ENVIRONMENTAL MANAGEMENT STRATEGY

PROJECT: Yanco BESS (Battery Energy Storage System)

ACLE SERVICES

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1 INTRODUCTION

ACEnergy Pty Ltd (ACEnergy), is progressing the development of the Yanco Battery Energy Storage System (BESS), a grid scale energy storage facility designed to enhance grid stability, improve energy reliability, and support the integration of renewable energy into the State's electricity network (herein referred to as 'the project'). With an estimated development cost exceeding $30 million, the project meets the statutory threshold for classification as a State Significant Development (SSD) under the *Environmental Planning and Assessment Act 1979*. As an SSD, the project is subject to a comprehensive assessment and approval process administered by the NSW Department of Planning, Housing and Infrastructure (DPHI). The project received development consent from the NSW Independent Planning Commission (IPC) in October 2025. A modification to the project was approved by the Director Energy Assessments on the 27 May 2026.

1.1 PURPOSE

This Environmental Management Strategy (EMS) details how ACEnergy and its in house Engineering, Procurement, and Construction (EPC) contractor, ACLE Services, will manage the environment, heritage and community as the Principal Contractor, for the Yanco BESS.

This plan has been developed to meet the requirements of:

- Development Consent: SSD-67478479
- ACLE Services' Policies and Procedures
- Environmental Protection / Management Legislation
- ISO 14001 Environmental Management System

1.2 PLAN APPROVAL

	Name	**Position**	**Signature**	**Date**
Plan Prepared by:	M. McDermott	Consultant	M. McDermott	04/09/2026
Plan Reviewed by:	Matt Keating	Project Delivery Manager	M. Keating	04/09/2026
Plan Approved by:	Andrew Umney	Project Manager	A. Umney	04/09/2026

1.3 PLAN DISTRIBUTION

Entity	**Details**
Key Contractor Staff	Electronic access
Principal	1 x electronic copy (latest version)
Engaged sub-contractors	Issued at engagement
Other interested parties	Extracts on request or as determined by the Principal Contractor

1.4 REVISION SCHEDULE

Date	Details of Amendment (if any)	Amended By

2 PROJECT DESCRIPTION

The Yanco BESS project comprises the design, procurement, construction, testing, and commissioning of a 250MW / 1,100MWh grid-scale battery energy storage facility located at 120 Houghton Road, Yanco, New South Wales. The facility will be connected to the National Electricity Market (NEM) via a 132kV connection to Transgrid's existing Yanco 132/33kV substation.

The development footprint is located at 120 Houghton Road, Yanco, New South Wales, within the Yanco Irrigation Area on the rural fringe of Leeton (Lots 516 and 521 DP751745). Regional access to the site is provided via Irrigation Way, with local access from Houghton and Hume (Hulme) Roads.

Parameter	Details
Project Name	Yanco Battery Energy Storage System (Yanco BESS)
Site Address	120 Houghton Road, Yanco NSW 2705
BESS Capacity	250MW / 1,100MWh (4-hour duration)
Grid Connection Voltage	132kV AC
Network Service Provider	Transgrid
Connection Point	Transgrid Yanco 132/33kV Substation
Transmission Link	~500m 132kV XLPE underground cable
BESS Technology Supplier	CATL (separate supply contract)
Planning Approval	Approved NSW IPC October 2025, modified May 2026

2.1 SCOPE OF WORKS

The Yanco BESS Project includes:

- Installation of containerised lithium-ion batteries with a capacity of up to approximately 250 MWAC and 1,100 MW-hours, with associated power conversion systems, switchgear and a control building;
- An underground 132 kV XLPE transmission cable connecting the BESS to the existing Yanco substation, with the final alignment to be in accordance with the approved design;;
- Cabling and collector units, site office, storage area, internal access tracks, on-site parking, security fencing, and temporary construction laydown area;
- Development of a new site access from Hume Road; and
- Intersection upgrades at Houghton/Hume Road and Houghton Road/Irrigation Way.

The project area, layout and surrounding access routes (including the intersection upgrade near Yanco township) are shown in Figure 1:

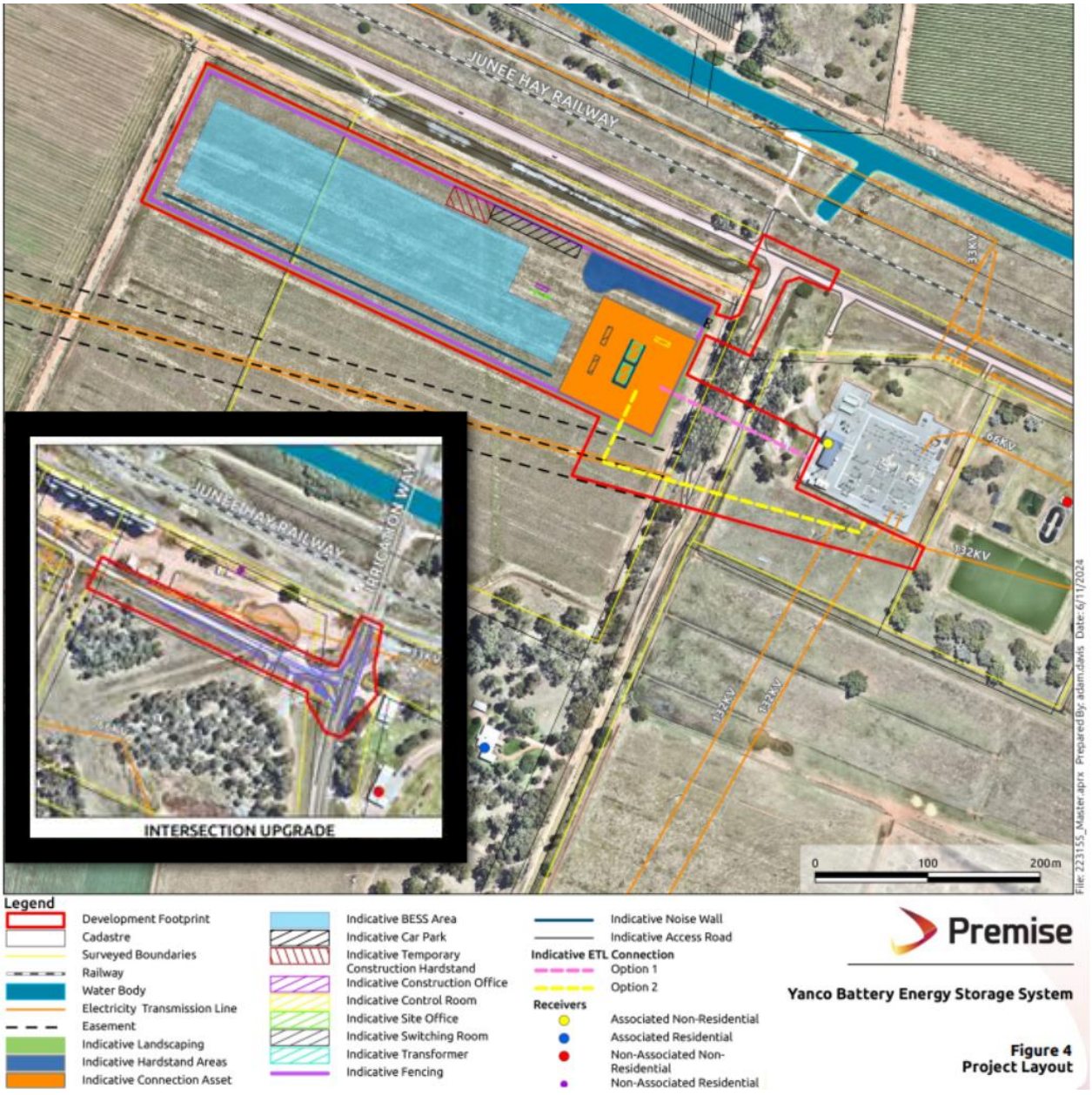


Figure 1: Project Layout

3 LEGAL AND OTHER REQUIREMENTS

ACLE Services recognises a range of legal obligations and responsibilities to not only ensure that our activities do not harm the environment but to also ensure we do not expose our Organisation to additional risks. To assist ACLE Services in identifying relevant legislation and ensuring that the staff members of the Organisation readily have access to this information, ACLE Services has established the Legal and Other Requirements process.

The Legal Register (including Regulations, Codes of Practice and Guidance Notes) and Standards Register is available on ACLE Services' network and where this is not readily accessible, copies of relevant legislation and standards are to be held on site. Relevant legislation including Acts, Regulations, Codes of Practice and Standards are listed in the Project Risk Register and in Safe Work Method Statements to provide guidance to site personnel on those legislation and other requirements applicable to the work activities they are carrying out.

3.1 PROJECT SPECIFIC LEGAL AND OTHER REQUIREMENTS

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals / Permits / Licences
***Environmental Planning and Assessment Act* (1979) (EP&A Act)**	The EP&A Act establishes the NSW planning system and sets out how State Significant Developments (SSD) are assessed, approved and regulated. It requires the preparation of an Environmental Impact Statement (EIS) for SSD projects and enables the Planning Secretary and the Independent Planning Commission to impose conditions of consent. The EP&A Act also provides the regulatory framework and enforcement powers necessary to ensure compliance throughout the life of the project.	Primary approval pathway due to SSD status of the Project. The Development Consent conditions issued under this Act must be adhered to.	Development Consent – Application Number: SSD-67478479
***Protection of the Environment Operations Act* (1997) (POEO Act)**	All activities associated with the development must be managed to prevent material harm to the environment in accordance with Sections 147 and 148 of the POEO Act. In meeting the performance measures and criteria of the development consent, all reasonable and feasible measures must be implemented to prevent, and where prevention is not practicable, minimise any material harm arising from the construction, commissioning, operation, upgrading, decommissioning or rehabilitation of the project. The	The project must ensure that no sediment-laden runoff, hydrocarbons, concrete washout or chemical contaminants enters nearby waterways or drainage lines. All dust, noise, waste and hazardous material storage must comply with the requirements of this Act, supported by effective spill response, erosion and sediment controls, and waste management	N/A

	POEO Act also regulates pollution of air, water and land, establishes offences such as the prohibition on water pollution under Section 120, and sets licensing and enforcement powers for the NSW EPA. Any pollution incident that causes, or has the potential to cause, material harm must be immediately notified to the relevant authorities.	measures to prevent pollution incidents.	
***Environment Protection and Biodiversity Conservation Act* (1999) (EPBC Act)**	The EPBC Act provides protection for Matters of National Environmental Significance (MNES), including threatened species, migratory species, and Commonwealth land. Any action likely to have a significant impact on an MNES must be referred to the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) for assessment and approval.	MNES searches and the project's Biodiversity Development Assessment Report (BDAR) demonstrates the project's unlikely impact on MNES.	N/A
***Water Management Act* (2000) (WM Act)**	The WM Act regulates water use, water sources, controlled activities and works near waterways, and provides protection for riparian zones, drainage lines and watercourses.	Activities such as stockpiling, constructing access tracks, installing culverts or undertaking trenching near waterways must comply with controlled activity guidelines, ensuring downstream water quality and hydrology are protected.	Dewatering activities during construction of footings may be required. If works are necessary, approval under the Water Management Act 2000 will be required. WM Act approval requirements, include water usage (s89), controlled activities (s91) and aquifer interference activities (s91F), or confirmed as SSD exempt.
Fisheries Management	The FM Act protects aquatic habitats, fish passage and riparian vegetation. It further regulates	If there is a water body nearby to the site which supports aquatic habitat,	Construction crossings through a

***Act* (1994) (FM Act)**	harm to aquatic environments and any waterway modifications.	works must avoid sedimentation, bank disturbance and changes to flow.	waterway may require a permit.
NSW Water Quality Objectives	The NSW Water Quality Objectives (WQOs) set the environmental values and desired water quality outcomes for rivers, creeks, wetlands and groundwater across the state. They define the level of water quality needed to protect aquatic ecosystems, support recreation, maintain drinking water supplies, and safeguard cultural and economic uses.	The WQOs apply by requiring construction and operation to avoid degradation of downstream water quality, particularly through effective erosion and sediment control, spill prevention, stormwater management, and protection of natural flow paths. While the project does not directly discharge to waterways, all site activities must be managed to ensure no sediment, hydrocarbons, chemicals or contaminated runoff enter nearby drainage lines, thereby maintaining the water quality objectives relevant to the local catchment.	Additional approvals or discharge permissions may be required if water is to be managed in a way that has not already been assessed or authorised under the SSD approval.
***Biodiversity Conservation Act* (2016) (BC Act)**	The BC Act establishes the framework for conserving biodiversity in NSW, including the protection of threatened species, ecological communities, and their habitats. It sets out requirements for assessing and managing biodiversity impacts through the Biodiversity Assessment Method (BAM) and, where triggered, requires preparation of a Biodiversity Development Assessment Report (BDAR). Where a development results in residual biodiversity impacts that cannot be avoided or minimised, s6.27 of the *BC Act 2016* requires the retirement of the biodiversity credits specified in the Biodiversity Development Assessment Report (BDAR) to satisfy the biodiversity	. The project must avoid and minimise impacts to biodiversity and implement the approved biodiversity management measures. The residual biodiversity impacts identified in the development consent are to be offset through retirement of the ecosystem and species credits specified in Tables 1 and 2 of the consent.	ACLE Services will retire the ecosystem and species credits specified in Tables 1 and 2 of the development consent and provide evidence of their retirement to the Planning Secretary, in accordance with Conditions B11 and B12. The retirement must be completed through a method permitted under the

	offset obligation. A Biodiversity Conservation Licence is also granted under the *BC Act 2016* to authorise activities that would otherwise be prohibited under the Act, including the capture, handling, rescue, treatment, rehabilitation and relocation of native fauna.		NSW Biodiversity Offsets scheme.
The Leeton Shire Local Environmental Plan (2014) (LEP)	The LEP establishes the land-use planning framework for the Leeton local government area, setting zoning controls, permissible land uses, development standards, and environmental protection provisions. It guides how land can be developed to ensure compatibility with surrounding uses, protection of environmental values, and orderly development.	The LEP is relevant in confirming the zoning of the project site, identifying whether the proposed infrastructure is permissible with or without consent, and highlighting any local constraints such as heritage items, riparian corridors, or environmental protection zones. This is an important reference document, despite overarching SSD assessment.	N/A
Local Government Act (1993)	The Local Government Act (1993) is the principal legislation governing local councils in New South Wales. It establishes the powers, functions, responsibilities, governance requirements, and regulatory authority of councils, providing the legal framework through which councils deliver services, manage public assets, regulate development-related activities, and represent their communities.	May apply to project activities requiring local council approval, including stormwater drainage works, works or activities affecting public roads, waste management arrangements, sewage management systems or other prescribed activities not otherwise authorised by the SSD consent. Relevant activities should be reviewed against s68 requirements before commencement.	ACLE Services will confirm with Leeton Shire Council whether any section 68 approval is required for a prescribed project activity and will obtain any required approval before that activity is carried out.
Rural Fires Act (1997)	The Rural Fires Act (1997) is the principal legislation governing the prevention, mitigation, management, and suppression of bushfires and rural fires across New South Wales. The Act establishes the NSW Rural Fire Service (RFS) and provides powers for bushfire	Applies to construction and maintenance activities that may create ignition risks, particularly hot works, vegetation management, plant operation, welding, grinding or other spark-generating works	NSW RFS exemption or permit may be required for activities undertaken during a Total Fire Ban. Hot works and other ignition-risk activities should not proceed

	planning, hazard reduction, emergency response, fire control, and community protection.	during declared Total Fire Ban periods. Site activities must comply with Total Fire Ban requirements and project fire prevention controls.	during a Total Fire Ban unless authorised by the NSW RFS under s99 of the Act and approved under the project permit system.
Electricity Supply Act (1995)	Provides the framework for the licensing, operation, protection and maintenance of electricity infrastructure in NSW, including requirements for consultation, asset protection, vegetation management and safe working near electricity networks.	Applies to electricity connection and network-related works associated with the BESS, including any works undertaken by or on behalf of the network operator that may require notification to Leeton Shire Council under s45. Relevant network works should be coordinated with Transgrid and assessed before commencement.	Within s45 requires a network operator to provide written notice of a proposal to carry out certain electricity works and to give the relevant local council an opportunity to make submissions.
Heavy Vehicle (Adoption of National Law) Act (2013)	The Heavy Vehicle (Adoption of National Law) Act 2013 (NSW) applies the national heavy vehicle regulatory framework in NSW. It governs the safe, efficient and lawful operation of heavy vehicles, including requirements for vehicle mass, dimension, loading, fatigue management, road access and compliance. For projects, it is particularly relevant where over-dimensional or over-mass vehicles are used to transport large plant, equipment or infrastructure components, and may require access permits issued by the NHVR with relevant road manager approvals.	Applies to transport of oversized or over-mass project components, including BESS containers, transformers, switchgear, cranes, construction plant and other heavy equipment to and from site. Heavy vehicle movements must comply with approved routes, access conditions, road safety requirements and any traffic management controls.	HVNL access permits issued by the NHVR may be required for over-dimensional or over-mass vehicle movements. Additional road manager consent, route assessment and traffic management approvals may be required for access via State, regional or local roads, including Leeton Shire Council roads.

