CONSTRUCTION MANAGEMENT PLAN

Yanco BESS

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1 DEFINITIONS AND ABBREVIATIONS

Abbreviation	Description
AC	Alternating Current

Abbreviation	Description
Energy Storage Project No. 9 Pty Ltd as trustee for Energy Storage Project No. 9 Unit Trust - the Principal (BW ESS).	The Principal[BC1][BC2]
ACLE	ACLE Services Pty Ltd — the Principal Contractor / BoP Contractor
AEMO	Australian Energy Market Operator
AEP	Annual Exceedance Probability
AHIMS	Aboriginal Heritage Information Management System
APZ	Asset Protection Zone
AS / AS/NZS	Australian Standard / Australian and New Zealand Standard
BESS	Battery Energy Storage System
BMS	Battery Management System
BMP	Biodiversity Management Plan
BoP	Balance of Plant
CATL	BESS System Integrator and battery cell/module manufacturer
CB	Circuit Breaker
CC	Construction Certificate
CCTV	Closed Circuit Television
EMS	Environmental Management Strategy
CMP	Construction Management Plan
COD	Commercial Operations Date
Council	Leeton Shire Council
CPHR	Conservation Programs, Heritage and Regulation Group (NSW DCCEEW)
CSE	Cable Seal End
CT / CVT	Current Transformer / Current Voltage Transformer

Abbreviation	Description
DC	Direct Current
DCA	Dedicated Connection Asset — interface point between TNSP substation and the BESS
DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
DPHI	NSW Department of Planning, Housing and Infrastructure
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EPA	NSW Environment Protection Authority
EWP	Early Works Package
FAT / SAT	Factory Acceptance Test / Site Acceptance Test
FRNSW	Fire and Rescue NSW
GIS	Gas-Insulated Switchgear
GPS	Generator Performance Standards
HAZID / HAZCON / HAZOP / CHAZOP	Hazard Identification / Construction Hazards / Hazard and Operability / Control Hazard and Operability studies
HP0 / HP1 / HP2 / HP3	Hold Point testing stages 0–3 (CATL/Princip) post-mechanical-completion R2 testing)
HSE / HSEQ	Health, Safety and Environment / and Quality
HV	High Voltage
IFC	Issued For Construction
ITP	Inspection and Test Plan
JHA	Job Hazard Analysis
LOTO	Lockout / Tagout
LV	Low Voltage
LVDB	Low Voltage Distribution Board
MI	Murrumbidgee Irrigation

Abbreviation	Description
MV	Medium Voltage
MVA	Megavolt-ampere
MVPS	Medium Voltage Power Station
MW / MWh	Megawatt / Megawatt-hour
NCC	National Construction Code
NER	National Electricity Rules
NTP	Notice to Proceed
O&M	Operations and Maintenance
PCS	Power Conversion System (inverter)
PI	Post Insulator
POC	Point of Connection
POEO Act	Protection of the Environment Operations Act 1997
PPC	Power Plant Controller (free-issued by CATL)
PPE	Personal Protective Equipment
QA / QC	Quality Assurance / Quality Control
R1 / R2	Registration Stages 1 and 2 under AEMO Generator Performance Standards
RFI	Request for Information
RFS	NSW Rural Fire Service
RFT	Request for Tender
RMU	Ring Main Unit
RUG	Released User Guide (AEMO modelling)
SCADA	Supervisory Control and Data Acquisition
SI	System Integrator — CATL for the Yanco BESS
SID	Safety in Design

Abbreviation	Description
Sieyuan	Sieyuan Electric Co. Ltd — supplier of the 132 kV main power transformers (Tx1 and Tx2)
SMA	SMA Solar Technology AG — supplier of 78 × MVPS 4600-S2 medium voltage power station units (358.8 MVA installed)
SSD	State Significant Development
SWMS	Safe Work Method Statement
TfNSW	Transport for New South Wales
TMP	Traffic Management Plan
TNSP	Transmission Network Service Provider — Transgrid for the Yanco BESS
Transgrid	NSW Electricity Networks Operations Pty Ltd (trading as Transgrid) — the Transmission Network Service Provider
Tx1 / Tx2	Main power transformer units 1 and 2
UGL	UGL Rail Services Pty Ltd — rail corridor works interface
UGLRL	UGL Rail — and associated rail corridor works
UPS	Uninterruptible Power Supply
VOC	Verification of Competence
VPA	Voluntary Planning Agreement
WAD	Works Authority Deed
WHS	Work Health and Safety

Table 1 Abbreviations and Definitions

2 REFERENCES

Reference Document
Development Consent SSD-67478479 — Yanco Battery Energy Storage System, granted by the NSW Independent Planning Commission on 2 October 2025
Environmental Planning and Assessment Act 1979 (NSW), Section 4.38
Environmental Planning and Assessment Regulation 2021 (NSW)

Reference Document
Protection of the Environment Operations Act 1997 (NSW)
Work Health and Safety Act 2011 (NSW) and Regulations 2017
Heavy Vehicle National Law (NSW) and associated regulations
Biodiversity Conservation Act 2016 (NSW)
Yanco BESS Environmental Impact Statement (8 November 2024) and Submissions Report (21 February 2025), including all additional information lodged through to 1 August 2025
Yanco BESS — Schedule 4: Balance of Plant Specifications (June 2026)
Aurecon 30% Design Package — Yanco BESS, project 529970-000 (30% Design Issue, with Civil Calculation Memo MEMO 529970-000-CI-001)
Mac Geo Geotechnical Investigation Report G24688 Rev 02 — Yanco BESS Substation Area
Mac Geo Geotechnical Investigation Report G24689 Rev 02 — Yanco BESS Pad Areas
ACLE Additional Geotechnical Investigation Report — Yanco BESS, project 25675840810
Water Technology Flood Risk and Groundwater Assessment Report — Yanco BESS
Yanco BESS Noise and Vibration Impact Assessment Report Rev 5
Yanco BESS Bushfire Assessment Report
AHIMS Aboriginal Site #49-5-0211 — site record and protection requirements
AS 1289 — Methods of testing soils for engineering purposes
AS 1940 — The storage and handling of flammable and combustible liquids
AS 2067:2016 — Substations and high voltage installations exceeding 1 kV AC
AS 2601:2001 — The demolition of structures
AS 3798 — Guidelines on earthworks for commercial and residential developments
AS 3745:2010 — Planning for emergencies in facilities
AS/NZS 1170 — Structural design actions (Parts 0, 1, 2, 4)
AS/NZS 1768 — Lightning protection
AS/NZS 3000:2018 — Electrical installations (Australian/New Zealand Wiring Rules)

Reference Document
AS/NZS 3500 — Plumbing and drainage (Parts 2 and 3)
AS/NZS 3600 — Concrete structures
AS/NZS 3845 — Road safety barrier systems and devices
AS/NZS 4282:2019 — Control of the obtrusive effects of outdoor lighting
AS/NZS 4801:2001 / ISO 45001:2018 — Occupational Health and Safety Management Systems
AS/NZS ISO 9001:2016 — Quality Management Systems
AS/NZS ISO 14001:2016 — Environmental Management Systems
AS/NZS 60076 — Power transformers
AS 4799 — Installation of underground utility services and pipelines within railway boundaries
AS 7642 — Rail track-side worker safety
IEC 62619:2017 — Safety requirements for secondary lithium cells and batteries for use in industrial applications
IEC 62109-1 / 62109-2 — Safety of power converters for use in photovoltaic power systems
IEEE 80 — Guide for safety in AC substation grounding
Transgrid Connection Documents and Connection Agreement for the Yanco BESS
Transgrid Technical Standards for Connecting Plant (HV cable, protection, SCADA and earthing)
UGL Rail Permit-to-Work, Rail Corridor Access and Construction Requirements
Murrumbidgee Irrigation — Conditions for works near, over or under MI assets
AEMO National Electricity Rules — Generator Performance Standards (Schedule 5.2)
AEMO Released User Guides (RUGs) for R1 and R2 modelling
FRNSW Fire Safety Guideline — Technical Information: Large scale external lithium-ion battery energy storage systems (Fire Safety Study considerations)
NSW DPHI Hazardous Industry Planning Advisory Paper No. 1 — Emergency Planning
NSW DPHI Hazardous Industry Planning Advisory Paper No. 2 — Fire Safety Study
NSW DPHI Hazardous and Offensive Development Application Guidelines — Applying SEPP 33

Reference Document
NSW EPA Interim Construction Noise Guideline (DECC, 2009)
NSW EPA Noise Policy for Industry (2017)
NSW EPA Storing and Handling of Liquids — Environmental Protection: Participants Handbook
NSW EPA Waste Classification Guidelines 2014
NSW RFS Planning for Bushfire Protection 2019
Landcom Managing Urban Stormwater: Soils and Construction (Blue Book, 2004) and Volume 2A (2008)
Australian Rainfall and Runoff 2019 — Drainage Design Guidelines
IECA Best Practice Erosion and Sediment Control Guidelines
ANZECC 2000 Australian Water Quality Guidelines for Fresh and Marine Waters
Independent Audit Post Approval Requirements (NSW DPHI, 2020)
National Construction Code (latest edition)

Table 2 Reference Documents and Standards

3 EXECUTIVE SUMMARY

3.1 OVERVIEW OF THE CONSTRUCTION MANAGEMENT PLAN

This Construction Management Plan (CMP) has been prepared by ACLE in its capacity as the BOP Contractor for the Yanco BESS, being developed by ACEnergy Pty Ltd. The Yanco BESS is a 250 MW / 1,000 MWh grid-scale, AC-coupled lithium-ion battery storage facility connecting to the Transgrid 132 kV transmission network at Yanco, NSW. The site sits on Houghton Road and Hulme (Hume) Road within the Leeton Shire local government area in the Riverina.

The project was granted Development Consent under State Significant Development Application SSD-67478479 by the NSW Independent Planning Commission on 2 October 2025. This Construction Management Plan has been prepared by ACLE Services Pty Ltd as a supporting controlled plan under the Project Management Plan (YAB-CF-PM-0-PLN-001). It describes the arrangements for planning, coordinating and controlling construction of the Works and is submitted to the Principal in accordance with the project document-control and programme requirements.

The System Integrator (SI) for the project is CATL, supplying 195 × CATL EnerX 0.25P containerised DC battery units ,78×SMA MVPS 4600-S2 medium voltage power station units , the BESS SCADA system, the Power Plant Controller, the communication network equipment, the Fire Indication Panel and the 132 kV Power Quality Meter as free-issued material. Inverter functionality is integrated within the SMA MVPS units. Main power transformers Tx1 and Tx2 are supplied by Sieyuan, with design by Aurecon. The connection to the National Electricity Market is made through Transgrid, the NSW TNSP.

This CMP describes how ACLE will deliver the construction phase of the Yanco BESS safely, on programme, and in compliance with the conditions of consent. It addresses the staged Construction Certificate framework, the two-pad construction methodology, the harmonic filter and 132 kV substation works, the Accredited Service Provider (ASP) interface for the 132 kV underground cable from the Transgrid substation to the Dedicated Connection Asset, the rail corridor interfaces with UGL Rail, and the Murrumbidgee Irrigation channel crossing required as part of the connection works.

3.2 INDICATIVE PROGRAMME REFERENCE

The following table is provided as an indicative reference at the time of issue of this revision of the CMP. The controlling document for project dates is the current Project Programme, maintained under Document Control by the ACLE Project Manager and reissued in accordance with the project change control procedure. This CMP is methodology-based and does not require revision when the Project Programme is re-baselined or when individual dates move within the controlling programme.

Phase Milestone	Indicative Date
NTP for Early Works Contract	Q4 2025
Submission of 30% Design Packages	Q1 2026
30% Constructability and SID Workshops	Q1 2026
Submission of CMP and BoP Management Plans to Principal	Q2 2026
Financial Close	Q2 2026
NTP for BoP Contract	Q3 2026
Construction Certificate Stage 1 (Bulk Earthworks and Fencing)	Q3 2026
Site Mobilisation and Establishment	Q3 2026
Commence Site Civil Works	Q4 2026
Construction Certificate Stage 2 (Remaining Civils)	Q4 2026
80% Constructability and SID Workshops	Q4 2026
IFC Design Complete	Q1 2027
Mechanical Completion — Pad 1	Q3 2027
Mechanical Completion — Pad 2	Q3 2027
BESS Ready to Energise	Q4 2027
Mechanical Completion — Facility / BoP Completion Date	Q4 2027
Substation Energisation	Q4 2027

Phase Milestone	Indicative Date
HP0 Testing (CATL / Principal)	Q4 2027
HP1 Testing (CATL / Principal)	Q4 2027
HP2 Testing (CATL / Principal)	Q1 2028
HP3 Testing (CATL / Principal)	Q1–Q2 2028
Commercial Operations Date (COD)	Q2 2028

Table 3 Indicative Programme Reference (refer to the current Project Programme for controlling dates)

3.3 OBJECTIVES

The primary objectives of the Yanco BESS construction phase are:

- Deliver a fully operational 250 MW / 1,000 MWh battery storage facility that meets the requirements of the BoP Contract, the Transgrid Connection Documents, the National Electricity Rules, AEMO Generator Performance Standards and the CATL technical and safety requirements;
- Achieve Mechanical Completion of the Facility on or before the date set out in the controlling Project Programme, enabling Hold Point testing under CATL / Principal management through to Commercial Operations Date;
- Ensure all construction, commissioning and decommissioning activities are conducted safely and in compliance with the Work Health and Safety Act 2011 and supporting regulations;
- Comply with every applicable condition of Development Consent SSD-67478479, including those relating to transport, biodiversity, heritage, soil and water, hazards, waste, accommodation and employment, and environmental management;
- Minimise harm to the environment through implementation of the Environmental Management Strategy, Biodiversity Management Plan, applicable Traffic Management Plan, Waste Management Plan, Fire Safety Study, Emergency Plan and applicable supporting protocols;
- Manage the unique hazards associated with grid-scale lithium-ion battery installations — thermal runaway, arc flash, dangerous goods, energisation — and the specific risks of working in rail corridors, near Murrumbidgee Irrigation infrastructure, and within Transgrid substation easements;
- Maintain transparent and proactive engagement with the local community, Leeton Shire Council, NSW DPHI, FRNSW, RFS, TfNSW, Transgrid, UGL Rail, Murrumbidgee Irrigation, and other stakeholders throughout the project lifecycle;
- Support the integration of renewable generation into the NSW electricity grid, enhance grid stability through grid-forming inverter technology, and provide firming and ancillary services as part of the broader transition to a low-emissions energy system.

4 INTRODUCTION

4.1 PURPOSE

The purpose of this CMP is to set out the structured approach, methodologies, controls and responsibilities for the safe and effective execution of the Yanco BESS construction works. It is a supporting controlled plan under the Project Management Plan (YAB-CF-PM-0-PLN-001) and interfaces with the Environmental Management Strategy (YAB-CF-EN-0-PLN-001), Health and

Safety Management Plan (YAB-CF-HS-0-PLN-001), applicable Traffic Management Plan, Biodiversity Management Plan, Fire Safety Study, Emergency Plan, Waste Management Plan and other applicable controlled project documents.

This CMP is a supporting controlled plan that will be reviewed and updated through project document control when changes to scope, methodology, organisation, approved staging or governing documents affect construction execution. Where a change also affects a strategy, plan or program required under the Development Consent, that controlled document will be reviewed in accordance with Condition C2.

4.2 SITE LOCATION

The Yanco BESS site is located approximately 1 km south-east of the township of Yanco, on land bounded by Houghton Road to the north and Hulme (Hume) Road to the east, in the Leeton Shire Council area. The terrain is predominantly flat with minor undulations and is currently used for agricultural and irrigation-supported cropping activities. The site sits adjacent to the Junee–Hay Railway and the Yanco–Griffith Railway, with the Gogeldrie Branch Canal of the Murrumbidgee Irrigation network running through the broader study area.



Figure 1 Site Location

The total development footprint is approximately 10.3 ha. The main BESS compound is approximately 431 m x 116 m (about 5 ha). Final dimensions and boundaries are governed by the approved layout plans.

Parameter	Details
BESS area	Pad 1 on Bus-A (CG-1 to CG-7); Pad 2 on Bus-B (CG-8 to CG-14)
Substation	132/33 kV substation
Switchroom and control room	Prefabricated buildings
O&M building	12 × 7 m
O&M warehouse	15.2 × 12 m (2 × 40 ft containers)
Pump house	4.7 × 4.6 m

Parameter	Details
Fire water tanks	Approximately 288 kL of dedicated static fire-water storage in above-ground tanks, based on the current Fire Safety Study. Final arrangement to be controlled by the applicable approved Fire Safety Study and approved fire-services design.
Harmonic filter compound	40.5 × 25 m
Landscape buffer	5 m wide native screen
Acoustic barrier	Acoustic mitigation measures, including the need, location and extent of any acoustic barrier, will be confirmed during detailed design in accordance with the applicable noise requirements.
Fire protection	Perimeter hydrant ring main and site-wide hydrant system with an estimated 16 hydrants, designed for two hydrants operating simultaneously at 10 L/s each for at least four hours, based on the current Fire Safety Study.
Access and laydown	Internal access tracks, hardstand and laydown (approx.1,560 m² west of the security fence)
Car parking	5 bays

Table 4 Key Site Elements

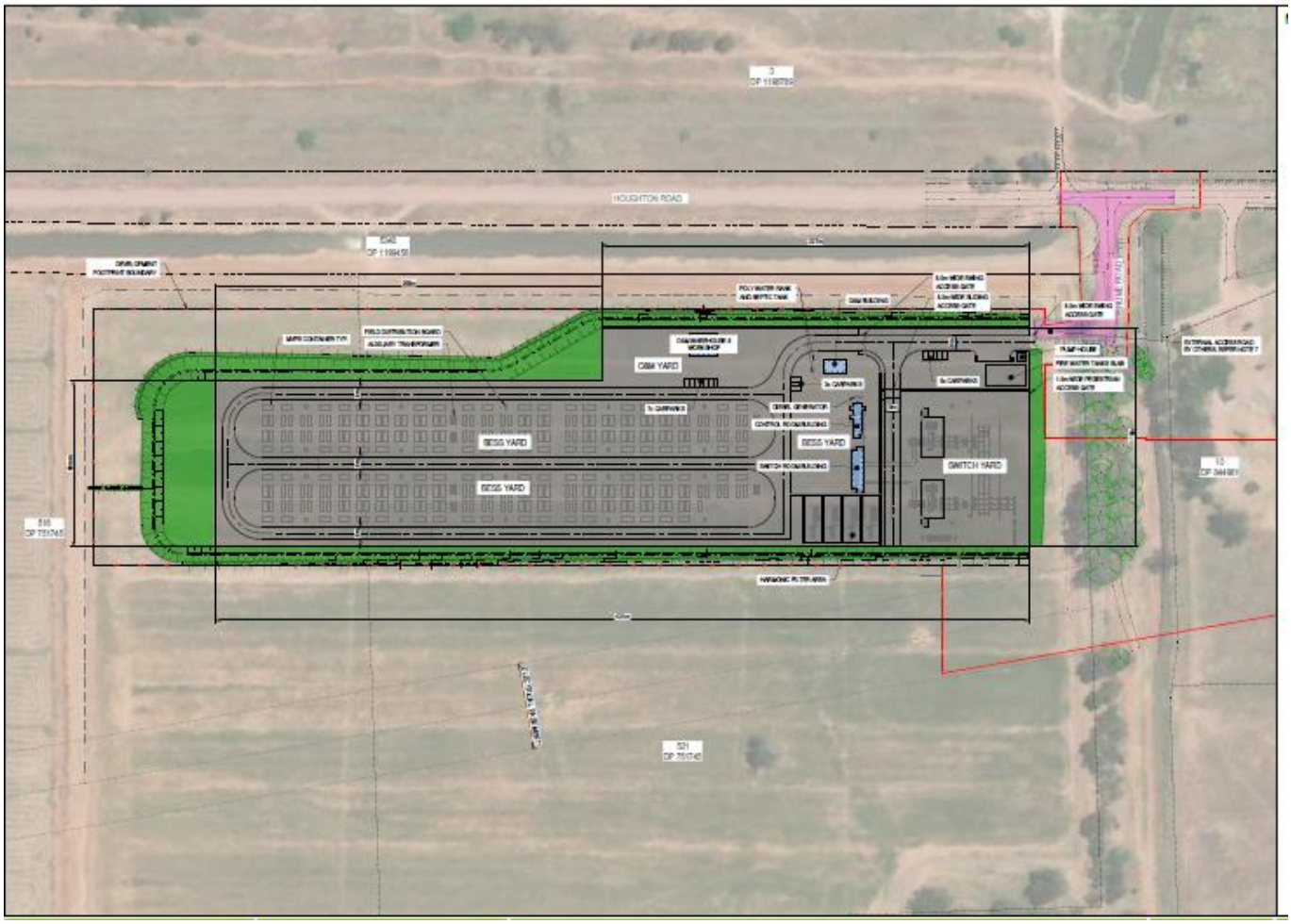


Figure 2 SIte Layout

4.3 PROJECT SCOPE

The construction scope under this CMP comprises the Balance of Plant works for the Yanco BESS. The contractual battery limit between BoP and the TNSP / Connection Works is the HV cable termination structure (excluded), in accordance with the BoP Specifications Section 3.1. ACLE is engaged by the Principal as the BoP Contractor and operates as the Principal Contractor on site under the WHS Act 2011.

Free-Issued Material supplied by CATL (as SI) and integrated by ACLE comprises: 195 × CATL EnerX 0.25P containerised DC battery units (6058 × 2438 × 2896 mm, approx. 45 t each, cells and modules to UL 9540A test and NFPA 855); 78 × SMA MVPS 4600-S2 medium voltage power station units (each <18 t, delivered in two batches to suit the Pad 1 / Pad 2 installation sequence); the BESS SCADA system; the Power Plant Controller; the communication network equipment; the Fire Indication Panel; and the 132 kV Power Quality Meter. The MVPS units integrate inverter and step-up transformer functionality within a single enclosure. The Project is nominally a 250 MW / 1,000 MWh facility. Condition A5 limits the battery storage facility to a maximum of 250 MW and 1,100 MWh. For the BOP Works, Schedule 4 specifies a maximum import and export capacity of 250 MW at the Point of Connection, installed inverter capacity of 358.8 MVA comprising 78 SMA SCS 4600 UP-S inverters, and 1,003.47 MWh usable energy at the Point of Connection. The collector architecture comprises 14 collector groups configured as 5 BESS containers: 2 MVPS units, with Pad 1 (Bus-A) hosting CG-1 to CG-7 (39 MVPS) and Pad 2 (Bus-B) hosting CG-8 to CG-14 (39 MVPS).

