

SSD 9550 - Glenellen Solar Farm

Independent Environmental Audit

Prepared for GPG Pty Ltd

January 2025

SSD 9550 - Glenellen Solar Farm

Independent Environmental Audit

GPG Pty Ltd

E240844 RP1

January 2025

| Version | Date | Prepared by | Approved by | Comments |
|---------|-----------------|-------------|-------------|----------|
| 0.1 | 10 January 2025 | David Bone | David Bone | Draft |
| 1.0 | 24 January 2025 | David Bone | David Bone | Final |

Approved by



David Bone

Independent Auditor

January 2025

Level 3 175 Scott Street

Newcastle NSW 2300

ABN: 28 141 736 558

This report has been prepared in accordance with the brief provided by GPG Pty Ltd and has relied upon the information collected at the time and under the conditions specified in the report. All findings, conclusions or recommendations contained in the report are based on the aforementioned circumstances. The report is for the use of GPG Pty Ltd and no responsibility will be taken for its use by other parties. GPG Pty Ltd may, at its discretion, use the report to inform regulators and the public.

© Reproduction of this report for educational or other non-commercial purposes is authorised without prior written permission from EMM provided the source is fully acknowledged. Reproduction of this report for resale or other commercial purposes is prohibited without EMM's prior written permission.

Executive Summary

EMM Consulting Pty Limited (EMM) was engaged by GPG and The Trustee for the Glenellen Solar Farm Pty Ltd to conduct an independent environmental audit (IEA) of the Glenellen Solar Farm (the Project). This IEA was completed to fulfil the requirements of the Development Consent SSD-9550 Mod 1 issued 23 August 2024.

Condition C14 of Schedule 2 requires that an IEA be undertaken in accordance with the *Independent Audit Post Approval requirements (2020)*. Audit intervals for sites under construction must commence no later than 12 weeks from the date on which construction commenced or as otherwise agreed by the Secretary. This is the first construction audit for the site and commenced with a site inspection conducted on 22 October 2024. Construction commenced on 26 September 2024.

The objective of this audit was to assess compliance with the SSD-9550 approval in relation to construction of the Project. This audit period assessed compliance from approval of the project (Mod 1) on 23 August 2024 up to 22 October 2024.

The Project has commenced construction of the project with road intersection upgrades, clearing and site road construction underway.

Consultation and a desk top review followed by a site inspection on the 22 October 2024, information provided was reviewed and determined that the Project is considered generally compliant with the SSD-9550 conditions. Management and associated environmental programs in place were found to be adequate and implemented on site for the stage of the project at the time of the audit.

Two (2) non-compliances were identified in relation to signage and website information and two (2) recommendations were made relating to updates to the site induction and traffic management plan to make conditions clear to site staff.

All of the NCR's and recommendations were closed out by the proponent during the preparation of this report.

TABLE OF CONTENTS

| | |
|--|----------|
| Executive Summary | 2 |
| 1 Introduction | 1 |
| 1.1 Background | 1 |
| 1.2 Audit Team | 2 |
| 1.3 Audit objectives | 2 |
| 1.4 Audit scope | 2 |
| 1.5 Audit Period | 3 |
| 2 Audit methodology | 4 |
| 2.1 Compliance evaluation | 5 |
| 2.2 Site interviews | 5 |
| 2.3 Site inspections | 5 |
| 2.4 Consultation | 6 |
| 2.5 Compliance status descriptors | 7 |
| 3 Audit findings | 8 |
| 3.1 Approvals and documents audited. | 8 |
| 3.2 Compliance performance | 9 |
| 3.3 Summary of agency notices, orders, penalty notices or prosecutions | 9 |
| 3.4 Previous audit recommendations | 9 |
| 3.5 EMS, management plans and compliance documents | 9 |
| 3.6 Environmental performance | 9 |
| 3.6.1 Site boundaries and clearing | 9 |
| 3.6.2 Erosion and sediment controls | 12 |
| 3.6.3 Voluntary Planning Agreement | 12 |
| 3.6.4 Dust Management | 13 |
| 3.7 Consultation outcomes | 13 |
| 3.7.1 Water | 13 |
| 3.7.2 Heritage | 13 |
| 3.7.3 Traffic and access | 14 |
| 3.8 Complaints | 14 |
| 3.9 Environmental incidents | 14 |
| 3.10 Actual verses predicted environmental impacts. | 14 |
| 3.11 Site interviews | 15 |
| 3.12 Site Inspection | 15 |

| | | |
|----------|---|-----------|
| 3.13 | Previous Annual Review or Compliance Report recommendations | 15 |
| 3.14 | Key strengths | 16 |
| 4 | Non-conformance and Recommendations | 17 |
| 4.1 | Non-compliances | 17 |
| 4.2 | Recommendations | 17 |
| 5 | Conclusion | 18 |

Appendices

| | | |
|------------|--|-----|
| Appendix A | NSW Department of Planning and Environment Secretary's Endorsement | 19 |
| Appendix B | Consultation Register | B.1 |
| Appendix C | Site Photographs | C.1 |
| Appendix D | Independent Audit Compliance Table | D.1 |
| Appendix E | Audit Findings Register | E.1 |

Tables

| | | |
|-----------|---|-----|
| Table 1.1 | Management plans and monitoring programs required by SSD-9564 | 2 |
| Table B.1 | Agency and stakeholder consultation records | B.2 |

Photographs

| | | |
|----------------|---|----|
| Photograph 1.1 | Glenellen Solar Farm construction status 10 January 2025 (Google Maps 2025) | 3 |
| Photograph 3.1 | Newly installed boundary fencing | 10 |
| Photograph 3.2 | No go area flagging along riparian area | 10 |
| Photograph 3.3 | CMT temporary exclusion zone established following unexpected find | 11 |
| Photograph 3.4 | Typical erosion and sediment controls | 12 |
| Photograph 3.5 | Ortlipp Road access point | 12 |
| Photograph 3.6 | Water Cart in operation on active road construction area | 13 |

1 Introduction

1.1 Background

EMM Consulting Pty Limited (EMM) was engaged by GPG Pty Ltd to conduct an independent environmental audit of the operational Glenellen Solar Farm (the Project). The Project incorporates construction and operation of a solar farm and associated infrastructure. The Project operates under State Significant Development Consent (SSD-9550) which was originally granted approval by the Independent Planning Commission on 15 December 2023. The consent has been modified once and the current development consent is Mod 1 approved on 23 August 2024.

Condition C14 of Schedule 2 of SSD-9550 requires that an independent environmental audit (IEA) be undertaken within 12 weeks of the commencement of construction, in accordance with the IAPAR 2020. Ongoing construction phase audits will be undertaken within six months – unless otherwise agreed by the Secretary.

This IEA was completed within 12 weeks of commencement of construction. The Project was in the early stages of construction for the site, most of the work force not required at the time of the audit. The focus of this IEA is to ensure compliance through this phase of the project.

The Project is situated (Figure 1.1) located approximately two kilometres (km) north-east of Jindera, in the Greater Hume local government area (LGA). The project involves the construction of a solar farm with a generating capacity of approximately 200 megawatts (MW), along with the upgrading and decommissioning of infrastructure and equipment over time. The project would connect to the adjacent Transgrid substation.

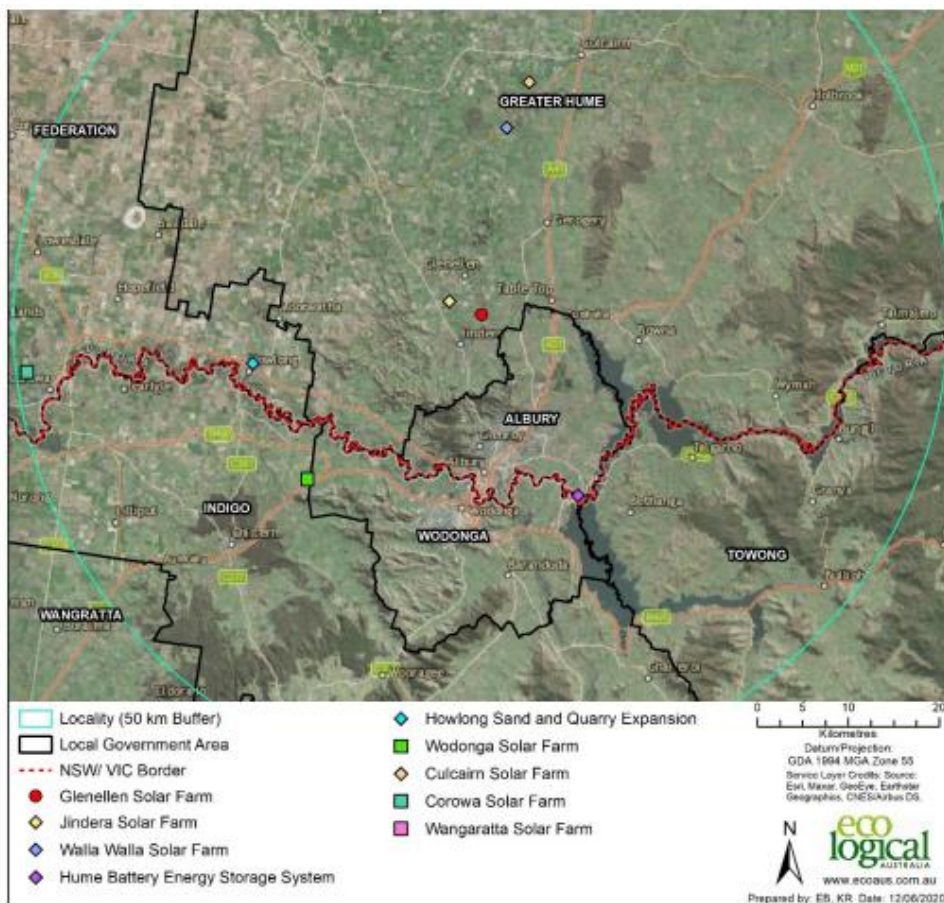


Figure 1.1 Project location

1.2 Audit Team

The audit was undertaken by the lead auditor Mr David Bone of EMM Consulting. NSW Department of Planning, Housing and Infrastructure Secretary's Endorsement letter from 2 September 2024 can be found in Appendix A.

1.3 Audit objectives

The key objective of the IEA is to determine the project's compliance with SSD-9550 conditions relevant to the pre-construction and construction phases of the Project. The independent audit requirements under SSD-9550 are detailed in the following subsections. The IEA also assesses the overall effectiveness of environmental management of the Project through the site-based component of the audit.

1.4 Audit scope

This audit considers the projects compliance with conditions of consent SSD-9550, targeting the pre-construction and construction phases of the Project. The specific conditions of consent which will be assessed as part of this audit are listed in Table 1.1 below.

