

Bomen Solar Farm

Responses to Independent Audit Recommendations

For submission to the Department of Planning, Industry and the Environment

February 2020



VERSION CONTROL

Control	Details
Project name	Bomen Solar Farm
Project application number	SSD 8835
Report	Responses to Independent Audit Recommendations
Current version	V1
Issue Date	19 Feb 2020

VERSION HISTORY

Version	Issue Date	Details	Approval
V1	19 Feb 2020	For Submission to DPIE	James Millar

1. PURPOSE OF DOCUMENT

This document has been prepared in accordance with Condition 5 of Schedule 4 of the Development Consent for Bomen Solar (SSD 8835) (the Project) which specifies (refer bold text):

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

(a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;

(b) be carried out in consultation with the relevant agencies;

(c) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and

(d) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.

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

The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.

The Independent Environmental Audit Report was finalised on 4 December 2019, which is exactly six months after the commencement of construction. This document provides the Project's responses to the recommendations within the audit report and timing for implementation (refer Table 1).

The Independent Environmental Audit Report is provided in Attachment A.

Table 1 Responses to the recommendations in the Independent Environmental Audit Report dated 4 December 2019.

Audit report ref.	Approval ID	Compliance Requirement	Independent Audit Findings and Recommendation	Project response	Timing for implementation
<p>Non-compliance: BSF-2019-IEA-NC-01 (page 18)</p>	<p>Schedule 3 Condition 3</p>	<p>Transport – Access Route All over-dimensional and heavy vehicles associated with the development must travel to and from the site via the approved site entry points (shown in Appendix 1) and:</p> <ul style="list-style-type: none"> • the Sturt Highway, Eunony Bridge Road, Byrnes Road and Trahairs Road; or • Jersey Street, Dorset Drive, Merino Road, Byrnes Road and Trahairs Road. 	<p>Finding: During the audit it was identified that some heavy vehicles are now using Merino road and Olympic highway, rather than the approved route via Sturt Highway, Eunony Bridge Road. This is due to Eunony Bridge Road bridge being limited to 20 tonnes.</p> <p>Recommendation: It is recommended that approval be sought for the use of Merino Road and Olympic Highway.</p> <p>Status at close of audit: Open</p>	<p>Heavy vehicles which exceed 20 tonnes have had to travel to site via Olympic Highway and Merino Road instead of Eunony Bridge Road, because Eunony Bridge Road has a bridge load limited to 20 tonnes. This approach has avoided risks to safety and damage/deterioration to the bridge. The Olympic Highway and Merino Road route is a designated RMS heavy vehicle route.</p> <p>Proposed corrective action: No corrective action is proposed. The alternative route along Olympic Highway and Merino Road is the only safe route for vehicles exceeding 20 tonnes, however this route is no longer required as mechanical construction is now complete and vehicles exceeding 20 tonnes will not be travelling to/from site anymore.</p>	<p>N/A</p>
<p>Non-compliance: BSF-2019-IEA-NC-02 (page 18)</p>	<p>Schedule 3 Condition 6</p> <p>Schedule 4 Condition 6</p>	<p>Transport – Traffic Management Plan Prior to the commencement of construction, the Applicant must prepare a Traffic Management Plan for the development in consultation with RMS and Council, and to the satisfaction of the Secretary.</p> <p>Access to Information</p>	<p>Finding: The current version of the Traffic Management Plan (Version 4, 06/09/2019) is not yet available on the Bomen Solar Farm website as required by the NSW DPIE approval letter dated 18/09/2019.</p> <p>Recommendation: Ensure that the current approved version of the</p>	<p>This non-compliance was already corrected during the audit.</p>	<p>N/A</p>

Audit report ref.	Approval ID	Compliance Requirement	Independent Audit Findings and Recommendation	Project response	Timing for implementation
		<p>The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> - the EIS; - the final layout plans for the development; - current statutory approvals for the development; - approved strategies, plans or programs required under the conditions of this consent; - the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; - how complaints about the development can be made; - a complaints register; - any independent environmental audit, and the Applicant's response to the recommendations in any audit; and - any other matter required by the Secretary; and (b) keep this information up to date. 	<p>Traffic Management Plan is placed on the website as soon as possible.</p> <p>Note: This finding was addressed and closed at the time of the audit. Auditor accessed website 18/11/2019.</p> <p>Status at close of audit: Closed</p>		
<p>Non-compliance: BSF-2019-IEA-NC-02 (page 19)</p>	<p>Statement of Commitments 6.2.1</p>	<p>6. Land use 6.2 Biosecurity general 6.2.1. Establish a vehicle high pressure wash down facility well away from livestock and crops to clean vehicles, boots and equipment which need to enter the property</p>	<p>Finding: A vehicle high-pressure wash down facility has not been established for the site as per the requirement of this commitment.</p> <p>Recommendation: Establish a vehicle high pressure wash down facility or seek approval from the Secretary that a wash down facility is not required.</p>	<p>A vehicle high pressure wash down facility has not been established at the site because dry conditions throughout construction have meant that vehicles have not been collecting significant mud and seeds. Vehicles are brushed down when required which is preferred over washing with water, which can create more dirty water/sediment issues for management.</p> <p>Proposed corrective action: No corrective action is proposed because mechanical completion is</p>	<p>N/A</p>

Audit report ref.	Approval ID	Compliance Requirement	Independent Audit Findings and Recommendation	Project response	Timing for implementation
				complete and there are minimal vehicle movements over the site for the remaining weeks of the construction period.	
Improvement opportunity: AR1 (page 19)	-	A few seedlings were identified missing from the middle-screening zone due to disturbance from site activities prior to permanent fencing being installed.	It is recommended that these seedlings be replanted at the next most favourable time for planting.	Proposed corrective action: The missing seedlings are proposed to be replanted in winter 2020 (by August) along with any other seedlings that have no survived. Winter, following rains, is the most favourable time for planting.	Winter 2020
Improvement opportunity: AR1 (page 19)	-	A New Product Substance Inspection Checklist was not completed for the herbicides previously used on site for weed spraying.	It is recommended that the New Product Substance Inspection Checklist be completed for all new substances to site, including any herbicides.	Proposed corrective action: The project will ensure the New Product Substance Inspection Checklist is completed for all new substances to site, including any herbicides.	When any new substances are used.

ATTACHMENT A - Independent Environmental Audit Report



INDEPENDENT ENVIRONMENTAL AUDIT REPORT

Bomen Solar Farm - SSD 8835

Spark Infrastructure

04 December 2019



Document Revision Record

Issue No.	Date	Details of Revision
Draft	18/11/2019	Draft for comment.
Draft	04/12/2019	Auditor initiated structural change to Audit Table. Minor grammatical revision based on comments.
Final	04/12/2019	For issue.

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Independent Environmental Audit – Bomen Solar Farm

Executive Summary

J2M Systems Pty Ltd was engaged by Spark Infrastructure Pty Ltd (Spark Infrastructure) to undertake an independent environmental audit (IEA) at the Bomen Solar Farm (referred to as the 'Project') in accordance with Schedule 4, Condition 5 of NSW Department of Planning, Infrastructure and Environment (NSW DPIE) State Significant Development Approval Modification 1 (SSD 8835 Mod 1).

SSD 8835 was granted on 8 October 2018 SSD was recently modified (Mod 1) in August 2019. SSD 8835 Mod 1, which is the scope of this audit, includes conditions covering the construction, operation and decommissioning of a 120 megawatt solar farm and associated infrastructure at Bomen, New South Wales (NSW). The Project commenced construction on 4 June 2019.

Schedule 4, Condition 5 of SSD 8835 MOD 1 required Spark Infrastructure to commission an IEA within six months of the date of commencement of construction, and every 3 years thereafter. J2M Systems was commissioned 30/09/2019 on to carry out an independent environmental audit of the Bomen Solar Farm. The auditor was approved by NSW Department of Planning, Industry and Environment (NSW DPIE) in correspondence dated 01 October 2019.

The audit methodology included:

- Audit planning discussion with Spark Infrastructure representatives with regard to audit timing, provision of documentation, site visits and personnel involvement.
- Review of audit documentation provided by Spark Infrastructure and its representatives
- Consultation with relevant Government agencies and Registered Aboriginal Parties.
- Site inspection undertaken Wednesday 30 and Thursday 31 October
- Review of additional audit documentation provided by Spark Infrastructure and its representatives during and after the audit site inspection.
- Submission of draft report to Spark Infrastructure for review of adequacy and as an opportunity for confirm findings and/or provide additional information.
- Finalisation of report.

The audit scope assessed compliance with Project Approval SSD 8835 MOD 1, the associated Statement of Commitments and management plans applicable to Bomen Solar Farm. A detailed audit table is presented in Appendix A identifying audit evidence, findings and recommendations. Non-compliances and auditor recommendations identified against the audit scope are presented in Section 5.

Overall, the audit of the Bomen Solar Farm determined a high level of compliance with their environmental management obligations under Project Approval including the Statement of Commitments. The Project's actual impacts appear generally consistent with those predicted in the Environmental Impact Assessment. Section 4 of this report presents the audit findings, including an assessment of the adequacy of management plans and summary of environmental performance.

1 Introduction:

1.1 Project Background

J2M Systems Pty Ltd was engaged by Spark Infrastructure Pty Ltd (Spark Infrastructure) to undertake an independent environmental audit (IEA) at the Bomen Solar Farm (referred to as the 'Project') in accordance with Schedule 4, Condition 5 of NSW Department of Planning, Infrastructure and Environment (NSW DPIE) State Significant Development Approval Modification 1 (SSD 8835 Mod 1).

SSD 8835 was granted on 8 October 2018 SSD was recently modified (Mod 1) in August 2019. SSD 8835 Mod 1, which is the scope of this audit, includes conditions covering the construction, operation and decommissioning of a 120 megawatt solar farm and associated infrastructure at Bomen, New South Wales (NSW).

The Project is classified as a State Significant Development (SSD) under State Environmental Planning Policy (State and Regional Development) 2011 and was therefore subject to assessment and determination by the NSW Minister for Planning under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Project commenced construction on 4 June 2019.

The Project was developed by Renew Estate Pty Ltd, and is now ultimately owned by Spark Infrastructure. The appointed Engineer Procure Construct contractor is Energy Solutions Pty Ltd, trading as Beon Energy Solutions (Beon).

1.2 Scope of Work

In accordance with Schedule 4, Condition 5 of SSD 8835 MOD 1 and Section 3.3 of the NSW DPE Independent Audit Post Approval Requirements the objectives of this IEA were to:

- assess the environmental performance of the development and its effects on the surrounding environment;
- assess whether the development is complying with the relevant standards, performance measures and statutory requirements;
- high-level review the adequacy of any strategy/plan/program/system required under this approval, and, if necessary, recommend measures or actions to improve the environmental performance of the development, and/or any strategy/plan/program required under this approval; and
- assess the status of implementation of previous Independent Audit findings, recommendations and actions.

The scope of the audit included the requirements of:

- Works within the audit period 4 June 2019 – 30 October 2019;
- the Development Consent, including its conditions of consent (Attachment A)
- the Environmental Impact Statement (EIS) (including its mitigation measures) (GHD, April 2018) as amended by:
 - Bomen Solar Farm Response to Submissions (Renew Estate, June 2018); B
 - Bomen Solar Farm PHA Supplementary Assessment (GHD, August 2018);
 - Bomen Solar Farm Aboriginal Archaeological and Cultural Heritage Impact Assessment (AECOM, August 2018);
 - Bomen Solar Farm Biodiversity Development Assessment Report (GHD, August 2018);
 - Bomen Solar Farm Modification Application (Renew Estate, July 2019)

- strategies/management Plans/programs required by the Development Consent conditions during the construction phase:
 - Final layout plans
 - Environmental Management Strategy
 - Traffic Management Plan
 - Landscaping Plan
 - Aboriginal Cultural Heritage Management Plan
 - Preliminary Hazards Analysis Implementation Program.
- The management plans required by the EIS mitigation measures during the construction phase:
 - Construction Environmental Management Plan (titled Work Health Safety and Environmental Management Plan for Construction (WHSEMP), which also addresses:
 - Flora and fauna management
 - Noise management
 - Waste management
 - Community and Stakeholder Engagement
 - Erosion and Sediment Control.

