



Environmental Management Strategy

West Wyalong Solar Farm

Prepared for
Lightsource bp

Client representative
Diana Mitchell

Date
27 July 2021

Rev 02



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Appendices

Appendix A — Environmental Monitoring Plan

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Authorised by — Jessica Berry		Date — 9 July 2020

Revision History

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Acronyms, abbreviations and definitions

Acronym, abbreviation or definition	Meaning
CEMP	Construction Environmental Management Plan
CoC	Condition of Consent
Council	Bland Shire Council
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	Environment Protection Authority
EPC	Engineering, Procurement and Construction
HSE	Health, Safety and Environment
MW	Megawatt
NSW	New South Wales
OEMP	Operational Environmental Management Plan
O&M	Operations and Maintenance
RMS	Roads and Maritime Services
Secretary	Secretary of the Department of Planning, Industry and Environment

1. Introduction

1.1 Purpose

Lightsource bp was granted Development Consent on 28 November 2019 to construct and operate a solar farm approximately 16 kilometres (km) northeast of West Wyalong, in the Bland Shire local government area. The West Wyalong Solar Farm ('the Project') signifies an important contribution to Australia's renewable energy supply.

The purpose of this EMS is to provide a framework for the management of environmental issues associated with the Project. Implementing this EMS will ensure that the Project team meets the Conditions of Consent in a systematic manner and continually improves its performance.

This EMS is the overarching document within the environmental management system for the Project that includes a number of management documents. This EMS is applicable to all staff and sub-contractors associated with the construction of the Project.

The structure and scope of this EMS has been prepared to meet the requirements of Condition 1 in Schedule 4 of the Development Consent. Table 1 identifies where each requirement is addressed in this EMS.

Table 1: EMS Structure

Condition requirement	Location in this document
Prior to commencing the development, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:	This document
(a) provide the strategic framework for environmental management of the development.	Section 3
(b) identify the statutory approvals that apply to the development;	Section 2.2
(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 3.3
(d) describe the procedures that would be implemented to:	
<ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the development 	Section 6
<ul style="list-style-type: none"> receive, handle, respond to, and record complaints 	Section 6.3
<ul style="list-style-type: none"> resolve any disputes that may arise 	Section 6.4
<ul style="list-style-type: none"> respond to any non-compliance 	Section 5.1
<ul style="list-style-type: none"> respond to emergencies; and 	Section 5.2 & 5.3
(e) include:	
<ul style="list-style-type: none"> references to any plans approved under the conditions of this consent; and 	Section 3.1
<ul style="list-style-type: none"> a clear plan depicting all the monitoring to be carried out in relation to the development 	Section 7
Following the Secretary's approval, the Proponent must implement the Environmental Management Strategy.	

1.2 Project overview

The Project involves the construction, operation and eventually decommissioning of a solar farm with a generating capacity of approximately 90 megawatts (MW) and 50 MW/90 MW-hour (MWh) of battery storage.

The main components of the Project include:

- approximately 296,000 single-axis tracking solar panels (up to 4.1 m high) and 15 inverter stations;
- 30 lithium-ion battery units with a total capacity of 50 MW/90 MWh (to be constructed at a later date);
- an on-site substation and connection to Essential Energy's 132 kV transmission line via overhead or underground transmission lines along Myers Lane;
- a monitoring house and two storage sheds;
- landscape screening; and
- internal access tracks, car parking and security fencing.

During operation of the Project, the ground cover and landscape screening would be properly maintained with appropriate species and weed management. Sheep grazing, where practicable, would be undertaken on the site during operation to manage ground cover.

The expected operational life of the infrastructure is approximately 30 years. However, the Project may involve infrastructure upgrades that could extend the operational life.

The Project is located on a 562-hectare (ha) property in Wyalong on the northern fringes of the Riverina Murray region of NSW. The development footprint of the Project is 211 ha and was designed to avoid site constraints, including native vegetation, Aboriginal heritage items of high significance and a watercourse. Access to the Site would be via a new access point on Blands Lane. The approved general layout of the Project is shown in *Figure 1*.

