compound buildings, lights face inwards to communal seating area



Photograph 39: Lighting on toilets in compound, lights face inwards to communal seating area



Photograph 40: Local catering business operates food hut to provide food and beverages to site workers. Lighting on compound building, lights face inwards to communal seating area



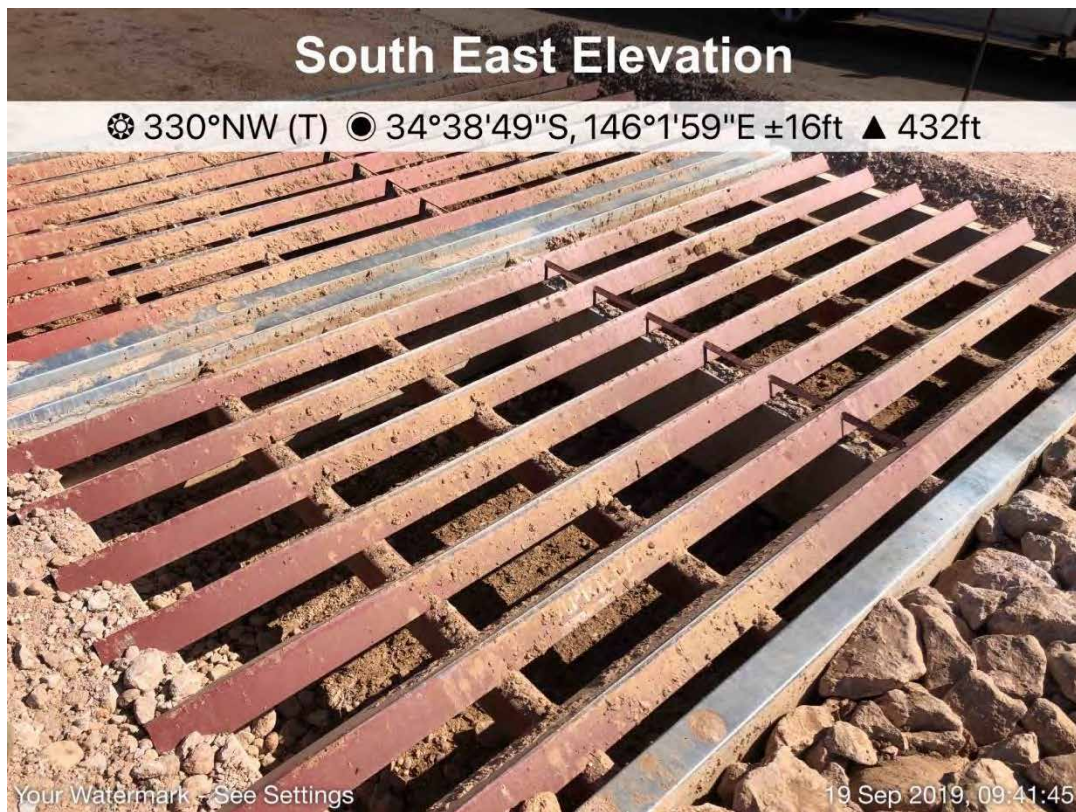
Photograph 41: Project Construction Board, located outside in communal seating area, includes copies of plans and other key information for easy access for site workers