1.3 Audit Period

The audit period is defined as the period between commencement of construction, 03 June 2019, to the conclusion of the onsite component of this IEA, 31 October 2019.

1.4 Audit Team

In accordance Section 3.1 of the NSW DPE Independent Audit Post Approval Requirements, this audit was completed by Peter Marshman of J2M Systems Pty Ltd. NSW DPE approval (letter of endorsement) of the auditor is also provided within this report (Appendix B). No technical specialists were required for this audit. A declaration of independence is provided within Appendix D of this report.

1.5 Methodology

1.5.1 Document review

Preparation for the IEA involved desktop reviews of documentation identified in the scope of this audit (Refer to Section 1.2), including relevant plans/programs/statutory requirements. An audit checklist was developed as part this review (Appendix A). An adequacy assessment of plans and programs required under the consent is provided in Section 3.6 of this report.

1.5.2 Opening and Closing Meeting

An opening meeting was held on Wednesday 30 October to introduce the auditor to the BSF management team and to outline the audit process and confirm audit arrangements.

Due to scheduling requirements for staff, two separate closing meetings were held at the end of each day (Wednesday 30 and Thursday 31 October) to provide a summary of audit findings.

Audit attendance at the opening and closing meeting is summarised in Table 1 below.

Table 1: Audit attendance

Name	Title - Organisation	Opening Meeting	Closing Meeting	
			Day 1	Day 2
Yogen Mathur	Senior Project Manager	Yes	Yes	Yes
Mark Whitehouse	Construction Manager	Yes	-	-
Simon Rees	Project Manager	Yes	-	-
Justin Coburn	Community & Stakeholder Engagement Manager	Yes	Yes	-
Cath Nolan	HSE Advisor	Yes	-	Yes
Faye Stojcevski	Community & Stakeholder Engagement Coordinator	Yes	Yes	Yes
Karina White	Owner's Engineer	Yes	Yes	Yes
Lauren Serjeantson	Environmental Planning Consultant	Yes	Yes	Yes
Philip Meletis	Project Officer	Yes	Yes	Yes
Peter Marshman	Lead Auditor – J2M Systems	Yes	Yes	Yes

1.5.3 Site inspection and Interviews

Two site inspections were undertaken on the project with the aim of assessing the effectiveness of environmental management measures on site. The audit site inspection included inspection of all active work areas as well as aboriginal heritage sites and environmental protection zones.

The first inspection focused on the Northern and Southern Development Areas, whilst the second inspection focused on work activities within the transmission line corridor up to the Wagga North Substation (Refer to Figure 1, Section 1.6.1).

1.5.4 Compliance Status Descriptors

The compliance status of each compliance requirement in the Audit Table (Appendix A) has been determined using the relevant descriptors in Table 2 below as required by the NSW DPE Independent Audit Post Approval Requirements.

Table 2: Compliance Status Descriptors

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

1.6 Site Description and Operation

1.6.1 Site Location

The Bomen Solar Farm is located at on a ~250 hectare site owned by Spark Infrastructure at Trahairs Road, Bomen, approximately 10 km northeast of the town centre of Wagga Wagga, New South Wales. The Site location and development boundary is shown in Figure 1 below, as sourced from the Project induction presentation.

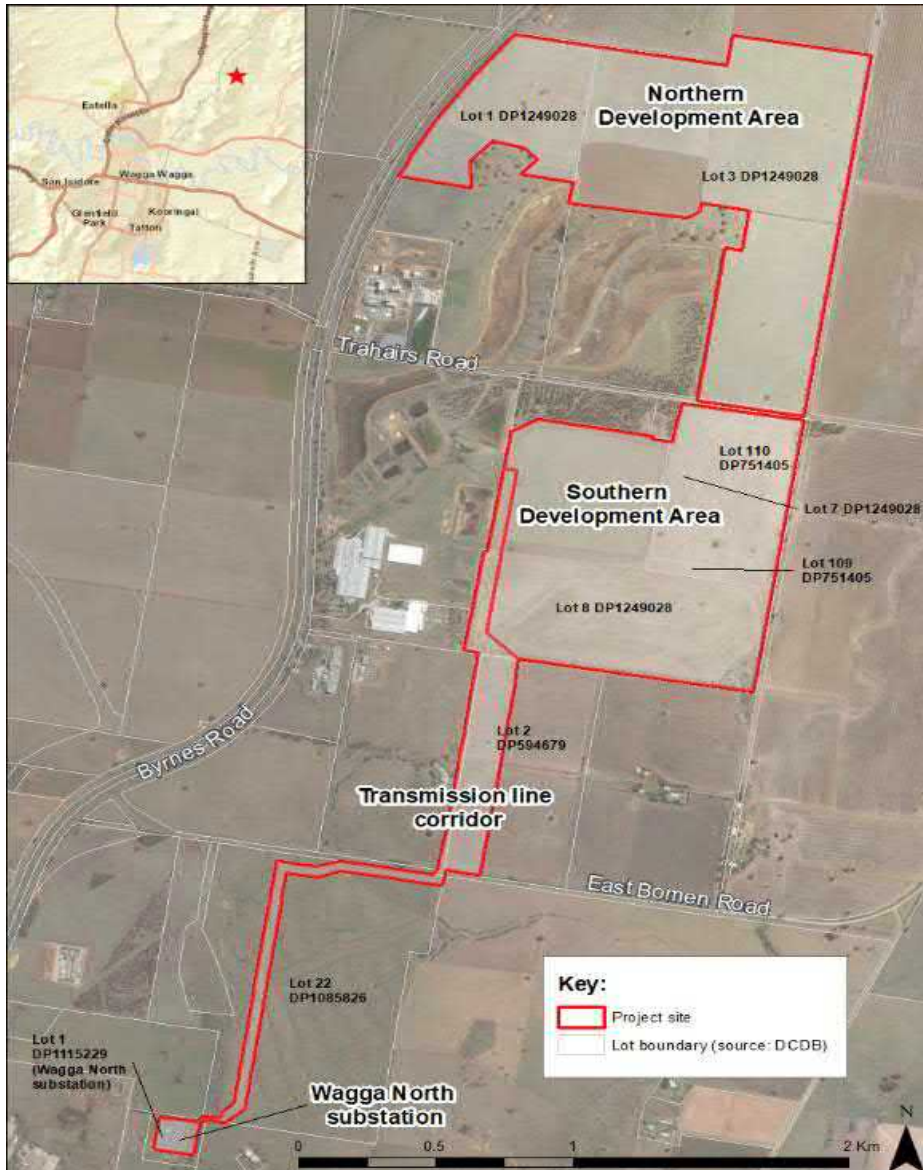


Figure 1: Site Location (Source: Bomen Solar Farm, Site Induction Presentation).

2 Consultation with relevant agencies

As part of the audit process, J2M Systems consulted with the following key government agencies, via email 08/10/2019, to gain an understanding of their interests in the Project and its environmental performance. This section provides a summary of this consultation and requests. Record of the actual correspondence is provided Appendix C.

2.1 NSW Department of Planning, Infrastructure and Environment (NSW DPIE)

NSW DPIE provided an email response 09/10/2019 requesting the audit focus on the following items:

NSW DPIE consultation/request:	Auditor response:
Extended hours conditions (complying with the type of activity/machinery use/times etc. as agreed with surrounding landholders);	<i>Refer to Section 3.4.</i>
Dust management;	<i>Refer to Section 3.8.6</i>
Noise management;	<i>Refer to Section 3.8.4</i>
Management of vehicles on site and associated noise;	<i>Refer to section 3.8.4 and 3.8.5.</i>
Planting and management thereof as per landscape management;	<i>Refer to Section 3.8.1</i>
Vehicle movements to and from site and within site;	<i>Refer to Section 3.8.5</i>
Management and recording of complaints and community consultation and liaison;	<i>Refer to Section 3.4</i>
Waste management;	<i>Refer to Section</i>
Visual impacts (glare from infrastructure).	<i>Refer to Section 3.8.3</i>

2.2 NSW Environmental Protection Agency (NSW EPA)

NSW EPA provided an email response 09/10/2019 stating 'The EPA has no feedback or comments to make on this project'. No further consultation required.

2.3 NSW Road and Maritime Service (NSW RMS)

NSW RMS provided an email response 24/10/2019 requesting the audit focus on the following items:

NSW RMS consultation/request:	Auditor response:
Review records of actual traffic generation	<i>Refer to Section 3.8.5.</i>
At what stage is the development at – percentage of work undertaken and potential completion date?	<p><i>The HSE Advisor reported the following:</i></p> <p><i>Construction & Civil Works at end of October:</i></p> <ul style="list-style-type: none"> • <i>Solar farm fencing has progressed in Northern & Southern Development (99%).</i> • <i>Trench Works: Progressing – AC Cable (99%) & DC trench (75%)</i> • <i>Piles: 75% completed.</i>

	<ul style="list-style-type: none"> • <i>Tracking System – 52.4% completed.</i> • <i>Panel Installation – 33.2% completed.</i> • <i>Electrical Works (String, SCB, Looming, etc.) – 45.3% completed.</i> • <i>APA Crossings – Works completed.</i> <p><i>Due for completion April 2020</i></p>
Compliance with conditions of the development consent relating to traffic generation and road impacts.	<i>Refer to Section 3.8.5.</i>
Impacts of project related traffic on roads which are part of the haulage route, particularly the intersection of Byrnes Road and Trahairs Road.	<i>Refer to Section 3.8.5.</i>
Verification that a dilapidation survey that was undertaken prior to commencement of works.	<i>Refer to Section 3.8.5.</i>
Have the required upgrades to Trahairs Road, as specified in the EIS, been completed to Councils satisfaction?	<i>Refer to Section 3.8.5.</i>

2.4 Wagga Wagga City Council

Wagga Wagga City Council did not provide a response.

2.5 Registered Aboriginal Party: Bundyi Aboriginal Cultural Knowledge

Mark Saddler of Bundyi Aboriginal Cultural Knowledge provided an email response 08/10/2019 requesting to be contacted by phone. The auditor called and spoke with Mark on the 08/10/2019 with regard to the project and noted the following items of focus during the audit:

RAP consultation/request:	Auditor response:
What is the level of Aboriginal participation on the project?	<i>Refer to Section 3.8.2</i>
Does the Project Induction include Aboriginal Heritage information and is it presented in a meaningful way?	<i>Refer to Section 3.8.2</i>

2.6 Registered Aboriginal Party: Warrabinya Cultural Heritage and Assessment Group

Warrabinya Cultural Heritage and Assessment Group did not provide a response.

2.7 Registered Aboriginal Party: Yalmambirra

Yalmambirra did not provide a response.

3 Audit Findings

3.1 Compliance Performance

This audit is considered to address the requirement of the scope of works to ‘*assess the environmental performance of the project*’. Section 4 of this report lists the conditions considered to be non-compliant, whilst Appendix A presents the status of environmental performance in respect of each condition of the Project Approval and Statement of Commitments. Site environmental controls were observed as being implemented on site generally in accordance with the measures stipulated in the approved management plans.

3.2 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

The Environmental Planning Consultant reported that the Project has not received any regulatory action within the audit period.

3.3 Summary of Environmental Incidents

The Environmental Planning Consultant reported that one incident has occurred within the audit period that triggered reporting to NSW DPIE. On 11/07/2019 a 21 tonne excavator made contact with an 11kV overhead power line while tracking across Bomen Solar Farm. The impact of the excavator cause the power line to be damaged and the excavator to become entangled. Essential Energy attended the site to isolate power and repair the line. The excavator operator safely exited the excavator cabin after Essential Energy were satisfied that the power line was de-energised. The incident did not result in any injury to personnel. Power was lost to 6 neighbouring properties until restore by Essential Energy. An incident report, including full ICAM investigation has been completed and maintained by Beon.