Table 1.1 Management plans and monitoring programs required by SSD-9550

| Condition | Requirement |
|------------------|---|
| A2 – Schedule 2 | Glenellen Solar Farm EIS, including amending documents as listed in the definitions of SSD-9550 |
| A13 – Schedule 2 | Consultation |
| B9 – Schedule 2 | Traffic Management Plan |
| B12 – Schedule 2 | Landscaping Plan |
| B19 – Schedule 2 | Biodiversity Management Plan |
| B27 – Schedule 2 | Heritage Management Plan |
| B33 – Schedule 2 | Emergency Plan |
| B36 – Schedule 2 | Accommodation and Employment Strategy |
| C1 – Schedule 2 | Environmental Management Strategy |
| C2 – Schedule 2 | Update strategies, plans and programmes |
| C3 – Schedule 2 | |
| C19 – Schedule 2 | Access to Information |
| Appendix 5 | Road Upgrades and Site Access |

The audit also included a review of pre-construction and compliance documentation prepared to satisfy the conditions of consent including the implementation of the Environmental Management Strategy (and associated sub-plans).

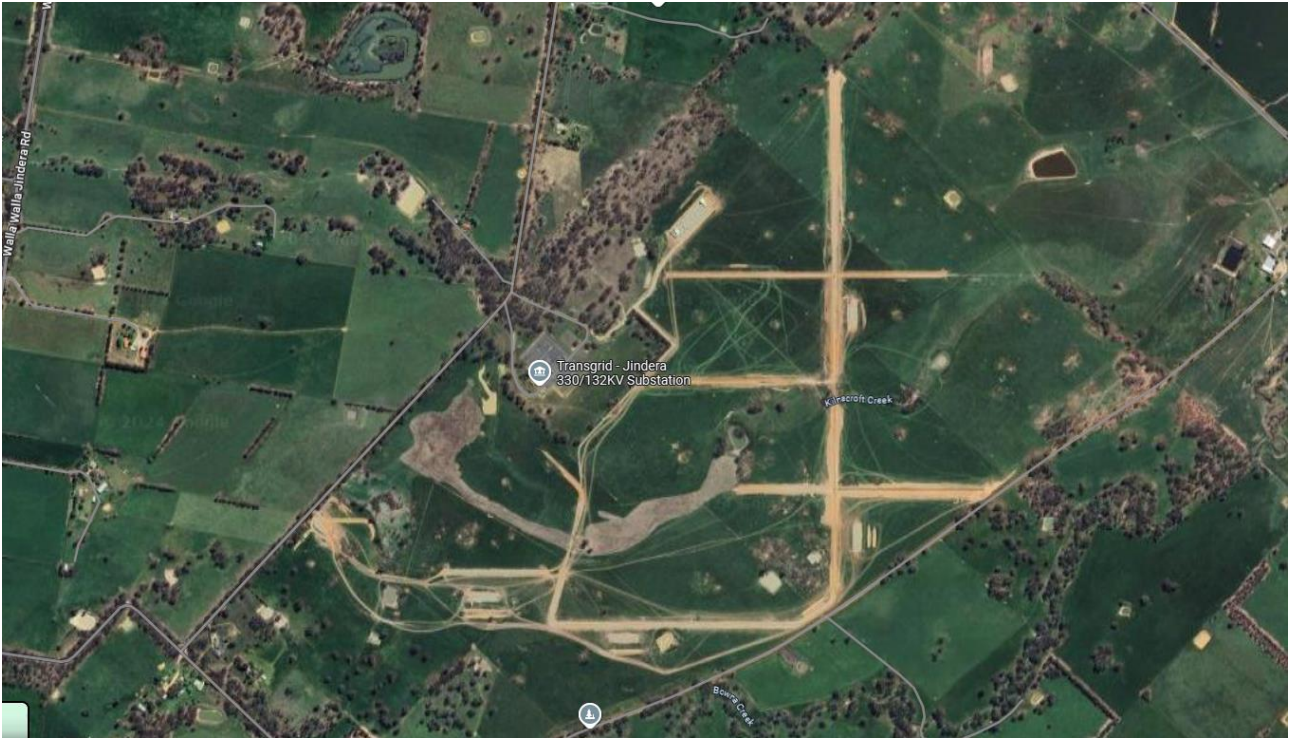
The audit evaluated the environmental performance of the project via assessment of:

- Actual impacts compared to predicted impacts documented.
- The physical extent of the project in comparison with the approved boundary.
- Incidents, non-compliances, and complaints that occurred or were made during the audit period.

- Through the consultation process determine if the project adequately addressed environmental concerns raised.
- Feedback received from the Department, other agencies, and stakeholders, including the community, on the environmental performance of the project during the audit period.

1.5 Audit Period

This IEA assessed the environmental performance and compliance status of the Glenellen Solar Farm during the construction phase between 26 September 2024 and 22 October 2024.



Photograph 1.1 Glenellen Solar Farm construction status 10 January 2025 (Google Maps 2025)

2 Audit methodology

The IEA process was undertaken in accordance with the requirements as set out by Section 3 of *Independent Audit Post Approval Requirements* (NSW Department of Planning, Industry and Environment (DPIE), 2020), and following the AS/NZS ISO 19011.2014 – Guidelines for Auditing Management Systems.

The audit scope was developed by the lead auditor, Mr. David Bone and included a review of the project approval and all documentation relevant to the operation of the Project. The scope and consultation requirements was supplied to DPHI for review on 25 October 2024 and the following scope and consultation requirements were provided:

Areas to be focused on include:

- Compliance with disturbance footprint, clearing limits and locations.
- Road maintenance and upgrades undertaken to the satisfaction of the roads authority (evidence of these being approved prior to construction commencing and heavy vehicle entering site).
- Evidence of vehicles using approved traffic route to and from site.
- Evidence of salvage and protection of aboriginal heritage items.
- Evidence of implementation, management and monitoring of erosion and sediment controls and preventing tracking of material off site.
- Evidence of VPA.
- Monitoring and recording of vehicle movements to and from site.
- Dust management.
- Evidence of Compliance with all commitments, monitoring and reporting requirement in all management plans.
- Complaints register evidence of the management, monitoring and responding to complaints.

Consultation with the following agencies:

- Local Aboriginal Land Councils
- Biodiversity Conservation Section (BCS)
- DCCEEW NSW Department of Climate Change, Energy, the Environment and Water
- Greater Hume Council
- NSW EPA
- Heritage NSW
- Fire and Rescue NSW
- Rural Fire Service

- TfNSW
- Water group within DCCEE

Consultation requests and responses can be found in Appendix B.

2.1 Compliance evaluation

The evaluation of compliance of the project was undertaken through several different means, including a desktop review of publicly available documentation, approved plans and monitoring records and a site inspection including site interviews. The site inspection was undertaken to ensure that compliance with approved plans is being implemented on the ground and that additional evidence is available to ensure ongoing compliance. Site interviews were used to assess that site personnel recognize what their role in relation to the compliance requirements.

2.2 Site interviews

Information was requested and reviewed prior to arriving on site; to ensure that auditor understood the key environmental elements of the Project before the site visit was undertaken.

Opening and closing meetings were conducted and interviews were also held on site as part of the audit and included the following staff:

- GPG HSE Manager – Daniel Cullen
- GPG Site HSE Manager – Sofia Rojas
- GPG Construction supervisor – Garry Rister
- GPG Site Manager – Thomas Doakes
- EPC Contractor supervisor – Monford Pty Ltd

Discussion points raised were:

- Project overview and update
- Monitoring results
- Site layout, and
- Complaints or incidents.

2.3 Site inspections

On the 22 October 2024 a site inspection of the Project, was undertaken. At the time of the site inspection the following activities had been completed or were active:

- road upgrades as required by Appendix 5 had been undertaken;
- temporary site access off Ortlipp Road was in place;
- clearing was nearing completion;
- internal fencing was nearing completion;

- Internal road network had commenced; and
- Site office and laydown area had been partially setup.

The construction work force was small and focussed on internal road construction. No solar panel installation, cabling or connections had commenced at the time of the site inspection. The auditor was always escorted by site representatives.

Those involved in the site inspection comprised of:

- GPG HSE Manager – Daniel Cullen
- GPG Site HSE Manager – Sofia Rojas
- GPG Site supervisor – Garry Rister

Appendix C includes photographs that were taken during the site inspection.

2.4 Consultation

Consultation with external stakeholders was undertaken as part of the audit. Matter raised included:

NSW DCCEEW – Water

- Preparation of management plans for water sources and dependent ecosystems
- Preparation and implementation of trigger action response plans
- Water supply availability is clearly defined
- Water take at the site is clearly documented
- Authorisation under the Water Management (General) Regulation 2018
- Water metering in accordance with the NSW Non-urban metering framework (where relevant)
- Water Access Licence(s) are used to account for water take and where water is being taken from
- Annual reporting

Biodiversity conservation services

- No comment received

Fire and Rescue NSW

- No comment received

Greater Hume Council

- No additional scope requirements

Heritage NSW

- No additional scope requirements (Heritage Management Plan requirements to be implemented)

NSW EPA

- No additional scope requirements

Transport for NSW

- review compliance with the approved TMP (v8) per Condition B9, Schedule 2 of Notice of Determination for SSD-9550 and the Planning Secretary approval for the Staging of the TMP.

All correspondence on the audit scope development can be found in Appendix B.

2.5 Compliance status descriptors

The audit has been undertaken in consideration of the following compliance status descriptors, in accordance with the requirements as set out by Section 3 of *Independent Audit Post Approval Requirements* (NSW Department of Planning, Industry and Environment (DPIE), 2020):

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

In addition to the compliance status descriptors, the auditor may make such observations and notes, including identifying any opportunities for improvement, as they see fit in relation to any compliance requirement or any other aspect of the project.

3 Audit findings

3.1 Approvals and documents audited.

The following documents were reviewed to assess compliance against relevant project approval conditions and the operational performance and effectiveness of environmental management measures implemented during the audit period:

- SSD-9550 Development Consent and the Conditions of Approval
- SSD 9550 PA 22 Auditor approval
- SSD 9550 Modification 1 and Modification 2
- Notification to DPHI prior to construction
- Site Induction
- VPA with Greater Hume Council
- Site management system data
- Traffic Management Plan V8, V9 (PDC Consultants)
- TMP staging approval (DPHI)
- Greater Hume Council correspondence
- Road Dilapidation report V1 (Maker Engineering)
- Vegetation and Landscaping plans
- Biodiversity Credit retirements (SSD 9550-PA17)
- Biodiversity Management Plan V5 (Eco Logical)
- BMP approval (SSD 9550 PA-3)
- Pre-clearing reports, post clearing reports
- Heritage Management Plan V08 (Past Traces)
- HMP approval and consultation on HMP
- Bushfire Management Plan Draft document
- Emergency Response Plan
- Waste dockets and reports
- Accommodation and Employment Strategy V4 (NGH)
- AES approval SSD9550 – PA 8

- Environmental Management Strategy V6 (Eco Logical)
- EMS approval SSD9550 PA-7
- Final layout plans September 2024, EOT SSD9550 PA 21
- Project website <https://glenellsolarfarm.globalpower-generation.com.au/>

3.2 Compliance performance

Compliance performance was addressed against:

- SSD-9550 Conditions of Approval

All conditions of approval have been given a compliance status as stated in Section 2.5 above. From the 142 conditions listed, 56 conditions were triggered with the remainder not triggered as they relate to other stages of the project.