Photograph 42: Front site entrance, inside site



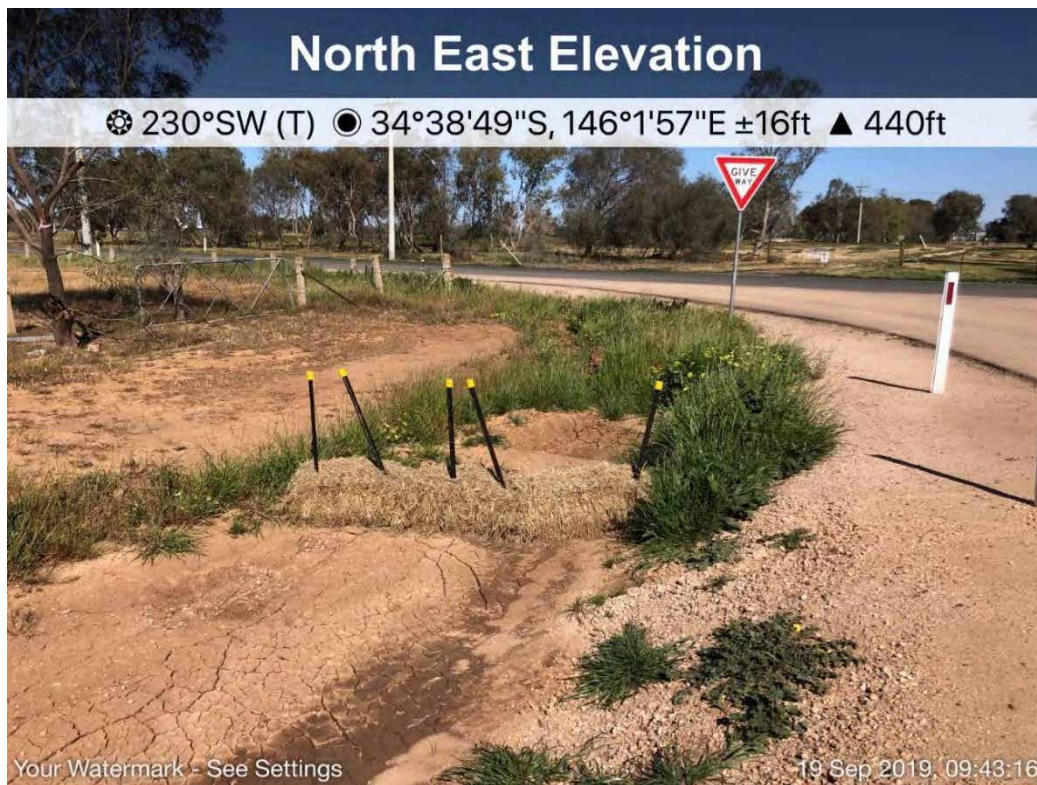
Photograph 43: Rumble pad and grid at front site entrance



Photograph 44: Cattle grid at front site entrance, collecting mud/dirt



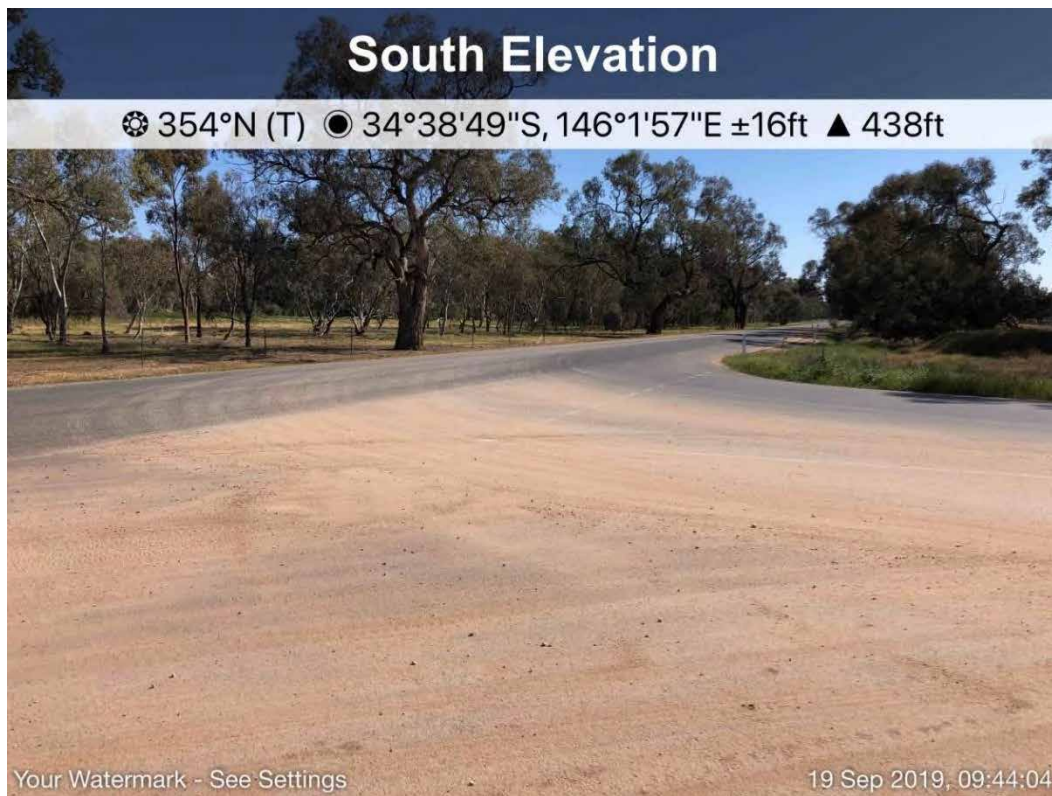
Photograph 45: Front Site entrance, drainage and vegetation