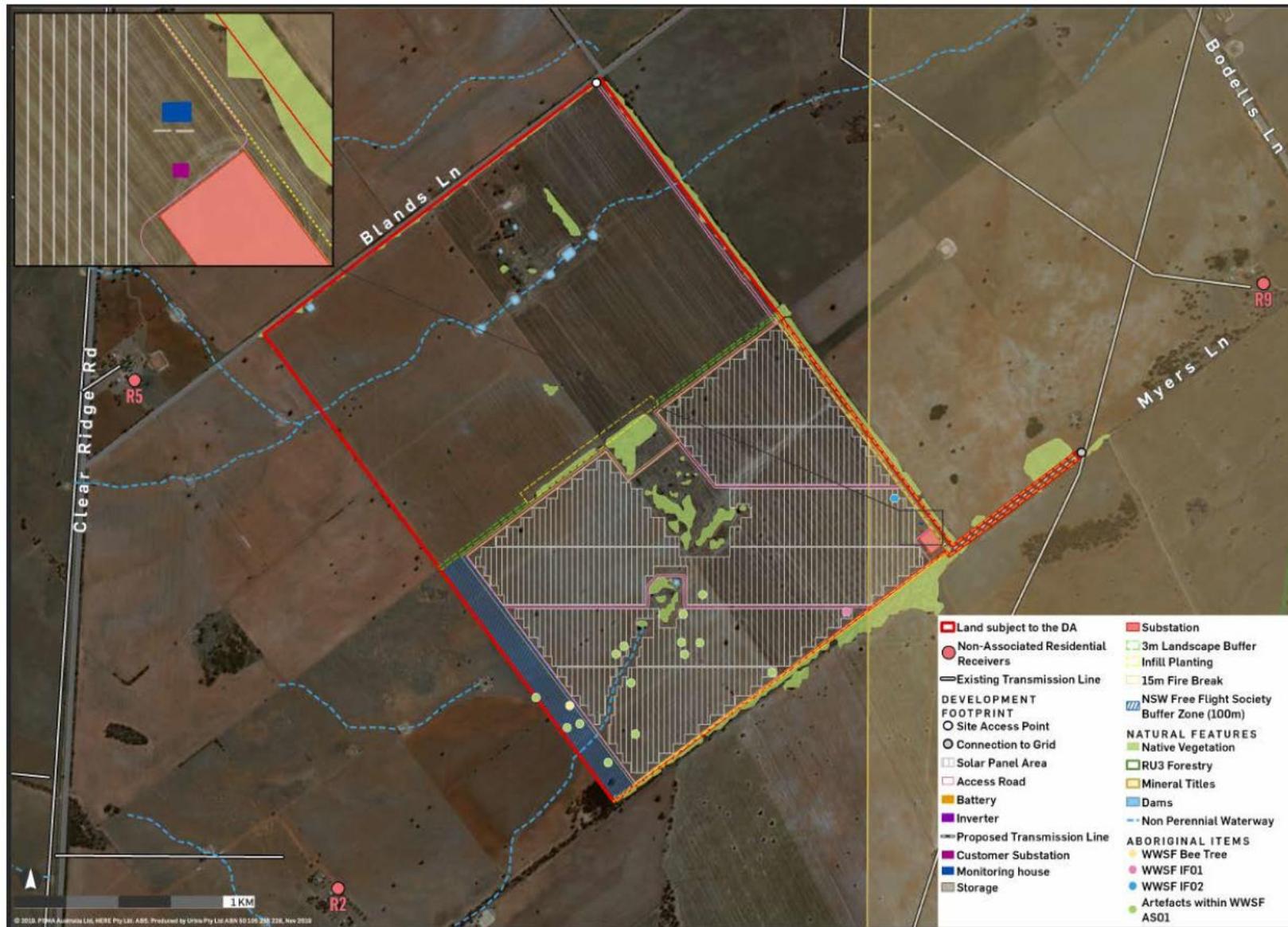


Figure 1: General layout of the Project as identified in the Development Consent

1.3 The Proponent

The proponent for the West Wyalong Solar Farm is Lightsource bp. Lightsource bp will engage an Engineering, Procurement and Construction (EPC) contractor to construct the Solar Farm and an Operation and Maintenance (O&M) contractor to manage the operation of the Solar Farm.

2. Statutory requirements

The *Environmental Planning and Assessment Act 1979* (EP&A Act) and its associated regulations provide the framework for assessing environmental impacts and determining planning approvals for developments and activities in NSW.

2.1 Conditions of consent

Development Consent (SSD 9504) for the Project was granted by the Department of Planning Industry and Environment (DPIE) on 28 November 2019 under part 4 of the EP&A Act. The Development Consent requires that the Project must be carried out:

- a) generally, in accordance with the Environmental Impacts Statement (EIS) which consists of the following documents:
 - West Wyalong Solar Farm Environmental Impact Statement, Urbis Pty Ltd, January 2019
 - Additional information supplied by Lightsource BP to DPIE on 15 May 2019 and 18 May 2019
 - Amended development application letter dated 12 September 2019
 - West Wyalong Solar Farm Amended Development Application letter, Lightsource BP, 12 September 2019
 - West Wyalong Solar Farm Response to Submissions Report, Urbis Pty Ltd, October 2019
 - Additional information received from Lightsource BP on 18 May 2019 and 3 October 2019
- b) in accordance with the conditions of consent.