One minor spill of approximately 30L of hydraulic fluid has also been reported during the audit period. This spill was of minor quantity, occurred on barren ground, was contained and did not enter sensitive environmental areas or a watercourse. As such the incident does not meet the definition of an incident under the Development Consent and did not require reporting to NSW DPIE.

Appropriate chemical storage was observed during the audit site inspection and spill kits are available within the site compound.

3.4 Summary of Environmental Complaints

Beon is maintaining a complaints register and this was provided for review during the audit. Eleven complaints were recorded within the audit period. Beon considers all complaints to be resolved. With regard to repeat issues, three of the eleven complaints relate to light vehicles operating on site after 6pm, whilst two of the eleven complaints related to light shine from office amenities. The remaining 6 complaints are separate issues and not repeated. One complainant is attributed to eight of eleven complaints. The following table provides a brief summary of the complaints:

Date	Complainant ID No.	Complaint / Issue	Beon Response	Considered resolved?
11/07/2019	1	11Kv electricity line hit on site causing temporary power loss (8 hours) to six neighbouring properties.	Direct follow up with impacted residents	Yes

19/07/2019	2	Spark Infrastructure contacted by a Wagga Wagga resident and enquired about the project.	No complaint recorded.	Yes
21/07/2019	3	A neighbouring resident contacted the site office regarding a farm gate being left open and cattle moving from one paddock to the next.	Subcontractors advised to ensure gates are closed. A more secure chain was also installed on the particular gate.	Yes
31/07/2019	4	Request to lower lights on site.	Lights lowered as requested and reportedly turned off earlier in the night.	Yes
22/08/2019	4	Complaint regarding 'extreme' dust coming off the site.	High wind day, with WSW wind gust of 63km/h recorded at Wagga Wagga AMO. Preceding three days were also windy with WSW wind gust of 48, 35 and 76km/h recorded. Two 13,000L water tanks engaged to assist with dust suppression. Work activities to be modified/ceased on windy days. Beon endeavour to close trenches quicker to reduce dust potential.	Yes
26/08/2019	4	Vehicle lights on site after 6pm.	Beon advised complainant that the only vehicles moving on site were those leaving the site. Subcontractors reaffirmed that they must finish works and back at the construction sheds before 6pm.	Yes
30/08/2019	4	Works continuing after 6pm on 22/08/2019 and 28/08/2019.	Beon advised complainant that lights might have been from light vehicles moving returning to amenities areas upon completion of construction activities that day and that no construction activities were or are carried out after 6pm. Beon utilise minivans and light vehicles to transport crew back to amenities areas.	Yes
30/08/2019	4	Light vehicle moving around on site after 6pm	All of the labour hire workforce employed by Beon finish their shifts by 5:30pm. They are bussed off site shortly after. Some subcontractors undertake construction works until just before 6pm and then drive light vehicles back to site amenities area. All personnel are off site by 6:30pm.	Yes
30/08/2019	4	Hazard lights left on vehicle all weekend (24-25/08/2019).	Beon acknowledge the issues and moving forward Beon personnel are to check all vehicle flashing beacons prior to leaving site and recall contractor immediately to remedy.	Yes
30/08/2019	4	Security light shines from office block to south and illuminates homes nearby.	Lights adjusted to point more toward the ground. Timer installed to ensure lights are off by 6:30pm and do not operate until 6:45am.	Yes
30/08/2019	4	Significant amount of reflection from the stage 1 of the infrastructure – morning and afternoon.	Beon acknowledge glare is an issue in Stage 1 activities and that once panels are installed reflective glare is reduced to negligible as tracking infrastructure is covered up.	Yes

3.5 Review of Adequacy of Project Management Plans

The Development Approval requires the preparation, Secretary approval and implementation of a series of management plans and programs. All management plans and programs required to be developed and approved for the Project in accordance with the requirements of SSD 3385 MOD 1 were reviewed during this Audit, including:

- Environmental Management Strategy
- Traffic Management Plan
- Landscaping Plan
- Aboriginal Cultural Heritage Management Plan
- Preliminary Hazard Analysis Implementation Program.

Additionally, the Construction Environmental Management Plan (titled Work Health Safety and Environmental Management Plan for Construction (WHSEMP)) was also reviewed as this plan is a key component of the Environmental Management Strategy.

The adequacy of the plans is assessed by reference to their submission and approval by the relevant Government Authority, compliance with consent conditions to which they relate, and whether there are any opportunities for improvement. A summary of the adequacy assessment of each strategy, plan or program is provided below.

3.5.1 Environmental Management Strategy

The current Environmental Management Strategy (Version 3, 13/05/2019 prepared by Renew Estate Pty Ltd) was submitted to and approved by the NSW DPIE, letter dated 23/05/2019. The Environmental Management Strategy is the overarching environmental management document for the Bomen Solar Farm, relevant to all stages of the project through design, construction, operation and decommissioning. The strategy appears to adequately address the requirements of Schedule 4, Condition 1 of the Project Approval. No recommendations for improvement were identified during this audit.

3.5.2 Construction Environmental Management Plan (titled Work Health Safety and Environmental Management Plan for Construction (WHSEMP))

The current WHSEMP (Version 1.0, 03/06/2019 prepared by Beon Energy Solutions Pty Ltd) is not required to be submitted to and/or approved by the NSW DPIE. The plan is referenced by the overarching Environmental Management Strategy and hence reviewed for adequacy. The revision history within the document indicates the plan has undergone review and amendment following stakeholder consultation. The WHSEMP incorporates the following elements:

- Site specific HSE management including scope, work hours, risk assessment and HSE structure
- Fire and emergency management
- Inspection schedule
- Communication and consultation
- Roles and responsibilities
- Mandatory processes and actions
- Environmental management including:
 - Planning approvals
 - Environmental management strategy
 - Cultural heritage
 - Fuels, chemicals and hazardous substances
 - Soil and surface water management
 - Waste management plan

- Visual impacts
- Weed management
- Flora and fauna management plan
- Noise management plan and
- Air quality.

The WHSEMP is easy to interpret, concise and readily identifies relevant forms or processes required to implement the plan. Overall the WHSEMP is considered adequate for the purposes on construction environmental management. No recommendations for improvement were identified during this audit or as a result of the audit.

3.5.3 Aboriginal Cultural Management Plan / Heritage Management Plan

The current Aboriginal Cultural Heritage Management Plan (ACHMP) Revision 2, 04/12/2018 prepared AECOM Australia Pty Ltd was submitted to and approved by the NSW DPE, letter dated 15/01/2019. The ACHMP was developed in consultation with Office of Environment and Heritage and Registered Aboriginal Parties. Overall the ACHMP is considered adequate with no recommendations for improvement identified during the review or as a result of the audit. The Project Team are aware of Aboriginal heritage items and the management of these items is consistent with project requirements.

3.5.4 Traffic Management Plan

The current Traffic Management Plan (TMP) Version 4, 06/09/2019 prepared by Renew Estate Pty Ltd was submitted to and approved by the NSW DPIE, letter dated 18/09/2019. The NSW DPIE notes that the plan was prepared in consultation with Wagga Wagga City Council as the relevant road authority who did not object to the plan. The plan was updated in accordance with SSD 8835 MOD1.

Version 3 of the TMP was submitted to and approved by the Secretary, letter dated 23/05/2019.

The current version of the TMP is not available on the Boman Solar Farm website. Overall the TMP is considered adequate with the following recommendations for improvement identified during this audit:

Auditor recommendations for improvement:

- Ensure the current version of the TMP is placed on the Bomen Solar Farm website as requested by the NSW DPIE letter of approval.

Note: This finding was immediately addressed during the audit and the current TMP at the time of this audit has been added to the Bomen Solar Farm website.

3.5.5 Landscaping Plan

The current Landscaping Plan (LP), version 4, 03/05/2019 prepared by BIOSIS, was submitted to and approved by the NSW DPIE, letter dated 23/05/2019. The LP is provided on the Bomen Solar Farm Website. The plan clearly outlines management actions, responsibilities, timeframes, performance criteria and monitoring frequencies to achieve intended outcomes. Overall the LP is considered adequate with no recommendations for improvement identified during this audit.

3.5.6 Preliminary Hazards Analysis Implementation Program (PHAIP)

The Preliminary Hazard Analysis Implementation Program (PHAIP), Revision A, 14/05/2019 was submitted to and approved by the Secretary, letter dated 35/05/2019. The program is available on the Boman Solar Farm website. Overall, given the recent review and approval, the PHAIP is considered adequate with no recommendations for improvement identified during this audit.

3.6 Status of Previous Audit Recommendations

Nil. This is the first Independent Environmental Audit for the Project.

3.7 Actual verses Predicted Environmental Impacts

The following section provides a summary of recent monitoring data to assess actual vs. predicted impacts of key environmental aspects identified by the Secretary's Environmental Assessment Requirements and subsequent Environmental Impact Assessment (EIS), including biodiversity, heritage, land, visual, noise, transport, water, hazards and risk, contamination and socio-economic. Measurement of environmental performance has been assessed by:

3.7.1 Biodiversity

The EIS predicted no significant impacts on any listed flora, fauna or ecological communities. The majority of the site has been extensively used for cropping and grazing. The audit found that biodiversity impacts were as predicted in the EIS. A flora and fauna management plan has been prepared and effectively implemented on site. No non-conformities, incidents or non-compliances have been reported or identified on the project with regard to flora and fauna.

A landscaping plan has been prepared and implemented on the project. Plantings of screening vegetation were inspected during the audit site inspections and found to be consistent with the plan. Beon staff are monitoring the success of the plantings, including a 6 monthly report to be submitted to the NSW DPIE on 1 December 2019.

Temporary and permanent fencing has been utilised on site to prevent encroachment and clearing of remanent vegetation and to limit the construction footprint to within the approved boundaries.

A local wildlife expert has been engaged to relocate some snakes from within the construction area during the project, which is consistent with predicted impacts.

Felled limbs with hollows were observed placed in woodland and planting along the boundary of the development areas as proposed in the EIS. Hollows appeared randomly placed and were not stacked.

Overall the project appears to be consistent with land and biodiversity impacts predicted in the EIS.

3.7.2 Aboriginal Heritage

An Aboriginal Cultural Heritage Management Plan has been prepared, approved by the NSW DPIE (letter dated 15/01/2019), and implemented on site. Known aboriginal cultural heritage sites are protected on site with fencing, signage and flagging tape. An archaeological salvage program was undertaken prior to ground disturbance works and identified artefacts were relocated to the known scar tree on the northern boundary of the site. This scar tree has been adequately protected through perimeter fencing around the drip zone and signage, as well as through awareness with the project team during the mandatory site induction that includes information on Aboriginal heritage.

A cultural induction was provided by Wiradjuri Community Elder and Members, that was attended by all Beon and Spark Infrastructure project personnel on site as at 01/09/2019. The induction was an open communication process with the local Wiradjuri Aboriginal Community to discuss cultural implication of the project, impact on the site, and employment potential for the community.

With regard to Aboriginal participation on the project, Beon's Community & Stakeholder Engagement Coordinator reported that 31 Aboriginal workers are currently engaged on site. Of this number 21 are from Wagga Wagga, 8 are from Queensland and 2 are from Mildura. The total number of personnel currently employed (apart from sub-contractors) is 174. Aboriginal participation is approximately 18% of the workforce, with 12% of the workforce being local Aboriginals.

Protocols for discovery of unidentified items are implemented through the Aboriginal Cultural Heritage Management Plan, however none have been identified within the audit period. Overall the project appears to be performing in line with predicted impacts from an aboriginal cultural heritage perspective, with no unforeseen impacts occurring.