Photograph 46: Front Site entrance, drainage, ESC device and vegetation to filter runoff



Photograph 47: Southern drain at front entrance, ESC device and vegetation to filter runoff



Photograph 48: Front Site entrance at Donald Ross Drive, minimal tracking of dirt onto road



Photograph 49: Northern drain at front entrance, ESC devices and vegetation to filter runoff



Photograph 50: Northern drain at front entrance, ESC device recommended to remove or replace with rock filter, coir log or hay bale, adequate vegetation to filter runoff



Photograph 51: Northern drain at front entrance, view to front, ESC device recommended to remove or replace with rock filter, coir log or hay bale, adequate vegetation to filter runoff



Photograph 52: Security Office at Front Site Entrance, lighting installed. Note: 20,000L water supply tank to left of picture



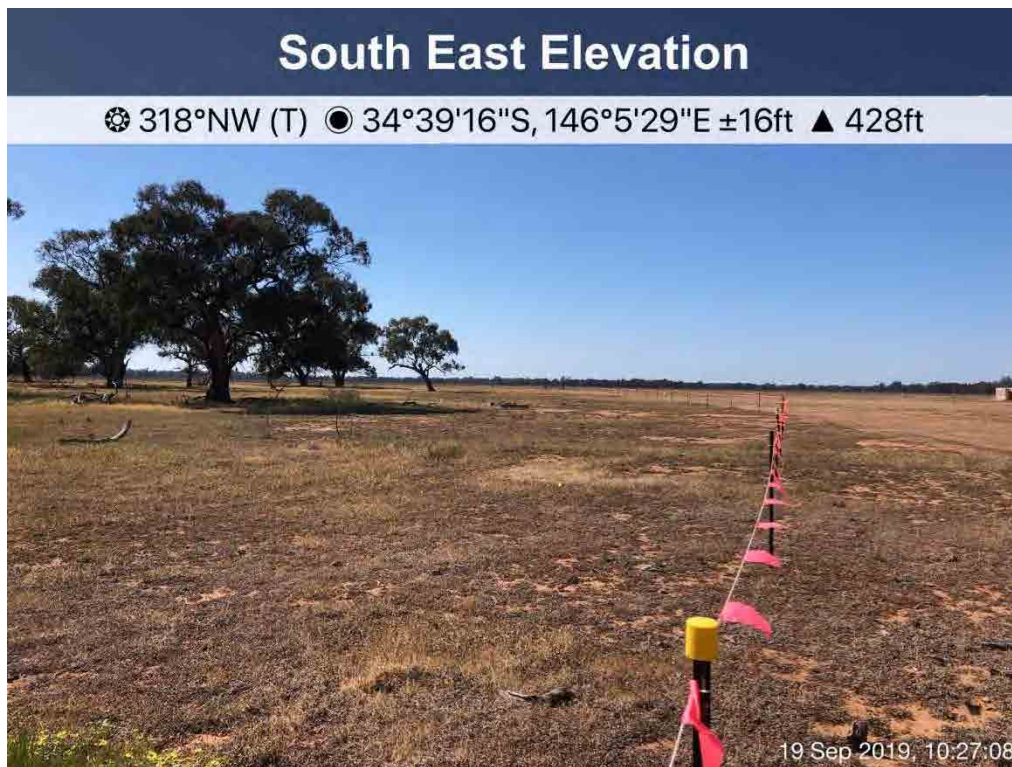
Photograph 53: Archaeological Site Location, not impacted by development, boundary fence has been kicked out to ensure adequate separation. Exclusion Zone now removed due to permanent fence installation