During this audit period there were two non-compliances and, two recommendation made. These are detailed in Section 4.

3.3 Summary of agency notices, orders, penalty notices or prosecutions

There were no notices, orders, penalty notices or prosecutions related to the site during the audit period.

3.4 Previous audit recommendations

This is the first construction audit for the site, there are no previous audit recommendations in relation to the site.

3.5 EMS, management plans and compliance documents

The Environmental Management Strategy and sub plans have been developed in accordance with the conditions of consent. Compliance documentation has been established in the site management system and shows correct implementation in accordance with the EMS and sub plans. Many of the construction phase management plans contain monitoring requirements which were examined as part of this audit and as identified during consultation.

3.6 Environmental performance

The plans required for the project were prepared and approved prior to the commencement of construction of the project. The project was in compliance with most conditions that have been triggered at this phase of the project at the time of the audit.

Site personnel that were present on site were aware of the environmental requirements under the conditions of consent and how they related to their role on the project. Signage and fencing clearly delineated heritage areas and restricted access to contractors undertaking clearing and other construction activities. Regular environmental inspection reports are filed in the management system.

3.6.1 Site boundaries and clearing

The site inspection for the audit involved an inspection of all active works and the entire site perimeter. During this inspection it was noted that:

- The entire boundary of the site was clearly marked and securely fenced
- The disturbance footprint was clearly marked and site staff were aware of the areas flagged off.



Photograph 3.1 Newly installed boundary fencing



Photograph 3.2 No go area flagging along riparian area



Photograph 3.3 CMT temporary exclusion zone established following unexpected find

3.6.2 Erosion and sediment controls

The site is heavily grassed across the entire site, construction works in progress are largely controlled by existing dams on site. Riparian areas were noted to be protected by sediment fencing and access point construction was still underway at the time of the inspection.



Photograph 3.4 Typical erosion and sediment controls

No offsite tracking of materials was identified on Ortlipp Road away from the active construction area of the access road.



Photograph 3.5 Ortlipp Road access point

3.6.3 Voluntary Planning Agreement

The requirements of A14 and Appendix 3 in relation to the development contributions to be paid to Greater Hume Council have been agreed (25/7/24). The agreement is in place with the first instalment due after the commencement of operation. This had not been triggered at the time of the audit.

3.6.4 Dust Management

Dust levels were not noted as an issue during the site inspection. A water cart was in continuous operation on active internal roads at the time of the inspection suppressing any potential for dust generation.



Photograph 3.6 Water Cart in operation on active road construction area

3.7 Consultation outcomes

The requirements identified from consultation listed in Section 2.4 are discussed below.

3.7.1 Water

All required management plans have been approved for the project. No specific water management plan is required by SSD 9550.

Water in use for construction is currently sourced from a Greater Hume Council metered standpipe on the corner of Urana Road and Walla Walla Jindera Road. A water supply pipeline is currently being installed to extend an existing supply pipeline from the corner of Lindner Road along Ortlipp Road and into the site to provide construction water. Existing dams are being used to store water at the time of the audit.

Biodiversity management plan version 5 (Eco Logical Australia Pty Ltd) has a number of measures relating to flora and fauna management. None of these measures are directly related to GDE management, however riparian area measures are included and are being implemented.

3.7.2 Heritage

All Heritage management plans required for the project have been approved and are being implemented.

During site survey and pre-clearing processes (13/9/24 to 16/9/24) a number of additional sites were identified by registered stakeholders as unexpected finds. These sites were all Culturally Modified Trees (CMT) and have been recorded and registered (Past Traces report Aboriginal Heritage – Unexpected Finds Culturally Modified Trees V2 25 October 2024). A review of the design and design changes were made on 17/10/24 to realign access roads, solar panel arrays and cable trenching to completely avoid impact to these sites in consultation with a consulting arborist.

All sites have now been signposted protected by temporary measures. Permanent fencing to exclude construction, and stock in the long term, will also be erected as requested by the Aboriginal stakeholders.

3.7.3 Traffic and access

The TMP for the project was approved as a staged approval by DPHI on 16 June 2024 (SSD-9550-PA-12). The stages included in the approval were:

- Stage 1a: Road upgrades or maintenance works to public road network as outlined in the conditions of consent, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying;
- Stage 1b: commence construction of Solar farm;
- Stage 1c: Solar farm construction continuation, including movement of heavy vehicles requiring escort during construction as described in Condition B1 of Schedule 2 of Consent.
- Stage 2: Solar Farm Operation; and
- Stage 3: Solar Farm Decommissioning at end of life.

Stage 1c involves the movement of OSOM vehicles and this stage has not been approved at the time of the audit. Further consultation with Greater Hume Council and TfNSW will be required prior to approval of this stage of the plan.

It is noted that at the time of the audit, no equipment classified as OSOM was present of the site and only Stage 1a and 1b were active.

Road upgrades had not been finalised at the time of the audit with some outstanding matters to be resolved in relation to Walla Walla Jindera Road and Lindner Road upgrade failed pavements. A meeting was held following the audit on 6 November 2024 with Greater Hume Council and the site teams to rectify the issues raised. A program of actions was agreed and these actions are in progress.

An NCR (SSD-NCR#1) was raised against Condition B9 c ii in relation to signage directing vehicles to the site not being in place at the time of the audit. Signage has been confirmed to be in place as identified in the approved TMP since the site inspection.

A recommendation (SSD 9550 - REC#1) was also raised in relation to the TMP to include correct references to the signage locations in the document. This omission was partly the cause of the NCR#1 as the sign locations were not shown on the mapping and therefore were not installed until identified during the audit.

3.8 Complaints

The Project website provides both a phone number and an email to ensure that the public can make enquiries/complaints regarding the project. No complaints regarding the project are recorded in the register on the website.

The project team were aware of their requirement to document all complaints and record the actions taken to adequately address any issues that may arise.

3.9 Environmental incidents

No environmental incidents have been recorded at this stage of the project.

3.10 Actual verses predicted environmental impacts.

The following key environmental management areas were noted from the approval:

- Transport access upgrades and restrictions and OSOM deliveries (see section 3.7)

- Biodiversity impacts (see section 3.7)
- Heritage impacts (see section 3.7)
- Landscaping and visual impacts

The actual environmental impacts of the project were assessed against the predicted environmental impacts in the approval documents and found to be compliant in all respects examined in detail.

The current construction phase at the time of the audit does not require significant trucks movements. No OSOM vehicle deliveries are approved and none had been recorded or required at the site at the date of the audit.

The visibility of the project from neighbours on Lindner Road and Drumwood Road is covered by landscaping works required. These works had not commenced at the time of the audit and are proposed to be undertaken progressively once fencing is completed. These works are currently planned to commence in March 2025 when seasonal temperatures and rainfall is more conducive to planting and growth.

3.11 Site interviews

All site personnel were aware of their environmental requirements for their role. Personnel interviewed during the audit are detailed in Section 2.3.

3.12 Site Inspection

The site was under construction at the time of the site inspection. Construction facilities had been recently constructed with additional works required. All-weather site access roads and road upgrades had been completed and were well maintained at the time of the inspection.

Entry and exit points were established and signage was in the process of being installed to ensure the correct flow of traffic. No permanent structures had been erected at the time of the site inspection.

No visual tracking of dirt onto public roads was observed and sediment fencing had been installed where required.

Waste management and environmental compliance measures were being implemented on the site as required. All wastes were appropriately stored in bins or segregated stockpile areas awaiting pick up.

Heritage protection measures were in place as required and biodiversity surveys had been completed. Clearing was complete at the time of the inspection.

Water sources were being established and discussions and inspections were occurring with Emergency response providers to ensure adequate access and capacity was in place for firefighting. Consultation with RFS had been undertaken to ensure access to the various dams on the site is available, the auditor was advised that further meetings were planned with RFS and Fire and Rescue teams from the local area.

Vegetative screening of the project had not commenced at the time of the inspection. This is timed to commence in March 2025. Weed management was well managed with a local weeds specialist engaged to manage pasture weeds and control methods to suit the local weather and growing conditions.

3.13 Previous Annual Review or Compliance Report recommendations

No previous operational annual reviews, or compliance reporting recommendations have been made. The site commenced construction in September 2024.

3.14 Key strengths

The online management system used ensured that the site records were readily available upon request. The project team was well organised and were aware of their environmental requirements for their role.

The project team has a very good understanding of the requirements and ensured that the site was well prepared and managed.

4 Non-conformance and Recommendations

4.1 Non-compliances

Two non-compliant areas have been found during the audit.

SSD9550 NCR#1 – CoA B9 c ii - Signage as required by B9 c ii not installed to prevent usage of local roads as per Section 4.3 of the approved TMP.

Signage to be placed at locations identified in the TMP.

Signage was prepared and placed at the required locations in the TMP on 28/10/24.

SSD9550 NCR#2 – CoA C19 - The website is difficult to find and requires addition of all items contained in this condition.

Website updates required to comply with C19.

These updates were undertaken in mid January 2025.

4.2 Recommendations

The following recommendations were identified during the audit.

SSD9550 REC#1 – CoA B9 c ii - TMP Section 4.3 refers to Appendix D (Design drawings) for signage installations, the TMP does not contain signage location drawings. Hyperlinks in Section 4 do not link to sign locations.

The TMP should be revised to include the correct links to ensure that all signage required is in place.

The TMPV9 was updated in mid January 2025 for resubmission to DPHI.

SSD9550 REC#2 – CoA B20 - A separate slide in the site induction clearly noting the hours of work would enhance the induction.

Include a slide with B20 wording in the induction to reinforce the hour of work allowed.

A new induction slide was added to the induction in late January 2025.

5 Conclusion

EMM Consulting Pty Limited (EMM) was engaged by GPG to conduct an independent environmental audit (IEA) of the Glenellen Solar Farm (the Project). This IEA was completed to fulfil the requirements of the Development Consent SSD-9550 as modified issued 23 August 2024.