If there is any inconsistency between the above documents, the most recent document prevails to the extent of the inconsistency. However, the conditions of the consent prevail to the extent of any inconsistency.

2.2 Required approvals

The permits and approvals which would be required for the Project are outlined in Table 2.

Table 2: Permits and approvals required for the Project

Licence/Approval	Legislation	Authority	Project relevance
Part 4 Development Consent	EP&A Act	DPIE	Development Consent for the Project was granted by a Delegate of the Minister of Planning.
Section 138 permit	Roads Act 1993	Council and Transport for NSW	For carrying out road upgrades for the Project

Care Agreement	<i>National Parks and Wildlife Act 1974</i> and EP&A Act	DPIE and West Wyalong Local Aboriginal Land Council	For the transfer and safekeeping of salvaged Aboriginal artefacts to the West Wyalong Local Aboriginal Land Council.
Access permit	<i>Heavy Vehicle National Law</i>	National Heavy Vehicle Regulator	For the use of over-dimensional vehicles on the road network.
Permits under Section 68	<i>Local Government Act 1993</i>	Council	For operation of a system of sewage management.
Construction and Occupation Certificates	EP&A Act	Council and an accredited certifier	For carrying out building works and occupation of a building.

3. Strategic framework

The environmental management system for the Project is based on a hierarchy of documents. The environmental management system follows Lightsource bp's existing environmental objectives and management processes.

The Environmental Management Strategy (EMS) is the overarching document for the Project in the system that includes a number of management documents. The purpose of this EMS is to provide a framework for compliance with the Development Consent and the management of environmental issues associated with the Project. A flowchart of the documents in the environmental management system is shown in Figure 2 below.

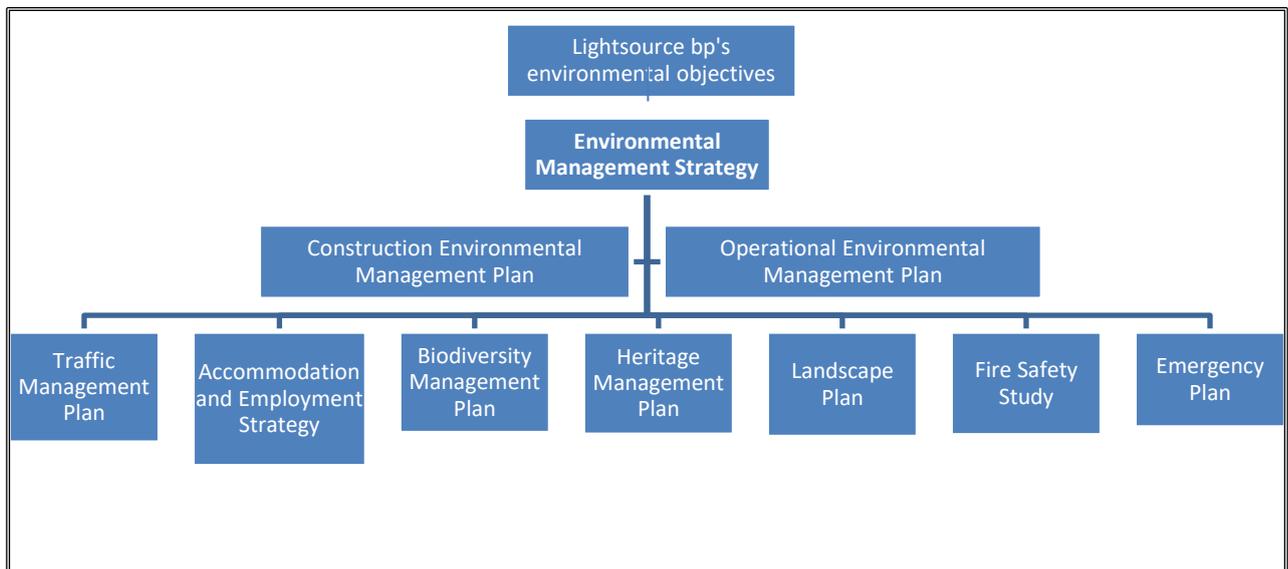


Figure 2: Flow chart of environmental management system

3.1 Objectives

The key objectives of the environmental management system are to:

- Comply with the Development Consent and all relevant approvals
- Comply with all plans and strategies under the environmental management system
- Implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment.

Ongoing monitoring of environmental performance under the environmental management system will be undertaken throughout all phases of the Project to ensure these objectives are upheld.

3.2 Environmental management plans

The plans outlined in Table 3 are required under the development consent and the majority have been prepared and approved by the Planning Secretary.