Photograph 54: Archaeological Site Location, not impacted by development. Exclusion Zone now removed due to permanent fence installation



Photograph 55: Vegetation Exclusion Zone (VEZ), flagging tape clearly delineates area



Photograph 56: Vegetation Exclusion Zone (VEZ), large separation from vegetation to flagging tape clearly delineating area



Photograph 57: Vegetation Exclusion Zone (VEZ), sample of ground cover species present, flagging tape clearly delineates area



Photograph 58: Sand stockpiles, possibly higher than 2m, not adequately protected with ESC devices



Photograph 59: Sand and topsoil stockpiles, not adequately protected with ESC devices



Photograph 60: Existing drainage channel has been maintained (not altered) to traverse under installed panels near to front of site, allows for natural drainage movements to prevail



Photograph 61: Existing drainage channel has been maintained (not altered), view to vegetated area offsite at front of site, allows for natural drainage movements to prevail



Photograph 62: Waste piles collated at point of install ('Golden Row'), to reduce movement of wastes



Photograph 63: Waste pile bound at point of install ('Golden Row'), to minimise loose waste movement



Photograph 64: Metal waste skip, located near to point of 'Golden Row' installation to reduce movement of wastes and increase compliance with waste separation



Photograph 65: ESC around large sand stockpile near front entrance satisfactory



Photograph 66: ESC around large sand stockpile near front entrance satisfactory, may need to cover if not utilised in near future

APPENDIX B: CORRESPONDENCE/CONSULTATION

The emails below illustrate the correspondence undertaken with key stakeholders to complete consultation prior to the audit site visits.

Correspondence between Echo Consultants and Department of Planning, Industry & Environment (DPI&E)

From: [Katrina O'Reilly](#)
To: [Claire Driessen](#)
Cc: [May Patterson](#)
Subject: Darlington Point Solar Audit
Date: Monday, 16 September 2019 6:39:39 PM

Claire,

Areas the Department would like to be considered include traffic mgt/movements, vegetation management/fencing etc, offsets, aboriginal/heritage site mgt, dust/erosion and sediment control, waste mgt, admin conditions such as having all plans/upgrades completed and/or approved prior to start date.

Please give me a call if you like further clarification.

Thanks and Regards

Katrina

0429400261

Get [Outlook for iOS](#)

From: [May Patterson](#)
To: [Claire Driessen](#)
Cc: [Katrina O'Reilly](#)
Subject: RE: Darlington Point Solar Farm - Independent Audit
Date: Friday, 6 September 2019 2:17:53 PM
Attachments: [image003.png](#)

Hi Claire,

Thank you for your email, I have referred your email to our Compliance team for further consideration. Please do not hesitate to contact me if you have any further enquiries.