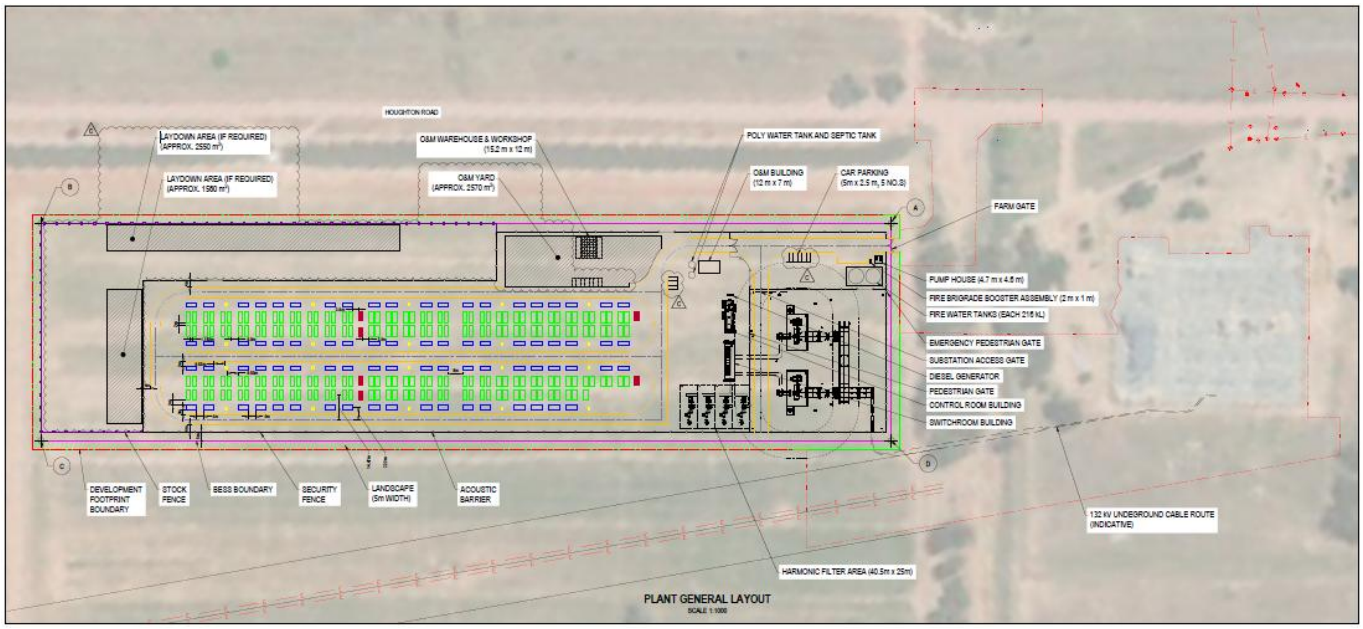


Figure 3 General Site Layout

4.3.1 Scope Summary by Work Package

4.3.1.1 Site Preparation and Civil Works (Stage 1 CC)

- Site clearing within approved disturbance areas only (Condition B10), with pre-clearance fauna inspections under the BMP;
- The first 100 mm of topsoil within excavation areas will be stripped, separately stockpiled and retained on site for reinstatement or make-good works, in accordance with the Landholder Relations and Management Protocol and

the Principal's directions. Excavated material below this layer that is not required for the Works will be removed from site promptly to an appropriately authorised location.

- Bulk and detailed earthworks per Aurecon drawing 529970-YANC-DRG-CV-2003 — approx.4,850 m³ cut from the western (cut) zone, approx.34,750 m³ structural fill to the bench, giving a net imported fill quantity of approx.29,900 m³ (Type A fill, placed in 150 mm layers, compacted to 98% standard MDD per AS 1289.5.4.1, with proof rolling to the satisfaction of the geotechnical engineer);
- Subgrade preparation to design CBR ≥ 4.0% per the geotechnical advice; lime stabilisation at 2–4% dosage where wet weather affects the working platform (TfNSW QA Spec R50);
- Pavement construction across three types per Aurecon drawing 529970-YANC-DRG-CV-4001: Type 1 (internal access in fill) — 14/7 mm double/double sprayed seal + emulsion prime + 150 mm DGB Class 2 + 250 mm DGS40 over subgrade; Type 2 (internal access in cut) — 150 mm DGB Class 2 + 200 mm in-situ lime stabilisation; Type 3 (BESS yards) — 100 mm 20 mm clean blue metal + 150 mm DGB Class 2 + 200 mm DGS40 (unbound granular, no seal); designed to 25-year period, 1.5×10^5 DESA in accordance with Austroads Guide to Pavement Technology Part 2 (2025) and the TfNSW Supplement;
- Perimeter security fencing — installed prior to commencement of BESS container placement — designed to allow flood flows (150 mm open centres);
- Site access works at the intersection of Houghton Road and Hulme (Hume) Road, and the Basic Left Turn and Basic Right Turn intersection upgrades at Irrigation Way and Houghton Road, will be undertaken in accordance with Condition B5 and the approved staging, traffic management and construction arrangements;
- Construction of all-weather internal access tracks, hardstands, laydown areas (approx.1,560 m² west of security fence) and the BESS construction car park; vehicle movement coordination verified for the 34.422 m × 4.188 m Sieyuan transformer delivery vehicle (12.5 m curb-to-curb turn radius), 19 m Prime Mover & Semi-Trailer, Terex AC30City mobile crane (general site work), and the 250 t crane assumed for BESS container and MVPS placement;
- Drainage works will provide surface conveyance through perimeter swales to the western low point, together with the emergency spillway and stormwater isolation measures required by the approved civil and hydraulic design. The current Fire Safety Study identifies a preliminary contaminated firewater containment demand of approximately 2,082 kL. The swale-based strategy will be verified through detailed civil and hydraulic design, and a dedicated lined retention basin will be provided if the required containment cannot be demonstrated;
- Oily water separator — Altan P.050/5/60.C12C.A.300.PVC, 54,600 L transformer oil volume, 60,200 L oil spill containment, 48.5 L/s design flow rate — installed adjacent to the substation per Aurecon drawing 529970-YANC-DRG-CV-4111;
- Subsoil drainage Type B (100 mm ND perforated pipe with geofabric sock in granular fill) per Aurecon drawing 529970-YANC-DRG-CV-4110; and
- Erosion and sediment controls will be implemented in accordance with the Soil Erosion and Sediment Control Plan, the Environmental Management Strategy, the Landcom Blue Book and the IECA Best Practice Erosion and Sediment Control guidelines.

4.3.1.2 Foundations and Structural Works (Stage 2 CC)

- Piled and insitu reinforced concrete foundations for the 14 collector groups (Pad 1: CG-1 to CG-7 on Bus-A; Pad 2: CG-8 to CG-14 on Bus-B) carrying 195 × CATL EnerX 0.25P battery containers, 78 × SMA MVPS 4600-S2 units, kiosks and LVDB units;
- Substation civil works — substation bench, substation drainage, main transformer foundations, HV equipment foundations for the bay (CSE, PI, Earth Switch, CT, SA, CVT, Disconnector, CB), harmonic filter foundations and lightning mast footings — all completed prior to substation primary equipment delivery;
- Construction of the prefabricated switchroom and control room, and the O&M building and warehouse, sequenced for delivery and connection during the Substation Mechanical Completion phase;
- Equipment support steel structures — HV gantries, busbar supports, transformer plinths, cable supports — hot-dip galvanised per BoP Spec; and
- Construction of the 132 kV Cable Termination Structure within the substation footprint.

4.3.1.3 BESS Pad 1 Construction (Bus-A)

Pad 1 (Bus-A) comprises 7 collector groups (CG-1 to CG-7), carrying 39 × SMA MVPS 4600-S2 units and the corresponding CATL EnerX 0.25P battery containers at a ratio of 5 BESS:2 MVPS per group (with CG-7 being a 3-MVPS short leg). Kiosks (3 × KIOSK #1–#3) and LVDB units are placed per the IFC layout. The Pad 1 construction sequence is governed by the following predecessor chain:

- Pile installation for collector groups CG-1 through CG-7 — predecessor: CC Stage 2 issued and pile design released for construction;
- Insitu foundations for LVDB and Kiosk units — predecessor: piles installed and proof-tested;
- Trenching and conduit installation — MV, LV, DC and Comms — predecessor: foundations cured and pavement Type 1/2 base layer in place at road crossings;
- Cable installation — MV (interconnecting), DC interconnecting, LV and Comms — predecessor: conduits installed, cable on site;
- MVPS unit installation onto foundations — sequenced in two batches (50% then 100%) — predecessor: foundations released for load, MVPS on site, 250 t crane mobilised, lift plans approved;
- CATL EnerX 0.25P container installation onto foundations — sequenced in two batches (50% then 100%) — predecessor: MVPS placed and aligned, foundations released for load;
- MV terminations, LV/DC terminations and Fibre/RS485/Comms/Fire terminations — predecessor: equipment placed, cables pulled, jointing space available; and
- Mechanical Completion Pad 1 — predecessor: all terminations complete, ITP signed off, system ready for pre-energisation testing.

4.3.1.4 BESS Pad 2 Construction (Bus-B)

Pad 2 (Bus-B) comprises 7 collector groups (CG-8 to CG-14) with the same equipment configuration as Pad 1 (39 × SMA MVPS 4600-S2 plus CATL EnerX 0.25P containers at 5:2 ratio; 3 × KIOSK #4–#6 and 2 × LVDB per group; CG-14 is a 3-MVPS short leg). Pad 2 follows Pad 1 by approximately two weeks to maintain efficient resource sequencing across both pads:

- Pile installation for collector groups CG-8 through CG-14
- Insitu foundations, conduit installation, cabling, equipment installation and terminations follow the same predecessor chain as Pad 1, offset by approximately two weeks;
- MVPS and BESS container installation sequenced in two batches each per pad, with the 250 t crane redeployed from Pad 1 to Pad 2 as installation progresses;
- Mechanical Completion Pad 2 — predecessor: all Pad 2 terminations complete, ITP signed off, system ready for pre-energisation testing.

4.3.1.5 Substation and Switchyard Works

- Civil bench and substation drainage
- Foundations for: Tx1 and Tx2 main power transformers (Sieyuan, lead time approximately 24 months from PO), CSE (switchroom and TNSP ends), Post Insulators, Earth Switches, Current Transformers, Surge Arresters, Current Voltage Transformers, Disconnectors, Circuit Breakers, Harmonic Filter banks (×4), Harmonic Filter Circuit Breakers (GIS Switchgear, lead time approximately 18 months from PO), Lightning Masts (×3) and 132 kV Cable Termination Structure;
- Substation Primary Equipment installation — predecessor: foundations cured, equipment delivered, crane access and laydown available;
- HV switchgear, MV switchgear and the prefabricated MV Switchroom & Control Room (one combined building) — sequenced for delivery during the Substation Foundations phase;
- Earth grid installation underground — designed to AS 2067, IEEE 80, EG-0 and EG-1; predecessor: substation bench complete, prior to foundations pour;
- HV substation cabling — MV cables, LV cables, fibre cables, all installed and terminated to the MV switchboard;
- Sub Station Cable Installation and Sub Primary Terminations complete prior to switchyard energisation;

- Switchyard Overhead Works complete prior to switchyard energisation; and
- Switchyard Ready for Energisation — final hold point before Transgrid POC energisation.

4.3.1.6 Harmonic Filter Works

The harmonic filter installation is a discrete and specialised package within the BoP scope:

- 4 × Harmonic Filter banks installed on dedicated foundations following CATL endorsement of the harmonic filter final design report;
- Harmonic Filter Circuit Breaker — supplied as a Gas-Insulated Switchgear (GIS) unit with long-lead procurement (approximately 18 months from PO);
- MV cable trenching, conduit and installation from the switchroom to the Harmonic Filter & CB compound (33 kV underground cables);
- Termination of 33 kV cables at the Harmonic Filter & CB; and
- Pre-commissioning and integration with the substation protection system in accordance with the Transgrid Connection Documents and the CATL Harmonic Study Report.

4.3.1.7 132 kV Cable Works (ASP Contractor Scope)

The 132 kV underground cable connecting the BoP substation to the Transgrid substation is constructed by an Accredited Service Provider (ASP) under sub-contract to ACLE. This package has unique interfaces with Council, Murrumbidgee Irrigation and Transgrid:

- Section 138 (Roads Act) application to Leeton Shire Council — predecessor to road-reserve works;
- Leeton Shire Council and Murrumbidgee Irrigation Engineering Assessment for works in road reserves and crossings of the Gogeldrie Branch Canal — predecessor to in-ground works;
- Under-bore works for the irrigation channel and rail corridor crossings — sequenced outside the MI operating season where reasonably practicable;
- Civil works — conduit installation;
- Installation of 132 kV underground cable from the Transgrid substation to the Dedicated Connection Asset (DCA);
- Cable termination at the Cable Seal End (Dedicated Connection end) and at the Transgrid end — Transgrid-end terminations subject to Transgrid's possession of site and bay construction completion; and
- Commissioning of the 132 kV cable prior to POC energisation.

4.3.1.8 Rail Corridor Interface (UGL Rail / UGLRL)

The 132 kV cable route and parts of the site civil scope cross the Junee–Hay Railway and Yanco–Griffith Railway corridors. UGL Rail manages access to and works within the rail corridor under its own permitting system:

- Potholing for services within the rail corridor, preliminary service design and utility relocation works — all subject to UGL Rail approval and predecessor to any in-corridor works;
- UGL Rail Construction Permit — application package prepared and submitted with sufficient lead time to accommodate UGL's standard review period (approximately 60 days);
- Compliance with UGL Rail-specific safety standards including AS 4799 (services within rail boundaries), AS 7642 (track-side worker safety), UGL Permit-to-Work, rail-corridor competencies (Cat 1 / Cat 2 protection officer); and
- Coordination of construction sequencing to align with rail possession windows where applicable.

4.3.1.9 Murrumbidgee Irrigation Interface

The site lies within Murrumbidgee Irrigation territory and works will impact channels (notably the Gogeldrie Branch Canal). Specific items include:

- Murrumbidgee Irrigation channel survey — predecessor to detailed design of channel crossings;
- Engineering Assessment by MI and Council for the 132 kV cable crossing — predecessor to under-bore works;

- Under-bore design and execution for the channel crossing — no disruption to irrigation supply during MI operating season; and
- Coordination with MI on water access during construction (Cond B23 — Water Supply).

4.3.1.10 Buildings, Mechanical and Ancillary Services

- Combined MV Switchroom & Control Room — prefabricated, factory-assembled, FAT'd off-site, delivered to site during the Substation Foundations phase;
- O&M Building — prefabricated, delivered to site in the same window as the Switchroom & Control Room;
- Kiosks (×6, 3 per pad) — manufactured off-site, delivered prior to Pad cabling installation;
- 6 × BESS Auxiliary Transformers (Aux Tx) — closed-ring configuration between Bus-A and Bus-B per Aurecon LST-PB-0001 — delivered prior to MV cabling installation;
- HVAC for control room, switchroom and harmonic filter compound, with the CATL interface preserved for the battery container HVAC (SI scope);
- Hydraulic services in accordance with AS/NZS 3500;
- Indoor and external lighting in accordance with AS/NZS 4282:2019; and
- Fire protection system per Aurecon drawing series 529970-YANC-DRG-BO, to AS 2419.1-2021 (hydrants) and AS 1670.1-2018 (detection), comprising:
    - 2 × 216 kL fire water tanks (432 kL total, auto top-up from potable supply);
    - Pump house (4.7 × 4.6 m) with 2 × full-duty pumps in parallel — 1 diesel, 1 electric, each 30 L/s at 1,100 kPa;
    - Fire brigade booster (2 × 1 m) with truck infill connection;
    - Perimeter DN160 HDPE hydrant ring main (approx.1,100–1,200 m) with approx. 12 hydrants outside the BESS security fence per Bushfire Assessment Report section5.4, designed for 3 simultaneous hydrants;
    - FDAS with Main FDCIE in the O&M Building Fire Control Room and Sub-FDCIE in the Control Room and Switchroom;
    - Tanks and pump house installed before BESS container placement and FDAS commissioning;
    - BoP wet hydrant and FDAS systems interface with — but are distinct from — the CATL dry suppression internal to the EnerX 0.25P containers; and
    - 65 mm Storz fitting and 432 kL capacity far exceed the 10,000 L minimum of Condition B30(b)(ii).

4.3.1.11 Environmental, Heritage and Compliance Works

- Implementation of the Environmental Management Strategy, Biodiversity Management Plan, Waste Management Plan, applicable Traffic Management Plan, Chance Finds Protocol and Unexpected Finds Procedure;
- Vegetation buffer (landscape screening) — established prior to operation in accordance with Condition B9;
- Demarcated 10 m no-go zone around AHIMS #49-5-0211 — visible on the Houghton Road / Hulme (Hume) Road site access drawing (Cond B21);
- Retirement of biodiversity credits — PCT 74 (8), PCT 26 (1), Koala (8), Southern Myotis (8) — prior to any biodiversity impact (Cond B12);
- Firefighting water tanks (2 × 216 kL = 432 kL) with FRNSW-compatible 65 mm Storz fitting on the booster assembly, exceeding the minimum 10,000 L requirement of Cond B30(b)(ii); and
- Vegetation fuel-load management within the 10 m defendable space around the BESS perimeter.

4.3.1.12 Commissioning, Energisation and Handover

ACLE's BoP scope ends at Mechanical Completion and Substation Energisation. Post-energisation Hold Point testing (HP0 to HP3) is delivered by CATL and the Principal under their own management:

- Field testing and pre-commissioning of MVPS and cabling for Pad 1 and Pad 2;
- CATL BESS Facility Cold Commissioning — Pad 1 and Pad 2, sequenced after pre-commissioning;
- Kiosk Power Group Cold & Warm Commissioning — CATL scope;

- Substation commissioning — earth system, AC & DC supplies, portable building wiring, relay configuration, CBM and protection testing, SCADA testing (by SI Contractor), AEMO signal list testing — through to Pre-Energisation Inspection;
- Transgrid POC Energisation and Substation Energisation — sequenced under Transgrid's switching schedule;
- Tx Soak and Facility Energisation;
- HP0 → HP3 Hold Point Testing (CATL / Principal) — sequenced post Mechanical Completion through to COD;
- AEMO Market Registration and AEMO/TNSP SCADA Signal List Testing Complete; and
- Commercial Operations Date (COD).

5 MANAGEMENT PLANS

All BoP Management Plans are submitted to the Principal in accordance with the controlling Project Programme. Where a plan is required to be approved by the Planning Secretary or accepted by another agency, that approval is obtained before the relevant phase of works commences.

Plan	Purpose & Key Elements
Project Management Plan	Project Management Plan (YAB-CF-PM-0-PLN-001) - Overarching management and governance plan for the BOP Works, including the controlled-document hierarchy and interfaces between supporting plans.
Environmental Management Strategy (EMS) (YAB-CF-EN-0-PLN-001)	Strategic framework for environmental management of the development. • Roles, responsibilities and accountability • Community communications, complaints and disputes • Non-compliance and emergency response • Monitoring and reporting register
Construction Management Plan (this document)	Supporting construction execution plan under the Project Management Plan (YAB-CF-PM-0-PLN-001). • Pad 1 / Pad 2 sequencing • Substation, harmonic filter, 132 kV cable scope • Rail, MI and TNSP interfaces
Traffic Management Plan	Manages all construction traffic to and from site. • Heavy vehicle limits (87/day, 9 escort, 2 high-risk escort) • Haulage route via Irrigation Way → Houghton Rd → Hulme (Hume) Rd • Driver's code of conduct, dilapidation surveys • Flood response plan; Yanco Sportsground & school bus coordination
Biodiversity Offsets & Biodiversity Management Plan	Manages biodiversity values and offset obligations. • PCT 74 (8) and PCT 26 (1) credit retirement • Koala (8) and Southern Myotis (8) species credits • Fauna management, exclusion fencing, weed control • Threatened species incidental finds protocol
Fire Safety Study	Addresses lithium-ion fire risk, prepared to FRNSW requirements. • Reasonable worst-case fire scenario • Adequate fire safety systems and water supply

Plan	Purpose & Key Elements
	• CATL battery cell-level UL 9540A test reports referenced • Aligned to HIPAP 2 and FRNSW BESS Guideline
Emergency Plan & Bushfire Emergency Management	Detailed emergency response procedures. • Aligned to Fire Safety Study findings • Bushfire emergency management and APZ • Safe isolation of CATL BESS sub-systems • FRNSW / RFS notification protocols
Waste Management Plan	Construction waste minimisation, recycling and disposal. • Prepared in consultation with Leeton Shire Council • Lithium-ion battery storage protocol • EPA Waste Classification Guidelines 2014 • Licensed disposal facilities identified
Construction Noise Management Controls	Manages construction noise emissions within the Environmental Management Strategy. • Interim Construction Noise Guideline (DECC, 2009) • Construction within Cond B14 hours • Proactive attended monitoring at non-associated residences • Reactive monitoring on complaints
Risk Management Plan	Project-wide risk management framework. • HSE Risk Register • Safety in Design risk register • HAZID, HAZCON, HAZOP, CHAZOP workshops
Soil Erosion and Sediment Control Plan	Soil Erosion and Sediment Control Plan (YAB-CF-EN-0-PLN-003). • Landcom Blue Book compliance • Sediment basins, silt fences, stabilised entry • Stormwater design to BoP Spec Table 5 AEPs • Surface conveyance via perimeter swales and trapped infiltration invert (no contaminated fire water retention basin)
Accommodation and Employment Strategy	Workforce accommodation and local employment. • Consultation with Council and local providers • Cumulative impacts with other SSD projects • Local worker / business prioritisation
Chance Finds Protocol	Aboriginal and non-Aboriginal heritage chance finds . • Aboriginal stakeholder & Heritage NSW consultation • 10 m no-go zone around AHIMS #49-5-0211 • Stop-work and notification procedures
Unexpected Finds Procedure (Contamination)	Manages unexpected contamination or asbestos in accordance with Condition B26. Detailed response steps, responsible roles, assessment, notifications, remediation and clearance requirements are governed by the controlled Unexpected Finds Procedure. • Roles, responsibilities and notification chain • Stop-work, Containment (20m buffer) and reporting protocols

Plan	Purpose & Key Elements
	• EPA/SafeWork NSW/Council notification thresholds • Certified by a CEnvP(SC) or CPSS CSAM consultant (Condition B26)
Health and Safety Management Plan	Site safety management to WHS Act 2011. • SWMS for high-risk construction work • CATL battery & arc-flash specific SWMS • Rail corridor permits (UGL) • Incident reporting and investigation
Voluntary Planning Agreement (VPA)	Community enhancement commitment to Leeton Shire Council. • Executed under Div 7.1 of Part 7 of EP&A Act • Terms per the offer at date of consent

Table 5 Related Controlled Documents

6 PROJECT ORGANISATION AND RESPONSIBILITIES

The Yanco BESS construction phase is delivered by an experienced ACLE project team supported by specialist subcontractors and the System Integrator (CATL). The organisational structure has been designed to provide clear lines of accountability, single points of contact for the Principal and stakeholders, and effective management of the SI / BoP / ASP interfaces. The organisation chart is provided in Appendix 1.

6.1 CONSTRUCTION CONTACTS

During construction, the ACLE Project Manager is the primary interface between ACLE and the Principal (Principal) and external stakeholders. In the Project Manager's absence, the Construction Manager is the authorised representative on site. The contact details for key personnel are set out below and will be updated as appointments are confirmed.

Role	Responsible Person	Phone	Email
Project Director	Brenton Moratto	0403 787 071	brenton@acle.com.au
Senior Project Manager	Andrew Umney	0410 358 794	a.umney@acle.com.au
Delivery Manager	Matt Keating	0427 336 813	m.keating@acle.com.au
Construction Manager	Brendon Chynoweth	0408 370 585	b.chynoweth@acle.com.au
Project / Site Engineer	TBC		
HSE Manager	TBC		
Quality Manager	TBC		

Role	Responsible Person	Phone	Email
Community Liaison Officer	TBC		
Environmental Manager / Officer	TBC		
Commissioning Manager	TBC		
Logistics Coordinator	TBC		

Table 6 Project Contact Details

Peak workforce numbers are anticipated to reach approximately 90 personnel during the peak construction period, when two-pad BESS installation runs in parallel with substation electrical installation and harmonic filter commissioning preparation. The workforce profile spans civil, structural, electrical, mechanical, commissioning, ASP cable, rail-corridor and support trades. The actual workforce profile is confirmed in the Accommodation and Employment Strategy required under Condition B34, and coordinated with Leeton Shire Council to manage cumulative impacts with other State Significant Development projects in the region.

6.2 KEY PERSONNEL AND RESPONSIBILITIES

The ACLE project team identified in the organisation chart is responsible for the delivery of the works in accordance with the BoP Contract, the conditions of Development Consent SSD-67478479, the Transgrid Connection Documents, the UGL Rail Construction Permit and the project schedule. The Senior Project Manager assumes the responsibilities of the Project Manager during periods of absence.