3.7.3 Visual

The EIS predicted that the Solar Farm and associated transmission line would be visible from locations within the surrounding area, including properties to the east. The transmission line is being installed underground thus reducing the visual impacts of the project. Tree plantings and remnant vegetation within the project site will provide additional screening for sensitive receivers. A landscape plan, approved by NSW DPIE (letter dated 23/05/2019) has been implemented on site.

Ripping and planting have occurred across the site in the areas identified within the Landscaping plan. Watering of plantings was observed at the time of the audit due to recent dry weather. Monitoring of plant success rates has commenced and a Screening Establishment Report is currently being prepared for issues to NSW DPIE (due 1 December 2019). The auditor inspected the both boundary and internal screening planting zones during the audit site inspection. Success rates of the plantings appear higher in areas without remnant vegetation (e.g. within the internal screen planting zones). Landscaping management measures observed on site included visual monitoring of planting, watering via water cart, and weed spraying.

Section 6.4.3 of the EIS outlines potential impacts of the Project, including glare and reflectivity of solar panels. The EIS provides that solar panel are designed to reflect as little sunlight as possible, resulting in negligible glare. Potential glare from other infrastructure was predicted to be minimal and similar to existing structures on nearby properties. One complaint has been received relating to glare from Stage 1 of the infrastructure during the morning and afternoon. This complaint was attributed to glare from the sun reflecting off the installed tracker infrastructure. This type of glare is likely reduced to negligible upon installation of the non-concentrating photovoltaic solar panels.

Overall the project appears to be consistent with the visual impacts predicted in the EIS.

3.7.4 Noise

The EIS predicted that the project would likely result in some exceedances of noise management levels at nearby residences, however that these impacts would be minimised by implementing identified noise mitigation measures. A Noise Management Plan has been developed for the project and is maintained within the Boman Solar Farm Work Health Safety and Environmental Management Plan for Construction (Rev 1, 03/06/2019). The weekly environmental inspection includes checks of noise mitigation measures. No noise monitoring is required for the project, except following a noise related complaint. There have been no specific noise related complaints within the audit period. There has been three complaints regarding movement of light vehicles on site outside of the approved construction hours (i.e. after 6pm), however Beon reported that all such movements were workers returning to the site compound and were not related to construction activities. These movements are considered negligible for noise impacts. The auditor did not identify any noise related issues during the audit site inspection. Overall the project is considered to be consistent with the predicted noise and vibration impacts.

3.7.5 Transport

The EIS predicted that Byrnes Road and Trahairs Road would accommodate the construction vehicle activity following minor upgrades to Trahairs Road prior to construction. Wagga Wagga City Council independently undertook and completed road upgrade works that satisfied the requirements of Schedule 3, Condition 4 of the Development Approval. A Road Dilapidation Report was undertaken and submitted to Wagga Wagga City Council prior to construction activity.

The auditor accessed the site each day from Wagga Wagga, via Byrnes Road and Trahairs Road. The road was clear and safe on each occasion. All construction traffic observed during the audit was found to be compliant with local road rules and construction requirements, including a 10-20km/h speed limit on whilst on site. The site compound is well established and there is adequate space for construction vehicles to enter, turn around and exit the site driving forwards. There appears to be no identifiable or reported impacts to traffic on roads that are part of the haulage route, particularly the intersection of Byrnes Road and Trahairs Road.

Beon maintain detailed vehicle tracking register, including type of vehicle, date and receipt of delivery. A sample of truck movements was verified during the audit using Nextracker and all matched the information maintained in the vehicle register. Average truck moments well below the approved 60 movements per day and there has been no exceedance of the 26m-length limit.

One non-compliance was identified with regard to the access route used. Schedule 3, Condition 3 of the Approval states *“All over-dimensional and heavy vehicles associated with the development must travel to and from the site via the approved site entry points (shown in Appendix 1) and:*

- *the Sturt Highway, Eunony Bridge Road, Byrnes Road and Trahairs Road; or*
- *Jersey Street, Dorset Drive, Merino Road, Byrnes Road and Trahairs Road.*

During the audit it was identified that some heavy vehicles (i.e. float with excavator) are utilising Merino Rd and Olympic Highway rather than the Sturt Highway and Eunony Bridge Road, due to the 20 tonne limit on Eunony Bridge being a limiting factor for that access route.

Overall the project appears consistent with predicted impacts for transport.

3.7.6 Sediment, Erosion, Water and Dust.

The upper reaches of three ephemeral drainage lines traverse the project site. Construction and operation of the solar farm was not predicted to impact the flow of water through the drainage lines, and this is consistent with the auditor’s observations on site. There has been no water pollution on site.

Soil erosion is managed on site in accordance with the erosion and sediment control plan (ESCP), including sediment fences and maintaining existing vegetation were possible. Coir logs described in the ESCP have not been implemented on site due to the dry weather experienced during construction and the practicalities of maintaining these controls with the number of vehicle movements on site. At the time of the audit site inspection the HSE team was actively monitoring weather forecasts and proactively preparing the site for an imminent wet weather event.

Four water carts were on site at the time of the audit site inspection for dust suppression purposes. These water carts were utilising a Council water filling station within the vicinity of the project. Progressive back filling of trenches, minimising stock piles and restricting soil disturbance (i.e. by using defined tracks) are other key dust mitigation measures observed implemented on the project.

Overall the project appears consistent with predicted impacts for sediment, erosion, water and dust management.

3.7.7 Contamination

No contamination sites were identified during the preparation of the EIS and no contaminated areas have been identified during construction. One minor spill of hydraulic fluid has been reported during the audit period. Beon maintains an incident report and evidence of corrective actions taken to clean up this spill. Appropriate chemical storage was observed during the audit site inspection and spill kits are available within the site compound.

3.7.8 Electric and magnetic fields

The EIS indicates there would be limited exposure to electric and magnetic fields (EMF) during construction and decommissioning. Exposure to areas of EMF (e.g. the existing subtransmission line which runs through the site and the North Wagga substation at the southern end of the project site) is limited as construction works within these areas is only for a short period of time. Due to time limits the auditor was unable to verify if all electrical equipment is designed and selected to minimise EMF levels and comply with the ICNIRP exposure levels. Generally the project appears consistent with predicted impacts for EMF.

3.7.9 Socio-economic

The total number of personnel currently employed (apart from sub-contractors) is 174. Aboriginal participation is approximately 18% of the workforce, with 12% of the workforce being local Aboriginals. A Procurement Plan has been implemented on site to identified suitable contractors and priority is given to local firms. It was reported that Beon had engaged 52 local businesses for a total spend of approximately \$5 million. Generally the project appears consistent with predicted socio-economic impacts.

3.8 Outcomes of Audit Site Inspection

A site inspection was carried out on Wednesday 30 and Thursday 31 October. The Community and Stakeholder Engagement Manager and the Environmental Planning Consultant escorted the auditor during the site inspection. The weather was 25°C sunny with a gentle breeze. The site inspection consisted of a drive across the site using a light vehicle, including walking to some more inaccessible locations such as the vegetated screening zones and easement near the Wagga North Substation.

Areas inspection included the perimeter of the entire site, aboriginal cultural heritage sites, and the transmission line easement to the Wagga North Substation. The site compound, waste collection areas and site entrances were also included in the inspection.

No non-conformances or opportunities for improvement were identified during the site inspection and the site was generally considered well managed. Dust observed during the inspection was settling locally to the disturbance (e.g. from the tracking of vehicles on internal roads or from excavation activities). A good level of groundcover and pasture rehabilitation was observed in areas of the site where solar panels are installed for a longer period of time. Water carts were observed in use for dust suppression and for watering of screening plants.

Photographs taken during the site inspection are included in Appendix E.

3.9 Key Improvements

Not applicable – This was the first audit.

3.10 Key Strengths

The auditor identified the following key strengths during the audit period:

- Consolidated environmental management strategy and associated management plans that are concise, applicable to the project and well implemented on site.
- Project area is generally tidy, with waste stored in designated locations for collection and potential reuse.
- Site compound and key access areas are well established. Key awareness items are communicated through regular toolbox talks and details are posted on the site noticeboard.
- Aboriginal heritage sites are permanently fenced or delineated with flagging and signage.
- Proactive management of dust via water carts and progressively closure of open trenches.

4 Summary of Audit Non Compliances and Recommendations

4.1 Non-Compliances

Non-compliant requirements identified during the audit are provided in Table 5 below. Refer Appendix A for the complete audit finding and further context for each non-compliant item below.

Table 3: Non-compliances

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
BSF-2019-IEA-NC-01	Schedule 3 Condition 3	<p>Transport – Access Route [red text is the condition as modified by MOD 1]</p> <p>All over-dimensional and heavy vehicles associated with the development must travel to and from the site via the approved site entry points (shown in Appendix 1) and:</p> <ul style="list-style-type: none"> • the Sturt Highway, Eunony Bridge Road, Byrnes Road and Trahairs Road; or • Jersey Street, Dorset Drive, Merino Road, Byrnes Road and Trahairs Road. 	<p>Finding: During the audit it was identified that some heavy vehicles are now using Merino road and Olympic highway, rather than the approved route via Sturt Highway, Eunony Bridge Road. This is due to Eunony Bridge Road bridge being limited to 20 tonnes.</p> <p>Recommendation: It is recommended that approval be sought for the use of Merino Road and Olympic Highway.</p> <p>Status at close of audit: Open</p>
BSF-2019-IEA-NC-02	Schedule 3 Condition 6	<p>Transport – Traffic Management Plan</p> <p>Prior to the commencement of construction, the Applicant must prepare a Traffic Management Plan for the development in consultation with RMS and Council, and to the satisfaction of the Secretary.</p>	<p>Finding: The current version of the Traffic Management Plan (Version 4, 06/09/2019) is not yet available on the Bomen Solar Farm website as required by the NSW DPIE approval letter dated 18/09/2019.</p> <p>Recommendation: Ensure that the current approved version of the Traffic Management Plan is placed on the website as soon as possible.</p> <p>Note: This finding was addressed and closed at the time of the audit. Auditor accessed website 18/11/2019.</p> <p>Status at close of audit: Closed</p>
	Schedule 4 Condition 6	<p>Access to Information</p> <p>The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> - the EIS; - the final layout plans for the development; - current statutory approvals for the development; - approved strategies, plans or programs required under the conditions of this consent; - the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; - how complaints about the development can be made; - a complaints register; - any independent environmental audit, and the Applicant's response to the recommendations in any audit; and - any other matter required by the Secretary; and <p>(b) keep this information up to date.</p>	

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
BSF-2019-IEA-NC-02	Statement of Commitments 6.2.1	6. Land use 6.2 Biosecurity general 6.2.1. Establish a vehicle high pressure wash down facility well away from livestock and crops to clean vehicles, boots and equipment which need to enter the property	Finding: A vehicle high-pressure wash down facility has not been established for the site as per the requirement of this commitment. Recommendation: Establish a vehicle high-pressure wash down facility or seek approval from the Secretary that a wash down facility is not required.

4.2 Auditor identified Recommendations and Opportunities for improvement

Recommendations and opportunities for improvement identified during the audit are provided in Table 5 below. Refer Appendix A for the complete audit finding and further context for each item below.

#	Improvement Opportunity	Auditor Identified Recommendation
AR1	A few seedlings were identified missing from the middle-screening zone due to disturbance from site activities prior to permanent fencing being installed.	It is recommended that these seedlings be replanted at the next most favourable time for planting.
AR2	A New Product Substance Inspection Checklist was not completed for the herbicides previously used on site for weed spraying.	It is recommended that the New Product Substance Inspection Checklist be completed for all new substances to site, including any herbicides.

5 Conclusion

The audit of the Bomen Solar Farm against the criteria in Section 1.2 demonstrated that the Project is generally compliant with their environmental management obligations under their Development Approval SSD 8835 Mod 1 including the Statement of Commitments. The Project's actual impacts are in line with those predicted in the Environmental Impact Assessment. Feedback from regulatory agencies did not highlight any areas of concern and whilst some complaints have been received from neighbouring residents and stakeholders, few of these are repeat type complaints.