Condition C14 requires that an IEA be undertaken in accordance with the *Independent Audit Post Approval requirements* (DPE 2020), audit intervals for operational projects must be no greater than 12 weeks from the commencement of construction and then at 26 weeks intervals from the date of the initial Independent Audit or as otherwise agreed by the Secretary.

The objective of this audit was to assess compliance over the audit period 26 September to 22 October 2024.

The Project has commenced construction and has completed all required road upgrades. Some defects in upgrades are noted to be required by Greater Hume Council and a plan of actions has been prepared and discussed with Council.

Consultation was undertaken with several agencies for this audit by the auditor as noted in Section 2.4.

Non-conformances were identified with road signage and website content and accessibility as described in Section 4.1.

Recommendations related to TMP updates and induction content were also made to enhance the clarity of approval requirements.

The site was well maintained, site access roads were well maintained and clearly delineated, entry and exit points were in place and well maintained. No visual tracking of dirt on public roads was observed, exclusion fencing for heritage and biodiversity areas were in place and sediment controls were noted around the site.

Site personnel were organised and were able to provide compliance evidence upon request. The project team had a good understanding of their environmental requirements and the implementation on site.

The project was found to be generally compliant with conditions for this phase of the project. To ensure compliance with requirements of the consent, the next audit will be required by late April 2025 unless otherwise agreed with DPHI.

The auditor would like to thank GPG and Monford contractors for co-ordinating unfettered access to the site and for provision of all information upon request to finalise this audit.

Appendix A

NSW Department of Planning and Environment
Secretary's Endorsement

NSW Planning ref: SSD-9550-PA-22

Mr Juan Carlos Cobo Ledezma
Project Director
The Trustee for Glenellen Asset Trust
Suite A, Level 3, 73 Northbourne Avenue
Canberra Australian Capital Territory 2601
02/09/2024

Sent via the Major Projects Portal only

Subject: Glenellen Solar – Independent Environmental Audit team endorsement 1st IEA

Dear Mr Cobo Ledezma

Reference is made to your post approval matter, SSD-9550-PA-22, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person to conduct the first Independent Environmental Audit of the Glenellen Solar, submitted as required by Part C Condition C 14 of SSD-9550 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 26 August 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person is suitably qualified, experienced, and independent. In accordance with Part C Condition C14 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements (2020)*, as nominee of the Planning Secretary, I endorse Mr David Bone of EMM Consulting Pty Limited.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements (2020)*. Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

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

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly", enclosed in a thin black rectangular border.

Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

NSW Planning ref: SSD-9550-PA-25
Mr Juan Carlos Cobo Ledezma
Project Director
The Trustee for Glenellen Asset Trust
Suite A, Level 3, 73 Northbourne Avenue
Canberra Australian Capital Territory 2601
16/12/2024

Sent via the Major Projects Portal only

Subject: Glenellen Solar – Request for Extension in time to submit the Independent Environmental Audit # 1 Report and Response to Audit Recommendations

Dear Mr Cobo Ledezma

Reference is made to your post approval matter, SSD-9550-PA-25, requesting an extension of time to submit the Independent Environmental Audit (IEA) # 1 Report and Response to Audit Recommendations (RAR) for Glenellen Solar, submitted to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 13 December 2024.

The department notes the reasons for the extension request. In accordance with the Independent Audit Post Approval Requirements (IAPARS), I grant an extension in time to submit the IEA Report and RAR until 24 January 2025.

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

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Appendix B

Consultation Register

B.1 Consultation Register

Table B.1 Agency and stakeholder consultation records

| Agency/ Stakeholder | Date Sent | Comments |
|-------------------------------------|-----------|---|
| DPHI | 25/10/24 | <p>Request to consult with:</p> <p>NSW Planning requests the below agencies are consulted:</p> <p>Local Aboriginal Land Councils</p> <p>Biodiversity Conservation Section (BCS)</p> <p>DCCEEW NSW Department of Climate Change, Energy, the Environment and Water</p> <p>Greater Hume Council</p> <p>EPA</p> <p>Heritage NSW</p> <p>Fire and Rescue NSW</p> <p>Rural Fire Service</p> <p>TfNSW</p> <p>Water group within DCCEEW</p> <p>Areas of focus to be:</p> <p>Compliance with disturbance footprint, clearing limits and locations.</p> <p>Road maintenance and upgrades undertaken to the satisfaction of the roads authority (evidence of these being approved prior to construction commencing and heavy vehicle entering site).</p> <p>Evidence of vehicles using approved traffic route to and from site.</p> <p>Evidence of salvage and protection of aboriginal heritage items.</p> <p>Evidence of implementation, management and monitoring of erosion and sediment controls and preventing tracking of material off site.</p> <p>Evidence of VPA.</p> <p>Monitoring and recording of vehicle movements to and from site.</p> <p>Dust management.</p> <p>Evidence of Compliance with all commitments, monitoring and reporting requirement in all management plans.</p> <p>Complaints register evidence of the management, monitoring and responding to complaints.</p> |
| BCS | 14/11/24 | No reply |
| DCCEEW Water | 14/11/24 | <p>Request to include in the scope:</p> <p>Prepare and implement plans related to water sources and dependent ecosystems and users</p> <p>Trigger action response plans for water source impacts and annual reporting</p> <p>Water supply is clearly defined</p> <p>Water storage, diversion, interception or extraction is clearly documented and authorised.</p> <p>Water metering</p> |
| Fire and Rescue | 14/11/24 | No additional scope identified |
| Greater Hume Council | 14/11/24 | No additional scope identified |
| Heritage NSW | 14/11/24 | No additional scope identified. Noted additional unexpected finds and revised plan. |

Table B.1 **Agency and stakeholder consultation records**

| Agency/ Stakeholder | Date Sent | Comments |
|--|------------------|---|
| Heritage Consultant (Past Traces and RAP's) | 14/11/24 | No reply. Additional email correspondence on CMT management and protection measures from RAP's provided by GPG. |
| NSW EPA | 14/11/24 | No additional scope identified |
| TfNSW | 14/11/24 | No additional scope identified. TMP comments provided in relation to OSOM. |

David Bone

From: South West Planning Mailbox <planning.southwest@environment.nsw.gov.au>
Sent: Thursday, 14 November 2024 3:57 PM
To: David Bone
Subject: Automatic reply: SSD 9550 Glenellen Solar Farm Independent Audit Scope Consultation

CAUTION: This email originated outside of the Organisation.

Thank you for your email.

The South West Planning Team will review your request and we will be in touch if we need clarification.

We will endeavour to get back to you as soon as possible, but please be aware that we allow up to four weeks to respond to matters that do not have a statutory timeframe.

Regards

South West Planning Team

Biodiversity and Conservation Division

Department of Climate Change, Energy, the Environment and Water

planning.southwest@environment.nsw.gov.au



Our ref: OUT24/17919

David Bone
Level 3, 175 Scott St, Newcastle
NSW, Australia 2300

18 November 2024

Subject: Glenellen Solar Farm - SSD-9550 - Audit Consultation

Dear David,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
 - Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan.

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous year's, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEEW - Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,



Alistair Drew
Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

David Bone

From: Info <Info@fire.nsw.gov.au>
Sent: Thursday, 14 November 2024 5:59 PM
To: David Bone
Subject: Automatic reply: SSD 9550 Glenellen Solar Farm - Audit scope consultation

CAUTION: This email originated outside of the Organisation.

Thankyou for contacting Fire and Rescue NSW. If you wish to report an emergency please phone '000'.

This is a general enquiries email address and is not monitored 24 hours a day, however we will endeavour to respond to your email as soon as possible, and within 14 days.

For Fire safety information please visit www.fire.nsw.gov.au

To contact your local Fire and Rescue NSW Fire Station please visit www.fire.nsw.gov.au and click on the 'Contact Us' tab.

FRNSW CONFIDENTIALITY NOTICE AND DISCLAIMER

The information in this transmission may be confidential and/or protected by legal professional privilege, and is intended only for the person or persons to whom it is addressed. If you are not the intended recipient of this message you must not read, forward, print, copy, disclose, use or store in any way the information in this e-mail or any attachment it may contain. Please notify the sender immediately and delete or destroy all copies of this e-mail and any attachment it may contain.

Views expressed in the message are those of the individual sender, and are not necessarily the views of Fire and Rescue NSW (FRNSW). Use of electronic mail is subject to FRNSW policy and guidelines. FRNSW reserves the right to filter, inspect, copy, store and disclose the contents of electronic mail messages, as authorised by law.

This message has been scanned for viruses.

David Bone

From: Greg Blackie [REDACTED]
Sent: Friday, 15 November 2024 11:41 AM
To: David Bone
Subject: RE: SSD 9550 - Glenellen Solar Farm - Independent Audit

CAUTION: This email originated outside of the Organisation.

David

I have no additional questions to add to the audit

Regards

Greg

Greg Blackie
Director Engineering
Greater Hume Council
39 Young St
PO Box 99
Holbrook NSW 2644
[REDACTED]



www.greaterhume.nsw.gov.au

Disclaimer - This email and attached files may contain information that is confidential and/or subject to legal privilege. If you receive this e-mail and are not the intended addressee please delete and notify sender immediately. Views expressed in this message are those of the individual sender and not necessarily the views of Greater Hume Council.

From: David Bone [REDACTED]
Sent: Thursday, 14 November 2024 4:03 PM
To: Greg Blackie [REDACTED]
Subject: SSD 9550 - Glenellen Solar Farm - Independent Audit

Greg

I have been provided your name by the GPG project team. I am the DPHI approved independent auditor for the project and DPHI have requested consultation with council as part of the audit.

Please find attached a letter requesting your input into the audit. If there are any matters you wish included in the audit please advise in your reply.

As outlined in the letter, the audit will be covering all pre-construction and construction requirements.

If you have any questions or require further information please contact me.

Thanks

David Bone CENvP #137

Technical Leader – Environmental Management & Delivery
Associate Director



[LI Connect on LinkedIn](#)
emmconsulting.com.au

NEWCASTLE | Awabakal Country, Level 3, 175 Scott Street, Newcastle NSW 2300



[Please consider the environment before printing my email.](#)

This email and any files transmitted with it are confidential and are only to be read or used by the intended recipient as it may contain confidential information. Confidentiality or privilege is not waived or lost by erroneous transmission. If you have received this email in error, or are not the intended recipient, please notify the sender immediately and delete this email from your computer. You must not disclose, distribute, copy or use the information herein if you are not the intended recipient.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

Message protected by MailGuard: e-mail anti-virus, anti-spam and content filtering.

<https://www.mailguard.com.au/mg>

[Report this message as spam](#)

Our ref: DOC24/938416

David Bone

Associate Director

EMM Consulting

Independent Environmental Audit – State Significant Development

Proposal: Glenellen Solar Farm

Major Project reference: SSD-9550

Received: 14 November 2024

Dear David,

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for the above State Significant Development. Thank you for the continued opportunity to comment on the project.