6.2.1 Project Manager

- Single-point accountability for delivery of the Yanco BESS construction works to scope, programme, budget, quality and safety;
- Primary interface with Principal, NSW DPHI, Leeton Shire Council, FRNSW, RFS, TfNSW, Transgrid, UGL Rail and Murrumbidgee Irrigation;
- Demonstrates proactive support for environmental compliance, including resourcing the Environmental, Engineering and Construction teams;
- Authority to issue Stop-Work directions for any HSE, environmental or quality breach;
- Reports on project performance and ensures risks are identified, tracked and mitigated;
- Ensures all CMP-related training is delivered to project personnel prior to commencement of their activities; and
- Approves contractor and subcontractor resource allocations to project tasks.

6.2.2 Construction Manager

- Day-to-day planning and scheduling of construction activities in accordance with the CMP, the Development Consent and the BoP Contract;
- Authority for day-to-day decisions relating to direct site operations;
- Manages the principal interface with the CATL site team during installation, integration and commissioning of free-issued material;
- Ensures quality and safety standards are achieved across all works;
- Coordinates Pad 1 / Pad 2 / Substation work-fronts to maintain parallel progress without resource contention;
- Communicates changes to the CMP, procedures or controls to all site personnel; and

- Manages the principal interface with subcontractors and the SI Contractor.

6.2.3 *Project Engineer / Site Engineer*

- Supports the Project Manager and Construction Manager in delivery of the project in accordance with the contract, the IFC design and company standards;
- Maintains and updates the project schedule against the master programme, with schedule performance indicators reported internally and externally;
- Proposes value engineering opportunities where they improve safety, programme, cost or constructability without compromising compliance;
- Assists in assessment of subcontractor progress claims and preparation of monthly progress claims to the Principal;
- Maintains drawing and specification control through ACLE's Document Management System, with obsolete copies withdrawn from site; and
- Manages the interface with the CATL design and SI deliverables register.

6.2.4 *Health, Safety and Environmental (HSE) Manager*

- Provides HSE direction to ensure construction activities comply with the WHS Act 2011, the Development Consent and the CMP;
- Coordinates internal HSE audits and reports on CMP performance, with recommendations for improvement;
- Authority to issue Stop-Work directions for any HSE breach;
- Maintains working relationships with NSW EPA, FRNSW, RFS, SafeWork NSW, UGL Rail (rail-corridor safety) and other regulators;
- Collates documents required under the conditions of consent and the UGL Rail Construction Permit;
- Manages specialist HSE consultants — including those engaged for the 30% and 80% Safety in Design workshops and Fire Safety Study; and
- Ensures construction personnel understand environmental constraints and mitigation measures, including biodiversity, heritage and bushfire protection requirements.

6.2.5 *Quality Manager*

- Implements the Project Quality Plan and the Inspection and Test Plans (ITPs) for each work package;
- Coordinates Factory Acceptance Tests (FATs) for major equipment — Tx1/Tx2 (Sieyuan), MV Switchroom & Control Room, O&M Building, Kiosks, MVPS (CATL Batch #1 and #2), BESS units (Batch #1 and #2), Harmonic Filter and GIS Circuit Breaker, Aux Tx, Lightning Mast, Post Insulator, Disconnector, Earth Switch, Surge Arrester, CB, CT, CVT;
- Coordinates Site Acceptance Tests (SATs) and commissioning records;
- Maintains the non-conformance register and ensures corrective and preventative actions are tracked to closure;
- Maintains the Document Control system, including the drawing register, RFI register and as-built records; and
- Coordinates handover documentation for the Document Deliverables Schedule.

6.2.6 *Commissioning Manager*

- Develops the Commissioning Plan in conjunction with CATL, Transgrid and the SI Contractor;
- Manages the integrated commissioning sequence — earth system, AC/DC supplies, portable building wiring, relay configuration, CBM and protection testing, SCADA, Transformer Stability Test;
- Coordinates Hold Point inputs and ACLE's preparedness for HP0 through HP3;
- Manages the interface with Transgrid for the POC Energisation date and Substation Energisation; and
- Coordinates with AEMO for Market Registration and AEMO/TNSP SCADA Signal List Testing.

6.2.7 *Superintendent / Supervisor*

- Organises inductions and manages work permits, access and the lockout/tagout regime;
- Reviews short-term construction planning and monitors progress against schedule and budget;
- Ensures quality and efficiency of work, with corrective actions taken promptly when issues arise;

- Supervises and schedules staff and subcontractor activities, with dedicated supervisors for Pad 1, Pad 2, Substation, Harmonic Filter and ASP interface;
- Liaises with team leaders to ensure construction efficiency; and
- Trains, supervises and leads subordinate personnel.

6.2.8 Environmental Manager / Officer

- Day-to-day implementation of the Environmental Management Strategy and the Biodiversity Management Plan;
- Conducts environmental inspections, monitoring (noise, dust, sediment, water) and audits;
- Investigates environmental incidents and prepares incident reports under Condition C10/C11;
- Manages the Chance Finds and Unexpected Finds protocols on site; and
- Liaises with CPHR, Heritage NSW, NSW EPA, Murrumbidgee Irrigation and other agencies as required.

6.2.9 Community Liaison Officer

- Primary contact for the local community and Leeton Shire Council;
- Manages the complaints register and oversees timely response under the Environmental Management Strategy;
- Coordinates community newsletters, notifications and updates on the project website; and
- Reviews the effectiveness of community engagement and reports outcomes to the Project Manager.

6.2.10 Subcontractor Packages

The Yanco BESS construction engages specialist subcontractors across the major work packages. Subcontractor selection will be finalised following completion of the IFC design and permits approval. The principal subcontractor packages are:

6.2.10.1 Civil Contractor

- Performs site preparation and clearing within approved disturbance areas, strips and separately stockpiles the upper 100 mm of topsoil for reinstatement or make-good works, and removes surplus excavated material below this layer from site where it is not required for the Works;
- Bulk and detailed earthworks for both BESS pads, substation bench and access roads, including cut, fill, grading, compaction and batter construction to AS 3798;
- Constructs concrete footings, foundations, pads and slabs for 195 × CATL EnerX 0.25P battery containers (approx. 45 t each), 78 × SMA MVPS 4600-S2 units (<18 t each), Sieyuan main transformers, switchroom, control room, O&M facility, kiosks, LVDB units and ancillary equipment;
- Constructs the internal access tracks, hardstands, perimeter swales, infiltration trapped invert and emergency spillway; and
- Implements erosion and sediment controls.

6.2.10.2 HV / MV / LV Electrical Contractor

- Installs HV plant — Tx1/Tx2, MV switchgear, HV cabling, busbars, surge arresters, instrument transformers, harmonic filter & GIS CB — to AS 2067 and AS/NZS 3000;
- Installs the protection and SCADA interface to Transgrid in accordance with the Connection Documents;
- Provides surveillance, access control and communications infrastructure including fibre optic backbone; and
- Coordinates with the Civil and Mechanical packages and the CATL SI Contractor to integrate electrical, communications and mechanical systems.

6.2.10.3 Accredited Service Provider (ASP) — 132 kV Cable

- Performs 132 kV cable design, installation and commissioning between the BoP Cable Seal End and the Transgrid substation;
- Manages the Section 138 application with Leeton Shire Council, the Murrumbidgee Irrigation channel-crossing assessment, and the UGL Rail under-bore works;
- Holds the appropriate ASP1/ASP2 accreditations for Transgrid; and

- Coordinates with Transgrid for terminations at the substation end (subject to TG bay construction completion).

6.2.10.4 Fire Protection Contractor

- Installs the wet fire safety, detection and suppression systems for the BoP scope in accordance with the Fire Safety Study;
- Coordinates with FRNSW and the RFS as required;
- Develops fire safety protocols and response plans with the HSE Manager; and
- Delivers the Fire Tanks & Pump House installation, underground fire piping (DN160 HDPE perimeter ring main) and hydrants on Pads 1 & 2.

6.2.10.5 Fencing Contractor

- Installs the perimeter security fencing and gates, sequenced for completion prior to BESS container placement;
- Ensures perimeter fencing does not obstruct flood flows (150 mm minimum open centres) in accordance with the BoP Specifications; and
- Aligned to the approved layout and the Bushfire Protection requirements (RFS PBP 2019).

6.2.10.6 Mechanical and HVAC Contractor

- Installs HVAC systems for the control room, switchroom, MVPS and inverter enclosures (subject to CATL SI interface);
- Installs hydraulic services in accordance with AS/NZS 3500; and
- Integrates mechanical systems with the CATL-supplied battery containers and SMA MVPS 4600-S2 units.

6.2.10.7 Rail Corridor Works (UGL Rail Interface)

- ACLE engages a UGL-accredited contractor for any works within the Junee–Hay or Yanco–Griffith rail corridors;
- Holds UGL Rail Construction Permit, with personnel certified Cat 1 / Cat 2 Protection Officers; and
- Compliance with AS 4799, AS 7642, and UGL-specific Permit-to-Work.

6.2.10.8 Landscaping / Rehabilitation Contractor

- Establishes the perimeter vegetation buffer (landscape screening) in accordance with Condition B9 and RFS Planning for Bushfire Protection 2019, using endemic species — established prior to operation;
- Maintains the buffer with weed management and replacement of failed plantings; and
- Implements the rehabilitation plan and ground cover establishment within three months of completion of construction (Condition B25(c)).

6.3 ALL SITE PERSONNEL

Every person inducted to the Yanco BESS site is responsible for:

- Following the procedures communicated during inductions, training, prestart meetings and site meetings;
- Reporting all health, safety and environmental incidents, near-misses and hazards to their Supervisor and/or the HSE Manager;
- Participating in task-specific training prior to commencement and when changing tasks;
- Stopping work and reporting where they consider a hazard or non-compliance has not been adequately controlled; and
- Complying with the conditions of Development Consent SSD-67478479 as they apply to their work activities (Condition A12).

7 RISK MANAGEMENT

Effective risk management is fundamental to the safe delivery of the Yanco BESS. ACLE applies a Plan-Do-Check-Act approach to risk, integrating Safety in Design, hazard identification (HAZID), hazards in construction (HAZCON), hazard and operability

studies (HAZOP) and control hazard and operability studies (CHAZOP) into the project lifecycle in accordance with the BoP Specifications. Constructability and SID Workshops are held at the 30% and 80% design release gates. The Project HSE Risk Register is reviewed at least monthly and updated whenever there is a material change in scope, methodology, plant or personnel.

Tools used at the work-face to identify and manage hazards in real time include:

- Safe Work Method Statements (SWMS) for all high-risk construction work as defined in the WHS Regulation 2017;
- Job Hazard Analyses (JHA) for non-high-risk tasks where additional control is appropriate;
- Regular team meetings will be held as appropriate to discuss ongoing activities, issues and updates;
- Permit-to-Work systems for hot work, confined space, working at heights, electrical isolation, excavation, live LV/HV works, and rail corridor entry (UGL Permit); and
- Daily prestart meetings where the day's hazards and controls are communicated to all site personnel.

7.1 PROJECT HSE RISK REGISTER

The Project HSE Risk Register below summarises the principal risks for the Yanco BESS construction phase. The register identifies risks specific to grid-scale lithium-ion battery installations — including thermal runaway, arc flash and lithium-ion fire — alongside the rail corridor, Murrumbidgee Irrigation channel crossing, ASP HV cabling and broader construction risks. The register is a living document and will be expanded during the HAZID, HAZCON and CHAZOP workshops required by the BoP Specifications.

Risk	Potential Impact	Mitigation Measures	Responsible
Thermal Runaway / CATL Battery Cell Failure	Cascading cell failure within a CATL battery module or container; release of toxic and flammable off-gases; potential for re-ignition; emergency services exposure.	• Container separation distances per CATL Fire Safety Study (FSS approved prior to BESS container placement) • CATL off-gas detection and ventilation interlocks (SI scope) • Wet fire suppression at BoP boundary • Battery Management System (BMS) emergency isolation • UL 9540A test report compliance (CATL deliverable 14) • FRNSW emergency responder induction package	HSE Manager, Fire Protection Contractor, CATL SI
Arc Flash / Arc Blast	Severe burns, blast injuries, fatalities and equipment destruction during energised LV/MV/HV work.	• Arc flash study completed per BoP Spec section6.0 • CATL arc flash register (CATL deliverable; harmonised with substation register) • Approach boundary controls and arc-rated PPE (cal/cm² appropriate) • Equipment labelling per IEEE 1584 / NFPA 70E equivalents • Lockout/tagout, isolation and verification of de-energisation • Permit-to-Work for all energised activities	HV Electrical Contractor, HSE Manager

Risk	Potential Impact	Mitigation Measures	Responsible
Lithium-Ion Fire (Facility-Scale)	Container or facility-level fire; difficulty extinguishing; smoke and air quality impact on local community.	• Fire Safety Study to FRNSW requirements (Cond B27); CATL Fire Safety Report, NFPA 855 Test Report, UL 1973 Report • 10 m defendable space around BESS perimeter (Cond B30) • Fire water tanks 2 × 216 kL (432 kL total), 2 × full-duty fire pumps (1 diesel + 1 electric) @ 30 L/s @ 1,100 kPa parallel duty, designed to AS 2419.1-2021 • DN160 HDPE perimeter ring main with approx.12 hydrants outside the security fence per Bushfire Assessment Report section5.4 • FDAS to AS 1670.1-2018: MFDCIE in O&M Building; Sub-FDCIE in Control Room and Switchroom • CATL EnerX 0.25P containers include internal off-gas, smoke and thermal sensors, pressure release and aerosol fire extinguishing systems per the Water Technology Flood Risk and Groundwater Assessment Report • Site clean-up measures (removal and replacement of swale topsoil and underlying material) deployed in the event of large-scale fire-fighting liquid release — no contaminated fire water retention basin per Aurecon Civil Memo section3 • Coordinated Emergency Plan and ESIP for FRNSW/RFS • APZ vegetation fuel-load management	Fire Protection Contractor, HSE Manager, Project Manager
HV Energisation / Live Switching (Transgrid Interface)	Electrocution, equipment damage, system instability during commissioning and grid connection at the Transgrid POC.	• HV switching procedures developed with Transgrid • Authorised, accredited HV operators only • Switching schedules and permits issued before each event • Transgrid Operator coordination per Connection Agreement • AS 2067 substation safety controls • Earthing verification (AS 2067, IEEE 80, EG-0/EG-1)	HV Electrical Contractor, Commissioning Manager
Rail Corridor Works (UGL Interface)	Train strike, electrocution from overhead, derailment caused by works in rail corridor; severe injury or fatality.	• UGL Rail Construction Permit obtained prior to any in-corridor works • Cat 1 / Cat 2 Protection Officer on site during all rail-corridor works	ASP Contractor, HSE Manager, UGL-accredited subcontractor

Risk	Potential Impact	Mitigation Measures	Responsible
		• AS 4799 (services within rail boundaries) compliance • AS 7642 (track-side worker safety) compliance • UGL Permit-to-Work for each entry • Under-bore design to avoid track interference • Coordination with rail possession windows	
Damage to Murrumbidgee Irrigation Assets / Channel Crossing	Damage to Gogeldrie Branch Canal or associated infrastructure; interruption to irrigation supply.	• MI channel survey completed prior to detailed design of channel crossings • MI and Council Engineering Assessment — predecessor to under-bore works • Under-bore design avoiding direct channel impact • Works scheduled outside MI operating season where possible • Site supervision during channel-proximity works	ASP Contractor, Environmental Manager
Crane Operations / Lifting of Containers	Dropped load, crane overturn, struck-by injury during lift of 195 × CATL EnerX 0.25P containers (approx.45 t each), 78 × SMA MVPS 4600-S2 units (<18 t each), Sieyuan transformers (Tx1 critical lift sequenced during the Substation Mechanical Completion phase), Kiosks and other heavy plant.	• Lift plans for all critical lifts; AS 2550 compliance • Principal lift method: 250 t mobile crane assumed for BESS container and MVPS placement per Aurecon drawing 529970-YANC-DRG-PB-0001 Note 12; smaller Terex AC30City (or equivalent) for general site work • Pavement design (Type 1 internal access, 1.5×10^5 DESA, Aurecon CV-4001) verified against 250 t crane track-loading prior to mobilisation — coordination item to be closed out at IFC design stage with Aurecon • Certified crane operators and dogmen/riggers • Ground bearing capacity sourced from Mac Geo reports G24688 Rev 02 and G24689 Rev 02 (12 boreholes + 14 boreholes + 3 test pits) and the ACLE additional investigation report (project 25675840810); outrigger mats sized to the lowest bearing pressure encountered along the working area • Re-verification of ground bearing capacity triggered by: extended wet weather periods, soft-spot remediation events, soil swap-out or re-grade events, or any change to crane class. Re-verification by competent	Construction Manager, Civil Contractor

Risk	Potential Impact	Mitigation Measures	Responsible
		geotechnical engineer prior to recommencement of lifting • Exclusion zones and tagline control • Heavy parts >1 t marked with weight and centre of gravity (BoP Spec section4.3.2) • Sieyuan transformer logistics plan from manufacture to site — see Heavy Vehicle / Transport risk	
Electrical Hazards (LV/MV)	Electric shock, burns, electrocution during LV/MV cable termination, testing and switching across 14 collector groups.	• AS/NZS 3000 compliance and licensed electricians only • Lockout/tagout regime and isolation verification • RCDs on all temporary supplies • SWMS for energised work • PPE: rated gloves, arc-flash where applicable	HV Electrical Contractor, HSE Manager
Heavy Machinery and Mobile Plant	Struck-by injuries, rollover, collision in active construction areas.	• Certified, licensed operators with verification of competence • Daily plant pre-start inspections and maintenance • Exclusion zones, segregation of pedestrians from plant • Spotters where operator visibility is reduced • JHA and SWMS for all plant operations	Construction Manager, Site Supervisors
Manual Handling	Musculoskeletal strain and injury during handling of cable drums (132 kV, MV, LV, Fibre), CATL battery modules, materials.	• Manual handling training and competency assessment • Mechanical lifting aids (telehandlers, trolleys) provided • Team-lift protocols for items >25 kg • SWMS for repetitive manual handling tasks	HSE Manager, Site Supervisors
Working at Heights	Falls from ladders, scaffolds, container roofs, lightning masts (×3) and structures.	• EWPs and scaffolds in preference to ladders • Fall arrest systems where edge protection not feasible • Permit-to-Work for working at heights >2 m • Training and rescue procedures	HSE Manager, Construction Manager
Trenching and Excavation	Collapse, engulfment, hit underground services during 33 kV cable trenching (approx.4,600 m route length, direct buried at 0.75 m depth per Aurecon cable schedule LST-PB-0001), 132 kV	• Dial Before You Dig and non-destructive service location (potholing as a predecessor to trenching) • Direct burial methodology — open trenching with progressive backfill and compaction; spoil management to align with the staged disturbance schedule	Civil Contractor, ASP Contractor, HSE Manager

Risk	Potential Impact	Mitigation Measures	Responsible
	ASP cable trenching to the Transgrid terminal station, LV/comms/fibre trenching, foundation excavation, fire ring main trenching (approx.1,100–1,200 m DN160 HDPE perimeter) and under-bore works at the rail corridor and MI channel.	• Conduit crossings under pavements as specified by the cable schedule — coordination with the civil pavement design (Type 1/2/3) so road crossings are pre-installed before sealing • Shoring or battering of excavations >1.5 m per WHS Reg • Permit-to-Work for excavations; barriers, lighting and pedestrian protection at all trenches left open overnight • Daily inspection by competent person • Confined space controls where applicable (deep excavations, pump house wet wells)	
Bushfire Risk	Site or off-site fire during construction or operation; risk to personnel, assets and surrounding properties.	• APZ established per RFS PBP 2019 • Vegetation fuel-load management • Total Fire Ban work restrictions • Hot Work Permit system • Firefighting water tank and equipment maintained	HSE Manager, Project Manager
Soil Erosion and Sedimentation	Off-site sediment transport into Gogeldrie Branch Canal and adjacent waterways; non-compliance with POEO Act.	• Erosion & sediment controls per Landcom Blue Book • Silt fences, sediment traps, stabilised access points • Staged disturbance and progressive rehabilitation • Inspection after rainfall ≥10 mm • Ground cover within 3 months of completion (Cond B25(c))	Civil Contractor, Environmental Manager
Water Pollution	Hydrocarbon, fuel, oil or chemical spill contaminating soil, surface water or groundwater (including Gogeldrie Branch Canal).	• Bunded fuel and chemical storage per AS 1940 • Spill kits at all refuelling and storage locations • Altan P.050/5/60.C12C.A.300.PVC oily water separator (54,600 L Tx oil, 60,200 L containment, 48.5 L/s) at the substation • Surface conveyance via perimeter swales draining to a trapped infiltration invert at the western lowest point (Aurecon Civil Memo section3, Water Technology Flood Risk and Groundwater Assessment Report) • Site clean-up measures (swale topsoil and subsoil removal/replacement) implemented in the event of fire-fighting liquid release	Environmental Manager, Site Supervisors

Risk	Potential Impact	Mitigation Measures	Responsible
		• Incident response and reporting under POEO Act	
Dust and Air Quality	Off-site dust emissions affecting nearby residences and Yanco Sportsground; non-compliance with Cond B18.	• Water carts for haul roads and stockpiles • Stockpile covers or vegetative stabilisation • Restrict earthworks during high winds • Wheel-wash or rumble grids at site exits (Cond B7(f)) • Air quality monitoring where required	Civil Contractor, Environmental Manager
Construction Noise & Vibration	Off-site noise impacts on non-associated residences; exceedance of operational limits in Table 3 of Cond B17 (40 dB(A) day / 35 dB(A) evening / 35 dB(A) night LAeq, 52 dB(A) night LAFmax for non-associated residential receivers).	• Construction within approved hours only — Mon–Fri 7am–6pm, Sat 8am–1pm, no Sun/public holidays (Cond B14) • Low-noise plant selection where feasible; noise emission specs verified before mobilisation • Construction noise management per ICNG and the Yanco BESS Noise and Vibration Impact Assessment R5 • Proactive attended noise monitoring at non-associated residential receivers during high-impact construction activities (piling, lime stabilisation, transformer delivery); LAeq(15min) trigger of 5 dB above measured background, with reduction to 3 dB at the night-time boundary • Noise mitigation measures implemented in accordance with the final acoustic design and applicable noise requirements. • Reactive monitoring on receipt of complaints — response within 24 hours, root-cause analysis and corrective action logged • Community notifications for noisy activities — minimum 5 working days' advance notice via the project mailbox and Leeton Shire Council channels	Construction Manager, HSE Manager
Biodiversity and Wildlife Impact	Clearing or disturbance outside approved areas; fauna injury; threatened species impact.	• BMP implemented prior to any biodiversity impact • Exclusion fencing around no-go zones • Pre-clearance fauna inspections • Incidental threatened species finds protocol • Biodiversity credits retired prior to impact	Environmental Manager, Civil Contractor

Risk	Potential Impact	Mitigation Measures	Responsible
Aboriginal Heritage	Damage to AHIMS #49-5-0211 or other heritage items; breach of National Parks and Wildlife Act 1974.	• 10 m no-go zone established around AHIMS #49-5-0211 prior to any disturbance — physical demarcation by exclusion fencing (orange para-mesh on star pickets at 3 m spacing), supplemented by signage at minimum 10 m intervals along the boundary (Cond B21) • Survey set-out of the 10 m no-go zone by a registered surveyor prior to mobilisation; coordinates lodged with the Environmental Manager • No-go zone shown on the IFC site setout drawings, the daily prestart map and the access map issued at site induction • Chance Finds Protocol implemented (Cond B22) — all personnel briefed in the Site-Specific Induction; stop-work, secure the area and notify the Environmental Manager and Heritage NSW within 24 hours • Weekly inspection of the no-go zone boundary by the Environmental Officer; reinstatement of any damaged signage or fencing within 24 hours • Heritage induction module for all site personnel before site access; tracked in the induction register • Heritage NSW and registered Aboriginal stakeholder engagement maintained through the Stakeholder Communication plan	Environmental Manager, Construction Manager
Traffic and Transport	Collision with school buses or local traffic; damage to Houghton Rd / Hulme (Hume) Rd; community complaints. Includes Sieyuan Tx1 and Tx2 transformer delivery from Port Kembla: vehicle 34.422 m × 4.188 m × 3.628 m, 12.5 m curb-to-curb turn radius, oversize escorted load per Aurecon drawing 529970-YANC-DRG-CV-4002.	• TMP approved by Planning Secretary prior to works • Dilapidation surveys before and after construction along the haulage route (Cond B6) • Heavy vehicle limits: 87/day, 9 escort, 2 high-risk escort, 19 m max non-escort length (Cond B1) • Approved haulage route only — Port Kembla → Hume Highway → Irrigation Way → Houghton Road → Hulme (Hume) Road (Cond B3) • Sieyuan Tx delivery managed under the Heavy Vehicle National Law with NHVR Class 1 Oversize Overmass permit — application lodged 60 days minimum before delivery; permit reference recorded in the logistics plan • Escort vehicle category and operator engaged per the NHVR permit	Construction Manager, Logistics Coordinator