3.2 APPROVALS, PERMITS AND LICENCING

The project is characterised as State Significant Development (SSD) as the development is for the purpose of electricity generating development works with an estimated development cost (EDC) of more than $30 million, pursuant to Clause 20 of Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021*.

The Independent Planning Commission of NSW granted consent to the development application subject to conditions in October 2025 – Development Consent SSD-67478479.

A modification to the approved Yanco BESS Project (Mod 1) was submitted via the Major Projects Portal in February 2026. The modification was prepared to reflect minor design refinements identified during the progression detailed engineering and design following the original approval of the development in October 2025. The modification addressed a minor increase to the project footprint (less than 1 hectare) together with minor adjustments to the road intersection upgrades (pictured in Figure 1), site access arrangements, internal site layout, and the alignment of underground cabling to the Yanco Substation. There was no change to the approved battery capacity (250 MW / 1,100 MWh), operational characteristics, workforce requirements, project lifespan, or connection to the existing Transgrid substation as a result of the Modification.

The modification was approved on the 27 May 2026.

3.3 ENVIRONMENTAL MANAGEMENT STRATEGY

Condition C1 of the Development Consent (SSD-67478479) requires the development of this EMS for the development to the satisfaction of the Planning Secretary. The requirements for the Environmental Management Strategy and relevant locations within the document are included in the table below:

Development Consent requirement	Reference within this document
a) provide the strategic framework for environmental management of the development;	Section 4 – EMS Structure
b) identify the statutory approvals that apply to the development;	Section 3 – Legal and Other Requirements
c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 7 – Roles and Responsibilities
d) set out the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and	Section 13 – Community Consultation Section 11.5 – Complaints Management Section 11.7 and Section 11.8 – Incident and non-conformance notification Section 12 – Emergency Preparedness and Response
(e) include: (i) references to any strategies, plans and programs approved under the conditions of this consent; and (ii) a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this consent.	Appendix C: Reference Documents Section 11.3

The EMS shall be reviewed in accordance with the Monitoring and Review Matrix (and any changes made shall be reflected in the table below. This strategy may be revised/updated in response to:

- Significant proposed changes to the work that is being carried out
- Where there is evidence the risk assessment is no longer valid; or
- Following any incident with potential or actual major consequences or any adverse audit findings.

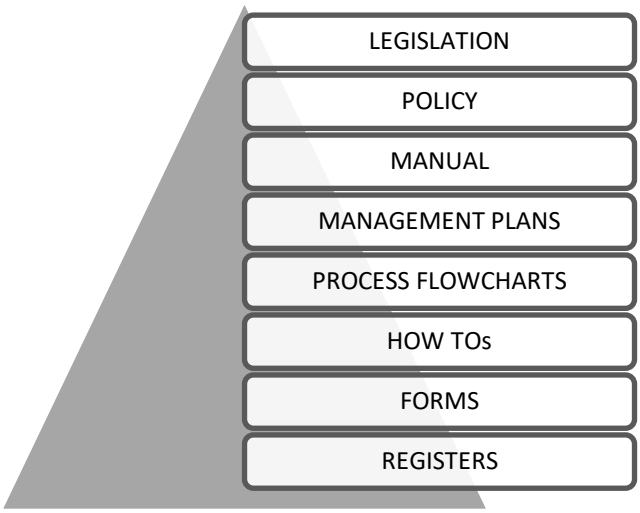
Review	Date	Name	Position	Comments	Sign
			PROJECT MANAGER		
			QUALITY OFFICER		
			HSE ADVISOR		
			PROJECT MANAGER		
			SITE MANAGER		
			ENVIRONMENTAL REPRESENTATIVE		
			PROJECT MANAGER		
			SITE MANAGER		
			ENVIRONMENTAL REPRESENTATIVE		

*Copy to additional pages/rows as required

4 ENVIRONMENTAL MANAGEMENT SYSTEM STRUCTURE

4.1 MANAGEMENT STRUCTURE

ACLE Services uses the following framework to disseminate its environmental management requirements across the organisation and the projects that ACLE Services undertakes.



4.2 LEGISLATION

This EMS has been prepared to ensure that ACLE Services meets its obligations under relevant Environmental legislation.

To assist ACLE Services in identifying relevant legislation and ensuring that the staff members of the organisation readily have access to this information, ACLE Services has established the Legal and Other Requirements process. Project specific Approvals, Permits and Licencing is detailed within Section 3.

4.3 ENVIRONMENTAL POLICY

Our Environmental Policy states our commitment to the environment and reflects our ongoing commitment to continuous improvement with respect to ACLE Services' environmental objectives and performance, compliance with environmental legislative requirements, eliminating harm to the environment and eliminating or minimising environmental aspects and impacts through our ACLE Services' operations.

In accordance with ACLE Services' Management Commitment process, this statement is prepared by Senior Management and is reviewed on a regular basis. This Policy Statement is promoted throughout the organisation in accordance with the Communication and Consultation process and is communicated to all employees, subcontractors, and to all site personnel through the various induction processes, is displayed at the head office and available at each worksite.

We are committed to fulfilling our environmental obligations by making every reasonable effort in the areas of incident and aspect/impact removal and/or control.

A copy of ACLE Services' Environmental Policy is available in the Appendices to this document.

4.4 ENVIRONMENTAL MANUAL

ACLE Services, in accordance with its accreditation to ISO 14001 Environmental Management Standard has implemented an Environmental Management Manual.

This manual details ACLE Services' commitment and processes for meeting and striving for continual improvement in the management of the organisation's environmental obligations.

4.5 ENVIRONMENTAL MANAGEMENT PLANS

4.5.1 Construction Environmental Management Plan

ACLE Services will prepare a CEMP, as Principal Contractor, outlining how ACLE Services will address the environmental issues in relation to construction work.

The CEMP is prepared to provide the overarching framework for the management of all potential environmental impacts resulting from the construction of the Project.

This EMS considers the following criteria:

- Purpose.
- Environmental Management System Structure.
- Project Specific Document Control and Records Management.
- Project Objectives and Targets.
- Project Environmental Responsibilities and Authorities.
- Induction, Training and Competencies.
- Legal and Other Requirements.
- Project Risk Assessment.
- Environmental Aspects and Impacts.
- Environmental Considerations in Purchasing.
- Emergency Preparedness and Response.
- Communication and Consultation.
- Hazard, Incident and Corrective Action Management.

The CEMP is signed off / authorised by the senior management position that is allocated overall environmental responsibility for the area in which the plan covers and is available to all site personnel to review as required.

4.5.2 Emergency Response Plan

In accordance with ACLE Services' Emergency Response process, emergency response procedures shall be developed and implemented to ensure that potential and actual emergency incidents are managed in a way that ensures the immediate safety of all those potentially endangered by the event, including ensuring the safety of emergency responders and minimises harm to the environment.

The procedures shall also provide details for the initial on-site response to be managed in a systematic and professional manner and include appropriate communication to all stakeholders and authorities.

Following the preparation of these emergency response procedures, a layout plan detailing the location and types of emergency equipment, location of spill skits, emergency evacuation routes, and assembly points are documented in conjunction with the Site Management process, with the preparation of the project site specific Site Management Plan.

4.5.3 Project Site Management Plan

The project site layout plan is developed in accordance with ACLE Services' Site Management process. The site management layout is included as an Appendix D and E and identifies the location of:

- Site Office
- Amenities – lunch/crib room/toilets
- First Aid facilities
- Bulk materials loading and unloading areas
- Safe access and egress routes to site office and amenities
- Evacuation assembly area and evacuation paths
- Site notice boards
- Hazardous Chemical Storage (e.g., LPG, Acetylene, Petrol, etc)
- Spill Control Kits
- Site Traffic Management
- Overhead / underground services
- Site specific environmental controls
- Areas of Cultural significance- Historical and Aboriginal
- Natural Watercourses
- Demarcation of Environmentally sensitive areas.

4.6 SUPPORTING DOCUMENT / DATA CONTROL

ACLE Services' Environmental Management System has multiple procedural documents that together meet the requirements of legislation and the ISO 14001 Environmental Management System Requirements.

These documents comprise Process flowcharts, how (Reference Documents), and Forms including checklists and Registers.

- Process flowcharts document the process flow and clearly identify responsibility and therefore accountability that when followed leads to the end deliverable.
- How To (Reference Documents) are used to explain how specific elements of a process are to be undertaken.
- Forms and Checklists are completed in line with the procedure or reference document and once completed become records of the process; and
- Registers serve two purposes: they record data on the procedure for performance evaluation, and they track the procedure to ensure all critical steps are followed.

These are available under ACLE Services' Integrated Business Management System (IBMS) available on ACLE Services' network.

Where access to ACLE Services' network cannot be facilitated then these will be attached to the CEMP.

4.7 INDEPENDENT ENVIRONMENTAL AUDITS

Independent Environmental Audits will be undertaken in accordance with consent condition C13 during construction to verify compliance with the project's SSD consent, this EMS, and environmental obligations. A suitably qualified and independent auditor will review site activities, documentation, monitoring results, and implementation of mitigation measures, and will identify any non-compliances. The report shall cover:

- non-compliances,
- observations,
- opportunities for improvement, and
- recommended actions.

The auditor must also prepare an Audit Declaration Form with the contractor responding with a Corrective Action Plan covering each finding. These reports are to be provided to the Department for publishing on the project's website.

5 DOCUMENT CONTROL AND RECORDS MANAGEMENT

ACLE Services has a number of processes that assist in document control and records management. At an organisational level, the Document Control and Records Management process provides specific guidance to the creation of documents within ACLE Services' Integrated Business Management System (IBMS). The Records Management process provides guidance on how records generated from ACLE Services' IBMS will be managed, including retention requirements for specific records generated and destruction requirements.

At the project level, document control requirements, including management of the drawing register and document transmittal records, are administered under ACLE Services' Project Administration process.

6 PROJECT OBJECTIVES AND TARGETS

6.1 PROJECT DESCRIPTION / DETAILS

Parameter	Details
Project Name:	Yanco Battery Energy Storage System (Yanco BESS)
Project No.:	
Site Address:	120 Houghton Road, Yanco NSW 2705
Council:	Leeton Shire Council
Client:	ACEnergy Pty Ltd
Project Manager:	
Senior Project Engineer:	
Commencement Date:	
Anticipated Date of Completion:	
Anticipated Duration (weeks):	
BESS Technology Supplier:	CATL (separate supply contract)
Planning Approval / Number:	Approved NSW IPC October 2025 / SSD-67478479

6.2 ACRONYMS AND DEFINITIONS

Parameter	Details
ACLE	ACLE Services
ACHAR	Aboriginal Cultural Heritage Assessment Report
AHIMS	Aboriginal Heritage Information Management System
ANL	Acceptable Noise Levels
BESS	Battery Energy Storage System
BoP	Balance of Plant

CEMP	Construction Environmental Management Plan
DCCEEW (NSW)	Department of Climate Change, Energy, the Environment and Water
EDC	Estimated Development Cost
EIS	Environmental Impact Statement
FRNSW	Fire and Rescue NSW
IPC	Independent Planning Commission of NSW
LGA	Local Government Area
LSC	Leeton Shire Council
NEM	National Electricity Market
POEO	Protection of the Environment Operations Act
RFS	Rural Fire Service (NSW)
SEPP	State Environmental Planning Policy
SSD	State Significant Development

6.2.1 Major Works to be Undertaken

Civil and Roads

- Site Preparation: Mobilisation of heavy equipment, site survey, and marking of existing services.
- Clearing & Fencing: Clearing of small shrubs, installation of perimeter chain mesh fence with anti-climb features, gates, and access control.
- Earthworks: Cutting, filling, and sorting of onsite materials, stockpiling, and installation of crushed rock layers for foundations.
- Road & Drainage Construction: Internal and external road construction, drainage systems, stormwater pits, and sealing access roads.
- Foundations: Construction of foundations for power stations, battery containers, distribution centre, cooling kiosks, and storage containers.
- Testing & Reporting: Geo-technical compaction testing, concrete sampling, and thermal backfill testing.
- Materials Supply: Delivery and installation of materials for road layers, stormwater systems, and crushed rock for subgrade and foundations.

Structural

- Structural Foundations: Construction of footings and foundations for BESS equipment, power stations, battery containers, distribution centre, and cooling kiosks.
- Support Structures: Installation of structural elements such as MV transformers, LV boards, and support structures for BESS components.
- Structural Testing & Compliance: Conduct structural testing and ensure compliance with engineering and safety standards.

Electrical and Grid Connection Works

- Electrical Systems: Installation of electrical systems, including MV and LV cabling, switchboards, and transformers for the BESS.
- Earthing & Protection: Implementation of earthing, lightning protection, and ancillary systems to ensure safe operation and compliance with electrical standards.
- Testing & Commissioning: Conduct testing and commissioning of all electrical installations, including metering, controls, and compliance with technical specifications.

Project Close-out and Demobilisation

- Commissioning & Testing: Provide commissioning support to contractor and perform performance testing of the facility as per the Agreement.
- Documentation & Compliance: Provision of documentation as per Contractor's requirements, grid connection, and compliance services.
- Project Support: Support contractor and Principal as required.
- Close-Out Tasks: Address punch list items, demobilise site, and perform final site inspection with contractor
- Training & Documentation: Conduct training for O&M suppliers, provide O&M manuals, and facilitate training for power stations and battery containers.
- Final Touch-Ups: Completion of painting and cleaning at the end of works.

6.3 PROJECT ENVIRONMENTAL OBJECTIVES

6.3.1 Project Objectives

Our project environmental Objectives and Targets are simple and measurable, and support ACLE Services' environmental objectives as identified in ACLE Services' Environmental Policy.

The project specific targets based on ACLE Services' objectives and other objectives identified are as follows:

Objective	Type	Target
Notifiable Incident	Lag	Nil
Breaches of Environmental Legislative or Regulatory Requirements (No prosecutions, enforcement, infringement or abatement notices)	Lag	Nil
Environmental inspections are conducted as per the Monitoring and Review Matrix.	Lead	Nil
Environmental Opportunity for Improvements / Corrective Actions completed on time.	Lead	Nil
Site Inductions completed prior to the commencement of work on site.	Lead	Nil
Communication and consultation are to be conducted as per the Communication and Consultation Matrix.	Lead	Nil

7 PROJECT ENVIRONMENTAL RESPONSIBILITIES AND AUTHORITIES

In planning for this project ACLE Services has identified its responsibilities and in order to carry out these responsibilities has subsequently identified and made available the relevant resources required to effectively implement ACLE Services' environmental objectives on this project.

7.1 KEY PERSONNEL

7.1.1 Key Personnel on Site

Position	Name	Contact Details
Project Manager		
Construction Manager		
Site Supervisor		
Safety Manager		
Environmental Representative		
Community Liaison		

7.1.2 Key Personnel Off Site

Position	Name	Contact Details
Senior Project Engineer		
Project Director		
Project Management Office Manager		

7.1.3 Client Details

Position	Name	Contact Details

7.1.4 Local Authority

Position	Name	Contact Details
Leeton Shire Council		

7.2 RESPONSIBILITIES

7.2.1 Roles and Responsibilities

Detailed below are the responsibilities of various roles for the project. Individuals nominated to these roles are required to sign Responsibility Statements acknowledging and accepting these responsibilities are part of the Site Induction and Training process.