This audit identified:

- Two non-compliances against three Conditions of the Development Approval;
 - NC 01: Schedule 3 Condition 3
 - NC 02: Schedule 3 Condition 6 and Schedule 4 Condition 6; and
- One non-compliance with the requirements of the Statement of Commitments
 - NC03: SoC 6.2.1.

Additionally the Auditor identified two opportunities for improvement in relation to recommendations for the replanting of a few plants identified missing from the middle-screening zone and for the implementation of Beon's New Product Substance Inspection Checklist for all new substances to site.

J2M Systems have recommended actions to address each of the non-conformances and opportunities for improvement identified. These actions are summarised in Section 4 of this Audit Report.

A draft report was provided to Spark Infrastructure as required by the audit criteria. No additional information was received that changed the status of any finding.

Limitations

J2M Systems Pty Ltd has conducted this Independent Environmental Audit (IEA) and generated this report in accordance with the usual care and thoroughness of the consulting profession for the use of Spark Infrastructure Pty Ltd.

The findings of this audit are based upon visual observations of the site, interviews with site personnel and our interpretation of documentation made available by Project personnel. Opinions presented herein apply to the site as observed at the times of the inspections and from the Auditor's interpretation of documentation and information provided by Project personnel. Any changes to this information of which the Auditor is not aware and has not had the opportunity to evaluate therefore cannot be considered in this report.

J2M Systems have taken due care to consider all reasonably available information provided during the undertaking of this audit and have taken this information to represent a fair and reasonable characterisation of the environmental performance of the Project. It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this Report. This IEA report did not assess any aspects relating to safety at the site.

This IEA Report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. This IEA Report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

Except as required by law, no third party may use or rely on this IEA Report unless otherwise agreed by J2M Systems in writing. It is the responsibility of third parties to independently make inquiries or seek advice in relation to their particular requirements and proposed use of the site.

To the extent permitted by law, J2M Systems expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this IEA Report. J2M Systems does not admit that any action, liability or claim may exist or be available to any third party.

Except as specifically stated in this section, J2M Systems does not authorise the use of this IEA Report by any third party.

Appendixes

The following appendixes are attached to this document:

- Appendix A: Independent Audit Table
- Appendix B: Planning Secretary Audit Team Agreement
- Appendix C: Consultation
- Appendix D: Independent Audit Declaration Form
- Appendix E Site Inspection Photographs.

Appendix A: Independent Audit Table

Appendix A: Independent Audit Table

Conditions of Consent – SSD 8835 Mod 1				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 2 Condition 1	<p>Obligation to Minimise Harm to the Environment</p> <p>In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.</p>	<p>Environmental Management Strategy</p> <p>Work Health Safety and Environmental Management Plan (WHSEMP)</p> <p>Evidence of on site management observed during the audit site inspection includes:</p> <ul style="list-style-type: none"> • Water carts • Water/Sedimentation basins • Sediment fences • Screen planting zones • Fenced areas to protection Aboriginal heritage locations • Site signage and awareness, including site induction processes. • Dedicated access routes across site. 	<p>The Environmental Management Strategy and associated Work Health Safety and Environmental Management Plan (WHSEMP) are current and implemented to manage environmental aspects and impacts, including aboriginal heritage, sediment and erosion control, dust, noise, landscaping and traffic.</p> <p>Bomen Solar Farm (BSF) appears generally compliant with its obligation to minimise environmental harm to the environment.</p>	Compliant.
Schedule 2 Condition 2	<p>Terms of Consent</p> <p>The Applicant must carry out the development:</p> <p>(a) generally in accordance with the EIS; and</p> <p>(b) in accordance with the conditions of this consent.</p> <p><i>Note: The general layout of the development is shown in Appendix 1.</i></p>	Refer to evidence collected throughout this audit table.	Based on a high level review of these documents, BSF is considered to comply with the terms of approval. Compliance against the SSD 8835 MOD 1 is detailed in this checklist, along with details of compliance against the statement of commitments from the EIS.	Compliant.
Schedule 2 Condition 3	<p>Terms of Consent</p> <p>If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.</p>	Noted.	No inconsistency reported or identified by the auditor.	Compliant.

Conditions of Consent – SSD 8835 Mod 1				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 2 Condition 4	<p>Terms of Consent</p> <p>The Applicant must comply with any requirement/s of the Secretary arising from the Department's assessment of:</p> <p>(a) any strategies, plans or correspondence that are submitted in accordance with this consent;</p> <p>(b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and</p> <p>(c) the implementation of any actions or measures contained in these documents.</p>	<p>Environmental Management Strategy (EMS) has been prepared and approved by NSW DPE (letter dated 24/5/19).</p> <p>NSW DPE approved the current Landscaping Plan (Version 4, 03/05/2019), letter dated 24/5/19.</p> <p>An Aboriginal Cultural Heritage Management Plan (ACHMP), (Revision 2, dated 4/12/18) has been established and implemented on site. NSW DPIE approved the ACHMP, letter dated 15/01/2019, which also notes consultation with OEH.</p> <p>Traffic Management Plan Version 4 updated to reflect conditions under SSD 8835 MOD 1. TMP V4 was submitted to and approved by NSW DPIE, sighted letter dated 18/9/19. This letter also confirms that the revised TMP was prepared in consultation with Council.</p>	<p>Compliance assessed through updates to management plans conducted in consultation with relevant parties, including plans submitted under SSD 8835 MOD 1.</p>	Compliant
Schedule 2 Condition 5	<p>Final Layout Plans</p> <p>Prior to the commencement of construction, the Applicant must submit detailed plans of the final layout of the development to the Secretary, including details on the siting of solar panels and ancillary infrastructure.</p>	<p>Final Layout Plans submitted to DPE letter dated 16/5 (REV D). DPE email of acknowledgement of final layout plans received via email 31/5/2019.</p>	<p>Final layout plans were submitted to the Secretary two weeks prior to commencement of construction.</p>	Compliant
Schedule 2 Condition 6	<p>Upgrade of Solar Panels and Ancillary Infrastructure</p> <p>Over time, the Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.</p>	<p>Nil.</p>	<p>The solar farm was under construction at the time of this audit and hence the requirements of this condition have not been triggered.</p>	Not triggered.
Schedule 2 Condition 7	<p>Work as Executed Plans</p> <p>Prior to the commencement of operations, or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development to the Department.</p>	<p>Nil.</p>	<p>The solar farm was under construction at the time of this audit and hence the requirements of this condition have not been triggered.</p>	Not triggered.

Conditions of Consent – SSD 8835 Mod 1				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 2 Condition 8	<p>Notification of Department Prior to the commencement of the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing of the date of commencement, or cessation, of the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>	<p>Renew Estate submitted notification of commencement of construction date to NSW DPE, letter dated 17/5.</p> <p>Construction commencement date 03 June 2019.</p> <p>NSW DPE acknowledged notification of commencement of construction via email dated 31/5/2019.</p>	<p>Renew Estate provided notification of commencement of construction 2 weeks prior to commencing works on site.</p>	Compliant.
Schedule 2 Condition 9	<p>Surrender of Existing Development Consents The Applicant shall surrender all existing development consents for the site in accordance with section 4.63 of the EP&A Act within 12 months of the date of this consent, unless otherwise agreed by the Secretary. Prior to the surrender or lapsing of any existing development consents, the conditions of this consent shall prevail to the extent of any inconsistency with the conditions of these consents.</p> <p>Notes: This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under Part 4A of the EP&A Act. Surrender of a consent should not be understood as implying that works legally constructed under a valid consent can no longer be legally maintained or used.</p>	<p>NSW DPE correspondence 17/01/2019 confirming only the surrender of existing 22MW solar farm DA was required (DA16-0135) to meet this condition.</p> <p>Wagga Wagga City Council correspondence 29/07/2019 confirming surrender of DA16/0125 completed in accordance with Clause 97(2) of the Environmental Planning and Assessment Regulation 2000.</p>	<p>Renew Estate obtained Secretary agreement that only the surrender of existing 22MW solar farm DA was required (DA16-0135) to meet this condition.</p> <p>Wagga Wagga City Council confirmed surrender of DA16/0125 completed in accordance with Clause 97(2) of the Environmental Planning and Assessment Regulation 2000.</p>	Compliant.
Schedule 2 Condition 10	<p>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 Building Code of Australia.</p> <p>Notes: - Under Part 6 of the EP&A Act, the Applicant is</p>	<p>The following Construction Certificates have been obtained from David Whitwell – Building Certification and BCA Advisor:</p> <ul style="list-style-type: none"> • Construction certificate for fencing, 18/07/2019 • Construction certificate obtained for on-site substation and associated 	<p>Construction certificates have been obtained for the buildings and structures under construction at the time of this audit.</p>	Compliant.

Conditions of Consent – SSD 8835 Mod 1				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	required to obtain construction and occupation certificates for the proposed building works. - Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	<p>infrastructure works, dated 25/08/2019.</p> <ul style="list-style-type: none"> Construction certificate obtained for bored piers for Power Station Units, dated 09/09/2019. Construction certificate for Stage 2 piling, array and tracking system works, dated 30/07/2019. <p>Construction certificate has not yet been sought for the Operation and Maintenance building, for which construction has not yet commenced.</p>		
Schedule 2 Condition 11	<p>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.</p>	Discussion with Project Environmental Planning Consultant.	The only demolition onsite was the decommissioning of groundwater monitoring bores, which is complete. It was reported that the groundwater bores were decommissioned in accordance with decommissioning guidelines.	Compliant.
Schedule 2 Condition 12	<p>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.</p> <p>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.</p>	Discussion with Project Environmental Planning Consultant	It was reported that there has been no damage to public infrastructure at the time of this audit, hence the requirements of this condition have not been triggered.	Not triggered.
Schedule 2 Condition 13	<p>Operation of Plant and Equipment The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.</p>	<p>Vehicle maintenance records associated with vehicle inspection checklists.</p> <p>Samples of Plant and equipment – Mobile Plant Hazard and Operation Inspection checklists were obtained for a random selection of plant observed on site during the audit site inspection including:</p>	<p>A detailed assessment of this requirement was not undertaken and the auditor did not check all plant and equipment on site.</p> <p>Processes for the management of plant and equipment appear implemented on site and operations are generally considered compliant with</p>	Compliant

Conditions of Consent – SSD 8835 Mod 1				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> CAT LADEX Grader. 140M Service history and plant risk assessment. Last service record 26/06. Also sighted Operation checklist. POSI-Track CAT 259D – Sighted risk assessment. Hazard checklist signed off 27/09/19. Excavator P404 Plant inspection checklist – 20/08/19. Vermeer Trencher P660 Service inspection record and risk assessment. Pronto vehicle inspection checklist for Plant T558 P660 Trencher 26/08/2019. <p>Daily plant inspection records for All Energy equipment including excavators and graders.</p> <p>Plant maintenance register.</p> <p>Daily pre-start inspection records for all BEON vehicles including ATVs, Utes, Trucks, Mini busses and Telehandler.</p> <p>PRONTO records and tracking of completion compliance on Dashboard.</p>	the requirements of this condition.	
Schedule 3 Condition 1	<p>Transport – Over-Dimensional and Heavy Vehicle Restrictions</p> <p>The Applicant must ensure that the:</p> <p>(a) development does not generate more than:</p> <ul style="list-style-type: none"> - 30 heavy vehicle movements a day during construction, upgrading or decommissioning; - 1 over-dimensional vehicle movement during construction, upgrading and decommissioning; and - 60 heavy vehicle movements a day during operations; on the public road network; <p>(b) length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 26 metres, unless the Secretary agrees otherwise.</p>	<p>NSW DPIE correspondence 15/01/2019 approving the requested increase in the number of permitted heavy vehicle movements a day during construction from 30 to 60.</p> <p>The approval applies to construction phase only, not decommissioning or upgrading works.</p> <p>Wagga Wagga City Council correspondence confirming their support for this increase</p> <p>NSW RMS correspondence confirming their support for this increase</p> <p>Vehicle tracking register, including type and receipt of delivery.</p>	<p>NSW DPIE, Wagga Wagga City Council and NSW RMS approved a requested increase in the number of permitted heavy vehicle movements a day during construction, from 30 to 60.</p> <p>The approval applies to construction phase only, not decommissioning or upgrading works.</p> <p>A vehicle tracking register is maintained and heavy vehicle movements appear to average approximately fifteen movements per day.</p> <p>It was reported that there has been no vehicles exceeding 26m.</p> <p>It was reported that there has been 1 over</p>	Compliant.