Risk	Potential Impact	Mitigation Measures	Responsible
		conditions; pilot/escort briefing with route familiarisation • Bridge load assessment for the route, particularly the rail and channel crossings, certified prior to delivery • Overhead clearance survey along the haulage route for the 3.628 m vehicle height plus load; coordination with TfNSW and Essential Energy for any temporary line lift • Time-of-day restrictions for the Sieyuan oversize load — outside school bus periods (07:30–09:00, 14:30–16:00) and outside Yanco Sportsground event days • Driver's Code of Conduct; fatigue management; speed compliance per the TMP • Advance notification to school bus operators, Leeton Shire Council and Yanco Sportsground	
Flooding	Site inundation during high rainfall; access to and from site cut off; safety of personnel.	• Flood Response Plan within TMP (Cond B8(h)) • Drainage designed to BoP Spec Table 5 AEPs • BESS floor levels min. 1% AEP + 300 mm freeboard • Weather monitoring and trigger thresholds • Site evacuation plan and alternate access	Construction Manager, Site Supervisors
Unexpected Contamination / Asbestos	Exposure of workers; uncontrolled disposal; regulatory non-compliance.	• Unexpected Finds Procedure (Cond B26) • Stop-work on suspicion of contamination • EPA-licensed testing and disposal • PPE and decontamination procedures	Environmental Manager, HSE Manager
Workplace Accidents (slips, trips, falls)	Common workplace injuries on a busy site.	• Housekeeping standards and inspection programme • Clear walkways and lighting • PPE (safety boots, hi-vis, hard hats) • Relevant risks, controls and work activities discussed through regular team meetings, as appropriate	HSE Manager, Site Supervisors
Programme Slippage / Critical Path Impact	Delay to Mechanical Completion impacts Transgrid POC energisation window and Commercial Operations Date.	• Primavera P6 or similar schedule control with two-week look-ahead • Critical path monitoring against the controlling Project Programme baseline	Project Manager, Project Engineer

Risk	Potential Impact	Mitigation Measures	Responsible
		• Long-lead procurement tracking (Tx1/Tx2 Sieyuan, GIS CB, Harmonic Filter) • Float management and recovery plans • Early engagement with Transgrid on POC dates	

Table 7 Project HSE Risk Register

7.2 PROJECT SITE HEALTH, SAFETY AND ENVIRONMENTAL RISK

Site-specific HSE risks are managed through the Health and Safety Management Plan (YAB-CF-HS-0-PLN-001), daily pre-start meetings, weekly HSE inspections and the formal monthly HSE review meeting. Each risk in the register has an assigned responsible person, a control hierarchy applied (elimination → substitution → engineering → administrative → PPE), and a verification mechanism. The HSE Manager maintains the register and reports on residual risk to the Project Manager.
Safety in Design workshops are facilitated by an external party in accordance with the BoP Specifications (Section 4.3.1), with workshops held at the 30% and 80% design release gates. The output of these workshops — including residual risks relevant to operation — is submitted in a final Safety in Design risk register with each monthly project report.

8 PROJECT EXECUTION

The Yanco BESS project execution comprises the integrated set of activities from Early Works (commencing under NTP of the Early Works Contract), through 30%, 80% and IFC design, procurement, two-pad construction and substation construction, to commissioning, energisation and post-energisation Hold Point testing. The ACLE BoP scope ends at Mechanical Completion of the Facility, with Commercial Operations Date (COD) following completion of HP0–HP3 testing under CATL / the Principal. The project execution framework follows the controlling Project Programme maintained under Document Control.

8.1 OVERVIEW

The execution phase is structured around three principal work fronts that run in parallel through the construction window:

- BESS Pad 1 — civil, foundations, equipment installation and termination for 7 collector groups (Bus-A, CG-1 to CG-7);
- BESS Pad 2 — civil, foundations, equipment installation and termination for 7 collector groups (Bus-B, CG-8 to CG-14), offset by approximately two weeks from Pad 1; and
- Substation Works — civil, foundations, equipment installation, harmonic filter, terminations and commissioning.

Together with the 132 kV ASP cable works, the rail corridor works (UGL Rail) and the Murrumbidgee Irrigation channel crossing, these work fronts converge on Mechanical Completion, at which point the project transitions to CATL / the Principal -led Hold Point testing through to COD.

8.2 PROJECT STAGING

Construction is delivered in three logical stages aligned to the Construction Certificate framework and the BoP Contract milestones. Stage gating is by approval and predecessor completion — refer to the controlling Project Programme for indicative dates.

Stage	Scope	Gating Trigger
Stage 1 — Bulk Earthworks & Fencing	Bulk earthworks for BESS pads and substation bench; drainage; perimeter fencing	Approval of Stage 1 Construction Certificate
Stage 2 — Remaining Civils	Foundations, hardstands, drainage refinement, internal access tracks, building pads	Approval of Stage 2 Construction Certificate
BESS & Substation Construction	Pad 1 & Pad 2 collector groups, substation, harmonic filter, 132 kV cable, commissioning	Site Mobilisation – Establishment complete

Table 8 Construction Staging

8.3 PRE-MOBILISATION PLANNING

Pre-mobilisation planning establishes the foundation for safe, efficient and compliant construction. Pre-mobilisation runs from NTP of the Early Works Contract through to Site Mobilisation – Establishment. Key activities include:

- Site Assessment — completion of geotechnical investigations, the Murrumbidgee Irrigation channel survey and the over-dimensional load survey (ODLS) route assessment;
- Resource Planning — confirmation of plant, labour and material requirements aligned to the IFC design and the controlling construction programme;
- Logistics Planning — detailed logistics for haulage of oversize loads (CATL battery containers, MVPS in two batches, Sieyuan Tx1 & Tx2, GIS Circuit Breaker for harmonic filter, Switchroom & Control Room) from Port Kembla via Hume Highway → Irrigation Way → Houghton Road → Hulme (Hume) Road, with pilot/escort arrangements under the Heavy Vehicle National Law;
- Permits and Approvals Tracking — confirming preconditions including VPA (A14), TMP (B8), Fire Safety Study (B27), BMP (B13), EMS (C1), WMP (B33), Chance Finds Protocol (B22), Accommodation and Employment Strategy (B34), biodiversity credits retired (B12), Stage 1 CC, Stage 2 CC, UGL Rail Construction Permit and the WAD (Works Authority Deed) acceptance;
- Safety Planning - Health and Safety Management Plan (YAB-CF-HS-0-PLN-001), Emergency Plan inputs, SWMS framework and induction requirements;
- Stakeholder Engagement — initial briefings for Leeton Shire Council, FRNSW, RFS, TfNSW, the Local Emergency Management Committee, Murrumbidgee Irrigation, UGL Rail, Transgrid and registered Aboriginal stakeholders; and
- Communications — establishment of the project website, complaints hotline, and notifications under the EMS.

8.4 DOCUMENT REVIEW

A thorough review of all project documents is undertaken before construction commences to confirm consistency and identify gaps. The review covers:

- Project Plans — scope, schedule (controlling Project Programme), budget, and execution methodology;
- Design Documents — Aurecon 30% design, the 80% design and the IFC design; CATL design deliverables register (44 deliverables, BoP Spec section4.3.1.2);
- Regulatory Documents — verification of compliance with the Development Consent SSD-67478479, including the EIS, Submissions Report and additional information, and reconciliation against the BoP Specifications;
- Contract Documents — BoP Contract, ASP sub-contract, UGL Rail Construction Permit, Transgrid Connection Documents, subcontractor agreements, and the Document Deliverables Schedule; and
- Standards Compliance — verification that the IFC design has applied the more onerous standard where multiple standards apply, in accordance with BoP Specifications Section 4.4.3.

8.5 APPROVALS

Securing and maintaining all relevant approvals is a precondition to commencement of the respective works. Key approvals for the Yanco BESS include:

- State Significant Development Consent SSD-67478479 — granted 2 October 2025 by the Independent Planning Commission;
- Voluntary Planning Agreement with Leeton Shire Council under Condition A14;
- Traffic Management Plan approved by the Planning Secretary under Condition B8;
- Fire Safety Study to the requirements of FRNSW under Condition B27;
- Biodiversity Management Plan approved under Condition B13, with credits retired under B12 prior to any biodiversity impact;
- Stage 1 Construction Certificate (Bulk Earthworks and Fencing) — approval prior to bulk earthworks commencement;
- Stage 2 Construction Certificate (Remaining Civils) — approval prior to remaining civils commencement;
- Construction Certificate(s) under Part 6 of the EP&A Act, and Occupation Certificate (Condition A7);
- UGL Rail Construction Permit — approval prior to any rail corridor works;
- WAD Acceptance for utility-corridor works;
- S138 (Roads Act) approval from Leeton Shire Council for 132 kV cable works in road reserves;
- Murrumbidgee Irrigation Engineering Assessment for the channel crossing;
- Water Access Licences under the Water Act 1912 and/or Water Management Act 2000 (Cond B23, where applicable);
- Heavy Vehicle permits and escort approvals under the Heavy Vehicle National Law (NSW) for oversize and high-risk loads including the Sieyuan transformer delivery;
- Transgrid Connection Agreement — Possession of Site Date and POC Energisation Date; and
- Building, plumbing, and electrical safety approvals from the relevant authorities in NSW for energisation of the Facility.

8.6 DESIGN

The design phase is delivered through Early Works (Aurecon as 30% designer) and ACLE-led 80% and IFC design, with CATL providing the SI design deliverables register in parallel. Design Safety Workshops (HAZID, HAZCON, HAZOP, CHAZOP) are integrated into each stage. Two Safety in Design workshops are facilitated by an external party per the BoP Specifications. The design risk register is reviewed and updated monthly.

8.6.1 30% Design (Aurecon-led)

- Aurecon delivers 30% design across Electrical Specifications and Reports, Electrical Primary substation, Electrical Studies, Electrical BESS, Security, Fire Protection, Civil, Structural, Electrical Secondary and Electrical Secondary Protection;
- ACLE Internal Engineering Design Review;
- ACLE Constructability Review;
- 30% Design Submission to Principal;
- Principal Design Review and CATL GA & SLD Design Review; and
- 30% Constructability and SID Workshops.

8.6.2 80% Design

80% design is delivered across separate work packages by area (Substation Area and BESS Area) with parallel CATL design endorsement. The discipline-by-discipline review sequence is: 50% preparation to ACLE → ACLE Review → 80% the Principal Review.

Disciplines include:

- Substation Primary,
- Substation Civil,
- Substation Structural (Transformers and Others),
- Substation Secondary & Protection,

- Substation Fire Protection,
- Substation SCADA & Telecom,
- Substation Security,
- BESS Electrical,
- BESS Civil and BESS Structural.

The 80% gate concludes with the 80% Constructability and SID Workshops.

8.6.3 IFC Design

IFC design is delivered by discipline with staged Principal review and incorporation of comments. The IFC release sequence by discipline includes:

- Civil Bench & Access Road Design IFC — sequenced as a predecessor to bulk earthworks;
- Primary Design IFC — sequenced as a predecessor to substation primary equipment foundation pour;
- Secondary Design IFC;
- BESS Electrical Design IFC — sequenced as a predecessor to BESS Pad cabling;
- Balance Civil Design IFC;
- Structural Tx Design IFC — sequenced as a predecessor to Tx foundation pour;
- Structural Others Design IFC;
- Fire Protection Design IFC — sequenced as a predecessor to fire system installation;
- Security Design IFC;
- Protection Design IFC;
- SCADA & Telecom Design IFC; and
- IFC Design Complete.

8.6.4 R1 Modelling & Generator Registration (Parallel to Construction)

- Data collection (RFI) and Model update / Tuning — Freeze R1;
- Prepare CSR, DMAT, benchmarking, PSDSDS, VCS, Models & RUGs;
- Submit R1 deliverables for Client review;
- Finalise R1 package and submission;
- AEMO/TNSP Due Diligence Review & Negotiation;
- AEMO/TNSP R1 Approval;
- AEMO Market Registration and SCADA Signal List Testing Complete; and
- R2 Modelling & Commissioning — covering HP0 through HP3 and COD (S&I).

8.7 PROCUREMENT

Procurement is managed in accordance with the BoP Contract and ACLE's ISO 9001-aligned procedures. The procurement strategy reflects the long-lead nature of HV and substation equipment, with major packages awarded sufficiently in advance of their required-on-site dates to accommodate manufacture, FAT and delivery lead times. The free-issued material from CATL is managed through a dedicated interface.

8.7.1 Free-Issued Material (CATL)

- Technical Requirement Freeze — BESS / MVPS — predecessor to manufacturer release;
- MVPS Design / Manufacture — delivered in two batches with intervening FAT campaigns sequenced against the Pad 1 / Pad 2 installation programme;
- CATL BESS containers Design / Manufacturing — delivered in two batches with intervening FAT campaigns sequenced against the BESS placement programme; and
- PPC and Comms Network Equipment delivered to the Switchroom OEM for integration prior to Switchroom factory dispatch.

8.7.2 Major BoP Procurement Packages and Lead Times

The following table sets out indicative lead times for the principal procurement packages. Lead times reflect typical manufacturer and shipping durations and are used to back-calculate procurement Award dates against the required-on-site date in the controlling Project Programme.

Package	Indicative Lead Time (from PO to Delivery to Site)
Sieyuan Tx1 + Tx2 main power transformers	Approx. 10 months
MV Switchroom & Control Room (combined)	Approx. 9 months
O&M Building	Approx. 6.5 months
MV Switchgear (within Switchroom OEM)	Approx. 6 months
Kiosks (×6)	Approx. 9 months
Aux Tx (×6)	Approx. 6 months
Harmonic Filter banks (×4)	Approx. 9 months
Harmonic Filter CB (GIS Switchgear)	Approx. 6 months
Current Voltage Transformer (CVT)	Approx. 6.5 months
Circuit Breaker	Approx. 8 months
Post Insulator	Approx. 6 months
Disconnector / Earth Switch / Surge Arrester / CT	Approx. 6 months
LVDB Units	Approx. 6.5 months
Cable Seal End	Approx. 5 months
Lightning Mast and CCTV Poles	Approx. 4 months
LV Cable & Conduits	Approx. 4.5 months
33 kV Cable & Conduits (approx.4,600 m route)	Approx. 6 months
Fibre Optic Cable	Approx. 2 months
132 kV Cable (ASP scope)	Approx. 3 months
Fire System (Tanks + Pump Container)	Approx. 8 months

Table 9 Major BoP Procurement Packages — Indicative Lead Times. (Refer to the controlling Project Programme for current Award and Delivery dates.)

8.8 QUALITY MANAGEMENT

Quality management is delivered through the Project Quality Plan, aligned to AS/NZS ISO 9001:2016. The Quality Plan establishes Inspection and Test Plans (ITPs) for each work package, defines hold points and witness points, and integrates quality records into the handover package and shall include:

- Quality Planning — Project Quality Plan, ITP register, hold and witness point schedule;
- Quality Control — material inspections, in-process verification, dimensional checks, density and concrete strength testing in accordance with AS 1289, AS 3798 and AS/NZS 3600;
- Quality Assurance — supplier audits, internal QA audits, NCR register, corrective and preventative actions tracked to closure;
- Document Control — drawing register, RFI register, change-management process, and an electronic Document Management System; and
- Continuous Improvement — lessons-learned register, monthly QA review, and feedback into procedures.

8.9 STANDARDS AND REGULATIONS

All works comply with the standards listed in Table 2 of this CMP and Table 3 of the BoP Specifications, with the more onerous standard applied where multiple standards apply. Compliance covers:

- Regulatory Compliance — Development Consent SSD-67478479, EP&A Act 1979, POEO Act 1997, WHS Act 2011, Biodiversity Conservation Act 2016, Heavy Vehicle National Law (NSW), Heritage Act 1977 and National Parks and Wildlife Act 1974;
- Industry Standards — Clean Energy Council Battery Best Practice Guide, AEMO Generator Performance Standards (Schedule 5.2), AS 2067:2016, AS/NZS 3000:2018, AS 4799 (rail-corridor services), IEC 62619, IEC 62109;
- Safety Standards — WHS Regulation 2017, AS/NZS 4801 / ISO 45001, AS 1940 dangerous goods, AS 7642 (rail-corridor worker safety), Codes of Practice for High Risk Construction Work; and
- Environmental Standards — NSW EPA construction noise (ICNG 2009) and industry noise (NPI 2017) policies, EPA Waste Classification Guidelines 2014, Landcom Blue Book, ANZECC 2000.

8.10 PROJECT CONTROLS

Project controls integrate schedule, cost, scope, risk, quality and HSE performance into a single reporting framework. The Project Engineer maintains the master schedule in Primavera P6 or similar aligned to the controlling Project Programme, with progress reported weekly and monthly.

8.10.1 Construction Schedule — Top-Level Phase Sequence

The construction phase sequence is summarised below. Phases run in parallel and concurrently where dependencies permit. The schedule is delivered against the Mechanical Completion gate, with critical path running through the BESS Pad 2 cable terminations and the substation transformer installation. Refer to the controlling Project Programme for current dates and float.

Phase	Predecessor Activity
Early Works & 30% Design	NTP of Early Works Contract
Management Plans	30% Design Submission complete
80% Design	30% Design and Review Process Complete
IFC Design	80% Design and Principal Review Complete by discipline

Phase	Predecessor Activity
Procurement (major packages)	Issued for Tender release; backed off require topsoil strip and stockpiled-on-site dates and supplier lead times
Site Entrance & Access Works	Council intersection upgrade approval
Site Establishment	Mobilisation milestone; CC Stage 1 approval
Bulk Earthworks	Civil Bench IFC Design released; CC Stage 1 issued
Substation Civil & Foundations	Substation Civil IFC; CC Stage 2 issued
Substation Electrical Works	Substation Foundations cured; equipment delivered
132 kV Cable Works (ASP)	Section 138 approval; under-bore approvals
BESS Pad 1 Installation	Pad 1 Foundations released; MVPS and BESS containers on site
BESS Pad 2 Installation	Pad 2 Foundations released; MVPS and BESS containers on site
Field Testing & Pre-Commissioning	Mechanical Completion of cable terminations
Substation Commissioning	Substation Electrical Works complete
Mechanical Completion / Energisation	Pre-Energisation Inspection complete; Transgrid switching ready
Hold Point Testing (CATL / Principal)	Mechanical Completion of Facility
Commercial Operations Date (COD)	HP0 → HP3 testing complete; AEMO Market Registration

Table 10 Construction Phase Sequence Refer to the controlling Project Programme for current Award and Delivery dates.)

8.10.2 Construction Reporting and Feedback

- Weekly Progress Reports — issued to the Principal and key stakeholders, with status, schedule variance, HSE performance, environmental performance, and forecast against committed milestones;
- Monthly Progress Reports — comprehensive report covering performance against KPIs, including the design risk register (BoP Spec section4.3.1.2);
- Two-Week Look-Ahead — issued every Monday;
- Weekly Site Meetings — held on site when ACLE is mobilised, with subcontractor representatives;
- Weekly video-conference meetings during pre-construction;
- Key Performance Indicators — Safety (LTIFR, TRIFR and near-miss rate), Quality (rework rate and NCRs closed), Schedule (CPI/SPI), Environmental (incidents and complaints), and Workforce (local employment and training hours); and
- Issue Resolution — structured process for documenting, escalating and resolving issues, integrated into the weekly meeting agenda.

8.10.3 Project Reporting and Notifications under the Consent

In addition to commercial and operational reporting, the Yanco BESS construction is subject to the formal reporting and notification regime under Part C of the Development Consent. The principal obligations are:

- Notification of Department prior to commencing construction, operations, upgrading, decommissioning or cessation of operations, via the NSW Major Projects portal (Condition C7);
- Submission of detailed layout plans prior to commencing construction (Condition C8);
- Submission of work-as-executed plans prior to commencing operations or following any upgrade (Condition C9);
- Incident notification within 24 hours of becoming aware of an incident, with a subsequent incident report within seven days of the immediate notification, or as otherwise agreed by the Planning Secretary, in accordance with Conditions C10-C11 and Appendix 5;
- Non-Compliance Notification within 7 days of becoming aware of a non-compliance (Condition C12);
- Independent Environmental Audits in accordance with the Independent Audit Post Approval Requirements 2020 (Condition C13); and
- Public availability of approved strategies, monitoring results, complaints process and audit reports on the Principal website (Condition C14, excluding the Fire Safety Study and Emergency Plan).

8.11 MOBILISATION

Mobilisation commences at Site Mobilisation – Establishment and runs through site temporary facilities and laydown areas being installed, operational and certified. Key activities include:

- Site setup — establishment of site offices, mess and crib facilities, ablutions, parking, water tanks, diesel generators and waste storage;
- Resource Deployment — staging of plant, equipment and materials in accordance with the logistics plan;
- Safety Inductions — General ACLE Induction (online) and site-specific induction (onsite) for all personnel prior to commencement;
- Initial / Early Works — site clearing within approved disturbance areas, perimeter fencing, environmental controls (silt fences, sediment traps), and establishment of internal access tracks; and
- Confirmation that all conditions precedent under the Development Consent and the BoP Contract have been satisfied prior to commencement of full construction.

8.12 SITE DEMOBILISATION AND O&M HANDOVER

Demobilisation and handover return the site to operational use and the operations team, culminating in Mechanical Completion of the Facility and Final Completion. Key activities include:

- Site Clean-Up — removal of temporary facilities, laydown areas, hardstand, plant and equipment; restoration of disturbed land within three months (Condition B25(c));
- Final Inspections — pre-handover walk-downs, punch-list close-out, and resolution of any outstanding items;
- Commissioning — comprehensive performance testing in accordance with the BoP Specifications, including integrated system tests, grid compliance and Hold Point testing in conjunction with Transgrid and CATL;
- Handover Documentation — as-built drawings, O&M manuals, test certificates, the Document Deliverables Schedule, and the Emergency Services Information Package kept on site;
- Training — comprehensive training of the Principal's O&M personnel covering operation, maintenance, emergency procedures, isolation and routine maintenance;
- Notification to the Local Emergency Management Committee in accordance with Condition B30(e);
- Submission of work-as-executed plans under Condition C9; and
- Notification to the Department of commencement of operations under Condition C7.

9 KEY STRATEGIES

This section sets out the operational strategies that will be applied during the Yanco BESS construction phase. Each strategy addresses a specific aspect of the works and is designed to deliver compliance with the Development Consent, the BoP Specifications, the Transgrid Connection Documents, the UGL Rail Construction Permit and the Murrumbidgee Irrigation requirements, while supporting safe and efficient delivery of the parallel Pad 1, Pad 2 and Substation work fronts.

9.1 CONSTRUCTION STRATEGY

The construction strategy for the Yanco BESS rests on five principles:

1 Parallel Work-Fronts — Pad 1, Pad 2 and Substation construction proceed in parallel once their respective foundation predecessors are released, with sequenced cable, equipment and termination activities coordinated by the Construction Manager to avoid resource contention;
2 Detailed Planning — meticulous planning of activities across 14 collector groups (Pad 1: CG-1 to CG-7 on Bus-A; Pad 2: CG-8 to CG-14 on Bus-B), with each group following a defined Piles → Foundations → Conduit → Cable → Equipment → Terminations sequence;
3 Quality Control — rigorous QA/QC measures, ITP hold and witness points, and FAT/SAT processes for Sieyuan transformers, CATL EnerX 0.25P battery containers, SMA MVPS 4600-S2 units, and the harmonic filter equipment;
4 Safety First — comprehensive WHS controls including SWMS for all high-risk construction work, a Permit-to-Work system, and dedicated rail-corridor permits where works enter UGL Rail jurisdiction; and
5 Compliance — strict alignment with the conditions of consent, the AEMO Generator Performance Standards (R1 modelling and R2/Hold Point testing), and applicable Australian Standards including AS 4799 (rail) and AS 7642 (track-side safety).