Table 3 Plans approved by the secretary

Environmental management plans	Date of approval
Biodiversity Management Plan (Revision 3, 9 December 2020) Revision 3, 9 December 2020)	21 December 2020
West Wyalong Solar Farm Traffic Management Plan (Revision 3, dated 4 September 2020)	11 September 2020
West Wyalong Solar Farm Heritage Management Plan (Revision 10, dated 15 October 2020)	09 November 2020
West Wyalong Solar Farm Accommodation and Employment Strategy (Revision 02, dated 7 August 2020)	24 August 2020
West Wyalong Solar Farm Landscape Plan (Revision H, dated 25 August 2020)	4 September 2020
Fire Safety Study	Prior to commencing construction of the battery storage facility (at a later date)
Emergency Plan	Prior to commissioning operations

A Construction Environmental Management Plan (CEMP) would be developed by the EPC to support the above management plans prior to commencement of construction. The CEMP will outline the environmental measures, monitoring and reporting required to ensure satisfactory environmental performance during construction. A site wide Erosion and Sediment Control Plan (ESCP) will be prepared as part of the CEMP.

An Operational Environmental Management Plan (OEMP) would be developed to manage the ongoing maintenance and operational activities and ensure compliance with the conditions of consent. The OEMP will include a suitable strategy for monitoring and reporting on water quality, a procedure for erosion and sediment controls for ground disturbance activities; and requirements for storage and use of hydrocarbons and chemicals, and a spill response plan.

3.2.1 Documentation and document control

The strategies and plans required by the Development Consent will be reviewed and, if necessary, revised to the satisfaction of the DPIE within one month of the:

- Submission of an incident report under condition 4 of Schedule 4
- Submission of an audit report under condition 6 of Schedule 4
- Any modification to the conditions of consent.

The strategies, plans or programs required by the Development Consent would be updated and approved by DPIE (as required) prior to carrying out any upgrading or decommissioning activities on the Project.

The CEMP will be reviewed as required in response to an incident, poor environmental performance or a modification to the Project.

The OEMP will be reviewed annually and after an incident or modification to the Project.

3.3 Roles and responsibilities

Lightsource bp as the proponent and owner of the Project has ultimate responsibility and accountability to ensure it is designed, constructed, operated, upgraded and decommissioned in compliance with the Development Consent. However, actions to achieve compliance during construction will be undertaken by the EPC contractor and during operation by the O&M contractor.

3.3.1 Construction

The EPC Contractor will be managing compliance and environmental measures during the construction phase of the Project. The key roles and responsibilities during construction are outlined in Table 4

Table 4: Construction roles and responsibilities

Role	Responsibilities	Accountability
Lightsource bp Project team	<ul style="list-style-type: none"> • Ensure compliance with Development Consent • Engage suitably qualified personnel to manage each phase of the Project • Maintain website and communication channels including email, postal address and phonenumber • Notify DPIE of commencement of construction and operation to DPIE • Notify DPIE of an incident or non-compliance • Identify if a modification is required to the Development Consent • Review internal environmental audit reports and ensure environmental performance is maintained • Revise any plans/strategies or programs required by a Development Consent and submit (as required) for approval to DPIE 	As the Proponent, Lightsource bp are ultimately accountable for delivery of the Project in accordance with the Development Consent
EPC Project Manager	<ul style="list-style-type: none"> • Ensure compliance with Development Consent • Engage suitably qualified personnel to manage each phase of the Project • Ensure compliance with environmental management system and associated plans • Liaise with Council regarding road dilapidation surveys and repairs • Ensure environmental monitoring is undertaken • Ensure appropriate approvals and permits are obtained. • Engage suitably qualified sub-contractors 	The Project Manager is responsible for providing general support to the site manager and HSE management

Role	Responsibilities	Accountability
	<ul style="list-style-type: none"> • Review any plans/strategies or programs required by a Development Consent and notify Lightsource bp of any required changes • Notify Lightsource bp on commencement of construction and operation • Notify Lightsource bp of any non-compliances or incidents • Participate in Independent Environmental Audits and implement recommendations • Revise any plans/strategies or programs required by a Development Consent and submit (as required) for approval to Lightsource bp 	
EPC Site Manager	<ul style="list-style-type: none"> • Maintain a working knowledge of the Project's environmental management system and environmental management plans • Manage incident response • Ensure incident investigation is undertaken and corrective actions carried out • Ensure relevant training and qualifications are completed by personnel • Maintain training records for site personnel • Maintain visitor register • Facilitate pre-start meetings • Participate in Independent Environmental Audit and implement recommendations 	<p>The Site Manager is responsible for the general supervision and day-to-day coordination of works on the Project site.</p> <p>The Site Manager is responsible for ensuring all works and workers comply with all environmental management plans.</p>
EPC Health, Safety and Environment (HSE) Coordinator/Manager	<ul style="list-style-type: none"> • Maintain a working knowledge of the Project's environmental management system, environmental management plans, and be aware of all environmental legislative requirements • Maintain working knowledge of environmental risks and impacts of the project and measures required to be put in place • Undertake a HSE Risk Assessment for the project • Carry out site inspections and environmental monitoring • Maintain records of compliance with the Development Consent and management plans • Maintain Complaints Register and respond to complaints or nominate a delegate to respond • Monitor the Complaints Register weekly to identify any trends in complaints • Investigate incidents and identify preventative actions • Prepare incident report and implement corrective actions • Manage toolbox talks • Review environmental management plans as required 	<p>The HSE Coordinator/Manager is responsible for overseeing the HSE management of the Project.</p>