Kind regards,

May Patterson
Team Leader

Planning and Assessment | Department of Planning, Industry and Environment
T 02 8275 1190 | E may.patterson@planning.nsw.gov.au
Level 30, 320 Pitt Street, Sydney NSW 2001
www.dpie.nsw.gov.au



**Planning,
Industry &
Environment**

The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: [Claire Driessen](#)
To: may.patterson@planning.nsw.gov.au
Subject: Darlington Point Solar Farm - Independent Audit
Date: Thursday, 5 September 2019 1:13:00 PM
Attachments: [image001.png](#)
[Compliance - Darlington Solar -DPE IEA auditor approval 27 aug 19.pdf](#)

Hi May,

I am undertaking an Independent Audit of the Darlington Point Solar Farm – SSD 8392 (please see attached letter of authority).

The audit is scheduled for Wednesday 18 – Thursday 19 September, so at this stage I am seeking input from DPI&E – Planning & Assessment; and Environment, Energy & Science (Biodiversity & Conservation) (formerly OEH) regarding the first 6 months of the construction phase of the project.

I understand DPI&E has reviewed/approved or provided input to the following project documents:

- Environmental Management Strategy
- Biodiversity Management Plan
- Chance Finds Protocol

Could you please advise if there are any outstanding matters relating to the project that would like to raise on behalf of DPI&E to be included in the audit scope? I'd be happy to discuss over the phone if preferred on the number below.

Kind regards,

Claire Driessen GradCertEnvMgt BScAusEnvst
Managing Director

0408 084 900

claire@echoconsultants.com.au



Echo Consultants Pty Ltd
PO Box 1024 Townsville Queensland 4810 Australia
<http://www.echoconsultants.com.au/>

Correspondence between Echo Consultants and Murrumbidgee Council

Note: No further correspondence or communication has occurred, therefore it was assumed there were no specific concerns or issues from Council.

From: [Claire Driessen](#)
To: [Heidi Bryce](#)
Subject: Re: Darlington Point Solar Farm - Independent Audit
Date: Wednesday, 18 September 2019 8:34:41 AM
Attachments: [Image001.png](#)

Hi Heidi,
Thanks for that. I haven't heard from Kelly yet. I'll be on site today and tomorrow.

Kind regards,
Claire

Claire Driessen

From: Heidi Bryce <heidib@murrumbidgee.nsw.gov.au>
Sent: Tuesday, September 17, 2019 3:47:47 PM
To: Claire Driessen <claire@echoconsultants.com.au>
Subject: RE: Darlington Point Solar Farm - Independent Audit

Hi Claire

I have forwarded your message on to Kelly, please let me know if you haven't received a reply and I can chase up for you.

Kind regards

Heidi Bryce
Technical Support, Planning & Environment



**Murrumbidgee
COUNCIL**

T 1300 MRMBGE (676243)

D 03 5886 1200

F 03 5886 1701

heidib@murrumbidgee.nsw.gov.au

35 Jerilderie St Jerilderie NSW 2716

PO Box 96 Jerilderie NSW 2716

I am available in the office Tuesday, Thursday and Friday. If your matter is urgent please forward to jerilderie@murrumbidgee.nsw.gov.au

PLEASE NOTE: Unless stated otherwise, this email, together with any attachments, is intended for the named recipient(s) only and may contain privileged and confidential information. If received in error, you are asked to inform the sender as quickly as possible and delete this email and any copies of this from your computer system. If you are not the intended recipient of this email, you must not copy, distribute or take any action that relies on it and any form of disclosure, modification, distribution and/or publication of this email is prohibited. We have taken precautions to minimise the risk of transmitting software viruses, but you are advised to carry out your own virus checks on any part of this message including any attachments. We cannot accept liability for any loss or damage caused by software viruses.

From: [Claire Driessen](#)
To: [Heidi Bryce](#)
Subject: RE: Darlington Point Solar Farm - Independent Audit
Date: Monday, 16 September 2019 10:17:00 AM
Attachments: [image001.png](#)

Good morning Heidi,

I'm just following up to check if Council has any specific items for me to include in the Independent Environmental Audit with site visits to commence at Darlington Point Solar Farm this Wednesday 18 September and conclude on Thursday 19 September? Would you please forward to Kelly Tyson if required?