9.2 CONSTRUCTION PROCESSES

The Yanco BESS construction process is sequenced across nine principal phases. Each phase is gated by the preceding phase's completion certificate or hold-point clearance, with concurrent activities scheduled where they are independent of one another. The flowchart below sets out the principal sequence and the interface points with the CATL System Integrator, the Accredited Service Provider, Transgrid, UGL Rail, Murrumbidgee Irrigation and the regulatory authorities. A graphical version is maintained as a separately controlled document under the Document Control system and is reissued at each design release (30% / 80% / IFC).

Phase	Activity
1. Pre-Construction	Permits and approvals (CC Stage 1, BMP credits retired, TMP approved, WAD acceptance, UGL Rail Permit, ASP1/2 accreditation), surveys, dilapidation reports, site induction system established
2. Site Establishment	Site offices, ablutions, mess and crib, fuel and chemical bunds, fire water tanks, perimeter fencing, security, induction room, laydown areas, parking
3. Civil Works (Stage 1 CC)	Clearing within approved areas only, strip and retain the upper 100 mm of topsoil; remove remaining surplus excavated material offsite., bulk earthworks (~29,900 m³ net fill), internal access tracks, drainage swales, pavement Types 1/2/3, intersection upgrades

Phase	Activity
4. Foundations & Structures (Stage 2 CC)	Piled and insitu foundations for BESS containers and MVPS, kiosk pads, switchroom pad, control room pad, O&M slab, transformer plinths, harmonic filter foundations, lightning mast footings, CTS
5. Substation & 132 kV ASP Works	Sieyuan Tx1/Tx2 installation, HV switchgear and bay primary equipment, harmonic filter, control & switchroom delivery, 132 kV cable to Transgrid (ASP), MI channel under-bore, UGL Rail under-bore
6. Pad 1 & Pad 2 BESS Construction	CATL EnerX 0.25P container placement (250 t crane), SMA MVPS 4600-S2 installation, kiosk and LVDB installation, 33 kV reticulation (~4,600 m direct buried), LV/DC/comms cabling, fire ring main (DN160 HDPE, ~1,100–1,200 m)
7. Mechanical, Buildings & Fire Services	HVAC, building services, fire tanks (2 × 216 kL) and pump house, FDAS (Main FIP + 2 × Sub-FIPs), perimeter hydrant ring main, hose reels, extinguishers, oily water separator, sewer
8. Field Testing & Commissioning	Pad 1 / Pad 2 MVPS and cabling testing, earth system testing, AC/DC supplies, relay configuration, CBM/HIPOT, SCADA testing (CATL), AEMO signal list testing, Pre-Energisation Inspection
9. Energisation, Hold Points & Handover	Transgrid POC Energisation, Substation Energisation, HP0–HP3 testing (CATL/Principal[BC3]), AEMO Market Registration, COD

Table 11 Yanco BESS Construction Process

9.3 SITE PREPARATION

Site preparation establishes the platform for safe and efficient construction. Activities are confined to the approved disturbance areas defined in the EIS, with no clearing outside those areas (Condition B10). The work runs from the upgrade of intersection works through site establishment to Stage 1 CC bulk earthworks and includes:

- Site Clearing — removal of vegetation only within approved disturbance areas, supervised by the Environmental Manager, with pre-clearance fauna inspections;
- Strip and retain the upper 100 mm of topsoil for reuse in rehabilitation, remove remaining surplus excavated material offsite,[BC4] in accordance with the BMP;
- Bulk Earthworks — Earthworks Bench Area (60 days), Stormwater Drainage System (10 days) for both BESS pads and substation bench;
- Access Roads — internal tracks designed to all-weather standards (Condition B7(a)) with adequate pavement design and surface treatment;
- Erosion Controls — silt fences, sediment traps, stabilised entry/exit, progressive rehabilitation per Landcom Blue Book;
- Establishment of the 2 × 216 kL fire water tanks, pump house and perimeter DN160 HDPE hydrant ring main in advance of the BESS container placement, in accordance with the Aurecon BO drawing series and AS 2419.1-2021;
- Site Temp Facilities — site temp facilities and temp laydown areas installed, operational and certified — predecessor to commencement of bulk earthworks haulage; and
- Site amenities to be established at the temporary construction office include:
    - 1 × Site office complex with meeting rooms
    - 2 × Crib / lunchroom facilities (scaled for approx.90 personnel at peak)
    - 1 × Toilet block with waste holding tank

- 1 × First aid station with trained First Aid Officer
- 2 × Site storage containers
- 2 × Water tanks (5,000 L each) for amenities and dust suppression
- 1 × Diesel generator with bunded fuel storage in accordance with AS 1940
- Waste segregation bins (general, recycle, timber, scrap metal)
- Designated smoking area outside fire risk zones
- Designated parking area near the site entrance off Hulme (Hume) Road

9.4 SITE INDUCTION

All personnel are required to complete induction prior to commencing work on the Yanco BESS site. Inductions cover safety, environmental, heritage and operational requirements specific to a grid-scale BESS construction, with additional modules for rail-corridor works and CATL-supplied battery handling.

9.4.1 General ACLE Company Induction (Online)

- Duration: 2–3 hours
- Frequency: Once on initial engagement
- Overview of ACLE, HSE policy, BESS construction context, key personnel and site layout
- Safety protocols, emergency procedures and PPE requirements
- Environmental awareness — biodiversity, heritage, waste, water and air quality
- Quality management system overview
- Fitness for Work, drug and alcohol policy

9.4.2 Site-Specific Induction (On-Site)

- Duration: 2–3 hours
- Frequency: Once on initial site attendance
- Site tour covering Pad 1, Pad 2, Substation work fronts, key areas, amenities and emergency assembly points
- Site-specific hazards including CATL lithium-ion battery hazards, HV plant, mobile plant, and live electrical work
- Emergency Plan walk-through and Emergency Services Information Package familiarisation
- Environmental controls — exclusion zones, AHIMS no-go zone (10 m around #49-5-0211), fauna protection
- Permit-to-Work system, SWMS and JHA processes
- Bushfire and weather trigger procedures

9.4.3 Rail Corridor Induction (UGL Rail)

- Required for any personnel entering the Junee–Hay Railway or Yanco–Griffith Railway corridors
- Delivered by UGL-accredited trainers
- AS 4799 (services within rail boundaries) and AS 7642 (track-side worker safety)
- Cat 1 / Cat 2 Protection Officer roles and responsibilities
- Train strike avoidance, lookout protocols, rail possession procedures
- UGL Permit-to-Work process and emergency response

9.4.4 CATL Battery Awareness Module

- Required for personnel involved in BESS unit installation, MVPS installation, terminations and commissioning
- Battery cell chemistry, thermal runaway indicators, off-gas hazards
- BMS interfaces and emergency isolation procedures
- UL 9540A and NFPA 855 test report findings as they apply to site work
- Container handling, lifting, tie-down requirements
- PPE requirements specific to battery cell handling

9.4.5 Ongoing Training and Toolbox Talks

- Duration: 30 minutes to 1 hour
- Frequency: Weekly toolbox talks; refreshers as required
- Toolbox topics covering recent incidents, near-misses, seasonal hazards, and forthcoming high-risk works
- Refresher training on key procedures including isolation, working at heights, confined space, hot work and emergency response
- Additional task-specific training as new equipment or processes are introduced

9.4.6 Emergency Responders Induction (FRNSW / RFS)

In accordance with the Emergency Plan (Condition B31), an induction package is developed for FRNSW and RFS responders, providing site familiarisation, isolation procedures, CATL battery hazards and the Emergency Services Information Package.

9.5 SITE SIGNAGE

- Directional Signage — at all entry points, intersections of internal tracks and key plant locations to guide vehicles and personnel between Pad 1, Pad 2, the Substation and the O&M Building;
- Safety Signage — prominent signs identifying hazards, mandatory PPE zones, no-go zones (including the AHIMS no-go zone), emergency assembly points, and emergency contact details;
- Rail Corridor Signage — where works are in or adjacent to the rail corridor, UGL Rail-specified signage including lookout protocols and rail possession indicators;
- Informational Signage — project information board near the site office, displaying the site map, project details, key personnel and complaints contact; and
- Regulatory Signage — speed limits, traffic management signage on approach roads as required by the TMP.

In accordance with Condition B19(c), no advertising signs or logos will be mounted on the site except where required for identification or safety purposes.

9.6 SITE ACCESS

Site access is a key compliance and safety requirement for the Yanco BESS, governed by Conditions B3, B4, B5 and B6 of the Development Consent.

- Site access - development-related vehicles will use the Site Access off Hulme Road, except Transgrid vehicles that may use the nominated Substation Access off Houghton Road, in accordance with Condition B4 and the applicable approved Traffic Management Plan.
- Intersection upgrades - site-access and intersection-upgrade works will be undertaken in accordance with Condition B5 and the applicable approved TMP staging. Construction traffic will only use access routes released under those approved arrangements.
- Controlled Access — gate control and visitor registration at the site office;
- Heavy Vehicle Movements — limited to 87 movements per day, with up to 9 escort vehicle movements and 2 high-risk escort vehicle movements per day (Condition B1). Vehicle length is restricted to 19 m other than for escorted vehicles such as the Sieyuan transformer delivery;
- Approved Haulage Route — Irrigation Way → Houghton Road → Hulme (Hume) Road. High-risk heavy vehicles requiring escort travel from Port Kembla via the route in Appendix 4 of the consent;
- Dilapidation Surveys — independent surveys of Houghton Road and Hulme (Hume) Road prior to and following construction, with development-related damage repaired (Condition B6);
- Emergency Access — adequate access for emergency vehicles maintained at all times, with the Hulme (Hume) Road access used as the primary emergency egress; and
- Internal Roads — constructed and maintained as all-weather roads (Condition B7(a)).

9.7 VEHICLE PARKING

- Designated Parking — sufficient on-site parking, with no parking on the public road network in the vicinity of the site (Condition B7(c));
- Construction Car Park — located near the site entrance off Hulme (Hume) Road, in accordance with the layout shown in Appendix 1 of the consent;
- Shared transport or shuttle arrangements may be used where required, in accordance with the Accommodation and Employment Strategy and the applicable approved Traffic Management Plan.
- Visitor Parking — separate visitor bay with sign-in at the site office; and
- Forward Direction of Travel — all vehicles enter and leave the site in a forward direction (Condition B7(e)).

9.8 SITE SECURITY

Site security protects personnel, the public, and project assets, and forms part of the broader operational security strategy for the BESS. The security strategy is detailed in Table below.

Security Measure	Details
Perimeter Fencing	1.8 m high chain-mesh security fence with galvanised steel; anti-climb design; gates with electronic locking; installed prior to commencement of BESS container placement. Open-mesh design with 150 mm minimum open centres to allow flood flow (BoP Spec).
Surveillance / CCTV	High-resolution CCTV cameras at strategic locations providing 360° coverage of both Pad 1 and Pad 2 areas, the substation and the main entrance. Coverage recorded to a hardened on-site server and remotely accessible to ACLE security control.
Security Personnel	Trained security personnel during non-working hours, with random patrols and inspections. Communications by radio and mobile device.
Access Control	Electronic access (card or biometric) at all entry points. Visitors register at the site office, are issued temporary access badges, and are escorted at all times.
Alarm and Intrusion Detection	Intrusion and tamper alarms tied to CCTV monitoring, with response procedures detailed in the security plan.
Lighting (Security)	Low-intensity security lighting designed to AS/NZS 4282:2019, not shining above the horizontal (Condition B20).

Table 12 Site Security Matrix

9.9 SITE MAINTENANCE AND HYGIENE

- Regular Cleaning — daily waste removal, weekly housekeeping inspections, monthly deep-clean of amenities;
- Waste Disposal — segregated waste streams with EPA-licensed disposal contractors;
- Hygiene Facilities — sufficient toilets, handwash stations and crib facilities scaled to the workforce (peak approx.90 personnel during the BESS container placement phase); cleaned and serviced daily;
- Pest Control — monitoring and treatment as required, with attention to rodent activity around stored materials; and
- Potable Water — provided to all amenities; non-potable water clearly labelled.

9.10 WORK HOURS

Construction hours for the Yanco BESS are governed by Condition B14 of the Development Consent:

- Monday to Friday: 7:00 am to 6:00 pm
- Saturday: 8:00 am to 1:00 pm
- Sunday and NSW public holidays: no work

Activities permitted outside these hours under Condition B15 are limited to:

- Commissioning activities that are inaudible at non-associated residences;
- Delivery or dispatch of materials as requested by NSW Police or other public authorities for safety reasons (e.g. Sieyuan transformer delivery, oversize loads); and
- Emergency work to avoid loss of life, property, or material environmental harm.

Rail corridor works are additionally subject to UGL Rail possession windows, which may require night or weekend access under separate authorisation.

Any other variation to construction hours requires written approval from the Planning Secretary under Condition B16, supported by activity-specific justification, written evidence of consultation with affected receivers and Council, demonstration of noise mitigation, and a noise impact assessment consistent with the Interim Construction Noise Guideline (DECC, 2009).

9.11 DELIVERY OF MATERIALS

- Delivery Scheduling — coordinated by the Logistics Coordinator to maintain the 87 heavy vehicle movements per day cap, avoid school bus times, and avoid two heavy vehicles passing on Hulme (Hume) Road simultaneously (Condition B8(e)(xi));
- Sequenced Major Equipment Deliveries — including: 132 kV Cable, Cable Seal End, Fire System Tanks & Pump Container, LVDB Units, Post Insulator, Lightning Mast, MV/LV/Fibre Cables, MV Switchroom & Control Room, Kiosks ×6, Aux Tx, CT/CVT/SA/Earth Switch/Disconnector, Harmonic Filter CB, CB, Substation Primary Equipment, MVPS Batch #1 and Batch #2, CATL BESS Batch #1 and Batch #2, Harmonic Filter, Sieyuan Tx1 & Tx2;
- Material Storage — designated secure laydown areas; weather-protected storage for sensitive equipment;
- Pilot / Escort Coordination — for high-risk heavy vehicles requiring escort, arrangements under the Heavy Vehicle National Law (NSW) including police escorts where required for travel from Port Kembla to site (notably the Sieyuan transformers);
- Forward Delivery Notification — to the local community via the project website and direct notification under the EMS for major or unusual loads; and
- Clean Vehicles — all development-related vehicles leaving the site to be in a clean condition (Condition B7(f)), with rumble grids or wheel-wash provided as required.

9.12 WASTE MANAGEMENT

Waste management is delivered in accordance with the Waste Management Plan required under Condition B33, prepared in consultation with Leeton Shire Council. Lithium-ion battery waste storage and disposal is given particular attention, given the unique hazards and the requirement to identify the location and method of storing CATL lithium-ion batteries if immediate recycling is not possible (Condition B33(a)(iv)).

Strategy	Details	Implementation
Waste Segregation	• Recyclables: metals, plastics, glass, paper • General waste • Construction debris: concrete, timber, aggregates • Hazardous waste segregated separately	• Labelled bins at all work areas • Worker training during induction • Daily compliance checks
Hazardous Waste	• Classified per EPA Waste Classification Guidelines 2014	• Dangerous goods training • Regular storage audits

Strategy	Details	Implementation
	• Secure bunded storage with SDS access • EPA-licensed disposal contractors only	• Waste disposal manifests retained
CATL Lithium-Ion Batteries (Damaged Cells / Modules)	• Damaged or end-of-life cells stored in fire-resistant containers • Quarantine area with thermal monitoring • Recycling through CATL-approved processor	• WMP Condition B33(a)(iv) • Coordinated with FRNSW where applicable • CATL battery handling procedures applied
Recycling	• Material recovery for construction materials • Local recycling facilities where available • Awareness programmes for workers	• Designated recycling stations • Recycling rates tracked and reported
Waste Reduction	• Efficient material use and offcut management • Use of prefabricated components (Switchroom, O&M, Kiosks) • Sustainable procurement	• Detailed quantity take-offs • Monthly material usage review

Table 13 Waste Management Strategies

No waste is received or disposed of on site (Condition B33(e)). All waste is removed from site as soon as practicable and is reused, recycled or sent to an appropriately licensed waste facility for disposal (Condition B33(f)).

9.13 CIVIL WORKS

Civil works underpin both BESS pads, the substation, the harmonic filter compound, the 132 kV cable route and ancillary facilities. The works are designed and constructed in accordance with the BoP Specifications, AS 3798, AS 1289 and AS/NZS 3600, with the more onerous standard applied where multiple standards apply. Civil works are gated by the Stage 1 CC (Bulk Earthworks and Fencing) and Stage 2 CC (Remaining Civils).

Activity	Purpose	Key Elements	Implementation
Earthworks (Pad 1, Pad 2, Substation)	Prepare site landscape	• Site clearing (approved areas only) • Upper 100 mm of topsoil stripped and retained onsite for rehabilitation; remaining surplus material removed offsite as generated. [BC5] • Bulk cut/fill, grading • Compaction to AS 1289 (98% under hardstands, 95% elsewhere)	• Bulldozers, excavators, scrapers • Bench area earthworks — durations per controlling Project Programme • Earthworks Bulk complete — predecessor to substation foundations • Earthworks Drainage complete — predecessor to substation primary equipment foundations
Pad 1 / Pad 2 Foundations	Provide stable bases for CATL/SMA equipment	• Piled foundations for 7 × collector groups per pad • Insitu foundations for LVDB and Kiosk units • Foundations for MVPS and BESS containers	• Pile schedule per IFC geotechnical design • MVPS Foundations sequenced 50% then 100% — predecessor to MVPS placement

Activity	Purpose	Key Elements	Implementation
			• BESS Foundations sequenced 50% then 100% — predecessor to CATL container placement
Substation Foundations	Provide stable bases for HV plant	• Tx1 and Tx2 foundations (Sieyuan transformers) • HV bay equipment foundations (CSE, PI, Earth Switch, CT, SA, CVT, DISC, CB) • Harmonic Filter bank foundations (×4) • Harmonic Filter CB foundations • Lightning Mast footings (×3) • 132 kV Cable Termination Structure foundations	• Concrete mixers, pumps, vibrators • Sub-Station Bench Complete 100% — predecessor to substation drainage • Sub-Station Drainage Complete 100% — predecessor to primary equipment foundations • Major Equipment Structural Foundations 100% — predecessor to substation primary equipment installation • ITP hold points for reinforcement and pours
Buildings Pad Foundations	Bases for prefab buildings	• O&M Building foundations • Switchroom + Control Room foundations • Steel frame ready for room installation	• O&M / Switchroom Foundations complete prior to building delivery • Curing per AS/NZS 3600
Drainage	Manage stormwater & flooding	• Surface & subsurface drainage • RCP culverts (DN300 — DN750) • Pits, headwalls, swales	• Trenchers, pipe-laying plant • Hydrological modelling per ARR 2019 • Erosion controls per Landcom Blue Book
Internal Access & Hardstands	Site access & laydown	• Internal access tracks • Hardstands for cranes and lifts • Carpark area • Earthworks – Internal Road & Access — sequenced after substation civils	• Graders, rollers, asphalt pavers • All-weather construction (Cond B7(a))
Surface Drainage and Fire Water	Surface drainage and fire-fighting water supply	• Perimeter swales draining west to a trapped infiltration invert (Aurecon CV-4100) • Emergency spillway at western lowest point • Subsoil drainage Type B — 100 mm DN perforated pipe with geofabric sock (Aurecon CV-4110) • Altan oily water separator at substation (P.050/5/60.C12C.A.300.PVC)	• No in-ground contaminated fire water basin — per Water Technology Flood Risk and Groundwater Assessment Report and Aurecon Civil Memo section3 • Surface conveyance and trapped invert promote infiltration to underlying sandy profile (15 m/d

Activity	Purpose	Key Elements	Implementation
		• Fire water tanks — 2 × 216 kL = 432 kL total	hydraulic conductivity, GW approx.6 m deep) • Site clean-up measures (swale topsoil and subsoil replacement) deployed in event of major fire-fighting liquid release • Fire Tanks & Pump House installation • FRNSW-compatible 65 mm Storz fitting on booster — exceeds Cond B30(b)(ii) 10,000 L minimum
Erosion & Sediment Control	Protect waterways & receiving environment	• Silt fences, sediment traps • Stabilised entry / exit • Progressive rehabilitation	• Per IFC ESC plan • Inspected after each ≥10 mm rainfall event • Landcom Blue Book + IECA BPESC

Table 14 Civil Works Summary

9.14 STRUCTURAL WORKS

Structural works deliver the prefabricated buildings, equipment support structures and the substation steel including the 132 kV Cable Termination Structure. All buildings comply with the National Construction Code (Condition A7) and AS/NZS 1170. Importance Levels are selected in accordance with the BoP Specifications.

Activity	Purpose	Key Elements	Implementation
Prefab Buildings	House control, switchgear & maintenance functions	• Combined MV Switchroom + Control Room • O&M Building • Kiosks ×6 — 3 per pad	• NCC compliance • AS/NZS 1170 wind & seismic actions • Cranes & EWPs for erection
Container Installation (Pad 1, Bus-A)	Place and secure CATL EnerX 0.25P and SMA MVPS 4600-S2 equipment for CG-1 to CG-7	• CATL EnerX 0.25P containers — approx.98 units across 7 groups (45 t each) • SMA MVPS 4600-S2 units — 39 across 7 groups (<18 t each, inverter and step-up transformer integrated) • Kiosks (3 × KIOSK #1–#3) and 2 × LVDB units per group	• MVPS Pad 1 installation: sequenced in two batches • CATL EnerX 0.25P Pad 1 installation: sequenced in two batches after MVPS placed • 250 t crane (Aurecon PB-0001 Note 12); lift plans per AS 2550 • Container tie-down per wind & seismic actions
Container Installation (Pad 2, Bus-B)	Place and secure CATL EnerX 0.25P and SMA MVPS 4600-S2 equipment for CG-8 to CG-14	• CATL EnerX 0.25P containers — approx.97 units across 7 groups (45 t each) • SMA MVPS 4600-S2 units — 39 across 7 groups (<18 t each)	• MVPS Pad 2 installation: sequenced in two batches, offset by approx.2 weeks from Pad 1

Activity	Purpose	Key Elements	Implementation
		• Kiosks (3 × KIOSK #4–#6) and 2 × LVDB units per group	• CATL EnerX 0.25P Pad 2 installation: sequenced in two batches after MVPS placed • 250 t crane; lift plans per AS 2550
Substation Steel Structures	Steelwork for HV plant	• HV gantries, busbar supports • Sieyuan transformer plinths • Cable supports & cable trays • 132 kV Cable Termination Structure • Harmonic Filter support structures • Lightning Mast structures (×3)	• Hot-dip galvanised per BoP Spec • AS/NZS 1554 welding • Switchyard Overhead Works 100%
Inspections	Verify compliance	• Stage inspections during construction • Final inspections at completion	• Per ITP schedule • Qualified structural engineer sign-off • NDT where applicable

Table 15 Structural Works Summary

9.15 ELECTRICAL WORKS

Electrical works deliver the LV, MV and HV systems that connect the BESS to the grid through Transgrid's network. Works are designed to AS 2067, AS/NZS 3000, AS/NZS 3008, and the BoP Specifications, with the protection and SCADA interface to Transgrid delivered in accordance with the Connection Documents. Power system studies — fault level (AS 3851), load flow, step and touch potential (AS 2067, IEEE 80, EG-0, EG-1), protection and arc-flash — are delivered to support the registrable Generator Performance Standards (R1 modelling and R2 testing).