In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes the Management and mitigation measures for Aboriginal Cultural Heritage detailed in Section 4 of the Glenellen Solar Farm Heritage Management Plan, prepared by Past Traces Heritage Consultants dated 26 February 2024 in accordance with Condition B27 of the Development Consent. Heritage NSW also notes the recent unexpected find of culturally modified trees reported to Heritage NSW in October 2024.

It is recommended that the Department of Climate Change, Energy, the Environment and Water Compliance Team be contacted via info@environment.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions regarding these comments, please contact Alison Lamond at Heritage NSW on 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely

Alison Lamond

Alison Lamond
A/ Strategic Manager
Major Projects
Heritage NSW

Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
3 December 2024

David Bone

From: Nick Van Lijf [REDACTED]
Sent: Wednesday, 27 November 2024 9:58 AM
To: David Bone
Cc: Jodie Williams
Subject: RE: SSD 9550 - Glenellen Solar Farm - Independent Audit

You don't often get email from nicholas.vanlijf@epa.nsw.gov.au. [Learn why this is important](#)

CAUTION: This email originated outside of the Organisation.

Hi David,

Thank you for your email.

We have reviewed your request for consultation and based on the information provided have no comments to provide at this stage.

If you have any further questions or concerns, please do not hesitate to contact me.

Kind regards,

Nick van Lijf
Unit Head
Regulatory Operations
NSW Environment Protection Authority
[REDACTED]
7/130-140 Banna Ave, GRIFFITH NSW 2680



www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the Traditional Custodians of the land, waters and sky where we work. As part of the world's oldest surviving cultures we pay our respect to Aboriginal Elders past and present.

I work on Wiradjuri Country.



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

From: David Bone [REDACTED]
Sent: Thursday, November 14, 2024 4:08 PM
To: Jodie Williams [REDACTED]
Subject: SSD 9550 - Glenellen Solar Farm - Independent Audit

Jodie

I have been provided your contact information for this project.

DPHI have approved me as the independent auditor for this project and have requested consultation with EPA on the audit scope.

Please find attached a letter requesting your input into the audit scope.

Should you have any questions please contact me.

Thanks

David Bone CENvP #137

Technical Leader – Environmental Management & Delivery
Associate Director



NEWCASTLE | Awabakal Country, Level 3, 175 Scott Street, Newcastle NSW 2300



[Please consider the environment before printing my email.](#)

This email and any files transmitted with it are confidential and are only to be read or used by the intended recipient as it may contain confidential information. Confidentiality or privilege is not waived or lost by erroneous transmission. If you have received this email in error, or are not the intended recipient, please notify the sender immediately and delete this email from your computer. You must not disclose, distribute, copy or use the information herein if you are not the intended recipient.

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately. Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Message protected by MailGuard: e-mail anti-virus, anti-spam and content filtering.
<https://www.mailguard.com.au/mg>

[Report this message as spam](#)

9 March 2024

TfNSW reference: WST24/00040/001 | SF2024/032456

Your reference: SSD-9550



Hayden Calvey
PDC Consultants
[REDACTED]

Review of Traffic Management Plan for Glenellen Solar Farm

Dear Hayden,

Reference is made to the Traffic Management Plan (TMP) submitted for Transport for NSW (TfNSW) consideration in accordance with consent Condition B9, Schedule 2 of Notice of Determination for SSD-9550 issued 15 December 2023.

TfNSW has reviewed the TMP prepared by PDC Consultants, dated 2 February 2024, and recommends the following amendments:

1. Details of OSOM vehicles required to access the site have not been provided. The TMP is required to be updated to include an assessment of the identified high risk OSOM routes to ensure that no further road upgrades are required to accommodate these movements. The assessment is required to provide and assess the following:
 - a) Identify and provide the following measurements parameters of the high risk OSOM components / materials to be moved:
 - Identify types and numbers of OSOM vehicles proposed to be used for the project.
 - Maximum combination load for the nominated vehicle, length, width, height and mass (including tare, payload, gcm and axle to weight ratio).
 - Maximum trailer articulation angle(s),
 - Minimum overhang heights above the road surface,
 - b) Details of the road geometry and alignment along the identified transport route/s, including existing formations, crossings, bridges, intersection treatments and any identified hazards, including:
 - Bridge Assessments for any at risk bridges on the classified road network due to dimensions and weight of OSOM vehicles.
 - Swept path analysis demonstrating the largest design vehicle can enter and leave the development, and simultaneously pass through intersections along the proposed transport route/s.

The design vehicle templates used in the swept path analysis software are also requested in order for TfNSW to review the performance within the software (e.g. Autodesk Vehicle Tracking or Transoft AutoTURN).

OFFICIAL

- Pinch points (corners, hairpin bends, underpasses, bridges)
- Road works (confirm with Program Delivery managers and Network Operations managers in Region for info)

If you have any questions, please contact Tim Mitchell on 1300 019 680 or email development.west@transport.nsw.gov.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Alexandra Power', written in a cursive style.

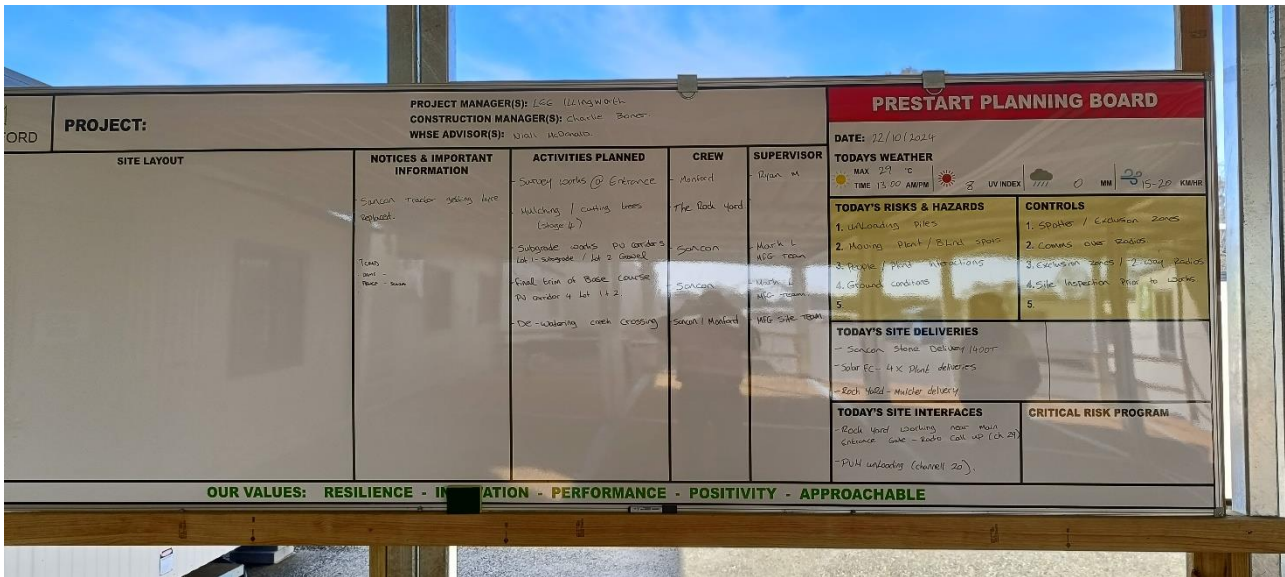
Alexandra Power

Team Leader Development Services - Renewables
Community and Place | Region West
Regional and Outer Metropolitan

Appendix C

Site Photographs

C.1 Site photographs – 22 October 2024



Photograph C.1 Pre-start site board



Photograph C.2 Typical road under construction



Photograph C.3 Site office and laydown area setup



Photograph C.4 Road Upgrade Example – Lindner Road – Walla Walla Road



Photograph C.5 Road Upgrade example Lindner Road – Ortlipp Road



Photograph C.6 Example of signage erected on 28/10/24 – Blight Road East – Gerogery Road