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		Discussion with Project HSE Advisor Discussion with Project Environmental Planning Consultant.	dimensional, relating to delivery of an excavator.	
Schedule 3 Condition 2	The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering or leaving the site each day.	Beon is maintaining a Vehicle tracking register, including type and receipt of delivery. Samples of truck movements were verified against records in Nextracker including for movements on 30/09, and 24/09. Average truck moments ~15/day. No 26m exceedence. 1 over dimensional for excavator.	Beon is maintaining a Vehicle tracking register, including type and receipt of delivery. Samples of truck movements were verified against records in Nextracker including for movements on 30/09, and 24/09. Heavy vehicle movements appear to average approximately fifteen movements per day.	Compliant
Schedule 3 Condition 3	Transport – Access Route [red text is the condition as modified by MOD 1] All over-dimensional and heavy vehicles associated with the development must travel to and from the site via the approved site entry points (shown in Appendix 1) and: <ul style="list-style-type: none"> the Sturt Highway, Eunony Bridge Road, Byrnes Road and Trahairs Road; or Jersey Street, Dorset Drive, Merino Road, Byrnes Road and Trahairs Road. 	NSW DPE correspondence 23/08/2019 approving MOD 1 for an alternative heavy vehicle route to allow heavy vehicles to travel from the Bomen rail sidings on Jersey St to site and the two offsite laydown areas on Byrnes Road (560 and 280 Byrnes Rd). Traffic Management Plan, Version 4 Discussion with Project HSE Advisor.	BSF-2019- IEA-NC-01: During the audit it was identified that heavy vehicles are now using Merino road and Olympic highway, rather than the approved route via Sturt Highway, Eunony Bridge Road. This is due to Eunony Bridge Road bridge being limited to 20 tonnes. The auditor understands that Merino Road was not completed at the time of preparing the EIS and gaining Development Approval. Recommendation: It is recommended that approval be sought for the use of Merino Road and Olympic Highway.	Non-compliant
Schedule 3 Condition 4	Transport – Road Upgrades Prior to the commencement of construction, the Applicant must undertake road upgrade works on sections of Trahairs Road, as specified in the EIS (shown in Appendix 1) to the satisfaction of Council.	Email correspondence from Wagga Wagga City Council 21 & 22/11/2018 confirming Council completed the road works to the satisfaction of this condition.	Upgrade works on Trahairs Rd were undertaken by the Council independent of the project.	Compliant.
Schedule 3 Condition 5	Transport – Operating Conditions 6. The Applicant must ensure: (a) the internal project site roadways are constructed as all-weather roads; (b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site;	Site inspection. Discussions with Project HSE Advisor and Project Environmental Planning Consultant.	Evidence to support this condition was obtained through visual inspection of the site. Roads driven appeared all weather and sufficient parking was provided with no parking observed on public roads. The capacity of existing road drainage did not appear reduced. Adequate space is provided to load and unload delivery vehicles within the site compound. Traffic inspection items confirmed on Environmental	Compliant.

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	(c) the capacity of the existing road drainage network is not reduced; (d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the sealed public road network.		inspection (weekly). All vehicles observed leaving site were clean and dirt tracking onto public roads appeared minimal.	
Schedule 3 Condition 6	<p>Transport – Traffic Management Plan</p> <p>Prior to the commencement of construction, the Applicant must prepare a Traffic Management Plan for the development in consultation with RMS and Council, and to the satisfaction of the Secretary. This plan must include:</p> <p>(a) details of the transport route to be used for all development-related traffic, including the location of access points;</p> <p>(b) a protocol for undertaking independent dilapidation surveys to assess the:</p> <ul style="list-style-type: none"> - existing condition of local roads on the transport route prior to construction, upgrading or decommissioning activities; and - condition of local roads on the transport route following construction, upgrading or decommissioning activities; <p>(c) a protocol for the repair of any local roads identified in the dilapidation surveys to have been damaged during construction, upgrading or decommissioning works;</p> <p>(d) details of the road upgrade works required by condition 4 of Schedule 3;</p> <p>(e) details of the measures that would be implemented to minimise traffic safety issues and disruption to local users of the transport route during construction, upgrading or decommissioning works, including:</p> <ul style="list-style-type: none"> - the movement of vehicles on local road network within the site; - temporary traffic controls, including detours and 	<p>NSW DPIE correspondence 23/05/2019 approving the Traffic Management Plan, Version 3. This correspondence also confirms that the TMP was prepared in consultation with RMS and Council.</p> <p>Version 4 of the TMP, updated to reflect conditions under SSD 8835 MOD 1.</p> <p>NSW DPIE correspondence 18/09/20149 approving TMP V4. This correspondence also confirms that the revised TMP was prepared in consultation with Council.</p> <p>Pre-construction dilapidation report.</p> <p>Evidence of implementation observed on site included:</p> <ul style="list-style-type: none"> • Construction signage. • Road work / caution signage. • Vehicle areas for loading/unloading. • Vehicles entering and leaving site in a forward direction. • Shuttle bus on site. • Visitor and worker parking bays. • Speed limit signage on site. 	<p>A Traffic Management Plan (TMP) has been prepared, updated and implemented on site. A pre-construction dilapidation report has also been completed and was provided for review during the audit.</p> <p>BSF-2019- IEA-NC-02: At the commencement of this audit, the current version of the Traffic Management Plan (Version 4, 06/09/2019) was not available on the Bomen Solar Farm website as required by the NSW DPIE approval letter dated 18/09/2019.</p> <p>Recommendation: Ensure that the current approved version of the Traffic Management Plan is placed on the website as soon as possible.</p> <p>Note: This finding was addressed and closed at the time of the audit. Auditor accessed website 18/11/2019/.</p>	<p>Non-Compliant –</p> <p>Refer to NC raised under Schedule 4, Condition 6.</p>

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	<p>signage;</p> <ul style="list-style-type: none"> - notifying the local community about project-related traffic impacts; - procedures for receiving and addressing complaints from the community about development related traffic; - minimising potential for conflict with school buses and other motorists as far as practicable; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather; - responding to any emergency repair or maintenance requirements; and - a traffic management system for managing over-dimensional vehicles; and <p>(f) a driver's code of conduct that addresses:</p> <ul style="list-style-type: none"> - travelling speeds; - driver fatigue; - procedures to ensure that drivers adhere to the designated transport route/s; and - procedures to ensure that drivers implement safe driving practices. <p>Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>			
Schedule 3 Condition 7	<p>Landscaping - Vegetation Buffer</p> <p>The Applicant must establish and maintain a mature vegetation buffer (landscape screening) at the locations outlined in the figure in Appendix 1 to the satisfaction of the Secretary. This vegetation buffer must:</p> <ul style="list-style-type: none"> (a) be planted prior to the commencement of operations; (b) consist of species that facilitate the best possible outcome in terms of visual screening; (c) within 3 years of the commencement of construction be effective at screening view of the solar panels and ancillary infrastructure on site from surrounding residences; and (d) be properly maintained with appropriate weed 	<p>Discussion with the Project Environmental Planning Consultant.</p> <p>NSW DPE correspondence 24/05/2019 approving the current Landscaping Plan (Version 4, 03/05/2019).</p> <p>Draft Screening Establishment Report</p> <p>Site inspection observations, including:</p> <ul style="list-style-type: none"> • Watering of plantings. • Visual monitoring of planting success rates. • Results of weed spraying. • Boundary and internal screening planting zones 	<p>It was reported that Jayfields Nursery undertook landscape planting in accordance with the approved Landscape Plan in late August 2019.</p> <p>The current Landscaping Plan (Version 4, 03/05/2019) prior to commencement of construction.</p> <p>Watering of plantings was observed at the time of the audit due to recent dry weather. Monitoring of plant success rates has commenced.</p> <p>A Screening Establishment Report is currently being prepared for issue to NSW DPIE (due 04 December 2019).</p>	Compliant.

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	management.	<p>The auditor inspected the both boundary and internal screening planting zones during the audit site inspection. Success rates of the plantings appear higher in areas without remnant vegetation (e.g. within the internal screen planting zones).</p> <p>Landscaping management measures observed on site included visual monitoring of planting success rates, watering via water cart, and results of weed spraying.</p> <p>Register of plantings and species list is maintained.</p>	<p>The auditor inspected the both boundary and internal screening planting zones during the audit site inspection. Success rates of the plantings appear higher in areas without remnant vegetation (e.g. within the internal screen planting zones).</p> <p>Landscaping management measures observed on site included visual monitoring of planting success rates, watering via water cart, and results of previous weed spraying.</p> <p>A register of plantings and species list is maintained. Screening and vegetation buffer zones were planted with a mix of Acacia and Eucalyptus trees and shrubs, including Redgum, Grey box, Yellow box, White box and Wattle.</p> <p>It is noted that the requirements of this condition are ongoing.</p>	
Schedule 3 Condition 8	<p>Landscaping – Landscaping Plan</p> <p>Prior to the commencement of construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with Council and surrounding landowners, to the satisfaction of the Secretary. This plan must include:</p> <p>(a) a description of measures that would be implemented to ensure that the vegetated buffer achieves the objectives of condition 7 (a) – (c) of this consent;</p> <p>(b) include a program to monitor and report on the effectiveness of these measures; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for the completion of actions.</p> <p>Following the Secretary’s approval, the Applicant must implement the Landscaping Plan.</p>	<p>NSW DPE correspondence 24/05/2019 approving the current Landscaping Plan (Version 4, 03/05/2019)</p> <p>Note: NSW DPE approval referenced the wrong version number but the correct plan date. The version they approved was v4 dated 3 May 2019 however the approval referenced V3 dated 3 May 2019, which is incorrect. This is considered an inconsequential administrative error.</p> <p>The above listed approval notes that Wagga Wagga City Council and relevant surrounding landowners were consulted on the</p> <p>Refer to evidence collected under Schedule 3, Condition 7 above.</p>	<p>NSW DPE approved the current Landscaping Plan one week prior to commencement of construction.</p> <p>The plan is considered adequately implemented at the time of this audit as evidenced through the audit site inspection.</p>	Compliant.
Schedule 3	Land Management	Discussion with HSE Advisor.	No construction works have been completed on site	Not triggered.