Activity	Purpose	Key Elements	Implementation
Pad 1 / Pad 2 MV / LV / DC / Comms Cabling	Distribute power within site per the 33 kV cable schedule (Aurecon LST-PB-0001 Rev A)	• 33 kV reticulation — total approx.4,600 m route length, direct buried at 0.75 m depth (road crossings in conduit) • Tx feeders: 4 × 3×1C-1000 mm² Cu/XLPE/PVC per phase, in conduit — TRFR 1 (approx.46 m) to Bus-A, TRFR 2 (approx.51 m) to Bus-B • Collector group mains: 1 × 3×1C-630 mm² Al/XLPE/PVC/HDPE per CG (14 mains total, longest CG-13 at approx.281 m) • Intra-string daisy-chain: 1 × 3×1C-300 mm² Al/XLPE/PVC/HDPE between MVPS within each CG	• Direct burial methodology — open trenching, sand bedding, marker tape per AS/NZS 3008 • Conduit pre-installed at all pavement crossings to coordinate with civil Type 1/2/3 pavement design • Design conditions: 90 °C conductor temp, soil TR 1.72 m·K/W, 25 °C soil temp, LF 0.75 @ 18 hr/day • Cables delivered to site • Pad 1 conduits 100% by • Licensed electricians only; HV cable terminations by accredited HV jointers

Activity	Purpose	Key Elements	Implementation
		(approx.60 segments, approx.22–33 m each) • BESS Auxiliary ring: 6 × Aux Tx between Bus-A and Bus-B, 3×1C-300 mm² Al closed ring (approx.620 m total) • LV auxiliary, control and DC interconnecting cabling between BESS and MVPS • Fibre optic communications backbone — for BESS SCADA, PPC and 132 kV PQM integration	
HV Substation (132 kV)	Grid connection at 132 kV	• Sieyuan Tx1 & Tx2 main transformers • HV switchgear & disconnectors • Surge arresters, instrument transformers • HV busbar & connections • 132 kV Cable Termination Structure	• Specialist HV installation team • AS 2067 substation safety • AS/NZS 60076 transformer testing • Sub Primary Terminations 100%
Harmonic Filter	Power quality management	• 4 × Harmonic Filter banks • Harmonic Filter GIS Circuit Breaker • 33 kV cable from switchroom to HF compound • HF earthing and protection	• Designed per Transgrid Harmonic Study (CATL Deliverable 28) • HF design endorsed by CATL • HF installation 18 Jun –
132 kV Cable (ASP Scope)	Connect BoP to Transgrid	• 132 kV cable from Cable Seal End to TG substation • Under-bore for MI channel and rail corridor • Terminations at both ends	• ASP Contractor (ASP1/ASP2 accredited) • S138 + MI + UGL permits obtained • Cable installation sequenced after under-bore works complete • Commissioning sequenced prior to POC energisation
Earthing & Lightning Protection	Personnel safety & equipment protection	• Substation earth grid • Pad 1 / Pad 2 equipment earth bonding • Equipotential bonding • Lightning Masts (×3)	• IEEE 80, EG-0, EG-1 design • AS/NZS 1768 lightning protection • Earth-grid installation underground complete
Protection, Control, SCADA	System operation & safety	• Protection relays & schemes • BESS SCADA & PPC interfaces (CATL FIM) • Power Quality Meters	• Free-issued by CATL: BESS SCADA, PPC, FIP, 132 kV PQM • Protection coordination studies (Aurecon) • FATs & SATs prior to energisation

Activity	Purpose	Key Elements	Implementation
			• Transgrid interface per Connection Documents
Auxiliary Power & UPS	Site auxiliary supply	• Aux Tx (Aux Transformer) • LV distribution boards (LVDBs) • UPS for critical loads	• Aux Tx delivered • LVDBs delivered • Per AS/NZS 3000
Testing & Commissioning	Verify performance	• Insulation resistance & hipot tests • Functional & integrated system tests • Grid compliance / pre-Hold-Point readiness	• Pad 1 MVPS testing • Pad 2 MVPS testing • Substation commissioning per

Table 16 Electrical Works Summary

9.16 MECHANICAL WORKS

Mechanical works deliver the HVAC, fire suppression, plumbing and ancillary mechanical systems required for safe and reliable operation of the BESS.

Activity	Purpose	Key Elements	Implementation
HVAC Systems	Cooling & ventilation	• Air conditioning for control room and switchroom • Ventilation for the harmonic filter compound • CATL EnerX 0.25P battery container HVAC — SI scope, BoP interfaces only • SMA MVPS 4600-S2 enclosure ventilation	• Mechanical contractor • Codes & Standards per BoP Spec section 6.1.4.3
Fire Protection (BoP scope per Aurecon BO drawing series)	Fire detection, alarm and suppression — distinct from CATL-supplied dry suppression internal to BESS containers	• Hydrant system designed for simultaneous hydrant operation in accordance with AS 2419.1-2021 • 2 × 216 kL fire water tanks (432 kL total), auto top-up from potable supply • Pump house (4.7 × 4.6 m), 2 × full-duty pumps in parallel — 1 × diesel + 1 × electric — 30 L/s @ 1,100 kPa each • DN160 HDPE perimeter ring main (approx.1,100–1,200 m) with approx.12 hydrants outside the security fence • Fire brigade booster assembly 2 × 1 m + truck infill connection to tanks	• Tanks & pump house installation • Underground fire piping installation — DN160 HDPE ring main installed prior to BESS container placement and prior to FDAS commissioning • FRNSW-compatible 65 mm Storz fitting on the booster — exceeds Cond B30(b)(ii) minimum 10,000 L tankage • 12-month defects liability and 12-month warranty per Aurecon BO-0001 general notes • Fire Protection Contractor ITP submission required before commencement • Multidisciplinary coordination — electrical, mechanical,

Activity	Purpose	Key Elements	Implementation
		• FDAS to AS 1670.1-2018: MFDCIE in O&M Building Fire Control Room; Sub-FDCIE in Control Room and Switchroom • Hose reel in O&M Warehouse to AS 2441-2005; portable extinguishers all buildings to AS 2444-2001 and NCC 2022	hydraulics, CSMS, architecture, structure
Hydraulics & Plumbing	Site services	• Sanitary plumbing • Cold / hot water • Stormwater drainage	• AS/NZS 3500 series compliance • Licensed plumbers
Ancillary Mechanical	Support equipment	• Pumps & motors • Emergency eye-wash & shower • Compressed air where required	• Compliance with relevant AS standards

Table 17 Mechanical Works Summary

9.17 CONSTRUCTION PLANT AND EQUIPMENT

- Equipment Selection — fit-for-purpose plant matched to the activity, including bulldozers, excavators, graders, rollers, scrapers, concrete pumps, vibrators, mobile cranes (heavy-lift required for Sieyuan Tx and CATL BESS containers), EWPs, telehandlers, cable pulling rigs, trenchers, under-bore drill rigs and HV testing equipment;
- Maintenance Programs — manufacturer-recommended preventative maintenance, daily pre-start checks, scheduled servicing, and a maintenance log for each item of plant. All plant maintained in a proper and efficient condition (Condition A10);
- Operator Training — operators hold the required licences and competencies, with verification of competence (VOC) prior to operation; rail-corridor plant subject to UGL accreditation;
- Safety Measures — guarding, exclusion zones, audible reversing alarms, beacon lights, three-point contact for entry/egress, PPE, and JHA/SWMS for each plant type;
- Plant Inspections — daily pre-start; weekly supervisor inspection; monthly audit; and
- **Refuelling – undertaken only in designated refuelling areas, including designated areas in the field for refuelling using portable diesel pumps, with appropriate safety and spill controls in place.**

9.18 CONSTRUCTION VERIFICATION AND COMMISSIONING

Verification and commissioning confirm the BESS operates safely and as designed. The Commissioning Plan, developed jointly with the CATL SI Contractor and Transgrid, sets out the sequence of testing from individual subsystem tests through to integrated system tests and post-energisation Hold Point testing (HP0–HP3) under CATL / Principal management.

9.18.1 Quality Assurance

- Stage inspections at each key construction phase — earthworks, foundations, structural, electrical, mechanical, commissioning;
- Compliance checks against IFC drawings (Aurecon 30% / ACLE 80% / IFC), specifications, AS standards and the Development Consent;
- Material testing — concrete cube/cylinder, soil density, weld testing, cable testing; and
- Quality records, checklists and forms retained electronically and rolled into the handover package.

9.18.2 Pad 1 / Pad 2 Field Testing and Pre-Commissioning

- Pad 1 MVPS and Cable Testing — 7 collector groups, approx.7 days per group, sequenced after Pad 1 Mechanical Completion;
- Pad 2 MVPS and Cable Testing — 7 collector groups, approx.7 days per group, sequenced after Pad 2 Mechanical Completion;
- CATL BESS Facility Cold Commissioning Pad 1: 7 groups, approx.3 days per group, sequenced after Pad 1 MVPS testing;
- CATL BESS Facility Cold Commissioning Pad 2: 7 groups, approx.3 days per group, sequenced after Pad 2 MVPS testing; and
- Kiosk Power Group Cold & Warm Commissioning — 6 kiosks, approx.20 days each, run concurrent with field testing (CATL scope).

9.18.3 Substation Commissioning

- Earth System Testing & Integration — approx.3 days, sequenced after substation earth grid installation;
- AC & DC Supplies — temporary supply, LOTO system, X/Y battery & charger testing — sequenced after switchroom power-up;
- Portable Building Wiring — Control Room, Switchroom 1 & 2 checks; switchboard primary testing; HIPOT;
- Relay Configuration Baseline Checks — EWS configs to device configs; system baseline checks;
- Standalone Secondary System Testing (Relays) — approx.45 days, sequenced concurrent with substation primary equipment installation;
- SCADA Testing — by SI Contractor (CATL); AEMO Signal List Testing (approx.5 days) — sequenced prior to Pre-Energisation Inspection;
- Outdoor Equipment — Cable Testing of all Primary/Secondary Field Cables, Standalone Substation Equipment Tests (CT/VT and CB), Integrated Equipment Tests (Functional Testing), Transformer Stability Test; and
- Pre-Energisation Inspection — approx.3 days, final hold point before Transgrid POC energisation.

9.18.4 Energisation and Hold Point Testing

- Transgrid Target Energisation POC — sequenced under Transgrid's switching schedule;
- Inclement Weather Allowance — approx.10 days held against the energisation window;
- Substation Energisation Date — predecessor: Pre-Energisation Inspection signed off;
- Mechanical Completion — predecessor: substation energised, all BoP scope items closed out, punch-list closed;
- Tx Soak and Facility Energisation — approx.5 days, CATL/ Principal management;
- HP0 Testing — approx.10 days, CATL/ Principal management;
- HP1 Testing — approx.30 days;
- HP2 Testing — approx.30 days;
- HP3 Testing — approx.30 days; and
- Commercial Operations Date (COD) — predecessor: HP3 complete, AEMO Market Registration confirmed.

9.18.5 Handover Procedures

- Handover documentation — as-built drawings, O&M manuals, test certificates, FAT/SAT records, training material;
- Training — comprehensive operator training including emergency procedures, isolation, BMS, SCADA and routine maintenance;
- Final inspections — pre-handover walk-down and punch-list close-out;
- Handover meetings — coordinated with Principal [BC6] operations team and CATL; and
- Work-as-executed plans submitted under Condition C9 of the consent.

9.19 INTERNAL TRAFFIC MANAGEMENT CONTROL

Internal traffic management ensures the safe and efficient movement of vehicles within the site, minimises disruptions, and complies with ACLE procedures and the Traffic Management Plan required under Condition B8. Key strategies are set out in Table below.

Strategy	Details	Implementation
Designated Routes	Routes within site clearly identified between Pad 1, Pad 2, Substation and amenities	Initial setup with periodic review; alignment to IFC layout
Traffic Signage	Speed limits, directional signage, hazard warnings, restricted areas signed	Installed prior to mobilisation and maintained throughout construction
Speed Limits	On-site speed limit of 20 km/h in congested areas, 20km/h on internal access tracks	Enforced via signage and supervision; speed monitoring as required
Pedestrian Segregation	Dedicated pedestrian walkways from car park to amenities and key work zones	Painted markings, barriers and signage; pedestrian-vehicle interface designed out where feasible
Heavy Vehicle Management	Scheduling of heavy vehicles to avoid peak movements, with marshalling areas; pad-specific access during BESS installation phase	Logistics Coordinator manages daily schedule; coordination with TMP requirements
Coordination with Authorities	Regular meetings with Leeton Shire Council, TfNSW	Monthly or as required; aligned to TMP commitments

Table 18 Internal Traffic Management

9.20 USE OF COUNCIL'S ROADS

The Yanco BESS project will use Leeton Shire Council roads — principally Houghton Road and Hulme (Hume) Road — for site access, with the Hume Highway and Irrigation Way being state roads administered by TfNSW. Use of these roads is managed in accordance with Conditions B3, B5 and B6 of the Development Consent, and supplemented by the S138 (Roads Act) approval for the 132 kV cable works.

Strategy	Details	Implementation
Road Use & Coordination	Liaison with Leeton Shire Council and TfNSW	Early engagement; written agreements; legal and project team review
S138 Approval (Roads Act)	For 132 kV cable works within Council road reserves	Application lodged with sufficient lead time prior to in-road-reserve works
Traffic Impact Mitigation	TMP, preferred routes, traffic control measures	Traffic management specialists; coordination with

Strategy	Details	Implementation
		Council & TfNSW; ongoing monitoring
Dilapidation Surveys	Independent surveys of Houghton Road and Hulme (Hume) Road	Pre- and post-construction; reports to roads authorities (Cond B6)
Road Maintenance & Repair	Inspection programme and prompt repair of development-related damage	Coordination with Leeton Shire roads team; budget allocated for repairs
Community Engagement	Public meetings, newsletters, dedicated communications	Community Liaison Officer manages engagement

Table 19 Use of Council Roads

10 CONSULTATION, COMMUNICATION, AND COMPLAINT MANAGEMENT

Effective consultation and transparent communication are central to the successful delivery of the Yanco BESS. The processes set out below address Condition C14 of the Development Consent (Access to Information) and the consultation obligations within Conditions A13, B8, B13, B22, B33 and B34, and provide for the receipt, handling, response and recording of complaints in accordance with the Environmental Management Strategy required under Condition C1.

10.1 DAILY PRESTART MEETING

A daily prestart meeting is held with all site personnel, including subcontractors, at the commencement of each shift. With three concurrent work fronts (Pad 1, Pad 2, Substation) running once their respective foundation predecessors are released, prestart meetings are organised per work front, with cross-front coordination handled at the daily Construction Manager's briefing including:

- Purpose: ensure all personnel are aware of the day's activities, hazards and controls;
- Attendance: mandatory for all site personnel;
- Agenda: review of previous day's activities and any issues; outline of today's tasks; safety briefings and SWMS recap; environmental considerations; emergency procedures and contacts;
- Site-Specific Considerations: weather forecasts, fire danger ratings, fauna activity, planned heavy lifts (Tx, CATL containers), traffic peaks, rail-corridor possession windows;
- Duration: 15–30 minutes;
- Chair: Construction Manager or Site Supervisor; and
- Records: meeting minutes and action items documented and retained.

10.2 WEEKLY SITE MEETINGS

- Held on site when ACLE is mobilised, with subcontractor representatives present;
- Review of weekly progress against the look-ahead schedule;
- HSE and environmental performance review;
- Interface coordination between BoP, CATL SI Contractor, ASP Contractor, UGL Rail-accredited subcontractor and Transgrid;
- Quality issues, NCRs, and corrective actions; and
- Forward planning and resourcing for the coming two weeks.

10.3 MONTHLY CONSTRUCTION MEETINGS

- Attendees: Project Director, Project Manager, Construction Manager, Site Supervisor, HSE Manager, Quality Manager, Environmental Manager, Commissioning Manager, key subcontractor representatives, and Principal 's[BC7] representatives;
- Agenda: progress against schedule (controlling Project Programme), delays and recovery plans, HSE performance (incidents, near-misses, audits), environmental compliance (monitoring results, incidents, complaints), financial update, planning for the next month;
- Site-Specific Considerations: updates on Council, DPHI, Transgrid, UGL Rail and MI engagement, community feedback, compliance audits;
- Duration: 1–2 hours; and
- Records: detailed minutes and action items distributed within 3 business days.

10.4 STAKEHOLDER COMMUNICATION

Stakeholder communication is delivered in accordance with the Environmental Management Strategy and the broader engagement framework for the project. Each agency, contractor and community group has a defined communication protocol covering what is communicated, the frequency of communication, the preferred channel, and a named ACLE single point of contact (SPOC). The protocol table below sets out the principal communication arrangements; the full stakeholder register is maintained by the Community Liaison Officer.

Stakeholder	What is Communicated	Frequency	Channel	ACLE SPOC
BW ESS (Principal)	Programme status, design submissions, monthly project report, KPIs, change requests, risk register updates, hold-point readiness	Weekly progress meeting; monthly project report; ad-hoc as required	Email, video conference, formal letter for change	Project Manager
NSW Department of Planning, Housing and Infrastructure (DPHI)	Phase commencement notifications (Cond C7), incident notifications (Cond C10/C11), non-compliance notifications (Cond C12), audit reports (Cond C13), public registry uploads (Cond C14)	Pre-phase commencement; within 24 hours of incident; within 7 days of non-compliance; annually for audit	NSW Major Projects portal; formal letter; ACEnergy public website	ACLE Project Director (statutory notifications submitted by ACEnergy as Proponent)
Leeton Shire Council	VPA execution, S138 Roads Act applications, dilapidation surveys, road maintenance, intersection works, community grievances	Pre-mobilisation briefing; monthly status; ad-hoc for applications and grievances	Email, formal letter, in-person meetings	Community Liaison Officer
NSW Planning Secretary	Approval of TMP (B8), Fire Safety Study (B27), BMP (B13), EMS (C1),	Pre-construction; pre-relevant phase;	Formal submission via DPHI	Project Director

Stakeholder	What is Communicated	Frequency	Channel	ACLE SPOC
	variations to construction hours (B16)	as needed for variations		
Transport for NSW	NHVR Class 1 OS/OM permit applications, escort coordination, road occupation if required	Per delivery; minimum 60 days lead for oversize loads	NHVR portal; email; pre-delivery briefing	Logistics Coordinator
Fire and Rescue NSW (FRNSW)	Fire Safety Study, Emergency Plan, Emergency Services Information Package (ESIP), incident notifications, pre-energisation briefing	Pre-construction; pre-energisation; within 24 hours of fire-related incident	Formal submission; email; on-site walkthrough	HSE Manager
NSW Rural Fire Service (RFS)	APZ details, bushfire emergency management, total fire ban coordination, hot-work permitting briefing	Pre-construction; bushfire season briefing	Email; in-person briefing	HSE Manager
NSW EPA	Waste classification, contaminated material disposal, POEO Act incident notifications, water pollution incidents	Pre-disposal; within 24 hours of incident	EPA portal; email; formal letter	Environmental Manager
Heritage NSW and Registered Aboriginal Parties	AHIMS #49-5-0211 protection, Chance Finds Protocol activation, heritage induction content, any heritage discovery	Pre-construction induction; within 24 hours of any chance find; ad-hoc as needed	Email; formal letter; on-site meeting	Environmental Manager
CPHR (NSW DCCEEW)	Biodiversity credit retirement (Cond B12), BMP implementation reports, threatened species incidental finds	Pre-impact for credit retirement; quarterly BMP reporting	Email; formal letter	Environmental Manager
Transgrid (TNSP)	Connection Agreement, Possession of Site coordination, POC switching schedule, R1/R2 modelling	Weekly during commissioning phase; ad-hoc for switching events	Email; video conference; formal letter	Commissioning Manager

Stakeholder	What is Communicated	Frequency	Channel	ACLE SPOC
	submissions, SCADA signal list			
AEMO	Generator Performance Standards (R1/R2), AEMO signal list testing, Market Registration application	Per AEMO process; quarterly during R1 review	AEMO portal; formal submission	Commissioning Manager
UGL Rail (UGLRL)	Construction Permit applications, possession window coordination, work-in-corridor notifications, Protection Officer scheduling	Pre-permit; minimum 14 days lead for in-corridor works	UGL Permit-to-Work system; email	Construction Manager
Murrumbidgee Irrigation	Channel survey, Engineering Assessment, under-bore design and execution, water supply during MI operating season, channel-proximity works	Pre-design; minimum 14 days lead for in-channel works	Email; in-person engineering meetings	Environmental Manager
Aurecon Group Pty Ltd	Design queries, RFIs, IFC release coordination, design risk register updates, constructability and SID workshop inputs	Weekly design coordination meeting; ad-hoc RFIs	Email; video conference; design review meetings	Project Engineer
CATL (System Integrator)	Free-issue material delivery coordination, design endorsement, FAT witness, BESS commissioning interface, harmonic study	Weekly during construction; per FAT campaign; per delivery	Email; video conference; on-site liaison during commissioning	Construction Manager / Commissioning Manager
Local Emergency Management Committee (LEMC)	Pre-construction briefing, Emergency Plan, ESIP, notification of operations commencement	Pre-construction; pre-operations; quarterly during construction	In-person briefing; formal letter	HSE Manager
Local residents (associated and non-associated)	Construction activity notifications (minimum 5 working days for noisy or oversize-delivery activities), complaints	Pre-construction; ongoing as required	Project mailbox; project website; door-knocks for adjacent landholders;	Community Liaison Officer

Stakeholder	What is Communicated	Frequency	Channel	ACLE SPOC
	handling, community newsletters		community newsletters	
Yanco Sportsground operators	Heavy vehicle movements coinciding with event days, traffic disruption advice	Minimum 14 days lead for oversize deliveries on event days	Email; phone	Community Liaison Officer
School bus operators (Cond B8(e)(vi))	Heavy vehicle movement schedule, time-of-day restrictions during school bus periods (07:30–09:00, 14:30–16:00)	Pre-mobilisation briefing; ad-hoc for oversize loads	Email; phone	Logistics Coordinator
Local businesses and service providers	Local procurement opportunities, employment opportunities, project status	Pre-mobilisation; quarterly	Council channels; project website; in-person meetings	Community Liaison Officer

Table 20 Stakeholder Communication Protocol

The Community Liaison Officer is the principal point of contact for the local community. All complaints are received, recorded, acknowledged within 24 hours, and resolved or escalated within timeframes set in the EMS. A complaints register is maintained and reported in the monthly project report. The complaints process is publicly available on the Principal website in accordance with Condition C14(a)(vii).

10.4.1 Escalation Path for Unresolved Stakeholder Issues

Where the ACLE SPOC named in Table 20 is unreachable, non-responsive or unable to resolve an issue within the agreed timeframe, the matter escalates to the next level as follows:

- Level 1 — ACLE SPOC named in Table 19 (response within 24 hours for routine matters; within 1 hour for incidents)
- Level 2 — ACLE Construction Manager (response within 4 hours; engaged where Level 1 is unavailable or where issue is not resolvable at SPOC level)
- Level 3 — ACLE Project Manager (response within 24 hours; engaged where Level 2 is unable to resolve, or where the matter has cross-functional implications)
- Level 4 — ACLE Project Director (engaged for unresolved matters, regulatory escalation, or matters requiring formal Principal involvement; also the route for any matter escalating to the Principal Project Director)

Out-of-hours and emergency contact details (24/7) are issued at site induction to all subcontractors and provided to FRNSW, RFS, LEMC and Transgrid prior to mobilisation.

10.4.2 Documentation of Stakeholder Interactions

All stakeholder interactions are recorded in the Stakeholder Register maintained by the Community Liaison Officer. Records include date and time, stakeholder, channel, ACLE attendee(s), summary of matters discussed, agreed actions, action owner, due date and close-out status. Formal correspondence (letters, regulatory submissions, statutory notifications) is filed in the Document Management System under controlled document numbers. The Stakeholder Register is reviewed monthly by the

Construction Manager and reported in the monthly project report. Complaints are tracked in a separate Complaints Register reported under section10.6 (HSEQ) and made publicly available per Condition C14.