Role	Responsibilities
Project Director	**General Responsibilities** • Ensure legislative obligations are met and ACLE Services' Quality, Health and Safety, and Environmental Policies are effectively implemented throughout the project as detailed in the relevant project specific plans • Ensure appropriate resources are allocated within the relevant ACLE Services team for the effective implementation of the IBMS and management of all project related risks. • Assist in the development and implementation of the Continuous Improvement process for the Integrated Business Management System within ACLE Services. **Specific Responsibilities** In order to meet the general responsibilities outlined above, the Project Director should: • Provide visible commitment to a safe and healthy work environment by ensuring regular reviews are undertaken, participating in health and safety meetings and consultation regarding quality, health and safety and the environment matters for the team and all project workers. • Ensure approvals, licenses, insurances, etc. are all approved prior to the commencement of the project. • Ensure quality, health and safety and environmental objectives and targets are established for the Project Works which are consistent with ACLE Services' Corporate Policies and Objectives. These shall be defined in the project specific management plans. • Ensure that all levels of management connected with the team promote continuous commitment, attitude and culture to implement the relevant Construction Management Plans. • Review operational quality, health and safety and environmental documentation and ensure compliance with ACLE Services' Integrated Business Management System and goals (as required). • Consider quality, health and safety and the environment matters with other team members and the WHS Advisor as part of normal business practice and incorporate these matters into project meeting agendas. • Ensure appropriate budget allocations for health and safety and environmental improvement in Project Works and provide adequate resources to achieve a high level of compliance across the projects. • Ensure a systematic approach to the identification, assessment, control and monitoring of Project-related risks that may arise through both normal and adverse operating conditions. • Ensure that personnel engaged on projects are adequately skilled and trained for the tasks they are required to undertake including health

	and safety and the environment, technical or operational training. Also ensure that any trainee is allocated appropriate time to participate and completed training requirements where necessary. • Assign competent personnel to coordinate and carry out quality, health and safety and environmental functions. • Ensure project management assess, engage and monitor the compliance of all contractors/suppliers engaged in Project works with ACLE Services' Health and Safety Management System (delivered under the IBMS) and Safe Work Method Statements (SWMS) and checklists including work methodology and quality. • Respond to non-compliance by any parties involved with project works who fails to discharge their duties as set by the responsibility statement and actively participate in dispute resolution where required.
Project Manager	• Ensure project objectives and targets are achieved and undertake overall quality, health and safety and environmental responsibility for the project including the resolution of disputes. • Review and set in place the project specific WHS Management Plan, Environmental Management Plan, Quality Management Plan, Project Risk Assessments and Safe Work Method Statements. • Provide and allocate sufficient resources to successfully implement and maintain the quality, health and safety and environmental objectives and targets. • Liaise with ACLE Services' WHS advisor and project quality representative (if applicable) and be aware of the current legislation and obligations of ACLE Services' in the area of workplace Quality, Health and Safety and the Environment. • Ensure that all levels of management connected with the project promote continuous commitment, attitude and culture to implement the site-specific Construction Management Plans. • Ensure supervision is provided at all levels to ensure the adoption of the site health and safety, environmental and project construction programmes and all other quality outcomes. • Review Health, Safety & Environmental performance on the project and reprimand any member of the organisation who fails to discharge their duties as set by the responsibility statements. • Ensure a system is established which will distribute pertinent information about health and safety issues to site management members and workers on the project. • Ensure all subcontractors are assessed on their health and safety and environmental requirements to comply with ACLE Services' IBMS and the relevant legislation. • Report to the Project Director/s on the level of compliance and standard of quality, health and safety and environment on the site. • Liaise with all relevant stakeholders including client and community groups where necessary to ensure the immediate community remain informed on all project matters. • Ensure all service providers are approved for use on the project and are able to provide services complying with ACLE Services' expectations.

	• Identifying training needs for the workforce and ensuring implementation of appropriate workforce development.
Construction Manager	• Work with other team members to ensure project objectives and targets are achieved. • Liaise with the site specific WHS Advisor, project contractor quality nominee and environmental representative and be aware of the current legislation and obligations of ACLE Services in the area of workplace quality, health and safety and the environment. • Ensure that the ACLE Services' project specific Management Plans have been implemented on site. • Ensure subcontractors are assessed on their HSEQ performance prior to, and after completion of the project. • Undertake assessments of subcontractor Safe Work Method Statements as required by ACLE Services' Monitoring and Review Matrix. • Undertake visual inspections of subcontractor work to ensure quality of product and tolerance compliance • Ensure continuous commitment, attitude and culture by site team members to implement the project specific WHS Management Plan, Environmental Management Plan and Quality Management Plan including project construction programme. • Provide guidance, motivation and resources, which are required to achieve the objectives and targets together with construction activities outlined in company documentation to maintain a safe work environment. • Ensure the health and safety consultation process is implemented and maintained to resolve any disputes or situations, which may arise over and work related HSEQ issue including stakeholder interaction. • Monitor and review procedures and systems so that an optimum level of health and safety is maintained and adhered to at all times. This includes ensuring receipt and collation of inspection and testing records. • Report to the project manager on the level of compliance and standard of quality, health and safety and environmental performance. • Ensure compliance with permits, local council guidelines & regulatory requirements. • Undertake the role as the Emergency Response Manager. • Ensuring all site management and supervisors are fulfilling their designated roles and responsibilities.
Site Supervisor / Foreman	*NOTE: Where a Site Manager has not been appointed for the project the Site Supervisor / Foreman is to combine the duties of the Site Manager.* • Work with other site team members to ensure project objectives and targets are achieved. • Organise work to ensure continuous commitment, attitude and culture by site team members in compliance with ACLE Services' project specific Management Plans and project construction programme.

	• Implement ACLE Services' project specific Management Plans and ensure that recording procedures, Safe Work Method Statements and checklists are carried out on a daily and as required basis. • Conduct daily inspections and maintain a record of areas which need attention as well as supervising what corrective action was taken rectify any defective areas. • Undertake assessments of subcontractor Safe Work Method Statements as required by ACLE Services' Monitoring and Review Matrix ensuring compliance and accountability. • Work closely with the WHS advisor, Project Quality Representative (where appointed), Environmental Representative (where appointed) in ensuring that safe work practices are being maintained and promote the commitment to working safely and provide information, instructions and supervision to workers on the project for all quality, health and safety and environmental matters. • Ensure work is completed in accordance with the correct construction techniques, ACLE Services' Quality Manual and Senior Management expectations. • Participate in and assist in developing an appropriate Health and Safety Committee (where required) for the project. Maintain accurate minutes of each meeting and instigate checking procedures to ensure the areas notified are rectified as soon as possible. • Ensuring that the latest revisions of contract documents (including construction drawings and schedules) listed in the Drawing Register are in use and all previous issues and revisions are either removed from the system or clearly identified as being obsolete • To liaise and work with the Site Manager and company WHS Advisor in investigating and reviewing all serious or dangerous occurrences, and to ensure accident / incident reports are properly documented with appropriate corrective action taken where required. • Ensure site personnel are aware of their quality, health and safety and environmental obligations. • Ensuring RFI, Site Instruction, Memo Forms and email communications are up to date. • Monitor all subcontractors to ensure they are utilising current construction documentation including but not limited to drawings, programme and specifications.
All personnel / employees	• To know and work in accordance with all relevant sections of the ACLE Services' Quality Management, Health and Safety and Environmental Management System as delivered under ACLE Services' IBMS. • To suggest ways of eliminating hazards and risks and improving workplace health and safety. • To perform all work and associated functions in the safest possible manner. • To obey all lawful written and verbal workplace health and safety instructions issued by ACLE Services' Senior Management or its officers.

	• To correctly use, store and maintain in serviceable condition, all personal protective clothing and equipment supplied by ACLE Services' that is required to be used. • To cease to operate and report immediately any malfunctioning plant or equipment and not to use such plant and equipment until appropriate safeguards are in place or repairs have been made. • To take corrective action to eliminate hazards within the workplace and/or to report those hazards which the person himself/herself cannot correct. • To establish and maintain at all times the highest possible standards of housekeeping and cleanliness in individual work areas and on ACLE Services' property. • To report, and if required, assist with the investigation of, all accidents and non-injury incidents. • Not to report to work affected by the consumption of alcohol or any other drug in such a state that endangers myself, or the safety of others. • To comply with all Legislative requirements and ACLE Services' rules and requirements that may be introduced or varied to suit individual projects or activities. • To strictly follow all standard safe work procedures laid down for particular equipment or tasks. • To report all injuries to a first aid officer or site team member for recording on the prescribed form. • When completing works ensure you don not wilfully damage any flora or fauna or create any excessive or necessary environmental nuisance to the surrounding community including dust, noise or vibration. • Ensure works are completed to the high-quality standard expected by ACLE Services', the Client and other stakeholders.
Environmental Representative	• Ensure that ACLE Services' Environmental Management System as delivered under the IBMS is effectively established, implemented and maintained at the site / project level. • Ensure that audits / inspections of the system and site are carried out and reported back to ACLE Services' HSEQ Coordinator, Construction Manager and the Project Manager. • Provide support to the Construction and Project Managers to enable them to meet their environmental commitments. • Ensure all pre-clearance inspection reports are managed, verified and approved prior to vegetation clearing, meeting both Client expectations and statutory environmental requirements. • Report to the Project Manager on the performance of the system and improvement opportunities. • Providing support to the project team to enable them to meet their environmental commitments. • Ensuring that site personnel receive appropriate environmental awareness training. • Ensure any Environmental corrective actions are allocated, resolved and closed out in a timely manner.

7.3 PROJECT ORGANISATION STRUCTURE

A copy of the project organisation structure is available in Appendix B.

8 INDUCTION, TRAINING AND COMPETENCY

All inductions will be managed in accordance with ACLE Services' Site Induction process. Specific requirements of this process are as follows.

8.1 PROJECT SITE SPECIFIC INDUCTION

All workers will complete the project-specific site induction. The Site-Specific Induction Content will be maintained and updated throughout the project and will form the minimum induction requirements.
The induction will also include distribution of the project-specific Site Rules. A Site Induction Register will be maintained to record all personnel who have been inducted.

8.2 DAILY PRESTART MEETINGS

ACLE Services will conduct a daily prestart meeting to communicate the activities of the day and address any issues as they arise. A representative from each trade will be present at the site prestart. If a representative is not able to make the prestart, contact must be made with the Site Manager or related supervisor prior to commencing on site for that day.

Each work team is required to undertake a Daily Pre-Start Meeting to review and communicate the work activities assigned for that shift. The meeting must consider the specific tasks to be undertaken and identify associated safety, environmental, community, and cultural heritage risks, including any changes to site conditions or the workplace. This process enables participants to review the adequacy of existing controls and identify any additional measures required to manage risks and ensure compliance with relevant obligations.

A record of the Daily Pre-Start is to be completed and provided to ACLE Services' Construction Manager and/or Site HSE advisor.

9 PROJECT RISK ASSESSMENT

9.1 FIRE HAZARD ASSESSMENT

The major onsite Fire Risk Hazard for the BESS Project is the potential for equipment failure in the BESS units, which could lead to fires and explosions. Such failures could result in radiant heat affecting personnel, equipment, storage facilities and other property onsite. A detailed assessment will be carried out every six months to identify possible ignition sources, especially from system overloads, electrical malfunctions, or thermal runaway within the BESS units.

9.2 CONSEQUENCES FROM BESS FAILURES

In the event of BESS failure, three primary consequences as below:

- Radiant Heat Exposure,
- Overpressure Effects,
- Chemical Spills/Toxic Fume release to atmosphere.

9.3 TOXIC RELEASE TO THE ENVIRONMENT

In the event of a fire at a BESS facility, there are significant health and environmental risks associated with the uncontrolled release of hazardous products of combustion into the environment. These emissions can have detrimental effects on air quality and pose serious health risks to both on-site personnel and the surrounding communities.

Continuous monitoring of air quality at and around the BESS site is essential. This includes the installation of air quality monitoring stations that can provide real-time data on the presence and concentrations of toxic substances. Emergency response plans must be developed and rehearsed, incorporating evacuation routes and procedures that consider potential scenarios of toxic cloud dispersion. Furthermore, community alert systems should be established to inform and instruct the nearby population in the event of an emergency.

9.4 ENVIRONMENTAL RISK ASSESSMENT – PROJECT RISK REGISTER

ACLE Services will, prior to the establishment of the EMS, undertake a range of project site specific risk assessments. This is documented under ACLE Services' Managing Construction process.

Environmental aspects will be identified and managed in accordance with ACLE Services' Managing Risk process. Environmental aspects will also be managed in accordance with ACLE Services' specific processes for activities it has deemed high risk. The Project Risk Register will document the project site specific risks and the minimum control measures required by ACLE Services in managing these risks.

The Project Risk Register will be updated when a new environmental aspect or risk is identified.

9.5 ENVIRONMENTAL MANAGEMENT SYSTEM

This EMS is evidence of the framework established by ACLE Services in carrying out environmental planning. It details ACLE Services' policies and procedures as applicable to this specific project. It is to be implemented by ACLE Services' Construction Manager.

Where project site specific information is to be changed in response to changes on site this needs to be identified in the plan and communicated with all relevant stakeholders in accordance with the framework identified under Consultation and Communication process. Any identified improvements / changes to the EMS / CEMP template need to be carried out in accordance with the Document Control process.

All relevant resources to the EMS / CEMP are available on ACLE Services' network. Where this is not readily available a copy of relevant resources will be attached to this plan (Refer Appendices).

10 ENVIRONMENTAL CONSIDERATIONS IN PURCHASING

10.1 PURCHASE OF GOODS

ACLE Services has established a documented Purchasing process which provides clear direction on the requirement to identify and assess safety hazards and risks associated with goods and services to be purchased.

This process provides direction on purchasing arrangements including but not limited:

- Approved Purchasing Methods.
- Authorised Financial Delegations.
- Preliminary risk assessment including but not limited to:
    - Manual handling
    - Noise
    - Consumables
    - Confined spaces

  - Ergonomics
  - Storage requirements
  - Training requirements.
  - Fumes
  - Waste management, and
  - Maintenance services etc.
- Specific environmental instructions/documentation to be identified and requested.
- Verification of goods being received; and
- Managing non-conforming products including segregation and tagging out processes as required.

10.2 HAZARDOUS CHEMICALS

The purchasing of goods which may be classed as Hazardous Chemicals is considered by ACLE Services within its Purchasing process.

Where goods are identified as being a Hazardous Chemical and where no alternative can be identified deemed necessary, then the risks associated with these goods need to be managed in accordance with the Managing Risk process.

This process outlines ACLE Services' requirements for the use of hazardous chemicals which include:

- Safety Data Sheet (SDS) to be provided for all chemicals.
- Risk assessments for substances identified as hazardous chemicals.
- Substances Register to be kept providing a central listing of all hazardous chemicals that are used on the site, to be located in the site office.
- All containers of chemicals to be handled or used in the workplace will be labelled to allow people to use the chemical safely; this includes containers into which chemicals are decanted, unless the whole amount is to be used immediately.
- All containers of chemicals, fuels and other hazardous substances must be appropriately stored, handled and disposed of to prevent pollution and environmental harm.
- Monitoring is to be undertaken to determine the risk of exposure to hazardous chemicals; and
- Health surveillance is undertaken to ensure the health of employees is maintained while working with hazardous substances (e.g., Asbestos, lead, silica, dust, manganese and isocyanides). Further details on health surveillance requirements are available in the project specific Work Health and Safety Management Plan.

10.3 PROCUREMENT OF ASSETS (PLANT AND EQUIPMENT)

Where ACLE Services is undertaking procurement of plant and equipment this is managed in accordance with ACLE Services' Managing Plant and Equipment process. This process considers in part the registration of plant and the recording of plant and equipment.
ACLE Services' Managing Maintenance and Calibration process ensures that plant and equipment owned and operated by ACLE Services' is serviced and maintained in accordance with the manufacturer's recommendations including calibration requirements.

The identification and assessment of risks associated with the use and maintenance of this plant and equipment is managed in accordance with the Managing Risk process which identifies the requirement for plant risk assessment. Where subcontractors will be supplying plant and equipment, ACLE Services' requirements for plant and equipment are identified and managed in accordance with the Managing Subcontractor and Managing Mobile Plant processes.

11 ENVIRONMENTAL CONSIDERATIONS DURING CONSTRUCTION

ACLE Services ensures that all environmental hazards, incidents, non-compliances, and system failures are promptly reported, recorded, and investigated. Any non-compliance must be notified to the Department

within 7 days of becoming known in accordance with consent condition C12, unless the matter is classified and reported as an incident.

11.1 HAZARD (ASPECT) IDENTIFICATION

Hazards (impacts) will continue to be identified throughout the course of the project, in response to a range of processes implemented by ACLE Services which include:

- Design review process
- Project risk assessment process (Project Risk Register)
- Inspections/task observations
- Environmental audits
- Review and evaluation of subcontractor documentation
- Subcontractor performance inspections/audits
- Plant inspections
- Development and review of documented safe methods of work

Site personnel are encouraged to ensure that all environmental hazards (aspects), potential or actual are reported to ACLE Services' site management.

This can be undertaken verbally; however, it is to be recorded on the Hazard Report which can be completed by the person reporting the hazard (impact) or ACLE Services' site management having received advice on the hazard (aspect). This will then be managed in accordance with ACLE Services' Managing Risk process.

11.2 EXAMPLES OF ENVIRONMENTAL HAZARDS

Some environmental hazards that may arise during construction include:

- **Exposed or disturbed soils lacking adequate erosion and sediment controls**, increasing the risk of sediment runoff.
- **Insufficient controls around hazardous chemicals**, including improper storage, handling or labelling.
- **Inadequate erosion and sediment controls in proximity to nearby water bodies**, increasing the potential for water quality impacts.
- **Refuelling or maintenance activities occurring near sensitive receivers or drainage lines**, increasing spill and contamination risks.
- **Overflowing or poorly managed waste receptacles**, leading to litter, odour or pest attraction.
- **Absence of flagging, fencing or delineation around protected environmental areas (no-go zones)**, increasing the risk of accidental disturbance.
- **Unprotected or poorly maintained concrete washout and spoil containment areas**, allowing contaminated runoff.
- **Inadequate plant and vehicle clean-down procedures**, increasing the risk of spreading weeds or biosecurity matter to surrounding agricultural lands and ecosystems.
- **Visible dust emissions generated from clearing, excavation or vehicle movements**, affecting air quality and nearby sensitive receivers.
- **Noise or vibration levels exceeding project or regulatory limits**, particularly during high impact construction activities that may be a nuisance to nearby sensitive receivers.

11.3 ENVIRONMENTAL MONITORING AND REPORTING

An environmental monitoring and reporting program will be maintained throughout the project to meet the requirements of the development consent, EIS, CEMP, and all subplans.