Appendix D

Independent Audit Compliance Table

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|---|----------------------------|---|---|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| SCHEDULE 1 Development Consent | | | | | |
| 1.1 | SSD 9550 Glenellen Solar Farm | | | | |
| SCHEDULE 2 Part A ADMINISTRATIVE CONDITIONS | | | | | |
| OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT | | | | | |
| A1 | 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. | Triggered | Completion of this compliance table | Completion of this compliance table | Compliant |
| TERMS OF CONSENT | | | | | |
| A2 | The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in APPENDIX 1. | Triggered | Mod 1 approved for 6 mth wait on B9 and B36 conditions Mod 2 submitted for new permanent road to sub station prior to audit 16/10/24. Not approved at time of audit. | The development was being carried out in accordance with these conditions at the time of the audit. | Compliant |
| A3 | The Applicant must comply with any requirement/s of the Planning 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. | Triggered | Noted | No directions received at the time of the audit | Compliant |
| A4 | The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict. | Triggered | Noted | No inconsistencies noted at the time of the audit. | Compliant |
| UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE | | | | | |
| A5 | 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 (including, but not limited to, the method of disposal for redundant solar panels) to the Planning Secretary incorporating the proposed upgrades. | Not Triggered | | No upgrades undertaken, no panels installed at the time of the audit. | Not Triggered |
| STRUCTURAL ADEQUACY | | | | | |
| A6 | 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 National Construction Code. | Not Triggered | | No new structures, alterations or additions constructed at the time of the audit. | Not Triggered |
| DEMOLITION | | | | | |
| A7 | The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version. | Not Triggered | | No demolition required at the time of the audit. Fencing has been removed across the site. | Not Triggered |
| NOTIFICATION OF DEPARTMENT | | | | | |
| A8 | Prior to commencing the construction, operation, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing of the date of commencement, or cessation, of the relevant phase. 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. | Triggered | Notification provided - 23/9/24 Construction commenced 26/9/24 | Construction notification 23/9/24 Construction commenced 26/9/24 | Compliant |
| PROTECTION OF PUBLIC INFRASTRUCTURE | | | | | |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|---|----------------------------|---|--|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| A9 | Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (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. | Triggered | Not required to date | No damage to public infrastructure identified at the time of the audit | Compliant |
| SUBDIVISION | | | | | |
| A10 | The Applicant may subdivide land comprising the site for the purposes of carrying out the development as identified in APPENDIX 4 and in accordance with the requirements of the EP&A Act, EP&A Regulation and the Conveyancing Act 1919 (NSW). | Triggered | Not required to date | No sub-division outside of approved areas required at the time of the audit | Compliant |
| APPLICABILITY OF GUIDELINES | | | | | |
| A11 | References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them. | Triggered | Noted | Noted and current guidelines in use at the time of the audit. Guidelines, policies and legislation monitored by corporate systems. | Compliant |
| COMPLIANCE | | | | | |
| A12 | The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development. | Triggered | Site Induction viewed | Induction process in place | Compliant |
| EVIDENCE OF CONSULTATION | | | | | |
| A13 | Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved. | Triggered | See approved documents | Plans approved and contain consultation evidence | Compliant |
| COMMUNITY ENHANCEMENT | | | | | |
| A14 | Prior to commencing construction, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with: (a) Division 7.1 of Part 7 of the EP&A Act; and (b) the terms of the letter of offer dated 26 March 2021, which are summarised in APPENDIX 3. | Triggered | VPA agreed 25/7/24 with Greater Hume Council | Agreement in place as required | Compliant |
| PART B - ENVIRONMENTAL CONDITIONS – GENERAL | | | | | |
| TRANSPORT | | | | | |
| Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions | | | | | |
| B1 | The Applicant must ensure that the: (a) development does not generate more than: (i) 45 heavy vehicle movements a day during construction, upgrading and decommissioning; and (ii) 11 movements of heavy vehicles requiring escort during construction, upgrading and decommissioning; and (b) length of any vehicles (excluding heavy vehicle requiring escort) used for the development does not exceed 26 metres, unless the Planning Secretary agrees otherwise. | Triggered | Daily site reports contain information on truck numbers, trucks have GPS fitted to allow tracking of routes. No escort vehicles required to date. | Vehicle movements comply with these requirements at the time of the audit. | Compliant |
| B2 | The Applicant must keep accurate records of the number of heavy vehicles and vehicles requiring escort entering or leaving the site each day for the duration of the project. | Triggered | Daily site reports contain information on truck numbers | Vehicle numbers tracked by onsite systems | Compliant |
| Access Route | | | | | |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|--|----------------------------|---|---|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| | | | | | |
| B3 | Unless otherwise agreed by the Planning Secretary, all heavy vehicles associated with the development (including heavy vehicles requiring escort) must travel to and from the site: (a) via Hume Highway, Thurgoona Drive, Union Road, Urana Road, Walla Walla Jindera Road, Lindner Road, and Ortlipp Road and the approved Main Access Point off Ortlipp Road, as identified in Figure 4; and / or (b) from the Ettamogah Rail Hub via Hub Road, Gerogery Road, Wagga Road, Catherine Crescent, Union Road, Urana Road, Walla Walla Jindera Road, Lindner Road, and Ortlipp Road, as identified in Figure 5. | Triggered | Induction slides | Induction contains this information. Code of conduct and access routes provided to delivery drivers | Compliant |
| B4 | All heavy vehicles and heavy vehicles requiring escort associated with the development: (a) Are prohibited from using Glenellen Road and Drumwood Road; and (b) are prohibited from moving through, and parking in, the township of Jindera (along Urana Road between Pioneer Drive and Walla Walla Jindera Road) during school zone times of 8am to 9.30am and 2.30pm to 4pm. | Not Triggered | | None to date of audit | Not Triggered |
| Site Access | | | | | |
| B5 | All vehicles associated with the development must enter and exit the site via the Main Access Point off Ortlipp Road, as identified in APPENDIX 1. | Triggered | Site Inspection Induction slides Traffic Management Plan Photos provided | No signage installed at the time of the audit. See NCR #1 Access road to site installed and intersection upgrades completed as required. Design refinement in progress to finalise pavement and connection to Ortlipp Road entrance. All vehicles noted to enter and exit via the main access point at the time of the audit. Limited site vehicles present at the time of the audit. Signage placed at entry on 28/10/24. | Compliant |
| Road Upgrades | | | | | |
| B6 | Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must complete the road upgrades detailed in APPENDIX 5. Unless the relevant road authority agrees otherwise, these upgrades must comply with the current Austroads Guidelines, Australian Standards and TfNSW supplements, and be carried out to the satisfaction of the relevant roads authority. | Triggered | Site Inspection Correspondence with council | Road upgrades complete and in use. Final assessment and signoff by council not completed at time of audit. | Compliant |
| Road Maintenance | | | | | |
| B7 | The Applicant must, in consultation with the relevant roads authority: (a) undertake an independent dilapidation survey to assess the: (i) existing condition of Ortlipp Road and Linder Road on the transport route, prior to construction, upgrading or decommissioning works; and (ii) condition of Ortlipp Road and Linder Road on the transport route, following construction, upgrading or decommissioning works; and (b) repair of roads identified in condition B7(a) if dilapidation surveys identify that the road has been damaged due to development-related traffic during construction, upgrading or decommissioning works. If there is a dispute between the Applicant and the relevant roads authority about road repairs required under this condition, then either party may refer the matter to the Planning Secretary for resolution. | Triggered | Dilapidation report 16/5/24 Maker Eng MKRV0065 V1 May 2024 | Report prepared and lodged as required | Compliant |
| Operating Conditions | | | | | |
| B8 | 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 public road network. | Triggered | Site Inspection Photos | Completed roads are all weather | Compliant |
| Traffic Management Plan | | | | | |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|--|----------------------------|--|---|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| | | | | | |
| B9 | <p>Prior to commencing road upgrades identified in condition B6, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include:</p> <ul style="list-style-type: none"> (a) details of the transport route to be used for all development-related traffic; (b) details of the road upgrade works required by condition B6; (c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: <ul style="list-style-type: none"> (i) details of the dilapidation surveys required by condition B7; (ii) temporary traffic controls, including detours and signage; (iii) scheduling the arrival and departure of heavy vehicles from the site to avoid the PM peak hour where practicable; (iv) notifying the local community about development-related traffic impacts; (v) procedures for receiving and addressing complaints from the community about development-related traffic; (vi) ensuring construction traffic complies with a 40 km/h speed limit along Ortlipp and Lindner Roads; (vii) minimising potential cumulative traffic impacts with other projects in the area; (viii) minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network, and avoiding the transport of material along the local bus routes when school buses are in operation, in consultation with local schools; | | <p>TMP V08 13/8/24 PDC Consultants 0888r01v08 13/8/24</p> <p>TMP V09 20/1/25</p> | <p>DPHI approval 21/8/24, consultation and further approval required prior to OSOM stage 1c, plan to be updated after consultation</p> <p>Jindera SF is adjacent and was not under construction at the time of the audit site inspection.</p> <p>NCR 1 - Signage as required by B9 c ii not installed to prevent usage of local roads as per Section 4.3 of the approved TMP. TMP Section 4.3 refers to Appendix D (Design drawings) which do not contain signage locations. Hyperlinks in Section 4 do not link to sign locations.</p> <p>REC-1 Update TMP to include links to the required signage locations.</p> <p><i>NOTE: NCR 1- Signage installed in accordance with approved TMP during the audit period on 28/10/24. REC-1 TMP updated for reissue to DPHI during the audit period V09</i></p> | Non-compliant |
| | <ul style="list-style-type: none"> (ix) details of how heavy vehicles and heavy vehicles requiring escort associated with the development will avoid moving through, and parking in, the township of Jindera during school zone times, as required by condition B4(b); (x) measures to minimise dirt tracked onto the public road network from development-related traffic; (xi) details of any employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; (xii) encouraging car-pooling or ride sharing by employees; (xiii) scheduling of haulage vehicle movements to minimise convoy length or platoons; (xiv) responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; (xv) responding to any emergency repair or maintenance requirements; and (xvi) a traffic management system for managing heavy vehicles requiring escort; <p>(d) a driver's code of conduct that addresses:</p> <ul style="list-style-type: none"> (i) driver fatigue; (ii) procedures to ensure that drivers adhere to the designated transport routes and speed limits; and (iii) procedures to ensure that drivers implement safe driving practices; and <p>(e) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan.</p> <p>Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.</p> | Triggered | <p>DPHI approval 21/8/24</p> <p>TMP staging approved 16/6/24</p> <p>Site photos</p> | <p>The TMP was being implemented on site at the time of the audit.</p> <p>Albury pick up point identified for later stages. Not required or in use at time of audit.</p> | Compliant |
| LANDSCAPING | | | | | |
| Vegetation Buffer | | | | | |
| B10 | <p>The Applicant must establish and maintain a vegetation buffer (landscape screening) as described in the EIS and at the locations identified in APPENDIX 6. The landscape screening must:</p> <ul style="list-style-type: none"> (a) be planted prior to commencing operation; (b) be comprised of species that are endemic to the area; (c) be designed and maintained in accordance with RFS's Planning for Bushfire Protection 2019 (or equivalent); and (d) be properly and actively maintained with appropriate weed management and replacement of failed plantings unless the Planning Secretary agrees otherwise. | Triggered | <p>Design drawings</p> <p>Correspondence on planting</p> | <p>Planned to occur in March 2025 depending on seasonal conditions.</p> <p>RAP's recommendations for planting incorporated into designs in particular in relation to CMT screening.</p> | Compliant |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|--|----------------------------|---|--|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| | | | | | |
| B11 | The Applicant must take all reasonable steps to provide additional vegetation screening or scattered trees at residences (receivers LIN001, 004, 005, 007, DRM008, NIK003 and MLA01), in consultation with the landowners, to ensure that views of the development are screened. | Triggered | Design drawings Correspondence on planting | Planned to occur in March 2025 depending on seasonal conditions. Consultation has been undertaken with landholders, on locations | Compliant |
| Landscape plan | | | | | |
| B12 | Prior to the issue of any construction certificate, the Applicant must prepare a detailed Landscape Plan. This plan must: (a) be prepared to a minimum scale of 1:1000; (b) describe measures including: (i) width of planting; (ii) density of plantings; (iii) timing of planting, considering appropriate seasonal windows to maximise success; and (iv) maintenance and monitoring requirements, including monthly monitoring for the first 12 months and replacement of mortalities for the first 5 years; and (b) provide details of the landscape screening required by condition B10 and B11, including: (i) how the Applicant will provide targeted landscape screening on the Site and at residences in consultation with adjacent landowners; and (ii) demonstrating that the landscape screening is of a width and depth sufficient to screen the views of the development from adjacent properties and roads; and (c) provide details of how any hollow-bearing trees proposed to be removed may be reasonably and feasibly reincorporated on the Site. The Applicant must implement the Landscape Plan. | Triggered | Correspondence Landscape Plan | Plan prepared and approved as part of other conditions. CC not approved to date Certifier has provided a checklist of items required. No construction related to these items has commenced. | Compliant |
| LAND MANAGEMENT | | | | | |
| B13 | The Applicant must maintain the agricultural land capability of the site, including: (a) establishing the ground cover of the site within 3 months following completion of any construction or upgrading; (b) properly maintaining the ground cover with appropriate perennial species and weed management; and (c) maintaining grazing within the Development Footprint, where practicable, unless the Planning Secretary agrees otherwise. | Triggered | Correspondence Reports from site inspections | Agronomist engaged and grazing management plan in preparation. No construction completed to date. | Compliant |
| B14 | The Applicant must maintain the site fencing to ensure the fencing remains stock proof. | Triggered | Site Inspection | Fencing in place as required | Compliant |
| BIODIVERSITY | | | | | |
| Vegetation Clearance | | | | | |
| B15 | The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS. | Triggered | Site Inspection | All clearing within approved footprints at the time of the audit | Compliant |
| B16 | The Applicant must make all reasonable efforts to replace the removed paddock trees with the same number of trees of a similar species on the site. These replacement trees are to be planted within the area of the site identified for riparian planting and/or within the vegetation buffer. | Triggered | Landscape Plan | Planting requirements contained in landscape mgt plan. No planting complete at the time of the audit. | Compliant |
| Biodiversity Offsets | | | | | |
| B17 | Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below. The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by: (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; and/or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. | Triggered | PA 17 15/8/24, credit retirement from DPHI. | Credits retired as required. | Compliant |
| B18 | Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must provide evidence to the Planning Secretary that biodiversity credits have been retired. | Triggered | PA 17 15/8/24, credit retirement from DPHI. | Evidence provided to DPHI as required | Compliant |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|--|----------------------------|---|---|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| Biodiversity Management Plan | | | | | |
| B19 | <p>Prior to carrying out any development that could directly or indirectly impact biodiversity values, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared in accordance with the Biodiversity Development Assessment Report dated 7 August 2023, including incorporation of the measures described in the Roadside Tree Assessment (ArborViews, 2023);</p> <p>(b) include a description of the measures and timeframes that would be implemented for:</p> <p>(i) protecting vegetation and fauna habitat outside the approved disturbance areas;</p> <p>(ii) managing and enhancing the remnant vegetation and fauna habitat on site;</p> <p>(iii) avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna;</p> <p>(iv) minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development;</p> <p>(v) minimising the impacts to fauna on site and implementing fauna management protocols;</p> <p>(vi) rehabilitating and revegetating temporary disturbance areas with native species that are appropriate to the site's ecology and conditions;</p> <p>(vii) 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</p> <p>(viii) controlling weeds, feral pests and pathogens;</p> | Triggered | <p>BMP Approved PA 3 22/8/24 Ecological Australia V5 19/8/24</p> <p>Union Fenosa website link exists to site and has documents required</p> | <p>Plan approved as required. Works undertaken up to the time of the audit have been in accordance with this plan and requirements of this condition.</p> | Compliant |