10.4.3 Statutory Notification Triggers

The following notification timeframes are statutory obligations under the Development Consent or other legislation, not courtesy commitments. They take precedence over any conflicting provision in this protocol:

- Incident Notification to the Department — within 24 hours of becoming aware of an incident (Condition C10)
- Subsequent Incident Report — within 7 days of the incident, in the form set out in Appendix 5 of the Consent (Condition C11)
- Non-Compliance Notification — within 7 days of becoming aware of a non-compliance (Condition C12)
- Pollution Incident Reporting under the POEO Act 1997 — immediately (Sections 148, 152) to NSW EPA, Health Department, SafeWork NSW, local Council and FRNSW where applicable
- Workplace fatality, serious injury or notifiable incident under the WHS Act 2011 — immediately to SafeWork NSW
- NHVR oversize / overmass permit applications — minimum 60 days lead time (no statutory minimum but operational requirement)
- Notification to LEMC of commencement of operations — prior to operations commencement (Cond B30(e))

10.5 ENVIRONMENTAL CONTROLS

Environmental controls are delivered through the EMS and the suite of subordinate plans listed in Table 5. The Environmental Manager has day-to-day responsibility for implementation, monitoring and reporting.

10.5.1 Construction Environmental Management Plan

The Environmental Management Strategy (Condition C1) provides the strategic framework for the project's environmental management. It identifies the statutory approvals applicable to the project, sets out roles and responsibilities, includes the complaints and dispute processes, the non-compliance response, and the emergency response procedures, and provides a clear monitoring plan with a register of all monitoring and reporting obligations under the consent.

10.5.2 Waste Management

Waste is segregated, recycled and properly disposed of in accordance with the Waste Management Plan and Condition B33. Refer to section 9.12 (Waste) and Table 13. CATL-supplied lithium-ion battery waste (damaged cells or modules) is given particular attention with quarantine, thermal monitoring and CATL-approved recycling pathways.

10.5.3 Erosion and Sediment Control

- Silt fences, sediment traps, stabilised entry/exit, and progressive rehabilitation per the Landcom Blue Book and IECA BPESC guidelines;
- Site grading designed to direct surface flows to sediment basins;
- Stabilisation of exposed soil within 3 months of construction completion (Condition B25(c));
- Inspection of all ESC measures after each rainfall event of 10 mm or greater, with remediation as required;
- No water pollution as defined under Section 120 of the POEO Act (Condition B24); and
- Additional controls during 132 kV cable trenching and the MI channel crossing to protect the Gogeldrie Branch Canal.

10.5.4 Air Quality, Dust Control and Water Pollution Prevention

- Water carts for haul roads and stockpiles, with frequency increased during dry or windy conditions;
- Stockpiles covered or stabilised with vegetative cover;
- Earthworks restricted during sustained high winds where dust generation cannot be controlled;
- Wheel-wash or rumble grids at site exits to prevent track-out (Condition B7(f));
- Air quality monitoring at agreed locations where required;
- Bunded storage of chemicals, fuels and oils per AS 1940 and EPA Storing and Handling of Liquids handbook;
- Spill kits maintained at refuelling, storage and high-risk locations, with documented spill response procedures;
- Stormwater management with oil separation upstream of receiving environments; and

- Surface drainage via perimeter swales draining to a trapped infiltration invert at the western lowest point; site clean-up measures (removal and replacement of swale topsoil and underlying material) deployed in the event of fire-fighting liquid release (Condition B25(g)).

10.5.5 Noise Control

Construction and operational noise are managed to the limits set out in the Development Consent.

- Construction within approved hours only (Condition B14);
- Low-noise plant selected where feasible;
- Construction noise management aligned to the Interim Construction Noise Guideline (DECC, 2009);
- Noise monitoring on receipt of complaints, with corrective action where exceedances occur;
- Community notifications for high-noise activities; and
- Operational noise informed by CATL Noise Study Report (CATL Deliverable 22).

Operational noise limits applicable to the Yanco BESS, as set out in Condition B17 / Table 3 of the consent, are reproduced below:

Location	Day LAeq(15min)	Evening LAeq(15min)	Night LAeq(15min)	Night LAFmax
Non-associated residential receivers	40 dB(A)	35 dB(A)	35 dB(A)	52 dB(A)
Non-associated industrial receivers	68 dB(A)	68 dB(A)	68 dB(A)	—

Table 21 Operational Noise Limit Requirements (Cond B17, Table 3 of Consent)

10.5.6 Visual Impact

- Off-site visual impacts minimised by paint colours and finishes that blend with the surrounding landscape (Condition B19(b));
- Glare and reflection avoided through specification of low-reflectance finishes; and
- No advertising signs mounted on site except as required for identification or safety purposes (Condition B19(c)).

10.5.7 Vegetation Buffer (Landscape Screening)

- Established and maintained in accordance with Condition B9 of the consent;
- Planted prior to commencing operation (Cond B9);
- Comprised of endemic species;
- Designed and maintained per RFS Planning for Bushfire Protection 2019; and
- Actively maintained with weed management and replacement of failed plantings.

10.5.8 Lighting

- External lighting is low-intensity, except where required for safety or emergency purposes (Condition B20);
- No light shines above the horizontal; and
- Compliance with AS/NZS 4282:2019 — Control of the Obtrusive Effects of Outdoor Lighting.

10.5.9 Biodiversity, Heritage and Hazards

- BMP implemented in accordance with Condition B13, with biodiversity credits retired prior to any biodiversity impact (Condition B12);
- AHIMS #49-5-0211 — 10 m no-go zone demarcated and protected (Condition B21);
- Chance Finds Protocol prepared and implemented (Condition B22);
- Unexpected Finds Procedure for contamination implemented (Condition B26);

- Dangerous Goods stored below SEPP 33 threshold quantities (Condition B28); and
- Fire Safety Study (Condition B27) and Emergency Plan (Condition B31) implemented as required.
-

10.5.10 Unexpected Finds Procedure — Contamination and Asbestos (Condition B26)

This procedure satisfies Condition B26. It applies if unexpected contamination or asbestos (or suspected contamination) is found or disturbed during construction. It is prepared, or reviewed and approved, by a certified contaminated land consultant [CEnvP(SC) or CPSS CSAM], and works alongside the Chance Finds Protocol (Condition B22) for Aboriginal and heritage finds.

Finds to watch for include asbestos (ACM, fines or friable), lead-based paint, stained or odorous soil, groundwater, buried waste, unidentified underground services, and protected species or habitat. Imported building materials are certified asbestos-free (BoP Specification 4.18.3); no asbestos is brought onto site.

Potential Contaminants of Concern

Unexpected find	Description
Buried Asbestos Containing Material (ACM), asbestos fines / friable asbestos	Cement-bound ACM may be present in building waste or conduits. Friable (easily crumbled) asbestos is more commonly associated with lagging and insulation. Laboratory analysis is typically required to identify asbestos fines and fibres.
Lead-based paint	Paint containing lead, a toxic metal, poses health risks if dust is inhaled or ingested.
Soil staining or odour	Soils with observed visual or olfactory impacts such as staining and/or odour.
Groundwater	Interception of groundwater and subsequent dewatering requirements.
Buried waste	Observation of bulk waste material or buried rubbish.
Underground services	Sub-surface infrastructure such as underground tanks, concrete layers, buried pipes or utility services not previously identified.
Unexpected finds relating to biodiversity	Discovery of protected species, habitats or vegetation requiring special management under environmental regulations.

Roles and responsibilities

Role	Responsibility
All site personnel (including subcontractors)	STOP WORK and immediately notify the ACLE Site Supervisor on discovery or suspicion of contamination or asbestos. Do not disturb, remove, touch or displace the material. Attend induction and toolbox training on identifying potentially contaminated material.
ACLE Site Supervisor	Implement this procedure. Secure and contain the affected area with a minimum 20 m buffer, install environmental controls, engage the certified environmental consultant, and maintain records of the find and the response.
ACLE Environmental Manager	Oversee implementation, coordinate with the certified consultant, manage notifications to the Principal and authorities, maintain the find / notification / RAP / validation records, and report to the Principal.
Certified environmental consultant [CEnvP(SC) / CPSS CSAM]	Assess the find, direct sampling and analysis and detailed site investigation, prepare or validate any Remediation Action Plan, and issue validation / clearance.
Licensed asbestos removalist / occupational hygienist	Where asbestos is confirmed, remove and dispose of it in accordance with SafeWork NSW requirements and the WHS Regulation 2017, and issue a clearance certificate.
BW ESS (Principal)	Support authority notifications, agree the scope of further works, and ensure the consent's incident notification obligations (Conditions C10–C11) are met.

Procedure

On discovery or suspicion of an unexpected find, the following steps are carried out. The decision logic is shown in the flowchart below.

- Step 1 — Stop work and secure. Stop work in the immediate affected area and notify the ACLE Site Supervisor immediately. Do not disturb, remove, touch or displace the material. Install environmental controls, secure the site and contain the affected area with a minimum 20 m buffer to allow assessment and management of the find. Engage the certified environmental consultant to assess the appropriate actions.
- Step 2 — Field preparation. Complete field preparations, including the appropriate Safe Work Method Statement (SWMS) and Environmental Work Method Statement (EWMS), and procure appropriate PPE.
- Step 3 — Detailed site investigation. Complete a detailed site investigation under the direction of the certified consultant.
- Step 4 — Further works / Remediation Action Plan. Where the impact is not sufficiently understood, complete further works and/or prepare a Remediation Action Plan in consultation with the relevant authorities until the issue is sufficiently understood.
- Step 5 — Remediation and validation. Complete remedial activities and validation works as detailed in the Remediation Action Plan.
- Step 6 — Recommencement. Recommence works at the site once the find has been appropriately managed and any required validation or clearance obtained.

Where the contamination is notifiable, ACLE — supported by the Principal — notifies the relevant authorities and agrees a proposed scope of works for further risk assessment. Notifiable circumstances include the duty to notify the EPA of material harm under section 148 of the Protection of the Environment Operations Act 1997, notification of asbestos to SafeWork NSW, and notification to Council where required. Where a find constitutes an incident under the Development Consent, the Department is notified within 24 hours (Condition C10) with a subsequent report within 7 days (Condition C11, Appendix 5).

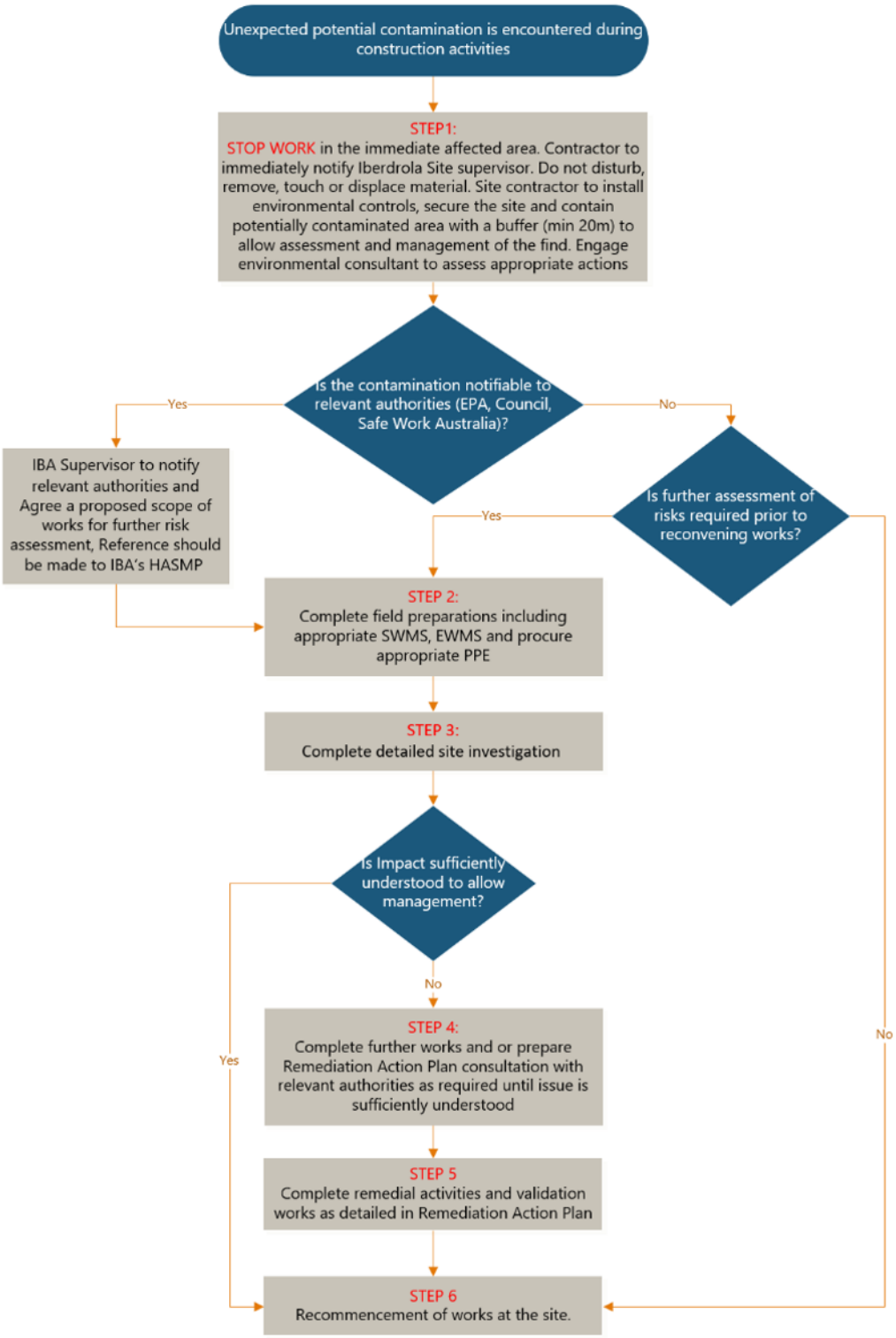


Figure 4 Unexpected Finds Procedure (Contamination) — response flowchart

Records kept for audit include the certified procedure, induction records, the find report with photographs and sampling results, authority notifications, any Remediation Action Plan and validation or clearance, and asbestos disposal dockets where applicable.

10.5.11 Dewatering and Groundwater Management

Groundwater is about 6 m below ground level. Where excavation or trenching — mainly the 132 kV cable trench and the Murrumbidgee Irrigation channel crossing — intercepts groundwater or accumulates water, it is tested before any discharge or reuse and must not cause water pollution under section 120 of the POEO Act (Condition B24). Water passes through sediment and, where needed, oil/water separation, or is disposed of to a licensed facility if it cannot meet criteria. Volumes, results and disposal are recorded, and contaminated groundwater triggers the Unexpected Finds Procedure above.

10.5.12 Environmental Monitoring and Reporting

- Regular environmental audits and inspections by the Environmental Manager;
- Compliance with environmental permits and reporting requirements;
- Immediate corrective actions for any non-compliance;
- Environmental training in induction and refresher toolboxes;
- Documented monitoring results published on the Principal [BC8]website in accordance with Condition C14; and
- Independent Environmental Audits conducted in accordance with Condition C13 and the Independent Audit Post Approval Requirements (2020).

The key environmental inspections and the records they produce are summarised below. These records feed the internal environmental audit program and the Independent Environmental Audit (Condition C13).

Aspect	Frequency	Record	Responsible
Erosion and sediment control	Weekly and within 24 h of rain ≥ 10 mm	ESC inspection checklist	Environmental Manager
Dust	Daily; on complaint	Dust and water-cart log	Environmental Manager
Noise	At non-associated residences; on complaint	Noise monitoring report	Environmental Manager
Water quality (incl. dewatering)	Before any discharge or reuse	Water test results	Environmental Manager
Site environmental inspection	Weekly	Inspection report	Environmental Manager
Complaints, incidents, non-compliances	On occurrence	Complaints / incident / non-compliance registers	Environmental Manager

10.6 HEALTH, SAFETY, ENVIRONMENT AND QUALITY (HSEQ) SYSTEMS

The integrated HSEQ Management System for the Yanco BESS is aligned to ISO 45001:2018 (OHS), ISO 14001:2015 (Environment) and ISO 9001:2015 (Quality). The HSEQ Manager is responsible for system implementation, monitoring and continuous improvement.

- HSEQ Management Plan — detailed plan setting out the policies, procedures and responsibilities for managing health, safety, environment and quality;
- Health and Safety — risk assessments and SWMS (including rail-corridor and CATL battery-specific SWMS), safe systems of work, incident reporting and investigation, and continuous improvement;
- Environmental Management — implementation and monitoring of the EMS and subordinate plans;
- Quality Assurance — regular quality checks and audits against IFC specifications and AS standards;
- Training — regular HSEQ training for all site personnel; certification and competency for specific roles including UGL rail-corridor accreditation;
- Audits and Inspections — regular internal audits and inspections to assess HSEQ performance;
- Continuous Improvement — feedback loops, corrective actions, lessons-learned register;
- HSEQ Manager — accountable for system implementation;

- HSEQ Management Software — for documentation, performance tracking and reporting; and
- Site-specific Adaptation — HSEQ systems adapted to Yanco-specific risks including CATL lithium-ion battery hazards, Sieyuan transformer logistics, harmonic filter installation, ASP cable works, rail corridor entry and Murrumbidgee Irrigation channel proximity.
-

10.7 COMPLIANCE, EVIDENCE AND INDEPENDENT AUDIT

Condition C13 requires Independent Environmental Audits of the development to be conducted in accordance with the Independent Audit Post Approval Requirements (2020). This section sets out how ACLE demonstrates and evidences compliance during construction so that the Independent Environmental Auditor (IEA) can verify it.

10.7.1 Independent Environmental Audit (Condition C13)

The Independent Environmental Auditor is the Department's independent checker and assesses whether the project complies with the consent. ACLE supports the audit by keeping the Compliance Evidence Register (Appendix 3) and the Section 10.5 records current and available, giving the auditor access to the site, people and records, closing out audit findings, publishing each audit report and ACLE's response on the DPHI [BC9]website (Condition C14), and revising the plans within one month of an audit report (Condition C2).

10.7.2 Incident and Non-Compliance Reporting (Conditions C10–C12)

Incidents are notified to the Department within 24 hours via the Major Projects portal, with a follow-up report within 7 days addressing the items in Appendix 5. Non-compliances are notified within 7 days. Both are logged in the incident and non-compliance registers and closed out through the EMS procedures.

10.7.3 Pre-Construction Compliance Gate

The following approvals and records are confirmed before the relevant activity starts, as part of the pre-mobilisation checklist.

Gate / activity	Condition(s)	Approval / evidence required before proceeding	Responsible
Any construction (site-wide)	A14, C1, C7, C8, B8, B33, B34, C14	Executed VPA; approved EMS; phase-commencement notification; layout plans submitted; approved TMP; approved Waste Management Plan; Accommodation and Employment Strategy; public information published on website	Project Manager
Vegetation clearing / ground disturbance	B10, B11, B12, B13, B25	Approved BMP; biodiversity credits retired with evidence to Planning Secretary; exclusion fencing installed; erosion and sediment controls installed	Environmental Manager
Road upgrades / pre-construction minor works	B5, B6, B8	Approved TMP; pre-construction dilapidation survey; road-upgrade approvals (roads authority / TfNSW)	Project Manager
Excavation (contamination readiness)	B26	Unexpected Finds Procedure in place and certified [CEnvP(SC) / CPSS CSAM]; personnel inducted	Environmental Manager
Battery storage facility and footings	B27	FRNSW-endorsed Fire Safety Study approved by the Planning Secretary	Project Manager
Commissioning	B31, B17	Emergency Plan and Emergency Services Information Package issued to FRNSW/RFS; operational noise controls in place	HSE Manager / Commissioning Manager
Operation	B9, B32, C9	Vegetation buffer planted; current ESIP on site; work-as-executed plans submitted	Project Manager

10.7.4 Compliance Evidence Register

Appendix 3 records, for each condition, where it is addressed, the record that evidences compliance and who is responsible. It is the auditor's primary reference and is updated at each revision.

11 CONCLUSIONS

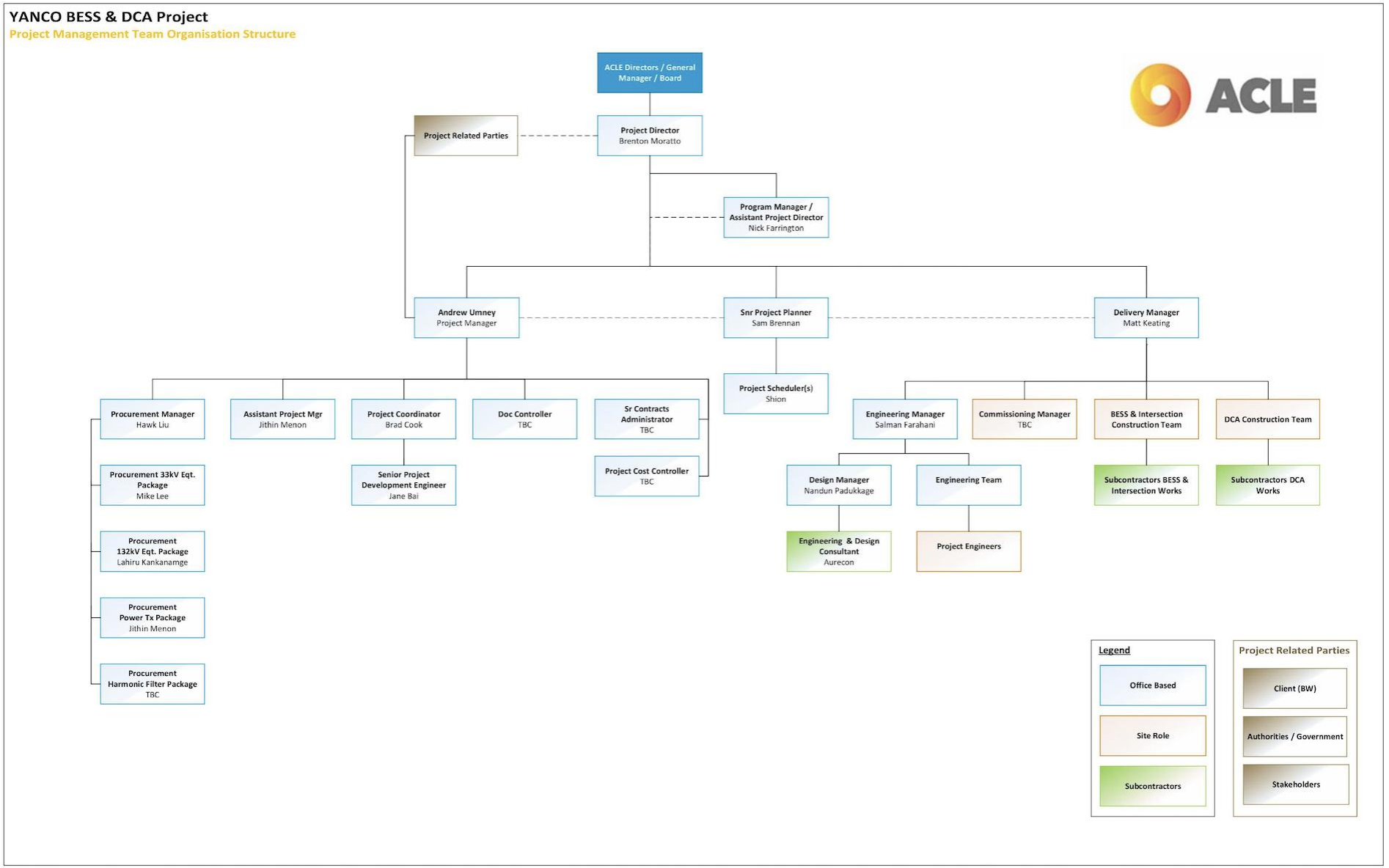
The Yanco BESS is a significant infrastructure project that will contribute to the firming of renewable generation and the stability of the NSW electricity grid through grid-forming inverter technology. The construction phase has been planned in detail to deliver a safe, compliant and high-quality outcome that meets the requirements of Development Consent SSD-67478479, the BoP Specifications, the Transgrid Connection Documents, the conditions of the BoP Contract and the broader regulatory framework, against the controlling Project Programme.