Role	Responsibilities	Accountability
	<ul style="list-style-type: none"> Participate in Independent Environmental Audits and implement recommendations 	
All EPC contractors and sub-contractors	<ul style="list-style-type: none"> Undertake works in compliance with the CEMP and relevant management plans Complete required training and attend toolbox talks where relevant Notify site manager of any non-compliance or incidents 	All personnel are responsible for undertaking activities in accordance with the environmental management plans.

3.3.2 Operation

The O&M Contractor will be managing compliance and environmental measures during the operation of the Project. The key roles and responsibilities during construction are outlined in Table 5.

Table 5: Operational roles and responsibilities

Role	Responsibility	Accountability
Lightsource bp Project team	<ul style="list-style-type: none"> Ensure compliance with Development Consent Maintain website and communication channels including email, postal address and phonenumber Notification of incident or non-compliance Notification of commencement of upgrading or decommissioning to DPIE Ensure environmental monitoring is undertaken Review internal environmental audit reports and implement any require actions Revise any plans/strategies or programs required by a Development Consent and submit (as required) for approval to DPIE Identify if a modification is required to the Development Consent 	As the Proponent , Lightsource bp are ultimately accountable for delivery of the Project in accordance with the Development Consent
O&M site manager	<ul style="list-style-type: none"> Ensure compliance with environmental management system and associated plans Ensure OEMP is carried out Review and update OEMP as required Carrying out site inspections and environmental monitoring Maintaining complaints register and responding to complaints Manage an incident response Investigate incidents and identify preventative actions Notify Lightsource bp of incidents and non-compliances 	The Site manager is responsible for overseeing the HSE management of the Project.

Role	Responsibility	Accountability
	<ul style="list-style-type: none"> Participate in Independent Environmental Audit and implement recommendations 	
O&M contractors	<ul style="list-style-type: none"> Operating in compliance with the OEMP and Development Consent Notify site manager of any non-compliance or incidents 	All personnel are responsible for undertaking activities in accordance with the environmental management plans

4. Environmental training, awareness and competence

Training will be implemented throughout the Project to ensure personnel are suitably qualified and informed to undertake the relevant works.

4.1 Induction

All Project personnel and subcontractors will complete a general site induction prior to commencing works. Environmental management measures would be part of the induction including:

- The Project's statutory obligations and the environmental management system to be complied with
- Key roles and responsibilities relevant to HSE
- Mitigation measures for the control of environmental issues
- Environmentally sensitive areas within the site and any no go zones
- Environmental emergency and incident procedures and locations of emergency spill kits
- The location of environmental management plans on the site.

A record of all environment inductions will be maintained and kept on site. The HSE Manager may amend the induction where required to address project modifications, legislative changes or amendments to the environmental management system or related documentation.

4.2 Toolbox talks

Tool-box talks will be used during construction to raise awareness and inform personnel of environmental risks and management practices. Tool-box talks will be held regularly to communicate with personnel on HSE matters and address any specific issues or learnings relevant to the works being undertaken. Tool-box talks will be managed by the HSE Manager. Some examples of tool-box talk topics include protection of vegetation and erosion and sediment controls.

Records of Toolbox talk attendance will be maintained. Targeted environmental awareness training will be provided to individuals or groups with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact.

4.3 Pre-start meetings

Daily pre-start meetings will be held during construction. The meetings will inform personnel of the shift activities, safe work practices, coordination issues with other trades, environmental controls, site visits, and other information that may

be relevant to the work. Pre-start meetings will be facilitated by the Site Manager or a delegate.

The environmental component of pre-start meetings will include any potential environmental issues that could arise from the day's activities and the environmental controls in place. Pre-start topics, dates delivered and a register of attendees will be recorded and the records maintained.

4.4 Site visitors

During construction, all visitors accessing the work areas will be accompanied by a fully inducted Project representative at all times. The person receiving the visitor/s is responsible for ensuring a visitor induction is given to each visitor with instructions on specific safety requirements and any notable hazards on site.