| | <p>(c) include a program to monitor and report on the effectiveness of mitigation measures;</p> <p>(d) include an incidental threatened species finds protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered on site; and</p> <p>(e) include details of who would be responsible for monitoring, reviewing and implementing the plan.</p> <p>Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> | | <p>Pre-clearing reports Post clearing report for areas cleared to date contains all information required in mgt plan</p> | <p>Monitoring of clearing provided in accordance with the requirements of the approved plan.</p> | Compliant |
| AMENITY | | | | | |
| Construction, Upgrading and Decommissioning Hours | | | | | |
| B20 | <p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <p>(a) 7 am to 6 pm Monday to Friday;</p> <p>(b) 8 am to 1 pm Saturdays; and</p> <p>(c) at no time on Sundays and NSW public holidays.</p> <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary:</p> <p>the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; and emergency work to avoid the loss of life, property and/or material harm to the environment.</p> | Triggered | <p>Site notice board Induction Site mgt system</p> | <p>Site induction covers these requirements.</p> <p>REC#2 - A separate slide clearly noting this condition would enhance the induction.</p> <p><i>NOTE: REC2 - The induction was updated to include these requirements during the audit period 17/1/25</i></p> | Compliant |
| Variation of Construction Hours | | | | | |
| B21 | <p>The hours of construction activities specified in condition B20 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be:</p> <p>(a) considered on a case-by-case or activity-specific basis;</p> <p>(b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours;</p> <p>(c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Council (and other relevant agencies) has been or will be undertaken;</p> <p>(d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and</p> <p>(e) accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009), or latest version.</p> | Not Triggered | No variation approved to date | | Not Triggered |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|---|----------------------------|---|--|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| Noise | | | | | |
| B22 | The Applicant must: (a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009) or its latest version; and (b) ensure that the noise generated by the operation of the development during the night does not exceed 35 dB(A) LAeq, 15min to be determined in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence. | Triggered | Site under construction at the time of the audit. | No noise complaints received at the time of the audit. No operations to date. A Noise management plan is in preparation to guide the requirements of this condition. | Compliant |
| Dust | | | | | |
| B23 | The Applicant must ensure all activities occurring at the Site are carried out in a manner that minimises dust including the emission of wind-blown or traffic generated dust. | Triggered | Site Inspection Photos | Water carts on site and active during site inspection A water pipeline is under installation to deliver water to site with a holding dam under construction. | Compliant |
| Visual | | | | | |
| B24 | The Applicant must: (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes. | Triggered | Site Inspection | No structures built at the time of the audit, no panel installation undertaken at the time of the audit. No advertising sign age was erected at the time of the audit. | Compliant |
| Lighting | | | | | |
| B25 | The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: (i) is installed as low intensity lighting (except where required for safety or emergency purposes); (ii) does not shine above the horizontal; and (iii) complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting, or the latest version. | Triggered | Site Inspection | No lighting installed for the development at the time of the audit. Temporary security lighting in place on site sheds | Compliant |
| HERITAGE | | | | | |
| Protection of Heritage Items | | | | | |
| B26 | The Applicant must ensure the development does not cause any direct or indirect impacts on heritage items located outside the approved Development footprint. | Triggered | Site Inspection | No works outside footprint to date | Compliant |
| Heritage Management Plan | | | | | |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|---|----------------------------|--|---|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| B27 | <p>Prior to carrying out any construction, the Applicant must prepare a Heritage Management Plan for the development and submit it to the Planning Secretary for approval. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary; (b) be prepared in consultation with Heritage NSW and Registered Aboriginal Parties; (c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> (i) protecting the heritage items located outside the approved Development footprint; (ii) salvaging and relocating the heritage items located within the approved Development footprint, as identified in Table 1 of APPENDIX 7; (iii) a contingency plan and reporting procedure if: <ul style="list-style-type: none"> • previously unidentified heritage items are found; or • Aboriginal skeletal material is discovered; (iv) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and (v) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and (d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. | Triggered | <p>HMP - Past Traces v08 15/7/24 DPHI approval 6/8/24. Consultation with NSW Heritage, Past Traces and RAP's</p> | <p>Plan approved as required and being implemented on site.</p> <p>Additional items identified, plan update will be required to be undertaken as a result of this. Aboriginal stakeholders have been consulted and are heavily involved in the mitigation measures for the additional items identified as well as landscaping of riparian and screening vegetation. No issues were raised during consultation with the Archeologist or stakeholders.</p> | Compliant |
| SOIL & WATER | | | | | |
| Water Supply | | | | | |
| B28 | The Applicant must ensure that it has sufficient water for all stages of the development, including volumes required for dust suppression and the maintenance of landscape screening for the life of the development. | Triggered | Site Inspection | Pipeline for incoming water in place for construction. | Compliant |
| Water Pollution | | | | | |
| B29 | The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act. | Triggered | Noted | No water pollution issues noted during site inspection | Compliant |
| Operating Conditions | | | | | |
| B30 | <p>The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise any soil erosion and control sediment generation; (b) ensure that construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual and the Managing Urban Stormwater: Soils and construction - Volume 2A manual (Landcom, 2008), or their latest versions; (c) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to reduce impacts on localised flooding and groundwater at the site; (d) ensure the solar panels do not cause any increased water being diverted off the site or alter hydrology off site; (e) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and (f) ensure all works within waterfront land is undertaken in accordance with Guidelines for Controlled Activities on Waterfront Land (DPE, 2022), unless the Water Group agrees otherwise. | Not Triggered | Not in operation | | Not Triggered |
| HAZARDS | | | | | |
| Storage and Handling of Dangerous Goods | | | | | |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|---|----------------------------|--|---|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| | | | | | |
| B31 | The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency. | Triggered | Ste Inspection Site photos | Minor amounts of paint etc. Fuel storage area identified and under bunding construction | Compliant |
| Operating Conditions | | | | | |
| B32 | The Applicant must: (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; (b) ensure that the development: (i) complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; and (ii) is suitably equipped to respond to any fires on site, including provision of four 10,000 litre water supply tanks fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection; (iii) includes a 10 metre defendable space around the perimeter that permits unobstructed vehicle access; and (iv) manages the defendable space and solar array areas as an Asset Protection Zone; and (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 commencing operations. | Triggered | Bushfire mgt plan draft | Bushfire mgt plan in prep 4 x tanks 45,000L with fittings as required awaiting installation and connections. | Compliant |
| Emergency Plan | | | | | |
| B33 | Prior to commencing construction of the solar farm, the Applicant must develop and implement a comprehensive Emergency Plan and detail emergency procedures for the development, and provide a copy of the plan to the local Fire Control Centre and FRNSW. The plan must: (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent); (b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; (c) include availability of fire suppression equipment, access and water; (d) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency; (e) include fire and bushfire emergency management planning, including: (i) details of the location, management and maintenance of the Asset Protection Zone; (ii) a list of works that must not be carried out during a total fire ban; and (iii) details of how RFS would be notified, and procedures that would be implemented, in the event that: • there is a fire on-site or in the vicinity of the site; • there are any activities on site that would have the potential to ignite surrounding vegetation; or • there are any proposed activities to be carried out during a bushfire danger period; (f) detail specific response measures in the case of flood to ensure site safety; (g) describe the specific emergency exit routes to be used in the case of flood and include evidence of access agreements with relevant landowners (e.g. right of carriageway); and | Triggered | Emergency Response Plan | Emergency response plan developed and implemented. Plan provided to FRNSW Ongoing FRNSW consultation on details of access and arrangements Information package, site visit planned for October 2024 to finalise package information required by FRNSW. | Compliant |
| B34 | The Applicant must: (a) implement the Emergency Plan and Emergency Services Information Package required under condition B33 for the duration of the development; and (b) keep two copies of the Emergency Plan and Emergency Services Information Package on-site in a prominent position adjacent to the site entry points at all times. | Triggered | Emergency Response Plan Site Inspection | Plan easily located in site offices | Compliant |
| WASTE | | | | | |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|---|----------------------------|--|---|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| | | | | | |
| B35 | The Applicant must: (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version); (c) store and handle all waste on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal (in consultation with Council for use of Council facilities). | Triggered | Waste reports on mgt system Waste dockets | Wastes tracked in monthly report. No export of soil to date. Quarry products imported only. As this is an Agri solar project has limited cut to fill. | Compliant |
| ACCOMMODATION AND EMPLOYMENT STRATEGY | | | | | |
| B36 | Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development. This strategy must: (a) be prepared in consultation with Council and informed by consultation with local accommodation and employment service providers; (b) propose measures to ensure there is sufficient accommodation for the workforce associated with the development; (c) consider the cumulative impacts associated with other State significant development projects in the area; (d) investigate options for prioritising the employment of local workers and use of local businesses during construction and operation of the development, where feasible; (e) give consideration to strategies that leave a positive community legacy and maximise local economic contribution; and (f) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction upgrading and decommissioning. The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary prior to commencement of construction and implement the plan throughout construction. | Triggered | NGH AES Final Draft V4 - 16/2/24 DPHI PA-8 16/2/24 - AES submission | AES prepared in consultation with Council plan on website AES sent to DPHI PA-8 16/2/24 prior to construction Stage of work does not require employees outside of local area workers, contractors on site are all local at this stage of work. | Compliant |
| DECOMMISSIONING AND REHABILITATION | | | | | |
| B37 | Within 3 years of the commencement of operation, the Applicant must prepare a Decommissioning and Rehabilitation Plan for the development which shall be updated by the Applicant half-way through the operational life of the project, and within 2 years prior to decommissioning. The Plan must: (a) include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Table 3 below; and (b) describe the measures that would be implemented to: (i) decommission the development and rehabilitate the site in accordance with the objectives in Table 3; (ii) minimise and manage the waste generated by the decommissioning of the development; (iii) include a program to monitor and report on the implementation of these measures against the detailed completion criteria; and (iv) ensure that best practice is employed in respect of utilising available recycling technologies. | Not Triggered | | Not operational at the time of the audit | Not Triggered |
| B38 | Within 18 months following the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3. | Not Triggered | | Not operational at the time of the audit | Not Triggered |
| PART CENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING | | | | | |
| ENVIRONMENTAL MANAGEMENT | | | | | |
| Environmental Management Strategy | | | | | |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|---|----------------------------|--|---|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| | | | | | |
| C1 | <p>Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <ul style="list-style-type: none"> (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; and (v) respond to emergencies; and (e) include: <ul style="list-style-type: none"> (i) references to any strategies, plans and programs approved under the conditions of this consent; and (ii) a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p> | Triggered | <p>EMS Eco Logical Australia V6 23/8/24 EMS prepared and approved PA 7 26/8/24</p> | <p>EMS prepared, approved and implemented on site. EMS contains all elements of the condition and examples of implementation include: - Statutory approvals identified and available in site offices - Complaints logged and responded to as required</p> | Compliant |
| Revision of Strategies, Plans and Programs | | | | | |
| C2 | <p>The Applicant must:</p> <ul style="list-style-type: none"> (a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and (b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the: <ul style="list-style-type: none"> (i) submission of an incident report under condition C10 of SCHEDULE 2; (ii) submission of an audit report under condition C14 of SCHEDULE 2; or (iii) any modification to the conditions of this consent. | Not Triggered | | No updates required at the time of the audit | Not Triggered |
| Updating and Staging of Strategies, Plans or Programs | | | | | |
| C3 | <p>With the approval of the Planning Secretary, the development may be staged and the Applicant may:</p> <ul style="list-style-type: none"> (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). | Not Triggered | | No updates required at the time of the audit | Not Triggered |
| C4 | If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent. | Not Triggered | | No updates required at the time of the audit | Not Triggered |
| C5 | If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program. | Not Triggered | | No updates required at the time of the audit | Not Triggered |
| C6 | If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage. | Not Triggered | | No updates or requests received or required at the time of the audit | Not Triggered |
| NOTIFICATIONS | | | | | |
| Notification of Department | | | | | |
| C7 | Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. | Triggered | DPHI notification | Construction notification 23/8/24 for start on 26/8/24 | Compliant |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|---|----------------------------|---|--|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| Final Layout Plans | | | | | |
| C8 | Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website including details on the siting of solar panels and ancillary infrastructure. The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans. | Triggered | Plan submitted Sept 2024 Extension requested due to heritage impacts and approved 25/10/24 (PA-21) | All plans required have been submitted in accordance with this condition at the time of the audit. | Compliant |
| Work as Executed Plans | | | | | |
| C9 | Prior to commencing operations or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development to the Department via the Major Projects website. | Not Triggered | | Site not operational at the time of the audit. | Not Triggered |
| Incident Notification | | | | | |
| C10 | The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in APPENDIX 8. | Triggered | None to date | No incidents had been recorded at the time of the audit. | Compliant |
| Non-Compliance Notification | | | | | |
| C11 | The Department must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance. | Triggered | None to date | No non-compliance had been identified at the time of the audit. | Compliant |
| C12 | A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. | Triggered | None to date | No non-compliance had been identified at the time of the audit. | Compliant |
| C13 | A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance. | Triggered | None to date | No non-compliance had been identified at the time of the audit. | Compliant |
| INDEPENDENT ENVIRONMENTAL AUDIT | | | | | |
| C14 | Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020). | Triggered | SSD-9550-PA-22 - Auditor approval | Auditor approval was gained on 02/09/2024 This audit has been undertaken in accordance with the IAPAR 2020 guidelines | Compliant |
| C15 | Deleted | Not Triggered | | | Not Triggered |