Condition	Aspect	Obligation	Management plan(s) reference
C1 (e)	Environmental Management	A clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this consent.	EMS and CEMP
	Site Inspections	Weekly inspections will include the following: • Ensure the site is in a clean and tidy state (waste, cleared material, etc.) • Inspection for sign of erosion • Identification and removal of any debris-build-up at boundary fences to ensure downstream water flow is not impeded. • Identification of any evidence of weed infestations on site. Update and refine measures for weed management as required. • Inspection of noise, dust, vibration issues / nuisance • Review and assessment of waste management practices. • Inspection of cultural heritage management measures. • Inspection of hazardous substance management measures. • Condition of access roads, ensuring suitability for emergency vehicles.	CEMP

	Internal Audits	Environmental compliance audits will be conducted on all aspects of the CEMP and will be performed in accordance with recognised audit procedures. 2 x audits will be undertaken – within 6 weeks of the commencement of works, within 6 weeks of completion of works.	EMS and CEMP
C13	Independent Environmental Audit	Independent Environmental Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) or as updated from time to time and published on the Department's website.	EMS and CEMP
B13 (e)	Biodiversity	((e) include details of who would be responsible for monitoring, reviewing and implementing the plan.	Biodiversity Management Plan (BMP)
B34 (e)	Accommodation and Employment Strategy	Include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction, upgrading and decommissioning.	Accommodation and Employment Strategy (AES)

ACLE site personnel will report all environmental hazards they identify as part of their normal day-to-day operations to the Site Manager.

11.4 ENVIRONMENTAL AUDITS

Environmental compliance audits will be conducted on all aspects of the CEMP and will be performed in accordance with recognised audit procedures.

Two (2) audits will be undertaken. Firstly within 6 weeks of the commencement of works, then within 6 weeks of completion of works.

Corrective actions resulting from audits will be addressed as soon as possible and may trigger an update to this EMS- refer section 11.10.

Section 4.7 outlines the requirements for independent audits per consent condition C13.

11.5 COMPLAINTS MANAGEMENT

Any complaints received from local government authorities, neighbouring businesses, subcontractors or members of the public are to be handled in a sensitive manner.

The person who receives the complaint needs to ensure that they obtain the following information:

- The name of the person making the complaint and their contact details including telephone number.
- Ascertain the exact nature of the complaint including:
  - What happened.
  - When it happened.
  - What was seen; and
  - Details about the activity that was the source of the environmental incident.

All complaints are to be reported and resolved in accordance with ACLE Services' Incident Management process.

11.6 INCIDENT MANAGEMENT

In accordance with Condition C1(d)(ii) of the Development Consent, complaints may be received by any project representative or through the project contact channels notified to the community. The Applicant will ensure that current information explaining how complaints about the development can be made is publicly available in accordance with Condition C14(a)(vii).

The person receiving a complaint must record the complainant's contact details, where provided, together with the date and time, location, nature of the complaint and the relevant project activity. The complaint must be promptly referred to the Project Manager and Environmental Representative.

Each complaint will be entered into the Complaints Register and assessed and investigated by the appropriate project personnel. Corrective or preventative action will be implemented where required. Where contact details are provided, the complainant will be advised of the outcome of the investigation and any actions taken.

The Complaints Register will record the complaint, investigation, response, actions taken, close-out date and any required follow-up. Complaints relating to development-related traffic will also be managed in accordance with the approved Traffic Management Plan and Condition B8(e)(iv) of the Development Consent.

If a complaint identifies a potential incident or non-compliance under the Development Consent, it must be immediately escalated to the Project Manager and the Applicant and managed in accordance with Sections 11.6 to 11.8.

11.7 DISPUTE RESOLUTION

In accordance with Condition C1(d)(iii) of the Development Consent, a complaint that is not resolved to the complainant's satisfaction will be treated as a dispute.

The Project Manager will review the original complaint, the investigation undertaken, the response provided and any outstanding matters. Further consultation will be undertaken with the complainant to clarify the unresolved issues. Relevant technical personnel, the Applicant or a regulatory authority may be consulted where required.

Any further corrective action and the final project response will be communicated to the complainant where contact details have been provided. The escalation process, consultation undertaken, actions and final outcome will be recorded in the Complaints Register.

The specific dispute-resolution process in Condition B6 of the Development Consent applies to any dispute between the Applicant and the relevant roads authority regarding repairs to Houghton Road or Hulme Road.

For the purposes of this section, a dispute means an unresolved complaint or disagreement relating to the environmental management or impacts of the development. Contractual disputes will be managed in accordance with the relevant contract.

Any complaint or dispute that constitutes an incident under the Development Consent must be notified and reported in accordance with Conditions C10 and C11 and Appendix 5. Any matter that constitutes a non-compliance must be notified in accordance with Condition C12. These requirements are addressed further in Sections 11.6 to 11.8.

11.8 INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS

The development consent defines an **incident** as:

An occurrence or set of circumstances that causes or threatens to cause material harm to the environment, and as a consequence of that environmental harm, may cause harm to the health and safety of human beings, and which may or may not cause a non-conformance.

The following notification and reporting steps are to be taken in the event of an incident:

1. An initial incident notification with details as outlined in Condition C10 of the development consent, must be made within 24 hours of becoming aware of the incident occurring via the NSW planning portal.
2. The Applicant must provide notification as required under these requirements, even if the Applicant fails to give the notification required under condition C10 or, having given such notification, subsequently forms the view that an incident has not occurred.

3. Within seven **(7) days** (or as otherwise agreed by the Planning Secretary) of the Applicant making the immediate incident notification (in accordance with condition C10), the Applicant is required to submit a subsequent incident report that:
    a) identifies how the incident was detected;
    b) identifies when the Applicant became aware of the incident;
    c) identifies any actual or potential non-compliance with conditions of consent;
    d) identifies further action(s) that will be taken in relation to the incident; and
    e) a summary of the incident;
    f) outcomes of an incident investigation, including identification of the cause of the incident;
    g) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence, including the period for implementing any corrective and/or preventative actions; and
    h) details of any communication with other stakeholders regarding the incident.

11.8.1 Examples of Environmental Incidents

Examples of environmental incidents that require reporting ACLE Services Incident Management Process:

- A breach in any approval conditions or legislation.
- Injury or death of native fauna potentially or caused by work under the contract.
- Tampering with any native fauna or identified habitat or animal breeding places unless authorised as a licenced Fauna Spotter Catcher.

- Clearing outside of the contractual limits (development footprint) as described in the EIS.
- Damage to vegetation outside of the development footprint.
- Hazardous materials released into water bodies or on land that left site and was unrecoverable.
- Identification of a biosecurity matter on site (introduced weed species or other biological matters that cause harm to fauna or neighbouring agricultural lands).
- Environmental near miss through procedural breaches.
- Damage, movement or relocation of Cultural Heritage that is unapproved without adhering to the Unexpected Finds Protocol.
- Unintentional damage of Cultural Heritage matter.
- Discovery of contaminated land or contamination to land due to construction works.
- Exceedance of noise and / or vibration limits that impacted sensitive receivers resulting in a complaint.
- Environmental nuisance from light pollution resulting in a complaint or ecological impact.

11.9 NON-COMPLIANCE REPORTING AND NOTIFICATION REQUIREMENTS

As outlined in Condition C11, within seven **(7) days** of becoming aware of a non-compliance, the Applicant must notify the Department in writing via the NSW Major Projects Planning Portal, identifying the development, relevant consent condition, nature and reasons for the non-compliance, and corrective actions taken or proposed, including timing.

11.10 CORRECTIVE ACTIONS

ACLE Services has a documented process, including all subordinate documents, to manage non-conformance, corrective actions and continual improvement within the ACLE Services.

The Continual Improvement Process Report (Refer Appendices D) ensures ACLE Services records and monitors corrective actions resulting from incident investigations, inspections, audits, and reports; and sets target completion dates and assigns responsibility for implementing and reviewing the effectiveness of corrective actions.

This process ensures all actions are logged in the appropriate register, which will monitor and record the progress of corrective actions for all actions arising from incidents, hazard reports, inspections, audits, etc., and will provide evidence that these actions are closed out in the allocated timeframe.

11.11 MANAGEMENT REVIEW

Condition C2 of the development consent requires

a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and
b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the:
    i. submission of an incident report under condition C10 of Schedule 2;
    ii. submission of an audit report under condition C13 of Schedule 2; or
    iii. any modification to the conditions of this consent.

Management review of incidents and corrective actions is achieved through a number of processes within ACLE Services' integrated Business Management System. Specific management review is identified and undertaken in the following processes:

- Incident Management.
- Internal Audit.
- Continual Improvement.
- System Performance; and

- Management Commitment.

12 EMERGENCY PREPAREDNESS AND RESPONSE

ACLE Services, in accordance with its Emergency Response process, and as directed under ACLE Services' Managing Construction process will ensure that project site specific emergency response procedures are developed in accordance with the hazards / risks present on the site.
Following the preparation of these emergency response procedures, a layout plan detailing the location and types of emergency equipment, location of spill kits, emergency evacuation routes and assembly points is documented in conjunction with the Site Management process, with the preparation of the project specific Site Management Plan (Refer Appendices E and F).

This is to be communicated with all site personnel at the time of induction, as per the Site Induction and Training process, and any changes to the to the plan in response to site conditions, or actions arising from emergency drills, either planned or unplanned, will be undertaken in accordance with the Communication and Consultation process.

13 COMMUNICATION AND CONSULTATION

ACLE Services has implemented the Communication and Consultation process to manage communication and consultation requirements at the corporate and project site specific level.

This process identifies specific areas for communication and consultation regarding environmental matters including, but not limited to:

- Display and communication of ACLE Services' Environmental policy.
- Hazard reporting system.
- The environment is an agenda item at all prescribed and regular meetings.
- Other communication and consultation arrangements for environmental matters; and
- Acquisition and exchange of information with external parties including customers, suppliers, contractors and public authorities.

As identified above a range of measures for communication and consultation are established within ACLE Services and these are identified within the Communication and Consultation Matrix.

13.1 SITE NOTICEBOARDS

The Site Noticeboard is an important communication tool and where practicable will be established to display the following:

- Environmental Policy (Appendix A)
- Construction Manager Notification
- Environmental Representative Notification
- Environmental alerts or toolbox talks
- Site Specific Emergency Response Plan including Warden Notification
- Site Management Plan (including emergency evacuation routes and assembly point/s)

In the event that it is not reasonably practicable to establish a site noticeboard, this information is to be made readily available, by being attached to the Construction Environmental Management Plan, which is to be available to all site personnel for review.

13.2 TOOLBOX TALKS

Toolbox talks are formal meetings held to communicate and consult on environmental and operational matters and to reinforce the importance of carrying out activities in a manner to avoids disturbance or damage to the environment.

The aim of these meetings is to communicate a clear and consistent message about business activities, changes to processes, and any other proactive matter that impacts the environment to enhance each person's understanding of their work and ensure a consistent and safe approach to undertaking work.

The Direct Manager / Supervisor shall lead the meeting and encourage open discussion between all attendees.

13.3 ENVIRONMENTAL ALERTS

Acquisition and exchange of information with external parties including customers, suppliers, contractors, and public authorities regarding environmental issues is recognised by ACLE Services as an important communication and consultation tool.

Where information prepared by external parties is communicated within ACLE Services, these environmental alerts are to be considered as information only.

Where an environmental or Hazard (Aspect) Alert is prepared and authorised in accordance with ACLE Services' Delegations Register and issued, this hazard alert is to be complied with across ACLE Services and all project sites.

14 ENVIRONMENTAL OPERATIONAL CONTROLS

With reference to the identified environmental aspects and impacts, contract documentation, legislative requirements, and relevant approvals the following environmental management plans and activity specific procedures have been developed and have been tabulated for ease of use on the construction site.

14.1 WATER QUALITY

Description
• Maintain and protect the quality of groundwater and nearby water bodies and site drainage features (irrigation channels) that may affect downstream environments, in compliance with s120 of the *POEO Act 1997*, the W*ater Management Act 2000,* the *Fisheries Management Act 1994* (for aquatic habitat protection), and applicable NSW water quality objectives.
Performance Requirements
• Maintenance measures for stormwater quality with minimal turbid water leaving the site boundary. • Compliance with all legislation and local water quality objectives.
Performance Indicators
• No evidence of contamination (Oily sheen, site rubbish) in to neighbouring water bodies. • No evidence of significantly turbid waters into neighbouring water bodies. • All fuel and waste storage areas adequately protected from potential rainfall, flood or groundwater influence. • Correct dewatering practices.
Control Strategies
• Construction activities to be undertaken in such a manner to incorporate appropriate practices so as not to adversely affect water quality. • Site managed using appropriate erosion and sediment controls to direct dirty water in to adequate controls as per any applicable Erosion and Sediment Control Plans (ESCPs). • Refer to the Site Layout Plan available in the Appendices (Refer Appendices E and F). • Fuel and chemical storage areas to be located away from water bodies. • Equipment wash-down facilities to be conducted away from water bodies. • Concrete wash out facilities for trucks to be located away from water bodies or at the supplier's premises. • Refuelling plant off-site or away from water bodies if refuelling on-site. • Stockpiles of materials located away from water bodies and noted in site ESCPs. • Stockpiles managed in accordance with the ESCP. • All contractors and their employees are informed of the requirements to protect the environment and keep good housekeeping practices throughout the duration of the project. • Fuel storage on site shall be maintained in a bunded enclosure and to be inspected periodically.
Corrective Actions and Emergency Response

- Ongoing maintenance of erosion and sediment controls, reflected by an approved ESCP.
- Ensure dewatering permit is adhered to and signed off by an environmental representative - stop dewatering and amend control strategies if sediment plume is developing.
- Isolate and/or remediate any water contamination.
- Contact ACLE Services' Construction Manager or Environmental Representative.

Monitoring and Reporting

- Visually monitor designated fuel and waste facilities within project area to ensure no off-site impacts.
- ACLE Services' Construction Manager or Environmental Representative to record any incidents.
- ACLE Services' Construction Manager or Environmental Representative to report to ACLE Services' Project Manager.

14.2 EROSION AND SEDIMENT CONTROL

A summary of the operational controls, as detailed more extensively in the project specific Erosion and Sediment Control Plan (ESCP), are as follows:

Description

- Implement and maintain erosion and sediment controls (ESCs) to protect nearby water bodies and site drainage features, including irrigation channels, from sediment-laden runoff and pollutants. All works must comply with s120 of the *POEO Act 1997*, the *Water Management Act 2000*, the *Fisheries Management Act 1994*, relevant NSW Water Quality Objectives, and the IECA Best Practice Erosion and Sediment Control Guidelines to ensure no off-site water quality impacts occur during construction.

Performance Requirements

- To prevent the displacement of sediment and soil from the site/s through providing temporary erosion and sediment control measures where necessary.
- Ensure control measures operate effectively.
- Controls outlined in the ESCP are installed and monitored during construction.

Performance Indicators

- Presence of required erosion and sediment controls on site.
- Turbidity within water/stormwater on site.
- Turbidity of adjacent/connecting water bodies to the site.
- Management/maintenance of existing erosion, both on-site and affected areas adjacent.

Control Strategies

- Implement ESCP in line with International Erosion Control Association (IECA) Best Practice Guidelines.
- Minimise areas of soil disturbance during construction.
- Waste soil and fill materials stored on-site long-term will be contained with a silt fence erected around the storage area.
- All unsuitable materials will be removed from the site.
- Retain and leave undisturbed as much of the existing vegetation as practicable, especially grasses, which are effective natural erosion controls.
- Progressively stabilise and rehabilitate exposed areas post-construction to minimise erosion.
- Do not remove these erosion and sediment controls until areas are stabilised.

Corrective Actions and Emergency Response

- Clean out all sediment controls after rainfall or as required.
- Improve/increase extent of erosion prevention measures.
- Ensure resources (plant/ equipment / personnel) are available to assist clean-up measures and rectify ESCs as soon as weather and site conditions permit.

Monitoring and Reporting

- Conduct pre and post rainfall inspections preferably by an Environmental Representative that is competent in ESC management.
- ACLE Services' Construction Manager or Environmental Representative to record any incidents.
- ACLE Services' Construction Manager or Environmental Representative to report to ACLE Services' Project Manager.

14.3 NOISE AND VIBRATION

Description

- Manage construction noise and vibration to ensure levels remain within the Acceptable Noise Levels (ANLs) for nearby sensitive receivers and to minimise disturbance to surrounding land uses.

Performance Requirements

- No complaints from the neighbouring properties or any sensitive receivers such as houses or businesses.

Performance Indicators

- Complaints made from the public.

Control Strategies

- Work hours will be limited to typical construction hours (7am-6pm, Mon-Fri; 8am-1pm Sat; no time Sunday or Public Holidays), with any out of hours work to be undertaken in accordance with an Out-of-Hours Protocol.
- Condition B17, Table 3 of the Development Consent outlines the Operational Noise Limit Requirements.
- Use quieter construction methods where feasible and reasonable to minimize noise emissions.
- Maintain all plant and equipment regularly to ensure optimal running conditions and reduce noise.
- Shut down or throttle down plant used intermittently when not in use, wherever practicable.
- Avoid the use of horns, whistles, or other audible signals on-site unless necessary for safety.
- Noise levels must comply with the *Interim Construction Noise Guideline* (ICNG) *2009*.
- Notify the Client and request approval for any additional noise controls or works outside of standard hours.