A record of visitors will be maintained and managed by the Site Manager.

4.5 Training records

Records of the training, experience and qualifications of each personnel engaged on site will be maintained by the Site Manager.

The training register will record the following for each worker:

- Date of training
- Description of training completed
- Qualifications.

5. Non-Compliance and incident response

Non-compliance and incidents, as relevant to this EMS, are defined by the Development Consent as:

- Incident: A set of circumstances that causes or threatens to cause material harm to the environment
- Non-compliance: An occurrence, set of circumstances or development that is a breach of the Development Consent but is not an incident.

Material harm is further defined as harm that:

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

5.1 Non-compliance response

Immediately after identification of a non-compliance, the following actions would be undertaken:

- Stop work, if applicable
- Notify HSE manager
- Identify corrective action to be undertaken
- Record details of non-compliance.

5.1.1 Non-compliance reporting

Immediately after a non-compliance has been identified on site, Lightsource bp must be notified and any further details regarding the breach must be provided.

Lightsource bp will notify DPIE in writing within 7 days after the Proponent becomes aware of any non-compliance with the conditions of this consent in accordance condition 5 in Schedule 4. The notification must identify the development and the application number, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.

5.2 Incident response

Immediately after identification of an incident, the following actions are to be followed:

- Remove people from harm and isolate the area around the incident to restrict access
- Stop works in the vicinity of the incident and ensure personnel safety
- Implement containment measures to prevent the impact of the incident spreading and restrict access
- Notify the Site Manager
- Implement the Emergency Response Plans as relevant to the incident
- Estimate the significance of the incident

The most likely incident to occur on Site is a spill event. As such, a Spill Response Plan would be prepared as part of the CEMP.

5.2.1 Incident reporting

Immediately after an incident has been identified on site, Lightsource bp must be notified and any further details regarding the breach must be provided.

Lightsource bp will notify DPIE in writing immediately after the Proponent becomes aware of an incident in accordance with condition 4 in Schedule 4. The notification must identify the development, including the development application number (i.e. SSD 9504) and the name of the development, and set out the location and nature of the incident.

If a pollution incident occurs and causes or threatens material harm to the environment, the Environment Protection Authority (EPA) must be notified immediately.

Other regulatory authorities which may need to be notified are:

- Bland Shire Council
- NSW Health
- SafeWork NSW
- Rural Fire Service (RFS).

5.2.2 Incident investigation

Once the initial response to the incident has been completed, the cause of the incident would be investigated. Based on the investigation actions are to be taken to improve the process and prevent the incidence reoccurring. The HSE Manager would investigate the incident and record the following details:

- Time, duration and location
- Description of incident
- Cause of the incident
- Likelihood to reoccur
- The corrective actions taken to remedy/address incident
- Actions taken to improve processes associated with the incident and prevent recurrence

5.3 Emergency response

If the incident presents an immediate threat to human safety or property, emergency services will be contacted first for emergency assistance - phone 000.

Emergency procedures for the construction phase including evacuation protocols would be detailed in the CEMP.

An Emergency Plan will be prepared and implemented prior to operation of the Project. The Emergency Plan will be prepared to the satisfaction of Fire and Rescue NSW and the NSW Rural Fire Service and include detailed emergency procedures for the Project.

6. Stakeholder and community engagement

Open communication lines will be maintained between the community, government agencies and stakeholders for the duration of the Project.

6.1 Community and stakeholder communication

Lightsource bp will ensure appropriate communication lines are available to the community and stakeholders for the duration of the Project. The following would be made available for the Project:

- Phone number
- Email address
- Dedicated website (<https://www.lightsourcebp.com/au/projects/west-wyalong-solar-farm/>)
- Postal address

Residents and businesses in proximity to the site will be notified of construction commencing, and ongoing project progress updates will also be provided to the community and stakeholders. Contact details are to be provided to all surrounding residences so they can directly contact a Project Representative if they have any issues with the Project.

Project updates will be provided to residents and businesses within 2 km of the Project and to key stakeholders outside of the 2 km radius such as Cowal Gold Operations and West Wyalong businesses at least one week prior to the following:

- Construction commencing
- Activities with increased impact on amenity
- Change in traffic conditions
- Out of hours work (if approved by the Secretary)

The Project website will be maintained by Lightsource bp and provide regular Project updates. The following information will be published on the website:

- The EIS
- The final layout plans for the development
- Current statutory approvals for the Project
- Approved strategies, plans or programs required under the Development Consent
- The proposed staging plans for the Project if the construction, operation or decommissioning of the development is to be staged
- How complaints about the Project can be made
- The Complaints Register
- Compliance reports (if required to be prepared by DPIE)
- Any independent environmental audit and the response to the recommendations in any audit.