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Condition 9	Following any construction or upgrading on the site, the Applicant must: (a) restore the ground cover of the site as soon as practicable, but within 12 months of completing any construction or upgrading, using suitable species; (b) maintain the ground cover with appropriate perennial species; and (c) manage weeds within this ground cover.	Discussion with Environmental Planning Consultant. Note: A groundcover management plan is currently being prepared by a local agronomist for the re-establishment of groundcover.	and hence the requirement of this condition was not triggered at the time of the audit.	
Schedule 3 Condition 10	Amenity – Construction, Upgrading and Decommissioning Hours Unless the Secretary agrees otherwise, the Applicant may only undertake construction, upgrading or decommissioning activities on site between: (a) 7 am to 6 pm Monday to Friday; (b) 8 am to 1 pm Saturdays; and (c) at no time on Sundays and NSW public holidays. The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary: - the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or - emergency work to avoid the loss of life, property and/or material harm to the environment.	NSW DPIE correspondence approving extended hours on Saturdays up to 3.30pm until 6/11/2019. Landowner, neighbouring stakeholders, Council and RMS approvals were obtained prior to requesting extended construction hours (sighted email records) Discussion with HSE Advisor Complaints Register.	NSW DPIE approved extended hours on Saturdays up to 3.30pm until 6/11/2019. It was reported that piling, construction of the 132 kv line and tree clearing/mulching activities have not been undertaken within extended hours and that the equipment used during the extended hours is limited to trenching equipment, utilities, buggies and 5kva generators. Landowner, neighbouring stakeholders, Council and RMS approvals were obtained prior to the request for extended construction hours. Working hours are communicated to workers via induction and pre-start meetings. 3 of 11 complaints relate to LVs driving on site after 6pm. Beon investigated and identified LVs were moving from site to site amenities. There have been no other complaints or non-conformities identified or reported with regard to working hours. As the above complaints were attributed to light vehicles moving on site rather than undertaking construction activities it is generally considered that the requirements of this condition have been complied with.	Compliant
Schedule 3 Condition 11	Amenity – Noise The Applicant must minimise the noise generated by any construction, upgrading or decommissioning	Section 16.10 of the WHSEMP. Site inspection Complaints register.	Noise minimisation measures are outlined in Section 16.10 of the WHSEMP. Implementation was assessed during the audit site inspection and found to be generally consistent with the WHSEMP.	Compliant

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	activities on site in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version.			
Schedule 3 Condition 12	Amenity – Dust The Applicant must minimise the dust generated by the development.	Section 16.11 of the WHSEMP. Site inspection, including evidence of water carts and prompt back filling of trenches. Complaints register.	Dust minimisation measures are outlined in Section 16.11 of the WHSEMP. Implementation was assessed during the audit site inspection and found to be generally consistent and effective. 4x water carts were observed in operation at time of audit site inspection. At the time of the site inspections, dust from construction activities was localised and settled on site.	Compliant
Schedule 3 Condition 13	Amenity – Visual The Applicant must: (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection from the solar panels; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	Discussion with Environmental Planning Consultant Discussion with HSE Advisor Refer to Schedule 3, Condition 7. Site inspection.	(a) It was reported that Jayfields Nursery undertook landscape planting in accordance with the approved Landscape Plan in late August 2019. Refer to Schedule 3, Condition 7. Visual impacts are to be managed through landscaping and screening. As predicted in the EIS, the auditor did not observe any glare from installed solar panels. Some glare was observed from the Stage 1 infrastructure, however appears to be negated upon installation of the solar panels. (b) Not yet triggered. O&M building designs are being drafted. Construction has not commenced on this yet. (c) no advertising signs or logos were observed no site, other than those at the main site entrances which were considered to be required for safety purposes.	Compliant
Schedule 3 Condition 14	Amenity – Lighting The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with	Discussion with Community & Stakeholder Engagement Manager Discussion with Environmental Planning Consultant Complaints Register.	The Community & Stakeholder Engagement Manager reported that all site lights are switched off at 6:30pm. The Environmental Planning Consultant for the project reported that the detailed O&M building	Compliant.

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	<p>the development:</p> <ul style="list-style-type: none"> - is installed as low intensity lighting (except where required for safety or emergency purposes); - does not shine above the horizontal; and - complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version. 		<p>designs are still being drafted, however it is anticipated that minimal lighting would be required for the O&M building.</p> <p>Two of the eleven complaints related to light shine from office amenities. Upon notification of the complaint, both of these issues were resolved by directing lights further down toward the ground.</p>	
Schedule 3 Condition 15	<p>Heritage – Protection of Heritage Items</p> <p>Prior to the commencement of construction, the Applicant must salvage and relocate all Aboriginal heritage items identified in Table 2 in Appendix 4 to suitable alternative locations on site, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version.</p>	<p>AECOM correspondence 29/04/2019 from G.Oakes confirming salvage works were undertaken on the 24/04/2019 by Geordie Oakes of AECOM, including attendance of two Register Aboriginal Parties, being Yalmambira and Warrabinya Cultural Heritage and Assessment Group,</p> <p>Aboriginal Site Impact Recording (ASIR) Forms for AHIMS Site ID: 56-1-0109-1; 56-1-0437-1; 56-1-0536-1; 56-1-0543-1; 56-1-0550-1; 56-1-0551-1; 56-1-0552-1; 56-1-0553-1; 56-1-0555-1; 56-1-0557-1 and 56-1-0590-1.</p> <p>ASIR forms submitted to OEH on 14/5/19.</p> <p>Photos record in ASIR forms.</p> <p>Site inspection.</p>	<p>Salvage of aboriginal heritage items was satisfactorily completed by Geordie Oakes of AECOM, including attendance of two Register Aboriginal Parties, being Yalmambira and Warrabinya Cultural Heritage and Assessment Group</p> <p>Completed Aboriginal Site Impact Recording (ASIR) Forms are maintained for AHIMS Site ID: 56-1-0109-1; 56-1-0437-1; 56-1-0536-1; 56-1-0543-1; 56-1-0550-1; 56-1-0551-1; 56-1-0552-1; 56-1-0553-1; 56-1-0555-1; 56-1-0557-1 and 56-1-0590-1.</p> <p>The ASIR forms have been submitted to OEH.</p> <p>The salvaged artefacts were relocated to the site of the Aboriginal scarred tree on the northern boundary as per the ACHMP as per photo evidence within in ASIR forms.</p> <p>The Aboriginal scarred tree is adequately protected with perimeter fencing and signage.</p>	Compliant.
Schedule 3 Condition 16	<p>Heritage – Protection of Heritage Items</p> <p>The Applicant must ensure the development does not cause any direct or indirect impacts on Aboriginal heritage items identified in Table 1 in Appendix 4 or located outside the approved development footprint. Note: The location of the Aboriginal heritage items are shown in the figure in Appendix 3.</p>	<p>Aboriginal Cultural Heritage Management Plan (ACHMP)</p> <p>Section 16.3 of the WHSEMP</p> <p>Mandatory site induction presentation.</p> <p>Site Inspection observations, including:</p> <ul style="list-style-type: none"> • Installation of permanent fencing around the scarred tree • Installation of temporary fencing around 	<p>An Aboriginal Cultural Heritage Management Plan (ACHMP) is implemented on site and Section 16.3 of the WHSEMP also outlines mitigation measures for Aboriginal heritage items.</p> <p>Awareness of Aboriginal Cultural Heritage is included in the mandatory site induction, as was communicated to the auditor during site induction.</p> <p>The audit site inspection confirmed implemented mitigation measures including permanent fencing around the scarred tree and temporary fencing</p>	Compliant.

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		<p>artefact scatters in Lot 22 DP1085826.</p> <p>Discussion with HSE Advisor regarding unidentified finds.</p>	<p>around artefact scatters in Lot 22 DP1085826.</p> <p>Site HSE team reported there have been no unidentified finds of Aboriginal heritage items to date on the project.</p>	
Schedule 3 Condition 17	<p>Heritage – Heritage Management Plan</p> <p>Prior to the commencement of construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</p> <p>(b) be prepared in consultation with OEH and Aboriginal Stakeholders;</p> <p>(c) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> - protecting the Aboriginal heritage items located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction and/or preconstruction minor works; - salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 in Appendix 4; <ul style="list-style-type: none"> - a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - previously unidentified Aboriginal heritage items are found; or - Aboriginal skeletal material is discovered; - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and - ongoing consultation with Aboriginal stakeholders during the implementation of the plan; <p>(d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> 	<p>An Aboriginal Cultural Heritage Management Plan (ACHMP), (Revision 2, dated 4/12/18).</p> <p>NSW DPIE correspondence 15/01/2019 approving the ACHMP and noting consultation with OEH.</p> <p>NSW DPIE correspondence 11/01/2019 approving Mr Geordie Oakes of AECOM as a suitability qualified expert.</p> <p>Consultation log within the ACHMP.</p>	<p>An Aboriginal Cultural Heritage Management Plan has been established in consultation with OHE and Aboriginal Stakeholders.</p> <p>The plan was approved approximately four months prior to commencement of construction.</p> <p>The ACHMP was prepared by a suitability qualified expert, who was approved by the Secretary.</p> <p>Consultation with RAPs is included within the ACHMP.</p> <p>It was reported that the site induction was modified following consultation with RAP.</p>	Compliant.

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	Following the Secretary’s approval, the Applicant must implement the Heritage Management Plan.			
Schedule 3 Condition 18	<p>Soil & Water – Water Pollution</p> <p>The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.</p>	<p>Site inspection</p> <p>Discussion with HSE Advisor.</p>	<p>It was reported that there has been no water pollution incidents or events on the project at the time of this audit.</p> <p>The auditor did not identify any evidence of water pollution. There was no standing or flowing water on the project site at the time of the audit site inspection.</p>	Compliant.
Schedule 3 Condition 19	<p>Soil & Water – Operating Conditions</p> <p>The Applicant must:</p> <p>(a) minimise the siting of solar panels and ancillary infrastructure within watercourses in the approved development footprint;</p> <p>(b) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version;</p> <p>(c) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and</p> <p>(d) ensure all works (including watercourse crossings) are undertaken in accordance with the following, unless otherwise agreed by DoI L&W:</p> <ul style="list-style-type: none"> - Guidelines for Controlled Activities on Waterfront Land (2012), or its latest version; and - Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004), or its latest version. 	<p>Erosion and sediment control plan (ESCP)</p> <p>Site inspection observation, including implementation of the following controls:</p> <ul style="list-style-type: none"> • Sediment fences • Maintaining existing vegetation where possible. • Weather forecast monitoring. <p>Discussion with Environmental Planning Consultant.</p> <p>Review of Environmental Assessment.</p>	<p>The upper reaches of three ephemeral drainage lines traverse the project site. Construction and operation of the solar farm was not predicted to impact the flow of water through the drainage lines, and this is consistent with the auditor’s observations on site.</p> <p>Soil erosion is managed on site in accordance with the erosion and sediment control plan (ESCP), including sediment fences and maintaining existing vegetation were possible. Coir logs described in the ESCP have not been implemented on site due to the dry weather experienced during construction and the practicalities of maintaining these controls with the number of vehicle movements on site. At the time of the audit site inspection the HSE team was actively monitoring weather forecasts and proactively preparing the site for an imminent wet weather event.</p> <p>The Environmental Planning Consultant for the project reported that “The Guidelines for Controlled Activities on Waterfront land (2012) do not apply to the drainage lines in the site because they do not meet the definition of 'waterfront land' for the purposes of the WM Act. This is because they 'do not exhibit the features of defined channel with bed and banks'. As the drainage lines are very unlikely fish habitat the Fish Passage Requirements do not warrant further consideration”.</p>	Compliant.