Corrective Actions and Emergency Response

- Respond to noise complaints by conducting noise monitoring to determine if the noise criteria are being exceeded.
- Ensure works stop immediately post receipt of a complaint in the area or construction activity likely to be the source of the nuisance.
- Amend hours of work for high noise construction activities where practicable.

Monitoring and Reporting
• Periodic monitoring to identify and fix unnecessary noise sources, especially after a complaint. • ACLE Services' Construction Manager or Environmental Representative to record any incidents. • ACLE Services' Construction Manager or Environmental Representative to report to ACLE Services' Project Manager.

14.4 AIR QUALITY

Description
• Manage construction activities to minimise dust generation and emissions from vehicles, plant, and machinery to prevent off-site air quality impacts. Controls must be implemented to suppress dust, limit exposed surfaces, and ensure equipment is well-maintained to reduce exhaust emissions.
Performance Requirements
• Maintain measures to reduce and minimise dust levels and greenhouse gas emissions.
Performance Indicators
• Complaints from the public. • Observations on site.
Control Strategies
• ACLE Services' Construction Manager will conduct daily visual observations of dust levels on-site and organize watering as required. • Maintain plant and machinery in accordance with the manufacturer's specifications and ensure no machinery or vehicles release emissions excessively. • Cover any material transported in trucks to reduce dust generation. • Visual surveillance for dust generation during work activities. Work will cease when high levels of airborne dust cannot be controlled. • Stop the dust generating activity and improve dust suppression techniques (e.g. more frequent use of water carts). • Necessary water licences to be obtained when accessing non-potable water for construction purposes. • Speed limits on site will be implemented at 40km/hr. • Any complaints of odours by nearby sensitive receivers will be investigated in a timely manner. • Odours or airborne contaminants that are noxious, offensive to public amenity, likely to cause environmental harm or nuisance, or exceed the limits listed in Schedule 2 of the *National Environment (Ambient Air Quality) Protection Measure 2021*, will not be released into the atmosphere.
Corrective Actions and Emergency Response
• Conduct regular plant and equipment maintenance to prevent excessive production of burnt fuel. • Where possible, procure or contract the use of plant or equipment that meets current emission reduction control targets.
Monitoring and Reporting

- ACLE Services' Construction Manager or Environmental Representative to record any incidents.
- ACLE Services' Construction Manager or Environmental Representative to report to ACLE Services' Project Manager.

14.5 BIODIVERSITY (FLORA & FAUNA MANAGEMENT)

Description

- Measures shall be implemented to avoid or minimise impacts to native flora and fauna within the construction footprint in accordance with the project's Biodiversity Management Plan. The Biodiversity Development Assessment Report (BDAR) prepared by Habitat concluded that the Project is unlikely to result in any significant impact on biodiversity values, including key habitat features (e.g. hollow-bearing trees), threatened species (including Southern Myotis and Koala), aquatic habitat (waterways), or result in cumulative impacts, given the limited biodiversity values present within the study area.

Performance Requirements

- Maintenance of site biodiversity values during construction and ongoing preservation during operational phase.

Performance Indicators

- No fauna mortality resulting from construction activities
- No incidents relating to vegetation clearing
- No dieback of vegetation in adjacent land to the site
- No degradation of aquatic ecology in adjacent waterways

Control Strategies

- Minimize clearing and disturbance: Restrict vegetation clearing to the minimum necessary, retain trees where possible, avoid impacts to tree protection zones, and implement flagging to delineate no-go areas.
- All vegetation clearing to be within the approved disturbance areas described in the EIS.
- Pre-clearance and supervision: If required, conduct a pre-clearance survey by a qualified fauna spotter 24hrs prior to clearing to identify and flag areas containing fauna or habitat features. Supervise all clearing activities to ensure wildlife is safely relocated.
- A staged clearing approach is preferred to give fauna an opportunity to relocate naturally.
- Avoid clearing vegetation during the nesting season of threatened fauna species such as the Superb Parrot (Spring/early Summer).
- Biodiversity management: If possible, reuse native vegetation by mulching or placing as potential fauna habitat, and dispose of non-native vegetation appropriately.
- Waste control and site maintenance: Dispose of weeds and waste appropriately, maintain a clean site, and progressively rehabilitate cleared areas.
- Awareness and training: Ensure staff are informed of increased animal activity during dawn and dusk, conduct regular training on biodiversity protocols, and implement a site-wide awareness program.
- Induct personnel on flora and fauna relevant to the site and highlight no-go zones and flagging for protected vegetation.

Corrective Actions and Emergency Response

- Relocate any fauna impacted by construction by a licenced and competent fauna spotter catcher.
- Reinstate any no-go zone delineations if impacted.
- Contact ACLE Services' Construction Manager or Environmental Representative.

Monitoring and Reporting

- Fauna spotter catcher supervising and reporting approved clearing activities and of any habitat features to facilitate construction.
- Inspections of post-clearing locations by an Environmental Representative to ensure no boundary exceedances.
- ACLE Services' Construction Manager or Environmental Representative to record any incidents.
- ACLE Services' Construction Manager or Environmental Representative to report to ACLE Services' Project Manager.

14.6 BIOSECURITY MANAGEMENT

Description

- Implement measures to prevent, manage, and respond to Biosecurity Matter, including weeds, pest animals, pathogens, and disease, to avoid their introduction or spread during construction. All activities must comply with the *Biosecurity Act 2015* and the General Biosecurity Duty, ensuring that site personnel, machinery, materials, and vehicle movements do not create or exacerbate biosecurity risks.

Performance Requirements and Indicators

- Maintenance of surrounding ecology.
- No spread or introduction of Biosecurity Matter such as weeds due to construction activities including travel to and from site.
- No proliferation of pest fauna species such as cats and dogs due to construction activities.

Control Strategies

- All personnel shall receive weed hygiene awareness training as part of the site induction.
- All vehicles, machinery and plant shall be inspected and certified as clean by a competent and trained person prior to first entry to the site.
- If clean down is required, this shall be inspected by a competent and trained person where a biosecurity matter exists on site or neighbouring properties.
- Only registered herbicides shall be used by a licensed weed sprayer in accordance with the Agriculture Chemical licences (Ground Applicator Licence) and hold any competency requirements.
- Weekly site inspections shall include identifying evidence of significant infestations of noxious weeds.
- Weed management: Implement weed management in line with the NSW Biosecurity Act 2015, using clean down facilities for vehicles and equipment if necessary, certifying them as weed-free, treating on-site weeds, and conducting ongoing monitoring.
- Ensure lids are on all bins in particular food waste bins.
- No feeding feral animals onsite.

Corrective Actions and Emergency Response

- Engage a licenced pest contractor for invasive animals in the worksite.
- Maintain regular weed maintenance around site compound boundaries.
- Isolate an infestation or newly introduced biosecurity matter on site, until appropriate measures are taken.
- Contact ACLE Services' Construction Manager or Environmental Representative.

Monitoring and Reporting

- Routine monitoring shall be undertaken by the Environmental Representative to identify weed species and detect any suspected newly introduced biosecurity matter.
- Where new biosecurity matter is identified, the ACLE Services Construction Manager shall notify the Client's Representative and the ACLE Services Project Manager.
- Where new biosecurity matter is present and active management is being implemented, daily visual inspections shall be undertaken to monitor its extent and the effectiveness of control measures.

14.7 WASTE MANAGEMENT

Description

- Manage waste generation through the segregation, handling, and removal of all waste materials in accordance with the project's Waste Management Plan. Waste must be removed from site on an ongoing basis and appropriately separated to maximise beneficial reuse and recycling. At project completion, the site will be left free of construction debris and rubbish, ensuring all waste is disposed of lawfully and the area is restored to a clean and orderly condition.

Performance Requirements and Indicators

- Housekeeping maintained each day and waste receptacles not causing public nuisance or surrounding pollution issue due to lack of service.
- Construction wastes that can be recycled are segregated and transported off site for beneficial reuse.

Control Strategies

- Any waste related to a spill disposed of in accordance with SDS requirements and any relevant local authority requirements.
- All wastes are to be stockpiled in bins/containers at the designated separation areas (steel, cardboard, aluminium, timber, general waste)
- If immediate recycling of lithium-ion batteries is not possible, a location specified in the Waste Management Plan will be used with appropriate controls in place
- Concrete washout / bins supplied to recycle waste concrete
- A hierarchy approach to waste management will be followed
- Avoid unnecessary resource consumption as a priority
- Disposal is undertaken as a last resort
- All waste generated from construction must be effectively controlled on-site before disposal at licenced waste and resource management facilities nominated in the Waste Management Plan.
- A waste tracking system will be maintained for the disposal of regulated wastes.
- No waste will be stored within 30m of waterways or flood exclusion zones.
- Waste will not be burnt on-site.
- Waste will not be used as fill or buried on-site.
- All waste will be disposed of at a licensed facility by a licensed regulated waste disposal contractor.

- All waste must be managed and disposed of in accordance with the *Protection of the Environment Operations (Waste) Regulations 2014*.
- Skips will be hired from a waste contractor and will be on-site for the duration of the project. The contractor will remove and dispose of waste, replacing skips as required.
- No skip bins to be left overflowing or unprotected from pest animals and wind.
- All formwork and construction materials will be removed from the site and returned to ACLE Services or subcontractors' yards.

Corrective Actions and Emergency Response

- Correct practices/activities which are not in line with current best practice and legislation.
- Request additional servicing of waste receptacles when bins are continually overflowing.
- Audit of waste contractor's practices at their facilities where possible to ensure recycling opportunities are being met.
- ACLE Services' Construction Manager to report to the Client's Representative and ACLE Services' Project Manager over any breach of contract.

Monitoring and Reporting

- Visually monitor designated waste receptacles within project area.
- Final check of the site to be carried out by ACLE Services' Project Manager and Client's Representative

14.8 SPILL RESPONSE AND MANAGEMENT

Description

- Implement spill prevention and response measures to avoid the release of fuel, oils, or chemicals to the environment, including land and nearby water bodies.

Performance Requirements

- Prevent loss of material between loading and disposal.
- Contain all spillage immediately and prevent any from entering drains and waterways.

Performance Indicators

- Number of incidents relating to spills.
- Complaints from the public.

Control Strategies

- Spill kits of absorbent material suitable for land and water will be on-site and available for immediate use. (Bio-active organic absorbent material where available).
- Isolate and contain any spilt material.
- If liquid waste spill, apply granular absorbent and mix in with shovel or broom – follow manufacturer specifications.
- Remove by shovel all material into the designated container and seal.
- Removal of all residues by power sweeper if necessary.
- Remove container to licenced waste disposal facility.

- All contractors and their employees are informed of the requirements to protect the environment and keep good housekeeping practices throughout the duration of the project.
- All plant and equipment on site to be maintained regularly via prestart inspections and routine servicing.

Corrective Actions and Emergency Response

- Isolate, and remediate spill site as soon as practicable to avoid further contamination.
- Assess root cause of each spill event no matter how minor and note down any reoccurring theme of spills.
- Contact ACLE Services' Construction Manager and Environmental Representative.

Monitoring and Reporting

- Monitor the effectiveness of spill response and improve if necessary.
- Monitor spill site for any offsite impacts.
- Report incident as per Appendix 5 of the IPC Development Consent (Appendix F)

14.9 FUELS, CHEMICALS AND HAZARDOUS SUBSTANCES

Description

- Manage dangerous and hazardous substances arising from construction activities or uncovered during site development to prevent risks to the local environment. This includes ensuring that fuels, chemicals, and other hazardous materials are stored, handled, and disposed of safely to avoid contamination of land, water bodies, and surrounding areas.

Performance Requirements

- Maintain measures to reduce and minimise the potential for environmental pollution.

Performance Indicators

- No environmental incidents from hazardous substances
- Spills contained within the project site and not leached or run into the external land or waters.

Control Strategies

- Fuels, chemicals and hazardous materials will be stored and handled in accordance with AS 1940-2017 – The storage and handling of flammable and combustible liquids
- If liquid chemicals are stored on site, *NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook*, must be adhered to.
- Safety Data Sheets (SDS) will be provided for all fuels, chemicals and hazardous substances brought to site.
- All fuels shall be stored in suitably bunded vessels well away from drainage lines and water features.
- Storage areas shall be bunded and segregate incompatible chemicals and wastes, such as flammable goods and oxidising agents, or flammable goods and poisons.
- Fuel and chemical storage areas should be inspected at least weekly to ensure there are no spills, any waste storage drums are in good condition, all materials are being stored in bunded areas and bund drain valves are locked closed.

- Storage bunds will be regularly inspected and accumulated rainfall removed to minimise overflow and disposed of appropriately to a licenced facility.
- Storage limits are to be below the threshold quantities listed in the *Department's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33* at all times.
- Only trained operators to handle hazardous substances with appropriate PPE as per the SDS.
- All contractors and their employees are informed of the requirements to protect the environment and keep good housekeeping practices throughout the duration of the project.
- Vehicles and machinery must be checked for leaks or damage prior to entering site. Vehicles leaking fuel or oils must be prohibited from the site.
- Vehicle and machinery prestart checks must be done daily.
- Any vehicles, mobile plant or equipment with any leaks must be stored in or over a portable, impervious bund until repaired or removed from site.
- General vehicle parking areas should be restricted to the location identified by the Site Manager on site.
- Vehicles and plant will be inspected for any loose items, debris or soil that could fall off the vehicle upon exiting the site.
- Any plant or equipment refuelled on site must have the portable bund directly below the refuelling point to collect any spills.
- Areas where plant and equipment maintenance are carried out shall be set up to ensure that pollutants and spills are contained and not discharged to the environment.

Corrective Actions and Emergency Response

- Monitor effectiveness of spill response and improve if necessary.
- Monitor spill site for any detrimental impacts.
- Should unexpected contamination or asbestos be discovered, an Unexpected Finds Procedure must be implemented to capture responsibilities and management of the contamination.
- ACLE Services' Construction Manager and Environmental Representative to be notified to assist in clean-up if the potential area of impact is significant.

Monitoring and Reporting

- Visual monitoring of spill site to ensure complete clean up.
- Report to ACLE Services' Construction Manager and Environmental Representative.
- ACLE Services' Construction Manager or Environmental Representative to record any incidents.
- Construction Manager or Environmental Representative to report to ACLE Services' Project Manager.
- ACLE Services' Project Manager report to the Client's Representative.

14.10 FIRE CONTROL

Prior to commissioning of the battery storage system, a comprehensive Emergency Plan will be prepared and implemented. The Emergency Plan will:

- Be developed in accordance with the findings of the Fire Safety Study;
- Be consistent with:
  - NSW Department's Hazardous Industry Planning Advisory Paper No. 1 – Emergency Planning; and
  - Planning for Bush Fire Protection 2019 (RFS) or equivalent;
- Include procedures for the safe isolation of battery storage systems and associated infrastructure in an emergency;

- Incorporate bushfire emergency management measures, including:
    - Asset Protection Zone (APZ) location, management and maintenance;
    - Identification of activities that must not occur during a Total Fire Ban;
    - Procedures for notification of the NSW Rural Fire Service (RFS); and
    - Response procedures for:
        - fire incidents on-site or in the vicinity;
        - activities with potential to ignite surrounding vegetation; and
        - works undertaken during bushfire danger periods;
- Include an Emergency Services Information Package (ESIP) prepared in accordance with Emergency Services Information and Tactical Fire Plan (FRNSW, 2019) to the satisfaction of FRNSW and NSW RFS.

The most current version of the Emergency Plan and ESIP will be maintained and implemented for the duration of the development, with copies:

- Provided to the local Fire Control Centre and FRNSW; and
- Retained on-site in a prominent location adjacent to site entry points at all times.

14.10.1 Consultation and Engagement

The BESS Project will establish an ongoing program of consultation and engagement will relevant stakeholders to achieve a reduction in the fire risk across its area of operations. Consultation will be ongoing with NSW Rural Fire Service (RFS) and Fire and Rescue NSW (FRNSW) through the course of construction.

In the Leeton Council Area, the RFS group is the Yanco / Wamoon Brigade. Their details are as follows:

Postal Address - Irrigation Way, Yanco 2703
Brigade Contact - 0427 533 752
Brigade Training Details - Training every Monday night at station, contact captain for further details.

Up to date contact information can be found here - Brigades - NSW Rural Fire Service

14.10.2 Emergency Contact List

An up-to-date emergency contact list will be compiled and maintained for the owners and occupants of properties adjacent to the Yanco BESS Project operations and the corridor. This will allow relevant stakeholders to be contacted and informed about any fire-related activities, threats, or issues.

14.10.3 Preparation for High-Risk Activities

Certain activities are considered high risk due to their potential to increase fire risk:

- Hot Works; and
- Grass Slashing.