6.2 Agency communication

Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, Lightsource bp will notify the DPIE in writing of the date of commencement, or cessation, of the relevant phase of the Project.

If any of these phases of the development are to be staged, then Lightsource bp will notify the DPIE in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.

Council will also be notified of commencement of construction and operation of the Project. Open communication will be maintained with Council throughout the Project.

6.3 Complaints Handling

Complaints will be able to be received via the established phone number and email for the Project. The process for making a Project complaint will be outlined on the Project website. The contact details will also be placed on a sign at the entrance to the Site during construction.

Upon receipt of a complaint the following actions will be undertaken:

- Acknowledging the complaint by email or phone call within one working day
- Providing a response to the person complaining within 10 business days of the complaint being made.
- Ensuring that the complaint is addressed in a timely manner and that the complaint is addressed adequately.
- Recording details of the complaint in the Complaints Register.
- Notifying the relevant Project management personnel.
- Ensuring the Complaints Register is made available on the Project website.

All complaints received will be recorded in a Complaints Register maintained by the HSE Manager during construction and by the Site Manager during operation. The details of the complaint will be recorded in a Complaints Register which will include the following:

- the date and time of the complaint
- the channel through which the complaint was made (e.g. via phone or email)
- contact details of the complainant if provided
- the nature of the complaint
- any action taken to address the complaint, including timeframes for carrying out the action

- the reasons if no action was taken.

The Complaints Register will be monitored weekly to identify any trends in complaints. Should a trend be identified in the complaints, corrective action to address the issue will be undertaken and the relevant environmental management plans and measures in place will be reviewed and updated as necessary to prevent the recurrence of complaints.

The Complaints Register will be published on the Project website. Contact details of complainants will not be published to protect privacy.

6.4 Dispute resolution

In the event that a complaint cannot be resolved through the above complaints handling procedure and a dispute arises, Lightsource bp will engage in mediation with an independent arbiter agreed by both parties. If an agreement on an independent arbiter cannot be reached, Lightsource bp will inform DPIE of the dispute and seek input.

7. Monitoring, Audit and Review

Environmental monitoring of the Project will be undertaken regularly for the duration of the Project to ensure high environmental performance and compliance with the Development Consent and environmental management system is maintained. Any identified non-compliances will be handled in accordance with the response outlined in Section 7.1

Environmental monitoring will be undertaken in accordance with the monitoring plan provided in Appendix A.

7.1 Environmental risk assessment

Prior to commencing construction and to support the development of the CEMP, the HSE Manager would undertake an environmental risk assessment of the Project. The risk assessment would consider the EIS, Development Consent and available management plans.

The risk assessment would:

- Identify construction activities which have the potential to harm the environment or human health
- Qualitatively assess the risk of the activity by considering likelihood and consequence
- Identify measures and controls which can be put in place to mitigate the risk
- Qualitatively assess the residual risk of the activity
- Determine whether the residual risk is acceptable.

The outcomes of the risk assessment would support the development of the CEMP. An environmental risk assessment would be updated in response to any modifications to the project during construction.

7.2 Site inspection

Regular site inspections will be undertaken to ensure the appropriate environmental controls are in place and identify any specific risks.

Site inspections during construction will be managed by the HSE Manager. A Site Inspection Checklist will be prepared for the construction phase of the Project and records of each inspection will be kept including:

- Date and time of inspection
- A completed site inspection checklist

- Actions identified to improve environmental outcomes
- Timeframe for completion of identified actions
- Status of actions.

During operation the O&M Site Manager will be responsible for ensuring completion of site inspections and environmental monitoring.

7.3 Internal Environmental Audit

Internal environmental audits will be conducted to ensure works are being undertaken in compliance with the Development Consent and the environmental management system for the Project. The audits will ensure evidence of compliance is available and the appropriate records are being collected.

Each internal environmental audit undertaken by the HSE Manager (or nominated delegate) will result in a report to be submitted the Lightsource bp. The report will identify non-compliances and improvement opportunities and provide a summary of environmental performance.

The frequency of these audits and the responsible personnel are outlined in Table 6.

Table 6 Program of internal environmental audits

Phase	Frequency	Responsible personnel
Construction	Within the first 3 months and then every 3 months until completion of works (or as required by Lightsource bp).	EPC HSE Manager
Operation	One audit within the first two months of operation then as required by Lightsource bp.	O&M Site Manager

7.4 Independent Environmental Audits

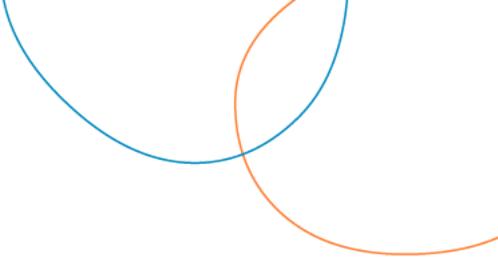
As required by Condition 6 in Schedule 4 of the Development Consent, Independent Environmental Audits of the project will be undertaken in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018 or the most recent version). Independent Environmental Audits will be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary.