| Glenellen Solar Farm (GSF) Environmental Compliance Audit #1 - 22/10/24 | | | | | |
|---|--|----------------------------|--|--|--|
| CoA # | Requirement | Triggered for audit period | Evidence collected | Audit findings and recommendations | Compliance Status (Compliant/Non-compliant / Not triggered) |
| | | | | | |
| C16 | Deleted | Not Triggered | | | Not Triggered |
| C17 | In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C14 of SCHEDULE 2 of this consent where notice is given by the Planning Secretary; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary. | Triggered | | The Applicants response to audit findings is separate to this audit report | Compliant |
| C18 | Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance. | Triggered | SSD-9550-PA-25 - EOT | AN extension of time for the audit report was granted on 16 December 2024 due to consultation not being complete over the end of year period. Due date for report is now 24 January 2024 | Compliant |
| ACCESS TO INFORMATION | | | | | |
| C19 | The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent (other than the Emergency Plan); (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (vi) how complaints about the development can be made; (vii) a complaints register; (viii) compliance reports; (ix) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (x) any other matter required by the Planning Secretary; and (b) keep this information up to date. | Triggered | Project website operational: https://glenellensolarfarm.globalpower-generation.com.au/ Old website operational: https://www.unionfenosa.com.au/hsw-glenellen-project-documents/ | The website is not able to be located easily and did not contain all of the information required at the time of the audit. Items which could not be located at the time of the audit include: C19 i - EIS not contained on their website C19 ii - Final layout plans (it is noted these are located in other documents but not easily identifiable) C10 iv - HMP (redacted) is not on the website NCR#2 - The project website is difficult to find and requires addition of all items contained in this condition. <i>NOTE: NCR2 - The project website content was updated during the audit period 10/1/25</i> | Non-compliant |
| Modifications | | | | | |
| MOD 1 - Modification to correct minor errors in consent | | 23/08/2024 | | | |

Appendix E

Audit Findings Register

| SSD 9550 Glenellen Solar Farm - NCR-OPP Register | | | | | | |
|--|----------------------|---------------------|--|-------------|--|--|
| Audit Reference | NCR or Opportunity # | Condition Number ID | Compliance Requirement | Date raised | Independent Audit Finding | Independent Audit Recommendation |
| IEA#1 | NCR#1 | B9 c ii | Prior to commencing road upgrades identified in condition B6, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include: (a) details of the transport route to be used for all development-related traffic; (b) details of the road upgrade works required by condition B6; (c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: (i) details of the dilapidation surveys required by condition B7; (ii) temporary traffic controls, including detours and signage; | 22/10/2024 | Signage as required by B9 c ii not installed to prevent usage of local roads as per Section 4.3 of the approved TMP. | Install signage as required as soon as possible. <i>NOTE: NCR 1- Signage installed in accordance with approved TMP during the audit period on 28/10/24.</i> |
| | NCR#2 | C19 | The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent (other than the Emergency Plan); (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (vi) how complaints about the development can be made; (vii) a complaints register; (viii) compliance reports; (ix) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (x) any other matter required by the Planning Secretary; and (b) keep this information up to date. | 22/10/2024 | The website is difficult to find and requires addition of all items contained in this condition. | Update website and make it easier to find. <i>NOTE: NCR2 - The project website content was updated during the audit period 10/1/25</i> |
| | REC#1 | B9 c ii | Prior to commencing road upgrades identified in condition B6, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include: (a) details of the transport route to be used for all development-related traffic; (b) details of the road upgrade works required by condition B6; (c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: (i) details of the dilapidation surveys required by condition B7; (ii) temporary traffic controls, including detours and signage; | 22/10/2024 | TMP Section 4.3 refers to Appendix D (Design drawings) for signage installations, the TMP does not contain signage location drawings. Hyperlinks in Section 4 do not link to sign locations. | Update TMP to include links to the locations. <i>REC-1 TMP updated for reissue to DPHI during the audit period V09</i> |
| | REC#2 | B20 | Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities 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. | 22/10/2024 | A separate slide clearly noting this condition would enhance the induction. | Include slide on construction hours in the induction. <i>NOTE: REC2 - The induction was updated to include these requirements during the audit period 17/1/25</i> |

Australia

SYDNEY

Ground floor 20 Chandos Street
St Leonards NSW 2065
T 02 9493 9500

NEWCASTLE

Level 3 175 Scott Street
Newcastle NSW 2300
T 02 4907 4800

BRISBANE

Level 1 87 Wickham Terrace
Spring Hill QLD 4000
T 07 3648 1200

CANBERRA

Level 2 Suite 2.04
15 London Circuit
Canberra City ACT 2601

ADELAIDE

Level 4 74 Pirie Street
Adelaide SA 5000
T 08 8232 2253

MELBOURNE

Suite 8.03 Level 8 454 Collins
Street
Melbourne VIC 3000
T 03 9993 1900

PERTH

Suite 9.02 Level 9 109 St
Georges Terrace
Perth WA 6000

Canada

TORONTO

2345 Young Street Suite 300
Toronto ON M4P 2E5

VANCOUVER

60 W 6th Ave Suite 200
Vancouver BC V5Y 1K1



[linkedin.com/company/emm-consulting-pty-limited](https://www.linkedin.com/company/emm-consulting-pty-limited)



emmconsulting.com.au