Operations with a high risk of sparking a bushfire require enhanced preparedness. In addition to standard preparations including compliance with the declared Total Fire Ban restrictions, the following specific measures must be implemented:

- Operational Risk Assessment;
- Permit to Work;
- Take Five (or similar safety checks);
- Designated Place of Safety;
- Emergency Response Team;
- First Response Fire Fighting Equipment; and
- Pre-Start Briefing.

14.10.4 Actions prior to and during the fire danger period

Prior to Fire Danger Period:

- review and update Emergency Plans;
- Inspection and Maintenance required for the equipment;
- Undertake staff training and emergency response drills;
- Vegetation Clearing/Slashing
- Weather Condition Monitoring

During Fire Danger Period:

- Increase Vigilance
- Limit High-Risk Operations
- Ensure Readiness of Emergency Response Team: Keep the Response Team on high alert and ready to responds at a moment's notice; and
- Communicate with Local Authorities (e.g., the NSW Rural Fire Service)
- Evacuation preparation

14.10.5 Asset Protection Zones and Fire Breaks

A nominal 10m wide internal perimeter fire break should be established, incorporating a 4m wide access road within it, fire breaks should encompass the following elements:

- Perimeter Fire Break: Constructed using non-combustible materials like gravel or bare soil; and
- Vegetation Management: Always maintain fire breaks free from vegetation and obstructions. Storage of plants or equipment within fire breaks is strictly prohibited.

14.10.6 Fire Monitoring and Surveillance

- Thermal Imaging and Smoke Detectors: working in conjunction to Manufactures' Thermal Management System, thermal cameras and smoke detectors integrated with the central monitoring system for immediate alerts and response.
- Regular Patrols and Inspections: Conduct regular checks within the buffer zone to monitor the integrity of safety measures and infrastructure.

Description
• Construction activities starting an uncontrolled fire or bushfire
Performance Requirements
• Maintain measure to reduce the potential of fire.
Performance Indicators
• No fires on site. • Containment of fires on site.
Control Strategies
• A potable water supply will be provided on-site to meet the needs of staff and visitors. • Necessary water licences to be obtained when accessing non-potable water for construction purposes. • Clearing burn to be conducted by the client prior to construction start (for cultural heritage identification purposes). Flora and Fauna to be monitored and actively removed by trained carers if possible. • Once the clearing and grubbing phase begins and where required, a 10m fire break will be cut and maintained on-site to reduce the risk of uncontrolled fires.

- No hot works to be conducted near vegetated areas.
- Water cart will be available during periods of high/extreme fire danger.
- All contractors and their employees informed of the requirements to protect the environment and keep good housekeeping practices throughout the duration of the project.

Corrective Actions and Emergency Response

- Firefighting equipment to be regularly inspected by the Contractor or delegate.
- Use of water cart and earth moving equipment to suppress/control active fires.
- Emergency services are to be contacted upon discovery of an uncontrolled fire.

Monitoring and Reporting

- Local fire conditions are to be monitored daily or as required by ACLE Services' Construction Manager
- High/extreme conditions to be included in morning prestart.
- Observation of fire activity to be reported immediately to ACLE Services' Construction Manager and Environmental Representative.
- ACLE Services' Construction Manager or Environmental Representative to record any incidents.
- ACLE Services' Construction Manager or Environmental Representative to report to ACLE Services' Project Manager.
- ACLE Services' Project Manager reports to the Client's Representative.

14.11 HERITAGE FINDS AND CONTROLS

The Wiradjuri Aboriginal People/s are associated with the Leeton region, with other groups likely to have also existed within the region. Archaeological assessments indicate that these groups would have typically been located nearby to a watercourse, particularly the Murrumbidgee River. The Cultural Heritage Assessment Report (ACHAR) identified one (1) previously recorded Aboriginal heritage site located near the project area, with no new sites identified during the archaeological survey (see Figure 2 below). Due to historical disturbance from cropping, infrastructure, and road construction, the project area is considered to have low archaeological potential. Recommended management measures include establishing a 10 m buffer around the previously recorded site (AHIMS #49-5-0211) and implementing a Chance Finds Protocol for the duration of construction.

ACLE Services' Chance Finds Protocol must be followed by any work personnel in the event of an unexpected heritage item being discovered. This process has been prepared in consultation with Heritage NSW Registered Aboriginal Parties and Leeton District Local Aboriginal Land Council (LALC).



Figure 2: Aboriginal Heritage Site (previous record extracted from AHIMS database)

Description
• Identify, protect, and manage cultural and historical heritage values within and adjacent to the project area to prevent disturbance to known or potential heritage items. All works must comply with the *Heritage Act* (1977), and any project-specific requirements identified through heritage assessments.
Performance Requirements
• No impacts to cultural or historical (European) heritage sites through the construction process. • The Chance Finds Protocol implemented effectively in the case of an unexpected heritage find.
Performance Indicators

- No incidents involving impacts to Cultural or Historical Heritage items.

Control Strategies

- Implementation of a Chance Finds Protocol in the event of an unexpected find.
- Implementation of a 10m buffer around the previously recorded Heritage site.
- Toolbox talks and site induction covering Cultural and Historical heritage.

Corrective Actions and Emergency Response

- Inspections on buffer zone and delineation maintained.
- Stop works and follow the Chance Finds Protocol in the event of an unexpected heritage find.
- Delineate a no-go zone if suspected artefacts or heritage items are discovered and notify the Client to contact the archaeologist to verify.

Monitoring and Reporting

- Report to ACLE Services' Construction Manager and Environmental Representative.
- ACLE Services' Construction Manager or Environmental Representative to record any incidents.
- Construction Manager or Environmental Representative to report to ACLE Services' Project Manager.
- ACLE Services' Project Manager report to the Client's Representative.

14.12 SITE MAINTENANCE AND HOUSEKEEPING

Description

- Keeping a clean site, free of any excess objects, waste, and other associated environmental and safety hazards.

Performance Requirements

- Maintain measures to reduce and minimise the potential for construction to cause damage to the environment through construction waste and other associated materials and equipment.

Performance Indicators

- No complaints.
- No Contract Notices or Non-Conformances from the Client regarding housekeeping.

Control Strategies

- The Principal Contractor will maintain responsibility for the location and protection of any Council and public utility service infrastructure and assets that may be impacted during construction of the development.
- The Principal Contractor will repair any damage incurred to Council and public utility services infrastructure and assets:
    - Immediately if hazards exist for public health and safety or vehicular safety.
    - Immediately upon completion of work associated with the development in all other cases.
- Designated areas for lunches away from the work face. These area/s must be provided with bins for scraps and wrappers and will be emptied daily into the site skips. No eating or drinking is permitted outside of these areas to reduce wrappers and cans on site.
- Designated areas for smoking on site. These area/s must be provided with a bin for cigarette butts and will be emptied daily into the site skips.
- Bins and skips to be provided on the job site in a location that the ACLE Services' Construction Manager sees fit. Inductions will be conducted for all personnel entering the site to inform them of the bins and skip locations.
- All contractors and their employees informed of the requirements to protect the environment and keep good housekeeping practices throughout the duration of the project.
- All personnel onsite provided induction training on housekeeping practices.
- Site offices and other associated meeting rooms to be serviced weekly by cleaning staff.
- Onsite toilet facilities are to be serviced weekly at a minimum by cleaning staff or as necessary as deemed by the ACLE Services' Construction Manager if more frequent cleans are required.
- Toilet facilities are to be stocked with the necessary goods to maintain health standards on site. This stock is to include but not be limited to hand soap, disposable hand towels, and toilet paper and sharps containers.
- Temporary toilet blocks are to be emptied at a minimum of once weekly or as necessary as deemed by the ACLE Services' Construction Manager if more frequently required. This will be conducted by an approved resource recovery company.
- Contractors on site to conduct daily clean-ups of their work area prior to leaving site.
- Contractors are to conduct a weekly clean-up prior to leaving the site for the weekend.
- No Chemicals, oils, etc. to be stored onsite in undesignated, unprotected locations.
- Isolate and contain any spilt material.
- Only trained operators to handle hazardous substances.
- Prevent any material from entering stormwater drains or waterways.
- If liquid waste applies spill sorb and mix in with shovel or broom.
- Remove by shovel all material into the designated container and seal.
- Removal of all residues, by power sweeper if necessary.
- Remove the container to the local authority landfill/waste disposal facility.
- Maintenance of stormwater inceptors.
- ACLE Services minimise the off-site visual impacts of the development, including:
    - the potential for any glare or reflection
    - implement all reasonable and feasible measures to minimise the visual impact of infrastructure, including the selection of paint colours and finishes to blend with the surrounding landscape; and
    - not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.

Corrective Actions and Emergency Response

- Monitor effectiveness of spill response and improve if necessary.
- Monitor spill site for any detrimental impacts.
- Monitor the site for housekeeping practices and improve if necessary.
- Monitor facilities for housekeeping and cleanliness and improve if necessary.

Monitoring and Reporting

- Daily monitoring of all facilities on site for cleanliness by ACLE Services' Construction Manager.
- Environmental Representative to conduct weekly inspections and submit to ACLE services' Construction Manager and ACLE Services' Project Manager.
- ACLE Services' Environmental (HSE) Manager to conduct Monthly Inspections.
- ACLE Services' Project Manager reports to Client's Representative as part of weekly reports.

14.13 ECOLOGICALLY SUSTAINABLE DEVELOPMENT

Description

- ACLE Services is committed to delivering an ecologically sustainable development by minimising power and water use, reducing unnecessary material consumption, sourcing locally where practicable, and ensuring construction activities avoid or minimise impacts on the surrounding ecology. Sustainable design and construction practices will be applied throughout the project to support resource efficiency and protect environmental values.

Performance Requirements

- Reduction in energy use during the construction phase.
- Reduction in energy use post-construction.
- Eliminate land and water contamination from toxic and harmful substances.
- Improvement in environmental standards within the footprint of the worksite once construction has been completed.
- Increase the use of materials and products with recycled content.
- Limit material procurement to what is reasonably required, promoting efficient and sustainable resource use.
- Recycling of construction water and waste such as steel, concrete and timber where possible.
- Beneficial reuse of site won earthworks materials (rock, topsoil, subsoil) on the project for erosion and sediment controls, stable platforms and rehabilitation where possible.
- Reduction in waste during the construction period.
- Facilitate procedures and practices that reduce harm to people and the environment.

Performance Indicators

- Reduced power and water consumption.
- No release of contaminated materials to the environment.
- No harm to fauna and unapproved impacts to native flora.
- Increased recycling output of construction wastes.
- Reuse of site won materials within the foundations and landscaping.
- Reduction of import materials where reuse is available.
- Implementation of sustainable initiatives that are above business as usual practices.
- Engage site teams in open discussions to develop sustainability initiatives that reduce costs and support environmental and community outcomes.

Control Strategies

- Minimise power use during the construction phase by shutting down tools, equipment, and lighting when not in use.
- All construction equipment, light vehicles and heavy machinery onsite to be completely shut down at the close of business each day. No vehicles/machinery left idling when not in use.
- All office equipment is to be completely shut down at the close of business each day.
- Use energy-efficient tools, equipment, and lighting (potential solar lighting).
- Outdoor lighting will be designed, sited, installed, and tested to comply with Tables 2.1 and 2.2 of Australian Standard 4282-1997 - *Control of the Obtrusive Effects of Outdoor Lighting, using a Control Level of 1*.

- All lighting will be of a type that gives no upward component of light when mounted horizontally (i.e., a full cut-off luminaire).
- Consider local business input for material resourcing and services.
- Local hire of site personnel where possible.
- Any graffiti on buildings or structures associated with the development will be immediately removed.
- The buildings and the site will be maintained in a clean and tidy manner at all times.
- Incorporate energy-efficient products into the building to reduce power consumption post-construction.
- Substitute hazardous substances and dangerous goods with equivalent alternative products where possible.
- Design and deliver sufficient landscaping to increase the overall environmental standard of the work site when compared to the area prior to construction – refer to Landscape Concept Plan (CUSP 23119 Rev E)
- Preferences for construction timing and processes to be considerate of local flora and fauna.
- Substitute materials with equivalent alternative recycled products where possible.
- Waste products to be separated into product-specific bins for recycling (steel, cardboard, aluminium, etc.)
- Substitute products with harmful waste for equivalent environmentally friendly alternatives.
- Ensure best environmental practices are adhered to by all personnel on site.

Corrective Actions and Emergency Response

- Shut down all equipment not in use.
- Shut down all lighting not in use.
- Shut down all components of the site at close of business.
- Substitute identified hazardous products with environmentally friendly products.
- Substitute identified materials with a recycled alternative.
- Correct practices which are not seen to be best practice standards.
- Report to ACLE Services' Construction Manager or Environmental Representative.

Monitoring and Reporting

- Reporting under the requirements of the National Greenhouse and Energy Reporting Act (2007), which is supported through the Climate Change (Net Zero Future) Act (2023) and the Protection of the Environment Operations Act (1997).
- Visually monitor areas of construction and the extent of recycling during construction.
- Inspect products on-site and research preferred alternatives that are better for the environment.
- Inspection of the site at close of business each day for any unnecessary power being consumed.
- ACLE Services' Construction Manager or Environmental Representative to record any incidents.
- ACLE Services' Construction Manager or Environmental Representative to report to ACLE Services' Project Manager.
- ACLE Services' Project Manager report to Client's Representative where a breach of contract.

14.14 DECOMMISSIONING AND REHABILITATION

Upon completion of construction, all temporary works, infrastructure, equipment and waste will be removed. Temporary access tracks will be progressively rehabilitated to as close as practicable to their pre-construction condition, consistent with the *Rehabilitation Objectives* in Table 4 of Condition B35 (Schedule 2) of the Project's Development Consent. All disturbed areas must be reinstated with minimum 100mm of topsoil and reseeded, with the mix to be agreed with the Landholder and in accordance with the Planning Documents. Rehabilitation must occur within 18 months post cessation of operations of the BESS.

The Contractor must design and deliver sufficient landscaping to increase the overall environmental standard of the work site when compared to the area prior to construction – refer to Landscape Concept Plan (CUSP 23119 Rev E). When the project reaches the end of its investment and operational life, the project

infrastructure (above and below ground) will be decommissioned, removed and land rehabilitated to pre-development conditions.

APPENDIX A: ENVIRONMENTAL POLICY

ENVIRONMENTAL POLICY

Established in 2019, ACLE Services is an Australian-owned and operated service provider for the renewable energy industry. ACLE specialise in the deployment of utility-scale PV solar and battery energy storage systems, with extensive expertise in engineering, procurement, construction, commissioning, operation and maintenance of large-scale renewable energy projects.

Our Environmental objectives are:

- Reduce significant environmental impacts as a result of our operations;
- Prevent non-compliance;
- Prevent pollution at its source;
- Minimise cross-pollutant transfers; and
- Continually seek ways to improve upon our environmental performance.

Our employees believe in these objectives and are committed to these as values. By acting according to these values, it is our intent that we shall provide outstanding service to our customers, give our employees a safe and enjoyable workplace and grow our business.

Our Environmental Management System fully meets the requirements of ISO 14001:2015.

Our management system addresses the following:

- Availability of information and resources necessary to support our operations;
- Identifying and complying with all relevant legislation and other requirements;
- Understanding how our business impacts upon the environment;
- Selection and training of staff and subcontractors to maintain our high standards;
- Continuous Environmental Assessment Practices;
- Commitment to lowering our carbon footprint;
- Control of waste, and regard for our environment during all processes; and
- Minimising pollution.

The preparation and ongoing operation of an Environmental System is as a result of our commitment to the environmental through the improvement in its own operations including the interaction between us and our customers, subcontractors and suppliers.