These audits will be conducted at the following times unless otherwise agreed with the Secretary:

- within 3 months of commencing construction
- within 3 months of the date of the initial Independent Environmental Audit;
- within 3 months of commencement of operations
- as directed by the Secretary.

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

Each Independent Environmental Audit will be published on the Project website in accordance with the Development Consent.



Environmental Monitoring Plan

Appendix A

Environmental Monitoring Plan

Frequency	Project phase	Objective	Monitoring activity	Relevant plans
Daily	Construction	Daily site inspection to ensure environmental controls relevant to the work being undertaken are in place	<ul style="list-style-type: none"> Inspect erosion and sediment controls Inspect dust controls and dirt being tracked onto local roads Inspect traffic controls Review fire risk and controls in place Inspect relevant environmental controls for construction activities being undertaken that day 	<ul style="list-style-type: none"> CEMP
Fortnightly	Construction	Site inspection to review records and inspect all environmental controls are in place	<ul style="list-style-type: none"> Inspect all environmental controls in place (fencing, signage, bunting) Inspect waste storage and management practices Inspect security/boundary fencing Review waste records Review complaints register Inspect storage of fuels, chemicals and hazardous substances Visual inspection of waterway on site Inspect water quality within farm dams 	<ul style="list-style-type: none"> CEMP Heritage Management Plan Traffic Management Plan Landscaping plan
After a complaint (as required)	All phases	Identify potential cause of complaint, inspect accordingly and identify actions	<ul style="list-style-type: none"> Inspect cause of complaint if applicable Inspect controls in place relevant to the complaint 	<ul style="list-style-type: none"> CEMP and OEMP
After a heavy rainfall event	Construction	Inspect erosion and water quality controls and identify any remedial actions required	<ul style="list-style-type: none"> Inspect erosion and sediment controls Inspect waterways on site 	<ul style="list-style-type: none"> CEMP (including Erosion and sediment control plan)

Frequency	Project phase	Objective	Monitoring activity	Relevant plans
After an extreme weather event (e.g. storm, bushfire, flood)	All phases	Inspect any damage to property or environmental controls and identify any remedial actions required	<ul style="list-style-type: none"> Inspect affected part(s) of the site 	<ul style="list-style-type: none"> CEMP and OEMP
As required by the management plan	All phases	Implement monitoring programs outlined in management plans to ensure environmental outcomes and compliance with Development Consent	<ul style="list-style-type: none"> Undertake all monitoring as specified in the relevant plan 	<ul style="list-style-type: none"> CEMP and OEMP Biodiversity Management Plan Heritage Management Plan Traffic Management Plan Accommodation and employment Strategy Landscaping plan Fire Safety Study Emergency Plan
<ul style="list-style-type: none"> Initial audit within the first 3 months of construction and then every 3 months until completion of works One audit within the first two months of operation then as required by Lightsource bp 	Construction and operation	Internal environmental audit to ensure works are being undertaken in compliance with the applicable conditions of consent and the environmental management system for the Project	<ul style="list-style-type: none"> Review evidence of compliance with Development Consent Review evidence of compliance with environmental management system and associated plans 	<ul style="list-style-type: none"> CEMP and OEMP Biodiversity Management Plan Heritage Management Plan Traffic Management Plan Accommodation and employment Strategy Landscaping plan

Frequency	Project phase	Objective	Monitoring activity	Relevant plans
				<ul style="list-style-type: none"> • Fire Safety Study (to be prepared at a later date) • Emergency Plan
<ul style="list-style-type: none"> • within 3 months of commencing construction • within 3 months of the date of the initial Independent Environmental Audit • within 3 months of commencement of operations; and • as directed by the Secretary; 	All phases	Independent Environmental Audit in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018)	<ul style="list-style-type: none"> • Assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent • Recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent 	<ul style="list-style-type: none"> • CEMP and OEMP • Biodiversity Management Plan • Heritage Management Plan • Traffic Management Plan • Accommodation and employment Strategy • Landscaping plan • Fire Safety Study(to be prepared at a later date) • Emergency Plan
Monthly	Operation	Monthly site inspection to review records and inspect all environmental controls in place	<ul style="list-style-type: none"> • Inspect environmental controls in place • Inspect Asset Protection Zone and fire protection measures • Inspect security/boundary fencing • Inspect storage of fuels, chemicals and hazardous substances 	<ul style="list-style-type: none"> • OEMP



Environmental Management Strategy

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