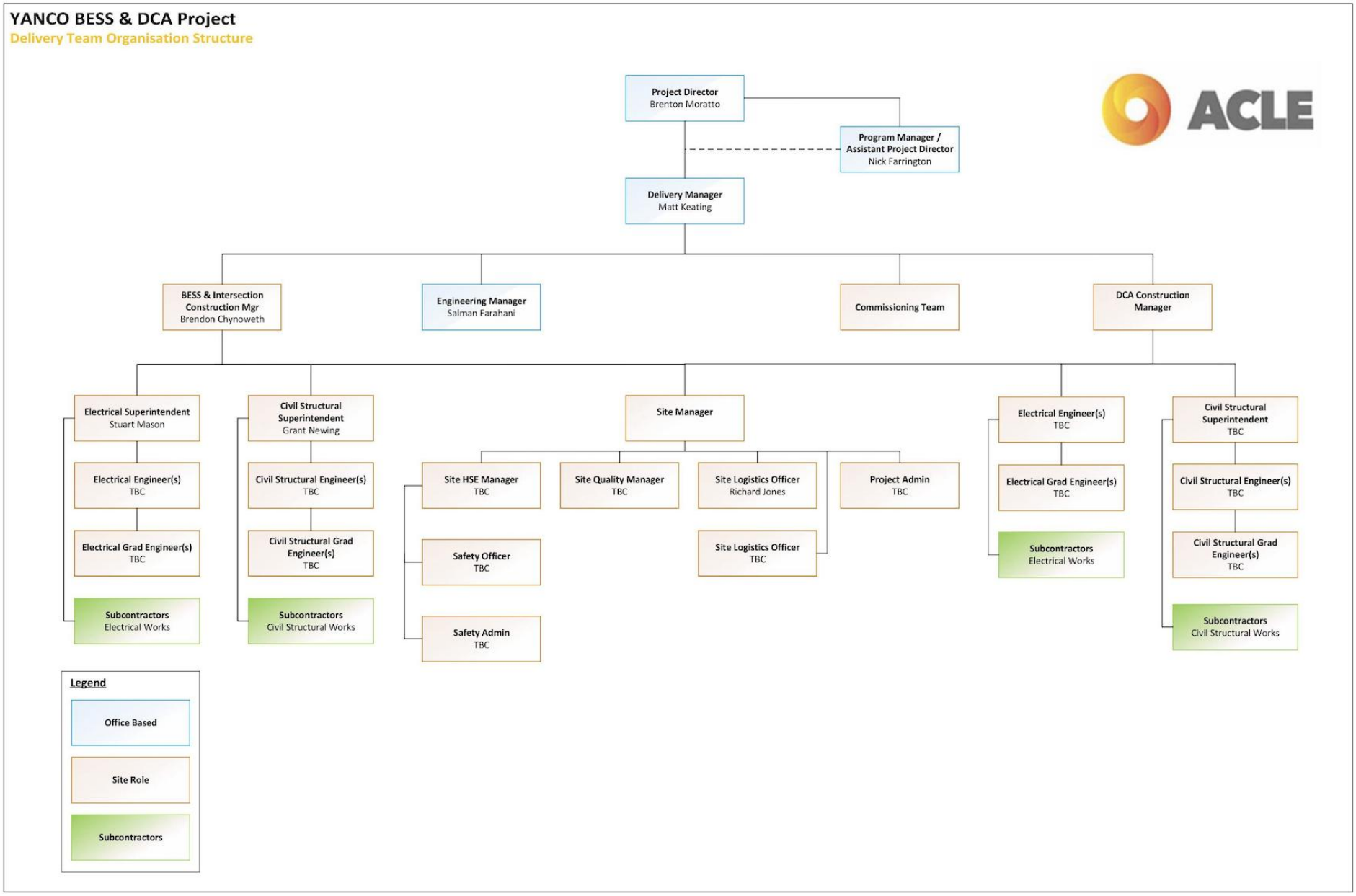
This Construction Management Plan provides the framework for the safe and effective delivery of the project. The key elements of the plan are:

- Project Organisation — clear roles, responsibilities and accountabilities, with a single point of accountability to the Principal through the Project Manager (refer Appendix 1: Organisation Chart);
- Risk Management — proactive identification, assessment and control of hazards through Safety in Design workshops at the 30% and 80% design release gates, the HSE Risk Register, SWMS, JHA and the Permit-to-Work system, including specific controls for rail corridor, ASP cable and MI channel crossing works;
- Project Execution — detailed pre-mobilisation planning, Aurecon-led 30% design, ACLE-led 80% and IFC design, staged Construction Certificates (Stage 1 — Bulk Earthworks and Fencing; Stage 2 — Remaining Civils), and timely procurement of long-lead items including Sieyuan transformers (Tx1 & Tx2), the harmonic filter GIS CB and the CATL-supplied free-issue equipment;
- Parallel Work-Fronts — Pad 1 (CG-1 to CG-7, Bus-A), Pad 2 (CG-8 to CG-14, Bus-B), and Substation construction running in parallel and gated by their respective foundation predecessors, converging on Mechanical Completion of the Facility;
- Specialist Interfaces — Transgrid (TNSP) Connection Agreement, ASP Contractor for 132 kV cable, UGL Rail Construction Permit for rail corridor works, Murrumbidgee Irrigation channel crossing, and Leeton Shire Council S138 approval for road reserves;
- Key Strategies — rigorous planning, robust site security, strict environmental controls, and specific plans for civil, structural, electrical and mechanical works at peak workforce of approximately 150 personnel during the BESS installation phase;
- Commissioning and Handover — field testing and pre-commissioning of MVPS/cabling per pad, CATL BESS facility cold commissioning, substation commissioning, Transgrid POC energisation, Substation Energisation and Mechanical Completion, and Hold Point testing HP0–HP3 through to COD; and
- Consultation and Communication — transparent engagement with all stakeholders including Transgrid, UGL Rail, Murrumbidgee Irrigation, CATL, Aurecon, regulators, Council and the community, with a publicly accessible complaints and reporting framework.

This CMP is a living document. It will be reviewed and updated in accordance with Condition C2 of the Development Consent within one month of any incident report, audit report or modification to the consent, and at any other time required to reflect material changes to scope, methodology or organisation.

APPENDIX 1 : ORGANISATION CHART


YANCO BESS & DCA Project
Project Management Team Organisation Structure
ACLE Directors / General Manager / Board
Project Related Parties
Project Director
Brenton Moratto
Program Manager / Assistant Project Director
Nick Farrington
Andrew Umney
Project Manager
Snr Project Planner
Sam Brennan
Delivery Manager
Matt Keating
Procurement Manager
Hawk Liu
Assistant Project Mgr
Jithin Menon
Project Coordinator
Brad Cook
Doc Controller
TBC
Sr Contracts Administrator
TBC
Project Scheduler(s)
Shion
Engineering Manager
Salman Farahani
Commissioning Manager
TBC
BESS & Intersection Construction Team
DCA Construction Team
Procurement 33kV Eqt. Package
Mike Lee
Senior Project Development Engineer
Jane Bai
Project Cost Controller
TBC
Design Manager
Nandun Padukkage
Engineering Team
Subcontractors BESS & Intersection Works
Subcontractors DCA Works
Procurement 132kV Eqt. Package
Lahiru Kankanamge
Engineering & Design Consultant
Aurecon
Project Engineers
Procurement Power Tx Package
Jithin Menon
Procurement Harmonic Filter Package
TBC
Legend
Office Based
Site Role
Subcontractors
Project Related Parties
Client (BW)
Authorities / Government
Stakeholders


YANCO BESS & DCA Project
Delivery Team Organisation Structure
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Program Manager / Assistant Project Director
Nick Farrington
Delivery Manager
Matt Keating
BESS & Intersection Construction Mgr
Brendon Chynoweth
Engineering Manager
Salman Farahani
Commissioning Team
DCA Construction Manager
Electrical Superintendent
Stuart Mason
Electrical Engineer(s)
TBC
Electrical Grad Engineer(s)
TBC
Subcontractors
Electrical Works
Civil Structural Superintendent
Grant Newing
Civil Structural Engineer(s)
TBC
Civil Structural Grad Engineer(s)
TBC
Subcontractors
Civil Structural Works
Site Manager
Site HSE Manager
TBC
Site Quality Manager
TBC
Site Logistics Officer
Richard Jones
Project Admin
TBC
Safety Officer
TBC
Safety Admin
TBC
Site Logistics Officer
TBC
Electrical Engineer(s)
TBC
Electrical Grad Engineer(s)
TBC
Subcontractors
Electrical Works
Civil Structural Superintendent
TBC
Civil Structural Engineer(s)
TBC
Civil Structural Grad Engineer(s)
TBC
Subcontractors
Civil Structural Works
Legend
Office Based
Site Role
Subcontractors

APPENDIX 2 : HAULAGE ROUTE

All construction haulage to and from the Yanco BESS site uses the approved route specified by Condition B3 of the Development Consent. The route description, vehicle categories and key constraints are summarised below. The graphical haulage route map is reproduced from Appendix 4 of Development Consent SSD-67478479 and will be embedded as a figure in the IFC-revision CMP.

1. APPROVED HAULAGE ROUTE

Vehicle Category	Route	Constraints
Standard heavy vehicles (non-escort)	Irrigation Way → Houghton Road → Hulme (Hume) Road → Site	87 movements per day maximum; 19 m maximum vehicle length (Cond B1, B3)
Escort vehicles	Hume Highway → Irrigation Way → Houghton Road → Hulme (Hume) Road → Site	9 escort vehicle movements per day maximum (Cond B1)
High-risk escort vehicles (oversize)	Port Kembla → Hume Highway → Irrigation Way → Houghton Road → Hulme (Hume) Road → Site	2 high-risk escort movements per day maximum; NHVR Class 1 OS/OM permit required (Cond B1)

Table 22 Haulage Route by Vehicle Category

2. CRITICAL HEAVY VEHICLE MOVEMENTS

Item	Vehicle / Load	Sequencing	Notes
Sieyuan Tx1 + Tx2	34.422 m × 4.188 m × 3.628 m, oversize escorted	Substation Mechanical Completion phase	NHVR Class 1 permit; bridge load and overhead clearance survey required; escort vehicles per NHVR
GIS Circuit Breaker (Harmonic Filter)	Oversize escorted	Substation Foundations phase, coordinated with Sieyuan delivery window	Coordinated with Sieyuan delivery window
Switchroom & Control Room	Modular building, escorted	Substation Foundations phase	Standard escort
O&M Warehouse modules (2 × 40 ft containers)	Standard heavy vehicle	Substation Foundations phase	Within 19 m / 87 per day envelope

Item	Vehicle / Load	Sequencing	Notes
MVPS Batch #1 / Batch #2	78 × SMA MVPS 4600-S2, <18 t each	Two batches, sequenced ahead of Pad 1 and Pad 2 installation windows	Standard heavy vehicles within Cond B1 limits
CATL BESS Batch #1 / Batch #2	195 × CATL EnerX 0.25P, ~45 t each	Two batches, sequenced ahead of Pad 1 and Pad 2 BESS placement windows	Standard heavy vehicles within Cond B1 limits
Fire tanks and pump container	Standard heavy vehicle	Site establishment phase, prior to BESS container placement	Within Cond B1 limits

Table 23 Critical Heavy Vehicle Movements

Route operational requirements per Conditions B6 and B7: all heavy vehicles approach the site in a forward direction; no parking on Council roads outside designated areas; dilapidation surveys completed before and after construction along Houghton Road, Hulme (Hume) Road and Irrigation Way; wheel washes or rumble grids at site exits to prevent mud tracking (Cond B7(f)); driver's Code of Conduct, fatigue management and speed compliance maintained through the TMP.

Coordination with school bus operators, Yanco Sportsground event days, and Leeton Shire Council is maintained through the Stakeholder Communication plan, with advance notification of oversize and out-of-hours deliveries provided not less than 5 working days in advance via the project mailbox.

APPENDIX 3 : REGISTER OF CONDITIONS FOR DEVELOPMENT CONSENT

This appendix maps each condition of Development Consent SSD-67478479 to the section(s) of this CMP and the subordinate management plans where compliance is addressed. The register is reviewed at each CMP revision and updated to reflect any

modification to the consent. For each condition it also records the evidence or records that demonstrate compliance and the responsible person, so that it serves as the project Compliance Evidence Register for the Independent Environmental Audit (Condition C13).

Condition	Subject	Addressed in CMP	Evidence / records for audit	Responsible
A1	Obligation to Minimise Harm to the Environment	Section 11.7; EMS	EMS and subordinate plans; HSE/environmental risk register; weekly environmental inspection records; incident and complaints registers	Environmental Manager
A2	Terms of Consent — compliance with EIS and Layout	Section 4.2; Section 4.3; throughout CMP	Approved layout plans (Cond C8); IFC drawings reconciled to Appendix 1 of consent; compliance evidence register (Appendix 3)	Project Manager
A3	Compliance with Planning Secretary requirements	Section 8.10; Section 10.7	DPHI correspondence register; record of directions received and actions taken	Project Manager
A4	Inconsistency resolution	Section 1; applied throughout	Document control register; RFI register; adoption of most-onerous-requirement decisions	Quality Manager
A5	Battery Storage Restriction — 250 MW / 1,100 MWh cap	Section 3.1; Section 4.3	Design basis (BOD); R1 model; equipment nameplate schedule confirming installed capacity	Project Engineer
A6	Upgrading within approved footprint	Section 3; EMS	Approved footprint drawings; survey set-out records; revised layout plans to Planning Secretary before any upgrade	Project Engineer
A7	Structural Adequacy — NCC compliance	Section 9.14; Section 8.6	Structural design certificates; construction certificate; independent structural checks; ITP sign-offs	Quality Manager
A8	Demolition — AS 2601-2001	Not applicable for new construction	N/A — no demolition. Noted for any future works	Project Manager
A9	Protection of Public Infrastructure	Section 9.20; TMP	Pre/post dilapidation surveys; road/service repair records; Council S138 approval	Site Manager
A10	Operation of Plant and Equipment	Section 9.17	Plant register; maintenance and calibration records; daily pre-start checks; RCD test records	Site Supervisor
A11	Applicability of Guidelines	Section 2; applied throughout	Standards register (date-of-consent versions per A11); any Planning Secretary directions on updated guidelines	Quality Manager
A12	Compliance — employees and contractors aware	Section 6; Section 9.4	Induction register; toolbox talk records; subcontractor sign-on and competency records	HSE Manager
A13	Evidence of Consultation	Section 10.4	Consultation log; correspondence; meeting minutes; record of matters resolved/unresolved (per A13)	Community Liaison Officer
A14	Community Enhancement — VPA with Council	Section 5; Section 8.5	Executed VPA (dated prior to commencing construction); Council correspondence	Project Manager
B1	Heavy Vehicle Restrictions — 87/day, 9 escort, 2 high-risk, 19 m max	Section 9.6; TMP; Appendix 2	Daily heavy-vehicle movement log; vehicle-length records; NHVR Class 1 permits	Traffic Manager / Site Manager
B2	Heavy Vehicle Records	TMP; Section 8.10	Daily vehicle count register maintained for the duration of the project	Site Manager

Condition	Subject	Addressed in CMP	Evidence / records for audit	Responsible
B3	Access Route — Irrigation Way / Houghton Rd / Hulme (Hume) Rd	Section 9.6; TMP; Appendix 2	Approved TMP route; driver route instructions; telematics/GPS records	Traffic Manager
B4	Site Access via Hulme (Hume) Rd / Substation Access (Transgrid)	Section 9.6	Site access drawings per Appendix 1; gate access log	Site Manager
B5	Road Upgrades prior to construction	Section 8.3; Section 9.6	Completion records for road/intersection upgrades (Appendix 3 of consent); roads authority / TfNSW sign-off	Project Manager
B6	Road Maintenance & Dilapidation	Section 9.20; TMP	Pre- and post-construction dilapidation reports issued to roads authority; repair/make-good records	Site Manager
B7	Operating Conditions — all-weather roads, parking, drainage, forward direction, clean vehicles	Section 9.6; 9.7; 9.20	All-weather road records; wheel-wash / rumble-grid logs; forward-direction and parking controls; site diary	Site Supervisor
B8	Traffic Management Plan	Section 5; Section 9.19; TMP	Planning Secretary-approved TMP; EIS reconciliation table; driver code-of-conduct training records; flood response plan	Traffic Manager
B9	Vegetation Buffer (Landscape Screening)	Section 10.5; BMP; Landscape Plan	Landscape plan; planting records (endemic species, prior to operation); weed and replacement maintenance logs	Environmental Manager
B10	Vegetation Clearance limited to approved areas	Section 4.3; Section 9.3; BMP	Approved disturbance-area drawings; pre-clearance survey; exclusion fencing photos and inspection records	Environmental Manager
B11	Biodiversity Offsets — credits required	Section 4.3; BMP	Biodiversity credit retirement certificates (PCT 74×8, PCT 26×1, Koala×8, Southern Myotis×8)	Environmental Manager
B12	Evidence of Credit Retirement prior to impact	Section 8.3; Section 8.5	Retirement evidence submitted to Planning Secretary, dated prior to any biodiversity impact	Environmental Manager
B13	Biodiversity Management Plan	Section 5; BMP	Approved BMP; fauna management and exclusion-fencing records; annual monitoring reports to CPHR; incidental threatened-species finds records	Environmental Manager
B14	Construction Hours	Section 9.10	Site diary / timesheets confirming works within 7am-6pm Mon-Fri, 8am-1pm Sat, nil Sun/public holidays	Site Manager
B15	Exceptions to Construction Hours	Section 9.10	Records of inaudible commissioning; police/authority-requested deliveries; emergency-work justification	Site Manager
B16	Variation of Construction Hours	Section 9.10	Planning Secretary approvals; consultation evidence; noise impact assessment (ICNG 2009)	Environmental Manager
B17	Operational Noise Limits — Table 3	Section 10.5; Table 21	Commissioning noise verification against Table 3; CATL Noise Study Report	Commissioning Manager
B18	Dust	Section 10.5; Section 9.12	Dust suppression / water-cart logs; daily visual monitoring; complaints register	Environmental Manager

Condition	Subject	Addressed in CMP	Evidence / records for audit	Responsible
B19	Visual	Section 9.5; Section 10.5	Paint colour / low-reflectance finish specifications; signage register (no advertising)	Project Engineer
B20	Lighting — AS/NZS 4282:2019	Section 9.8; Section 10.5	Lighting design and compliance certificate to AS/NZS 4282:2019; no light above horizontal	Project Engineer
B21	Protection of Heritage Items — 10 m no-go AHIMS #49-5-0211	Section 7; Section 10.5; Chance Finds Protocol	10 m no-go zone demarcation photos and register; induction records; heritage inspection records	Environmental Manager
B22	Chance Finds Protocol	Section 5; Chance Finds Protocol	Approved Chance Finds Protocol (consultation with Aboriginal Stakeholders and Heritage NSW); induction records; any find/stop-work reports	Environmental Manager
B23	Water Supply	Section 4.3; Section 8.5	Water access licence (Water Act / WM Act); supply records	Project Manager
B24	Water Pollution (POEO s120)	Section 7; Section 10.5	Water quality monitoring; ESC inspection records; spill/incident register; no s120 pollution demonstrated	Environmental Manager
B25	Soil & Water Operating Conditions	Section 9.13; Section 10.5	ESCP (Landcom Blue Book Vol 1 & 2A); inspection records within 24 h of >=10 mm rainfall; ground-cover stabilisation within 3 months	Environmental Manager
B26	Unexpected Finds Procedure (Contamination and Asbestos)	Section 10.5 (Unexpected Finds Procedure); Section 5; Section 7	This documented procedure; certification of the procedure by a CEnvP(SC) or CPSS CSAM consultant; induction/toolbox records; any find, notification, RAP and validation records	Environmental Manager
B27	Fire Safety Study — to FRNSW & Planning Secretary	Section 5; Section 7; Fire Safety Study	FRNSW-endorsed Fire Safety Study; Planning Secretary approval prior to battery/footing construction	Project Manager
B28	Storage & Handling of Dangerous Goods — below SEPP 33 thresholds	Section 10.5; HSE Plan	Dangerous goods inventory/manifest below SEPP 33 thresholds; SDS register	HSE Manager
B29	Storage & Handling per AS 1940 and EPA Handbook	Section 10.5; Section 7	Bunding inspection records; spill-kit register; AS 1940 storage compliance checks	HSE Manager
B30	Hazards Operating Conditions — fire risk, APZ, water supply, Storz, defendable space	Section 4.3; 9.13; 9.16; Fire Safety Study; Emergency Plan	Fire-water supply records (432 kL, 65 mm Storz); APZ / defendable-space records; RFS notification	HSE Manager
B31	Emergency Plan	Section 5; Emergency Plan	Emergency Plan and Emergency Services Information Package; evidence of distribution to local Fire Control Centre and FRNSW/RFS	HSE Manager
B32	Implementation of Emergency Plan & ESIP	Emergency Plan; Section 8.12	Current-version ESIP kept on-site at entry points; drill records; version control	HSE Manager
B33	Waste Management Plan	Section 5; Section 9.12	Waste Management Plan (Council consultation); waste classification records; disposal dockets to licensed facilities; lithium-ion battery storage records	Environmental Manager
B34	Accommodation and Employment Strategy	Section 5; Section 6	Strategy prepared with Council; local employment / local business records; monitoring reports	Project Manager

Condition	Subject	Addressed in CMP	Evidence / records for audit	Responsible
B35	Decommissioning and Rehabilitation	Section 8.12; Rehabilitation Plan	Rehabilitation Plan (Table 4 objectives); decommissioning methodology	Project Manager
C1	Environmental Management Strategy	Section 5; Section 13.3; EMS	Planning Secretary-approved EMS; monitoring and reporting register	Environmental Manager
C2	Revision of Strategies, Plans and Programs	Section 4.1; Section 11; Document Control	Revision history (front of CMP); records of revision within 1 month of an incident report (C10), audit report (C13) or consent modification	Project Manager
C3	Staging, Combining, Updating Strategies	Section 5; EMS	Approved staging submissions and combined-plan relationships	Project Manager
C4	Staging without full consultation (Secretary approval)	EMS Section 3	Planning Secretary approvals	Project Manager
C5	Updated plans supersede previous versions	EMS; Document Control	Superseded-document register; controlled-copy distribution	Project Manager
C6	Staging without all requirements (where not applicable)	EMS	Planning Secretary approvals confirming non-applicable requirements	Project Manager
C7	Notification of Department of phase commencement	Section 8.10; Section 10.7	Major Projects portal notification records for each phase commencement/cessation	Project Manager
C8	Layout Plans submitted prior to construction	Section 8.6; Section 8.10	Layout plans submitted via Major Projects portal prior to construction	Project Manager
C9	Work-as-executed Plans	Section 8.12	Work-as-executed plans submitted to Department and Council prior to operation	Project Engineer
C10	Incident Notification — 24 hours	Section 7; Section 10.7; EMS	Portal incident notifications within 24 h; incident register	Environmental Manager
C11	Subsequent Incident Report — 7 days (Appendix 5)	Section 7; Section 10.7; EMS	Subsequent incident reports addressing Appendix 5 items (a)-(h) within 7 days	Environmental Manager
C12	Non-Compliance Notification — 7 days	Section 7; Section 10.7; EMS	Non-compliance register; portal notifications within 7 days	Environmental Manager
C13	Independent Environmental Audit	Section 10.5; Section 10.7; EMS	IEA appointment; audit program per Independent Audit Post Approval Requirements (2020); audit reports, ACLE responses and close-out of actions	Project Manager / Environmental Manager
C14	Access to Information — website publication	Section 10.4; Section 10.7; EMS	Evidence of website publication (approved plans, monitoring summaries, complaints process, audit reports and responses) kept up to date	Community Liaison Officer