Kind regards,

Claire Driessen
Managing Director

0408 084 900
claire@echoconsultants.com.au



Echo Consultants Pty Ltd
PO Box 1024 Townsville Queensland 4810 Australia
<http://www.echoconsultants.com.au/>

From: Heidi Bryce <heidib@murrumbidgee.nsw.gov.au>
Sent: Thursday, 5 September 2019 2:47 PM
To: Claire Driessen <claire@echoconsultants.com.au>
Subject: RE: Darlington Point Solar Farm - Independent Audit

Hi Claire

Thank you for your email, I will pass this onto my Manager, Kelly Tyson and we will endeavour to get back to you soon.

Regards

Heidi Bryce
Technical Support, Planning & Environment



Murrumbidgee
COUNCIL

T 1300 MRMBGE (676243)
D 03 5886 1200
F 03 5886 1701
heidib@murrumbidgee.nsw.gov.au
35 Jerilderie St Jerilderie NSW 2716
PO Box 96 Jerilderie NSW 2716

From: [Claire Driessen](mailto:Claire.Driessen@echoconsultants.com.au)
To: heidh@munimwides.nsw.gov.au
Subject: Darlington Point Solar Farm - Independent Audit
Date: Thursday, 5 September 2019 1:23:00 PM
Attachments: [image001.png](#)
[Compliance - Darlington Solar -DPE IEA auditor approval 27 aug 19.pdf](#)

Hi Heidi,

I am undertaking an Independent Audit of the Darlington Point Solar Farm – SSD 8392 (please see attached letter of authority).

The audit is scheduled for Wednesday 18 – Thursday 19 September, so at this stage I am seeking input from Council regarding the first 6 months of the construction phase of the project.

I understand Council has reviewed/approved or provided input to the following project documents:

- Traffic Management Plan
- Accommodation and Employment Strategy

I understand Council is also the "Principal Certifying Authority" and required evidence of all approved project management plans before issuing Signal Energy with a Construction Certificate.

Could you please advise if there are any outstanding matters relating to the project that would like to raise on behalf of Council to be included in the audit scope? I'd be happy to discuss over the phone if preferred on the number below.

Kind regards,

Claire Driessen GradCertEnvMgt BScAusEnvSt
Managing Director

0408 084 900

claire@echoconsultants.com.au



Echo Consultants Pty Ltd

PO Box 1024 Townsville Queensland 4810 Australia

<http://www.echoconsultants.com.au/>

Correspondence between Echo Consultants and Roads and Maritime Services (RMS)

Note: As per below email instruction to contact Maurice by phone, a phone call occurred on 17 September, 2019. During that discussion the RMS representative indicated there were no specific concerns, but requested an assessment of compliance with the Traffic Management Plan which was already included in the scope of this Audit.

From: [Maurice Morgan](#)
To: [Claire Driessen](#)
Subject: RE: Darlington Point Solar Farm - Independent Audit
Date: Monday, 16 September 2019 6:43:29 PM
Attachments: [image001.png](#)

Claire

Can you please call me tomorrow on the contact details below:

Thank you

Maurice Morgan
Manager Land Use
South West NSW | Regional and Outer Metropolitan Division

T: (02) 6923 6611
193 Morgan Street, Wagga Wagga NSW 2650

Every journey matters

From: Claire Driessen [mailto:claire@echoconsultants.com.au]
Sent: Monday, 16 September 2019 10:19 AM
To: Maurice Morgan
Subject: RE: Darlington Point Solar Farm - Independent Audit

Good morning Maurice,

I'm just following up to check if RMS has any specific items for me to include in the Independent Environmental Audit with site visits to commence at Darlington Point Solar Farm this Wednesday 18 September and conclude on Thursday 19 September?