This Environmental Policy is approved and issued by:

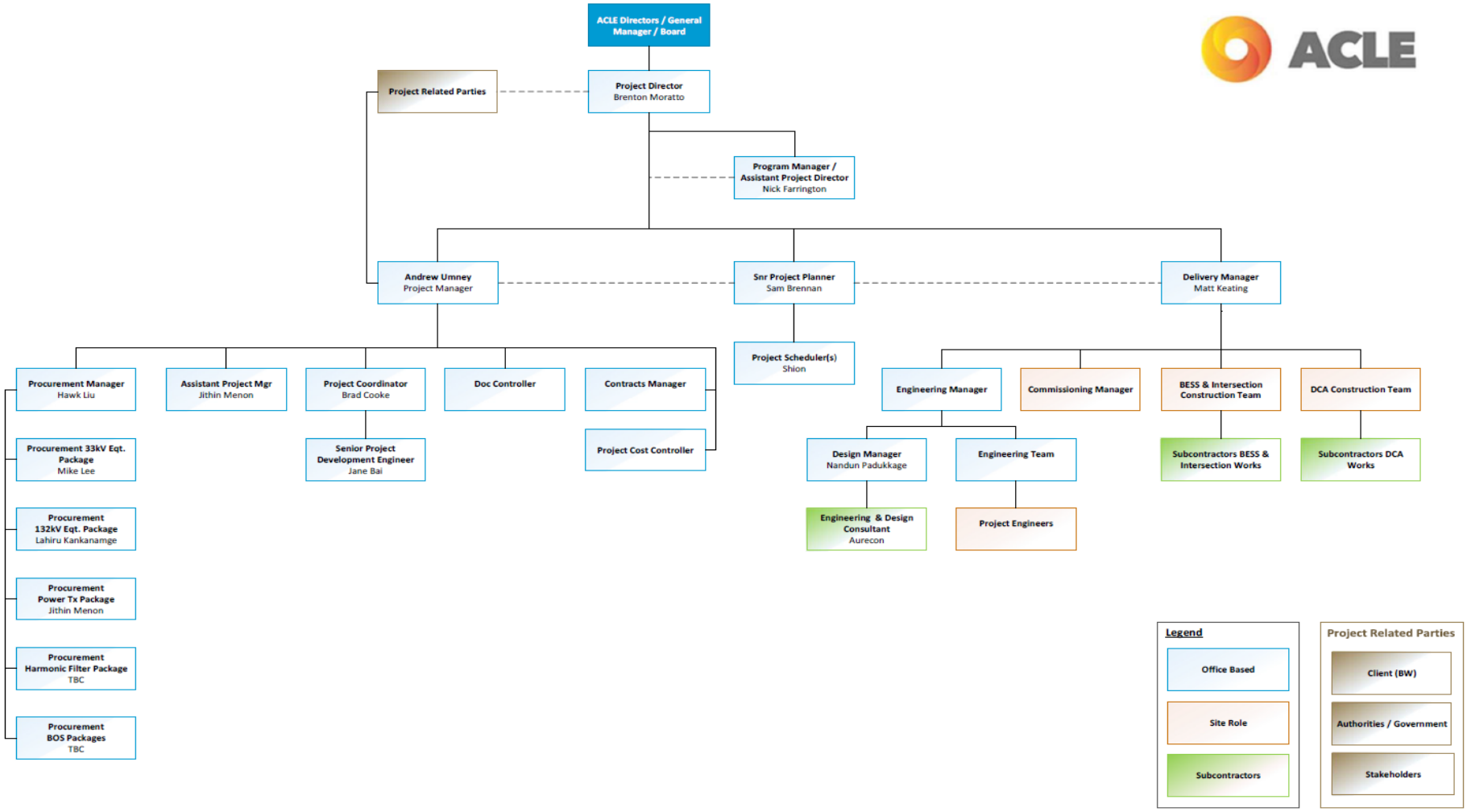
Brenton Moratto
Director

Raymond Wang
Director

APPENDIX B: PROJECT ORGANISATIONAL CHART

YANCO BESS & DCA Project

Project Management Team Organisation Structure



APPENDIX C: REFERENCE DOCUMENTS (AVAILABLE ON SERVER)

These processes / resources are available electronically on the server and detailed below as reference documents only.

Document Reference	Document No	Check
Emergency Plan & Bushfire Emergency Management Plan		☒
Waste Management Plan		☒
Construction Environmental Strategy		☒
Biodiversity Offset and Management Plan		☒
Soil & Water Management Plan		☒
Construction Noise Management Plan		☒
Landscape Concept Plan		☒
Construction Management Plan		☒
Unexpected Finds Procedure (for contamination)		☒
Chance Finds Protocol		☒
Risk Management Plan		☒
Site Specific Emergency Response Plan	QSE07-FORM-05	☒
Project Organisation Chart	OPGS02-FORM-01	☒
Incident Report	QSE09-FORM-01	☒
Project specific Monitoring and Review Matrix	QSE05-REG-05	☒
Project specific Communication and Consultation Matrix	QSE08-REG-01	☒
Managing Construction Overview	CON00-PFC-01	☒
Managing Subcontractors	CON17-PFC-01	☒
Continual Improvement process	QSE03-PFC-01	☒
Purchasing process	FIN01-PFC-01	☒

Managing Plant and Equipment process	ASM01-PFC-01	☒
Managing Maintenance and Calibration of Plant and Equipment process	ASM02-PFC-01	☒
How to Manage Project Records	CON01-REF-01	☒
Document Control	QSE01-PFC-01	☒
Records Management	QSE01-PFC-01	☒
Internal Audit	QSE02-PFC-01	☒
Emergency Response	QSE07-PFC-01	☒
Communication and Consultation	QSE08-PFC-01	☒
Incident Management	QSE09-PFC-01	☒
System Performance	QSE10-PFC-01	☒
Project Start-Up	OPSG02-PFC-01	☒
Project Administration	OPSG03-PFC-01	☒
Project Completion	OPSG04-PFC-01	☒
Defects / Maintenance	OPSG05-PFC-01	☒
Managing Design	OPSG06-PFC-01	☒

APPENDIX D: GENERAL DEVELOPMENT LAYOUT

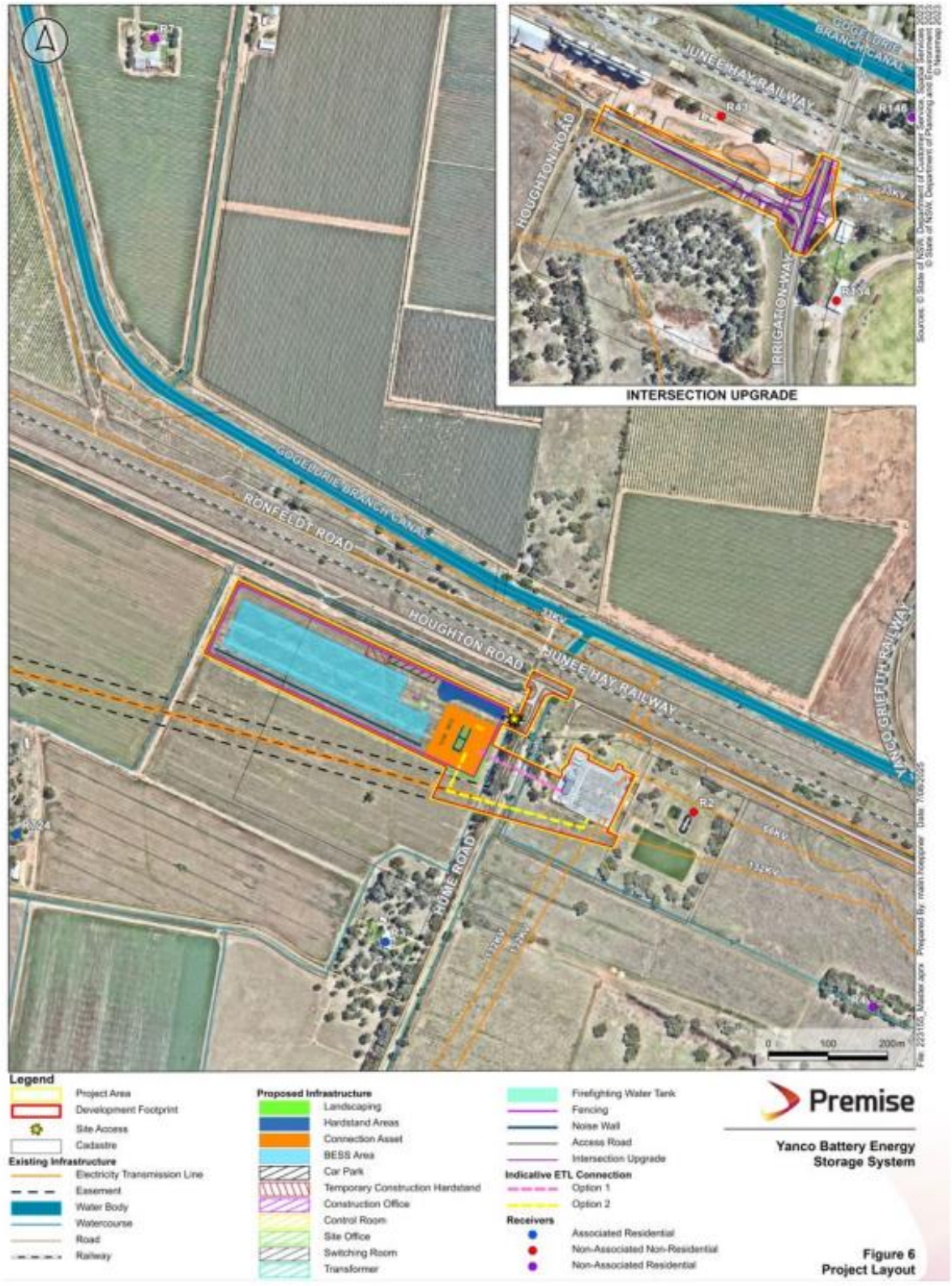
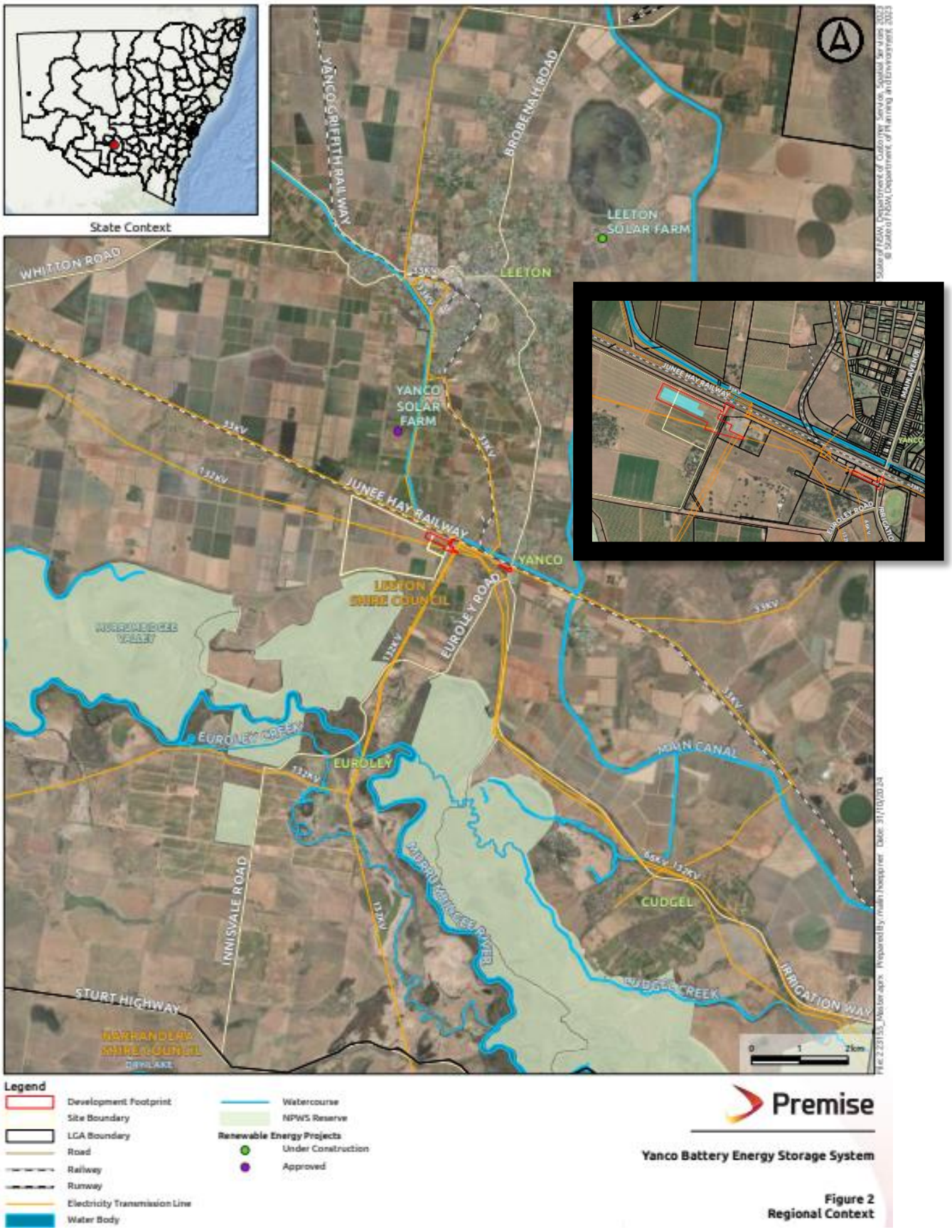


Figure 1: General Development Layout

APPENDIX E: SITE LOCATION – ENVIRONMENTAL MAPPING



APPENDIX F: DEVELOPMENT APPROVAL CONDITIONS

A summary of the Development Approval Conditions related to environment, issued on the 2nd of October, 2025 are outlined below:

SCHEDULE 2 - PART A – ADMINISTRATIVE CONDITIONS

Condition	Requirement	Compliance with EMS / CEMP
Obligation to Minimise Harm to the Environment		
A1	In meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, commissioning, operation, upgrading, decommissioning or rehabilitation of the development.	**This EMS**
A2	**Terms of Consent** The development may only be carried out: a) in compliance with the conditions of this consent; b) in accordance with all written directions of the Planning Secretary; c) generally in accordance with the EIS; and d) generally in accordance with the Development Layout in Appendix E.	**Section 3**
A3	The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this consent; b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and c) the implementation of any actions or measures contained in these documents.	**Acknowledged**
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	**Acknowledged**
A5	**Battery Storage Restriction** Unless the Planning Secretary agrees otherwise, the battery storage facility or system associated with the development must not exceed a total delivery capacity of 250 MW and an energy storage capacity of 1,100 MWh. *Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of battery storage in the future.*	**Acknowledged**

A6	**Upgrading of Battery Storage and Ancillary Infrastructure** The Applicant may upgrade the battery storage and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site and the total delivery and storage capacity prescribed in condition A5. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Planning Secretary incorporating the proposed upgrades.	**Section 3**
A7	**Structural Adequacy** The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the *National Construction Code*. *Notes:* • *Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development.* • *Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.*	**Acknowledged**
A8	**Demolition** The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard *AS 2601-2001: The Demolition of Structures*, or its latest version.	**Acknowledged**
A9	**Protection of Public Infrastructure** Unless the Applicant and the applicable authority agree otherwise, the Applicant must: a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. *Note: This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent*.	**Acknowledged**
A10	**Operation of Plant and Equipment** The Applicant must ensure that all plant and equipment used on site is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	**Section 14.3, 14.4**
A11	**Applicability of Guidelines** References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	**Acknowledged**

	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	
A12	**Compliance** The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	**Community Engagement Management Plan**
A13	**Evidence of Consultation** Where conditions of this consent require consultation with an identified party, the Applicant must: a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and b) provide details of the consultation undertaken including: i. the outcome of that consultation, matters resolved/unresolved; and ii. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	
A14	**Community Enhancement** Unless the Planning Secretary agrees otherwise, prior to commencing construction, the Applicant must enter into a VPA with Council in accordance with: a) Division 7.1 of Part 7 of the EP&A Act; and b) the terms of the offer as at the date of this consent.	

SCHEDULE 2 - PART B - ENVIRONMENTAL CONDITIONS - GENERAL

Condition	Requirement	Compliance with EMS / CEMP
Transport		
B1	**Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions** Unless the Planning Secretary agrees otherwise, the Applicant must ensure that the: a) development does not generate more than: (i) 87 heavy vehicle movements a day during construction, upgrading, and decommissioning; and (ii) 9 movements of heavy vehicles requiring escort during construction, upgrading, and decommissioning; and	**Traffic Management Plan**

	(iii) 2 movements of high-risk heavy vehicles requiring escort during construction, upgrading, and decommissioning; and b) Length of any vehicles (excluding high-risk heavy vehicles requiring escort) used for the development does not exceed 19 meters.	
B2	The Applicant must keep accurate records of the number of high-risk heavy vehicles requiring escort, heavy vehicles requiring escort and heavy vehicles entering or leaving the site each day for the duration of the project.	**Traffic Management Plan**
B3	**Access Route** Unless the Planning Secretary agrees otherwise: a) All heavy vehicles must travel to and from the site via Irrigation Way, Houghton Rd and Hulme (Hume) Rd, as identified in the EIS; and b) Heavy vehicles requiring escort and high-risk heavy vehicles requiring escort associated with the development must travel to and from the site via Irrigation Way, Houghton Rd and Hulme (Hume) Rd as described in the EIS and identified in Appendix; and c) High-risk heavy vehicles requiring escort must travel along the route from Port Kembla to the intersection of Irrigation Way / Houghton Rd as identified in Appendix 4 Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of heavy vehicles requiring escort on the road network.	**Traffic Management Plan**
B4	**Site Access** All vehicles associated with the development must enter and exit the site via the access point off Hulme (Hume) Rd.	**Traffic Management Plan**
B5	**Road Upgrades** Unless the Planning Secretary agrees otherwise, prior to commencing construction, the Applicant must complete the road upgrades as detailed in Appendix 3 to the satisfaction of the relevant roads authority (and TfNSW for upgrades to the State Road network).	**Traffic Management Plan**
B6	**Road Maintenance** The Applicant must: a) Undertake an independent dilapidation survey to assess the: (i) Condition of Houghton Rd and Hulme (Hume) Rd prior to construction, upgrading and decommissioning activities; and (ii) Condition of Houghton Rd and Hulme (Hume) Rd, following the completion of construction,	**Traffic Management Plan**

	upgrading and decommissioning activities; b) On completion of the dilapidation reports undertaken in conditions B6 (a)(i) and B6 (a)(ii) provide a copy to the relevant roads' authorities; and c) Repair and/or make good any development-related damage to Houghton Rd and Hulme (Hume) Rd identified in dilapidation surveys during construction, upgrading or decommissioning works in consultation with the relevant roads authority. If there is a dispute between the Applicant and the relevant roads authority about repairs required under this condition, then either party may refer the matter to the Planning Secretary for resolution.	
B7	**Operating Conditions** The Applicant must ensure: a) Any new internal roads are constructed and maintained as all-weather roads; b) Any existing internal roads are maintained as all-weather roads; c) There is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site, unless required for emergency work to avoid the loss of life, property or prevent material harm to the environment; d) The capacity of the existing roadside drainage network is not reduced; e) All vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and f) Development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the public road network.	**Traffic Management Plan**
B8	Prior to commencing road upgrades under condition B5, construction or pre-construction minor works (whichever comes first), the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. Unless the Planning Secretary agrees otherwise, this plan must: a) Detail vehicle volumes, types and turn movements that would be generated during pre-construction minor works and demonstrate how pre-construction traffic would be managed to ensure a high level of safety for all road users; b) Detail the transport route to be used for all development-related traffic, including details of the chosen high-risk heavy vehicle requiring escort vehicle configuration; c) Detail road upgrade works required by condition B5 of this consent;	**Traffic Management Plan**

	d) Include a reconciliation table to demonstrate all traffic-related management measures and recommendation measures identified in the EIS have been included in the plan; e) Detail the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: i) Details of dilapidation surveys required by condition B6 of this consent; ii) Temporary traffic controls, including detours and signage; iii) Notifying the local community about development-related traffic impacts; iv) Procedures for receiving and addressing complaints from the community about development related traffic; v) Minimising potential cumulative traffic impacts with other projects in the area and traffic associated with the Yanco Sportsground; vi) Minimising potential for conflicts with school buses and other road users as far as practicable, including preventing queuing on the public road network; vii) Minimising dirt tracked onto the public road network from development-related traffic; viii) Details of employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service as described in the EIS; ix) Encouraging car-pooling or ride sharing by employees; x) Scheduling of heavy vehicle movements to minimise convoy length or platoons, and to minimise conflict with light vehicles; xi) Scheduling vehicles so no two heavy vehicles or high-risk heavy vehicles requiring escort pass one another on Hulme (Hume) Rd; xii) Responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; xiii) Responding to any emergency repair or maintenance requirements; and xiv) A traffic management system for managing high-risk heavy vehicles requiring escort; f) Include a driver's code of conduct that addresses: (i) Driver fatigue;	

	(ii) Procedures to ensure that drivers adhere to the designated transport routes and speed limits; and (iii) Procedures to ensure that drivers implement safe driving practices, including not storing vehicles within the rail corridor; and g) Include a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan; and h) Include a flood response plan detailing procedures and options for emergency access to and from the site in the event of flooding. Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.	
Landscaping		
B9	**Vegetation Buffer** The Applicant must establish and maintain a vegetation buffer (landscape screening) as described in the EIS and shown in Appendix D. The landscape screening must: a) Be planted prior to commencing operation; b) Be comprised of species that are endemic to the area; c) Be designed and maintained in accordance with RFS's Planning for Bushfire Protection 2019 (or equivalent); and d) Be properly and actively maintained with appropriate weed management and replacement of failed plantings, unless the Planning Secretary agrees otherwise.	**Section 14.14** **Landscaping Plan**
Biodiversity		
B10	**Vegetation Clearance** The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	**Section 14.5**
B11	**Biodiversity Offsets** Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below. The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by: a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; b) making payments into an offset fund that has been developed by the NSW Government; and/or	**Biodiversity Management Plan**

c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offsets scheme.

Table 1 – Ecosystem Credit Requirements

Vegetation Community	PCT ID	Credits Required
White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South East Corner and Riverina Bioregions.	74	8
Myrall Woodland in the Darling Riverine Plains, Brigalow Belt South, Cobar Peneplain, Murray–Darling Depression, Riverina and NSW South Western Slopes bioregions.	26	1

Table 2 – Species Credit Requirements

Species Credit Species	Credits Required
Koala (*Phascolarctos cinereus*)	8
Southern Myotis (*Myotis macropus*)	8

B12 Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must provide evidence to the Planning Secretary that biodiversity credits have been retired.

Biodiversity Management Plan

B13 **Biodiversity Management Plan**

Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must prepare a Biodiversity Management Plan for the project in consultation with CPHR, and to the satisfaction of the Planning Secretary. This plan must:

a) be prepared in accordance with the revised Biodiversity Development Assessment Report (dated 9 April 2025);
b) include a description of the measures and timeframes that would be implemented for:
   i. protecting vegetation and fauna habitat outside the approved disturbance areas;
   ii. managing and enhancing the remnant vegetation and fauna habitat within the development footprint;
   iii. minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development;

	iv. minimising the impacts to fauna on site and implementing fauna management protocols, including the design of temporary fencing; v. rehabilitating and revegetating temporary disturbance areas with native species that are appropriate to the site's ecology and conditions within 3 months following the completion of construction or upgrade; vi. establishing landscaped areas with native species that are appropriate to the site's ecology and conditions; vii. maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; viii. controlling weeds, feral pests and pathogens. c) include a program to monitor and report on the effectiveness of mitigation measures and report to CPHR following each annual reporting window; d) include an incidental threatened species finds protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered on site; and e) include details of who would be responsible for monitoring, reviewing and implementing the plan. The Applicant must implement the most recent version of the Biodiversity Management Plan approved by the Planning Secretary.	
Amenity		
B14	**Construction Hours** Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, commissioning or decommissioning activities on site between: a) 7 am to 6 pm Monday to Friday; b) 8 am to 1 pm Saturdays; and c) at no time on Sundays and/or NSW public holidays.	**Section 14.3**
B15	**Exceptions to Construction Hours** The following activities may be carried outside the hours specified in condition B14 above: a) commissioning activities that are inaudible at non-associated residences; b) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or	

	c) emergency work to avoid the loss of life, property or prevent material harm to the environment.	
B16	**Variation of Construction Hours** The hours of construction activities specified in condition B14 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be: a) considered on a case-by-case or activity-specific basis; b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Councils (and other relevant agencies) has been or will be undertaken; d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and e) accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009), or latest version.	
Noise		
B17	**Noise** The Applicant must: a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009) or its latest version; and b) take all reasonable and feasible steps to minimise operational noise and ensure that the noise generated by the operation of the development does not exceed the noise limits in Table 3 below, to be determined in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residences, unless the Planning Secretary agrees otherwise.	**Section 14.3**

Table 3 – Operational Noise Limit Requirements

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

Dust		
B18	The Applicant must minimise the dust generated by the development.	**Section 14.4**
B19	**Visual** The Applicant must: a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection; b) implement all reasonable and feasible measures to minimise the visual impact of infrastructure, including the selection of paint colours and finishes to blend with the surrounding landscape; and c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	**Section 14.12**
Lighting		
B20	The Applicant must: a) minimise the off-site lighting impacts of the development; and b) ensure that any external lighting associated with the development is installed as low intensity lighting (except where required for safety or emergency purposes), does not shine above the horizontal, and complies with *Australian/New Zealand Standard AS/NZS 4282:2019 – Control of the Obtrusive Effects of Outdoor Lighting*, or its latest version.	**Section 14.13**
Heritage		
B21	**Protection of Heritage Items** The Applicant must ensure the development does not cause any direct or indirect impacts to Aboriginal heritage items located outside the approved development footprint and provide a demarcated 10 m no-go zone around the registered location of AHIMS #49-5-0211.	**Section 14.11** **Chance Finds Protocol**
B22	**Chance Finds Protocol** Prior to the commencement of construction, the Applicant must prepare a Chance Finds Protocol for the development in consultation with Aboriginal Stakeholders, and Heritage NSW. The Applicant must implement the Chance Finds Protocol.	
Soil and Water		

B23	**Water Supply** The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. *Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.*	**Design**
B24	**Water Pollution** The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	**Section 14.8, 14.2**
B25	**Operating Conditions** The Applicant must: a) minimise any soil erosion and control sediment generation; b) ensure the battery storage and ancillary infrastructure and any other land disturbance associated with the construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and Managing Urban Stormwater: Soils and Construction – Volume 2A (Landcom, 2008), or its latest version; c) establish ground cover with appropriate perennial species on land within the disturbance footprint within 3 months of completion of construction or upgrade, and maintain ground cover with weed management; d) ensure the battery storage and ancillary infrastructure does not cause any increased water being diverted off the site or alter hydrology off site; e) ensure the battery storage and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on surface water, localised ponding and groundwater at the site; f) ensure the battery storage and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and g) provide for interception and removal of contaminants from stormwater basin(s) in the event of fire damage to the battery cells.	**Operations Management Plan**
Contamination		
B26	An Unexpected Finds Procedure for contamination must be prepared before the commencement of construction and implemented throughout construction. The procedure must a) be followed should unexpected contamination or asbestos (or suspected contamination) be excavated or otherwise discovered, and	**Section 14.9**

	b) include details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of those involved.	
Hazards		
B27	**Fire Safety Study** At least three months prior to commencing construction of the battery storage facility and associated footings/foundations except for construction of those preliminary works that are outside the scope of the hazard studies, or within such further period as the Planning Secretary may agree, the Applicant must prepare a Fire Safety Study for the development, to the satisfaction of FRNSW and the Planning Secretary. Unless the Planning Secretary agrees otherwise, construction of the battery storage facility and associated footings/foundations (except for construction of those preliminary works that are outside the scope of the hazard studies) must not commence until the Fire Safety Study meets the requirements of FRNSW and approval has been given by the Planning Secretary. The study must: a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline and FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations; b) describe the final design of the battery storage facility; c) include reasonable worst-case fire scenario to and from the battery storage and the associated fire management; and d) identify measures to eliminate the expansion of any fire incident including i. adequate fire safety systems and appropriate water supply; ii. separation and/or compartmentalisation of battery units; and iii. strategies and incident control measures specific to the battery storage design. The Applicant must implement the measures described in the Fire Safety Study. *Note: 'to the requirements of FRNSW' above means confirmation in writing from FRNSW that the Study meets the requirements of FRNSW as required by the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guidelines*	**Section 14.10**
B28	**Storage and Handling of Dangerous Goods** The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the *Department's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33* at all times.	**Section 14.9**

B29	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: a) the requirements of all relevant Australian Standards; and b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook, if the chemicals are liquids. In the event of an inconsistency between the requirements above, the most stringent requirement must prevail to the extent of the inconsistency.	
B30	**Operating Conditions** The Applicant must: a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; b) ensure that the development i. complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones, and ii. is suitably equipped to respond to any fires on site, including provision of a minimum 10,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection; c) ensure that the battery storage area and infrastructure: i. includes a minimum 10 metre defendable space around the perimeter that permits unobstructed vehicle access to assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site, and ii. is managed as an asset protection zone (including the defendable space); d) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and e) notify the relevant Local Emergency Management Committee following construction of the development, and prior to commencing operations.	**Section 14.10**
B31	**Emergency Plan** Prior to commencing commissioning of the battery storage, the Applicant must develop a comprehensive Emergency Plan (including an emergency responders induction package) and detailed emergency procedures for the development and provide a copy of the plan to local Fire Control Centre and FRNSW. The plan must: a) be prepared in accordance with the findings of the Fire Safety Study required under Condition B27 of Schedule 2; b) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent);	**Emergency Response Plan**

	c) include details on how the battery storage and sub-systems can be safely isolated in an emergency; d) include bushfire emergency management planning, including: i. details of the location, management and maintenance of the Asset Protection Zone ii. a list of works that should not be carried out during a total fire ban; and iii. details of how RFS would be notified and procedures that would be implemented in the event that: o there is a fire on-site in the vicinity of the site o there are any activities on site with potential to ignite surrounding vegetation, or o there are any proposed activities during a bushfire danger period; and e) include an Emergency Services Information Package in accordance with Emergency services information and tactical fire plan (FRNSW, 2019), to the satisfaction of FRNSW and RFS.	
B32	The Applicant must: a) implement the most recent version of the Emergency Plan and the Emergency Services Information Package for the duration of the development, and b) following commencement of commissioning of the battery storage, keep a copy of the Emergency Services Information Package on-site in a prominent position adjacent to the site entry points at all times.	
Waste		
B33	The Applicant must: a) prepare and implement a Waste Management Plan prior to commencing construction which must be prepared in consultation with Council; i. be consistent with the EIS; ii. identify opportunities to maximise recycling; iii. identify appropriately licensed waste and resource management facilities at which waste disposal and recycling will take place; iv. identify the location and method of storing lithium-ion batteries if immediate recycling is not possible; and v. include a description of the measures that will be implemented to ensure that the objectives of condition B33(b)–(f) below are achieved; b) minimise the waste generated by the development; c) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);	**Waste Management Plan**

	d) store and handle all waste on site in accordance with its classification; e) not receive or dispose of any waste on site; and f) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.	
Accommodation and Employment Strategy		
B34	Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development. This strategy must: a) be prepared in consultation with Council and informed by consultation with local accommodation and employment service providers; b) propose measures to ensure there is sufficient accommodation for the workforce associated with the development; c) consider the cumulative impacts associated with other State significant development projects in the area; d) investigate options for prioritising the employment of local workers and use of local businesses during the construction and operation of the development, where feasible; and e) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction, upgrading and decommissioning. The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary prior to commencement of construction and implement the plan throughout construction.	**Accommodation and Employment Strategy**
Decommissioning and Rehabilitation		
B35	Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to comply with the objectives in Table 4. **Table 4 – Rehabilitation Objectives** **Feature** / **Objective** Site: • Safe, stable and non-polluting; • minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use. Battery Storage and ancillary infrastructure: • To be decommissioned and removed unless the Planning Secretary agrees otherwise and with the exception of assets held by the Network Service Provider. Community: • Ensure public safety at all times.	**Section 14.14**

PART C – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING

Condition	Requirement	Compliance with EMS / CEMP
Environmental Management Strategy		
C1	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: a) provide the strategic framework for environmental management of the development; b) identify the statutory approvals that apply to the development; c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; d) set out the procedures that would be implemented to: i. keep the local community and relevant agencies informed about the operation and environmental performance of the development, receive, handle, respond to and record complaints, resolve any disputes that may arise, respond to any non-compliance, and respond to emergencies; and e) include: i. references to any strategies, plans and programs approved under the conditions of this consent; and ii. a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this consent.	**Environmental Management Strategy**

C2	**Revision of Strategies, Plans and Programs** The applicant must: a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the: i. submission of an incident report under condition C10 of Schedule 2; ii. submission of an audit report under condition C13 of Schedule 2; or iii. any modification to the conditions of this consent.	**Section 11.10**
C3	**Staging, Combining and Updating Strategies, Plans or Programs** With the approval of the Planning Secretary, the Applicant may stage the development and may: a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the	**Section 13**

	environmental performance of the development).	
C4	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	**Section 13**
C5	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	**Section 13**
C6	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	**Section 13**
Notifications		
C7	**Notification of Department** Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage and clearly identify the development that would be carried out during the relevant stage.	**Acknowledged**
C8	**Layout Plans** Prior to commencing construction, the Applicant must submit detailed plans of the layout of the development showing details on the siting of battery storage and ancillary infrastructure to the Department via the Major Projects website.	**Acknowledged**

	The Applicant must ensure that the development is constructed in accordance with the layout plans.	
C9	**Work as Executed Plans** Prior to commencing operations or following the upgrades of any battery storage components or ancillary infrastructure, the Applicant must submit work as executed plans of the development showing comparison to the final layout plans to the Department via the Major Projects website and to Council.	**Acknowledged**
C10	**Incident Notification** The Applicant must notify the Department within 24 hours of becoming aware of an incident. The notification must be made via the NSW planning portal (Major Projects) and address details of the incident including: a) date, time and location; b) a brief description of what occurred and why it has been classified as an incident; c) a description of what immediate steps were taken in relation to the incident; and d) identifying a contact person for further communication regarding the incident.	**Section 11.6**
C11	The Applicant must provide the Department with a subsequent incident report in accordance with Appendix H.	**Section 11.7**
C12	**Non-Compliance Notification** Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing and must be submitted via the NSW planning portal (Major Projects). The notification must identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply, the reasons for the non-compliance (if known), and what actions have been undertaken, or will be undertaken, and when, to address the non-compliance.	**Section 11.8**

	Note: a non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	
C13	**Independent Environmental Audit** Independent Environmental Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) or as updated from time to time and published on the Department's website.	**Section 4.7**
C14	**Access to Information** The Applicant must: a) make the following information publicly available on its website as relevant to the stage of the development: i. the EIS; ii. the final layout plans for the development; iii. current statutory approvals for the development; iv. approved strategies, plans or programs required under the conditions of this consent (other than the Fire Safety Study and Emergency Plan); v. the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; vi. a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; and vii. how complaints about the development can be made; viii. any independent environmental audit, and the Applicant's response to the recommendations in any audit; and ix. any other matter required by the Planning Secretary; and b) keep this information up to date.	https://www.planningportal.nsw.gov.au/major-projects/projects/yanco-battery-energy-storage-system