Kind regards,

Claire Driessen
Managing Director
0408 084 900
claire@echoconsultants.com.au



Echo Consultants Pty Ltd
PO Box 1024 Townsville Queensland 4810 Australia
<http://www.echoconsultants.com.au/>

From: [Claire Driessen](#)
To: Maurice.morgan@rms.nsw.gov.au
Subject: Darlington Point Solar Farm - Independent Audit
Date: Thursday, 5 September 2019 1:23:00 PM
Attachments: [image001.png](#)
[Compliance - Darlington Solar -DPE IEA auditor approval 27 aug 19.pdf](#)

Hi Maurice,

I am undertaking an Independent Audit of the Darlington Point Solar Farm – SSD 8392 (please see attached letter of authority).

The audit is scheduled for Wednesday 18 – Thursday 19 September, so at this stage I am seeking input from RMS regarding the first 6 months of the construction phase of the project.

I understand RMS has reviewed/approved or provided input to the Traffic Management Plan.

Could you please advise if there are any outstanding matters relating to the project that would like to raise on behalf of RMS to be included in the audit scope? I'd be happy to discuss over the phone if preferred on the number below.

Kind regards,

Claire Driessen GradCertEnvMgt BScAusEnvSt
Managing Director

0408 084 900

claire@echoconsultants.com.au



Echo Consultants Pty Ltd

PO Box 1024 Townsville Queensland 4810 Australia

<http://www.echoconsultants.com.au/>

APPENDIX C: PLANNING SECRETARY APPROVAL OF LEAD AUDITOR

Contact: Katrina O'Reilly
Phone: 0429400261
Email: Katrina.oreilly@planning.nsw.gov.au

Mr Chris Stewart
SHEQ Manager
Level 24, Three International Towers
300 Barangaroo Avenue
Sydney NSW 2000

27 August 2019

Dear Chris,

**Darlington Point Solar Farm SSD 8392
Independent Environmental Audit**

I refer to letter dated 20 August 2019 seeking the Departments endorsement of the Independent Environmental Audit (IEA) audit team for Project Approval SSD 8392 (the Consent) for the Darlington Point Solar Farm.

Having considered the qualifications and experience of Echo Consultants, namely;

- Claire Driessen

the Secretary endorses the appointment of this team to undertake the audit in accordance with Condition 4 of Schedule 7 of the Consent. This approval is conditional on Ms Driessen being independent of the development.

The audit is to be conducted in accordance with the IAPAR. A copy of the requirements can be found at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>. Auditors may wish to have regard to AUS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems.

Within three months of commencing the audit Signal Energy is to submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Secretary, it is recommended that Signal Energy review the report to ensure it complies with the relevant consent condition.

Should you wish to discuss this matter please contact myself on the details above.

Yours sincerely



Katrina O'Reilly
Team Leader Compliance
as nominee for the Secretary

Department of Planning, Industry & Environment

L2, 84 Crown Street Wollongong NSW 2500 | PO Box 5475 Wollongong NSW 2520 | T 02 4224 9478 | F 02 4224 9470 | www.planning.nsw.gov.au

APPENDIX D: INDEPENDENT AUDIT DECLARATION FORM

Appendix C – Independent Audit Declaration Form Template

Independent Audit Declaration Form

Project Name Darlington Point Solar Farm

Consent Number SSD 8392

Description of Project Solar PV development covering ~710ha to supply up to 275MW via upgrade Transgrid Substation

Project Address Lot 160 Donald Ross Drive, Darlington Point, NSW 2706

Proponent Edify Energy Pty Ltd

Title of Audit Darlington Point Solar Farm Independent Audit

Date 2 November, 2019

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

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2018)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor Claire Driessen

Signature



Qualification GradCertEnvMgt, BScAusEnvSt, EnvAuditor Cert#276, Internal Auditor Cert#16149

Company Echo Consultants Pty Ltd

Company Address PO Box 1024, Townsville, Qld 4800