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Schedule 3 Condition 20	<p>Hazards – Fire Safety Study</p> <p>At least one month prior to the commencement of construction of the battery storage facility (excluding preconstruction minor works), unless otherwise agreed by the Secretary, the Applicant must prepare and a Fire Safety Study of the development, to the satisfaction of the Secretary. The study must be consistent with the:</p> <ul style="list-style-type: none"> - Department’s Hazardous Industry Planning Advisory Paper No. 2, ‘Fire Safety Study’ guideline; and - New South Wales Government’s Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. <p>Construction of the battery storage facility, other than pre-construction minor works, must not commence until the Secretary has approved the Fire Safety Study.</p>	Discussion with Environmental Planning Consultant.	It was reported that the battery storage system is not being constructed at this stage, but may be constructed separately in the future. Hence the requirements of this condition have not been triggered.	Not triggered
Schedule 3 Condition 21	<p>Hazards – Energy Storage and High Pressure Gas Pipelines</p> <p>Prior to the commencement of construction, the Applicant must prepare a program for the implementation of all actions and recommendations arising from the following reports:</p> <ul style="list-style-type: none"> - Renew Estate Pty Ltd, Bomen 120 MWdc solar farm EIS, SEPP 33 Level 2 Preliminary Hazard Analysis (revision 2, dated 29 June 2018, prepared by GHD); and - Renew Estate Pty Ltd, Bomen Solar Farm, PHA Supplementary Assessment (revision 0, dated 8 August 2018, prepared by GHD), to the satisfaction of the Secretary. <p>Following the Secretary’s approval, the Applicant must implement the program.</p>	<p>Preliminary Hazard Analysis Implementation Program (PHAIP).</p> <p>NSW DPIE correspondence 31/05/2019 approving the Preliminary Hazard Analysis Implementation Program (PHAIP)</p> <p>Fire and Emergency Management Plan.</p> <p>Traffic Management Plan.</p> <p>Site inspection, including implementation of the following controls:</p> <ul style="list-style-type: none"> • Site speed limits • Operator competencies. • 10m defendable space around site; • Fuel and chemical storage onsite • Spills kits and spare PPE. <p>Records of completed Site Inspection Checklists, which include checks of fuels, chemicals and hazardous substances.</p>	<p>A Preliminary Hazard Analysis Implementation Program (PHAIP) was prepared, submitted to and approved by NSW DPIE two days prior to construction.</p> <p>The PHAIP is being implemented on site, with evidence sighted including:</p> <ul style="list-style-type: none"> • Traffic Management Plan, site speed limits, and operator competency checks during induction. • Fire and Emergency Management Plan, 10m defendable space around site, adequate fuel and chemical storage onsite, spills kits and PPE. • Site inspection process, including checks of fuels, chemicals and hazardous substances. 	Compliant.

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Schedule 3 Condition 22	<p>Hazards – Energy Storage and High Pressure Gas Pipelines The Applicant must identify the location of all high pressure pipelines, including ancillary assets, licensed under the Pipelines Act 1967 and within the development area by appropriate signage and in all relevant documentation, including and not limited to the Emergency Plan under condition 25 of Schedule 3.</p>	<p>Site inspection.</p> <p>Bomen Solar Farm Site Equipment Layout – Solar Farm Areas and 132kV Cable Route (Drawing No. BOM CIVIL DWG 0001 D, 09/05/2019) .</p> <p>Discussion with HSE Advisor.</p>	<p>The high-pressure gas pipeline easement is identified within site plans and has temporary signage placed by Beon, as verified during site inspection.</p>	Compliant.
Schedule 3 Condition 23	<p>Hazards – Storage and Handling of Dangerous Materials 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.</p> <p>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	<p>Site inspection.</p>	<p>All chemicals are stored in a container within internal bund. Spill kits were also available within the site compound.</p>	Compliant
Schedule 3 Condition 24	<p>Hazards – Operating Conditions The Applicant must: (a) minimise the fire risks of the development; (b) ensure that the development: - includes at least a 10 metre defendable space around the perimeter of the solar array area that permits unobstructed vehicle access; - manages the defendable space and solar array areas as an Asset Protection Zone; - complies with the relevant asset protection requirements in the RFS’s Planning for Bushfire Protection 2006 (or equivalent) and Standards for Asset Protection Zones; - is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65mm Storz fitting located adjacent to</p>	<p>Discussion with HSE Advisor.</p> <p>Discussion with Environmental Planning Consultant.</p>	<p>This condition relates to operational activities. As the site is under construction at the time of this audit the requirements of this condition have not been triggered.</p>	Not triggered.

Conditions of Consent – SSD 8835 Mod 1				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>the internal access road;</p> <p>(c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(d) notify the relevant local emergency management committee following construction of the development, and prior to the commencement of operations.</p>			
Schedule 3 Condition 25	<p>Hazards – Emergency Plan</p> <p>Prior to the commissioning of development, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry points at all times. The plan must:</p> <p>(a) be consistent with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 1, ‘Emergency Planning’;</p> <p>(b) be prepared in consultation with APA Group with regards to incidents which may involve high pressure gas pipelines;</p> <p>(c) be prepared in consultation with Fire and Rescue NSW and NSW Rural Fire Service to their satisfaction;</p> <p>(d) identify the fire risks and controls of the development, including incidents which may involve high pressure gas pipelines; and</p> <p>(e) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site.</p>	<p>Fire and Emergency Management Plan (FEMP).</p> <p>Discussion with Environmental Planning Consultant.</p>	<p>Not triggered. This condition relates an emergency plan for the operation phase, to be approved prior to commissioning.</p> <p>A Fire and Emergency Management Plan (FEMP) has been prepared for the construction phase to manage risk during construction. This was prepared in consultation with NSW Rural Fire Service and Fire & Rescue NSW</p>	Not triggered.
Schedule 3 Condition 26	<p>Hazards – Compliance Report</p> <p>One month prior to commissioning of the development, the Applicant must submit to the Secretary for approval a Compliance Report detailing compliance with conditions 20 to 26 inclusive. Commissioning of the development must not commence until approval has been given by the Secretary.</p>	Discussion with Environmental Planning Consultant	Commissioning is not anticipated until February 2020, hence the requirement of this condition as not triggered at the time of this audit.	Not triggered.

Conditions of Consent – SSD 8835 Mod 1				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 3 Condition 27	<p>Waste</p> <p>The Applicant must:</p> <p>(a) minimise the waste generated by the development;</p> <p>(b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);</p> <p>(c) store and handle all waste on site in accordance with its classification;</p> <p>(d) not receive or dispose of any waste on site; and</p> <p>(e) remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal.</p>	<p>Waste disposal register</p> <p>HSE Performance Reports (weekly) for June – October 2019.</p> <p>Site inspection observations.</p> <p>Discussion with Community & Stakeholder Engagement Manager regarding potential re-use of wooden pallets on site.</p> <p>Discussion with Community & Stakeholder Engagement Manager regarding waste classification and offsite disposal (all soils retained on site).</p>	<p>A Waste Disposal Register is maintained. HSE performance are updated weekly and include reporting on waste generation rates.</p> <p>General waste is removed from site and packaging is recycled, including cardboard, steel, and insulated cable.</p> <p>It was reported that the Community & Stakeholder Engagement Manager is currently in discussions with an external stakeholder with regard to the potential collection and re-use of wooden pallets on site.</p> <p>It was reported that no waste classification or offsite disposal has been required (all soils retained on site).</p> <p>Due to time limitation the auditor was not able to validate how waste generation was minimised</p>	Compliant
Schedule 3 Condition 28	<p>Decommissioning and Rehabilitation</p> <p>Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 2 of the Development Consent.</p>	Nil	As the site is under construction at the time of this audit the requirements of this condition have not been triggered.	Not triggered.
Schedule 4 Condition 1	<p>Environmental Management – Environmental Management Strategy</p> <p>Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <p>(a) provide the strategic framework for environmental management of the development;</p> <p>(b) identify the statutory approvals that apply to the development;</p> <p>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p> <p>(d) describe the procedures that would be implemented to:</p> <p>- keep the local community and relevant agencies</p>	<p>Environmental Management Strategy (EMS)</p> <p>NSW DPE correspondence 24/5/19 approving the Environmental Management Strategy.</p> <p>Bomen Solar Farm Website.</p> <p>A sample of completed records of weekly site inspections.</p> <p>Evidence of on site management observed during the audit site inspection includes:</p> <ul style="list-style-type: none"> • Water carts • Water/Sedimentation basins • Sediment fences 	<p>An Environmental Management Strategy (EMS) has been prepared and was approved by NSW DPE one week prior to construction.</p> <p>The EMS is available on the Bomen Solar Farm Website.</p> <p>Records of weekly site inspections were sampled during the audit and found to be complete.</p> <p>Evidence of on site management observed during the audit site inspection includes:</p> <ul style="list-style-type: none"> • Water carts • Water/Sedimentation basins • Sediment fences 	Compliant

Conditions of Consent – SSD 8835 Mod 1				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>informed about the operation and environmental performance of the development;</p> <ul style="list-style-type: none"> - receive, handle, respond to, and record complaints; - resolve any disputes that may arise; - respond to any non-compliance; - respond to emergencies; and <p>(e) include:</p> <ul style="list-style-type: none"> - references to any plans approved under the conditions of this consent; and - a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>	<ul style="list-style-type: none"> • Screen planting zones • Fenced areas to protection Aboriginal heritage locations • Site signage and awareness, including site induction processes. • Dedicated access routes across site. 	<ul style="list-style-type: none"> • Screen planting zones • Fenced areas to protection Aboriginal heritage locations • Site signage and awareness, including site induction processes. • Dedicated access routes across site. <p>The EMS is considered to be adequately implemented on site.</p>	
Schedule 4 Condition 2	<p>Environmental Management – Revision of Strategies and Plans</p> <p>The Applicant must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:</p> <ul style="list-style-type: none"> - submission of an incident report under condition 4 of Schedule 4; - submission of an audit report under condition 5 of Schedule 4; or - any modification to the conditions of this consent. 	<p>Traffic Management Plan, Rev 4.</p> <p>NSW DPIE correspondence 18/9/19 approving TMP, Rev 4 and confirming that the revised TMP was prepared in consultation with Council.</p>	<p>The only required revision to date has been the update of the Traffic Management Plan to reflect the approved MOD 1 for alternative heavy vehicle route. Version 4 of the TMP was updated to reflect conditions under SSD 8835 MOD 1. TMP V4 was submitted to and approved by NSW DPIE, sighted letter dated 18/9/19. This letter also confirms that the revised TMP was prepared in consultation with Council.</p>	Compliant.
Schedule 4 Condition 3	<p>Incident Notification</p> <p>The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.</p>	<p>Incident notification to NSW DPIE in September 2019 regarding an overhead 11kv line.</p> <p>Incident notification, incident report and full ICAMS investigation records maintained.</p> <p>SafeWork NSW Improvement Notice 7-357242 issued 15/07/2019.</p> <p>Power lines now clearly identified on site.</p>	<p>One incident notified to NSW DPIE in September 2019 regarding an overhead 11kv line. Incident notification, incident report and full ICAMS investigation records maintained. SafeWork NSW Improvement Notice 7-357242 issued 15/07/2019. Power lines now clearly identified on site.</p>	Compliant

Conditions of Consent – SSD 8835 Mod 1				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 4 Condition 4	<p>Non-Compliance Notification</p> <p>The Department must be notified in writing to compliance@planning.nsw.gov.au within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the noncompliance (if known) and what actions have been done, or will be, undertaken to address the noncompliance.</p>	<p>Discussion with HSE Advisor</p> <p>Discussion with Environmental Planning Consultant</p>	<p>The HSE Advisor and Environmental Planning Consultant reported that there is no known non-compliance(s) to date on the project. Therefore this condition is considered not triggered.</p>	<p>Not triggered.</p>
Schedule 4 Condition 5	<p>Independent Environmental Audit</p> <p>Within 6 months of the commencement of construction, or as directed by the Secretary, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must:</p> <p>(a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) be carried out in consultation with the relevant agencies;</p> <p>(c) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and</p> <p>(d) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.</p> <p>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.</p>	<p>This audit report.</p>	<p>This audit is considered to comply with the requirements of this condition.</p>	<p>Compliant.</p>

Conditions of Consent – SSD 8835 Mod 1				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.			
Schedule 4 Condition 6	<p>Access to Information</p> <p>The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> - the EIS; - the final layout plans for the development; - current statutory approvals for the development; - approved strategies, plans or programs required under the conditions of this consent; - the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; - how complaints about the development can be made; - a complaints register; - any independent environmental audit, and the Applicant's response to the recommendations in any audit; and - any other matter required by the Secretary; and <p>(b) keep this information up to date.</p>	The Bomen Solar Farm website www.bomensolarfarm.com.au was accessed 16/10/2019	<p>The Bomen Solar Farm website www.bomensolarfarm.com.au was accessed 16/10/2019 and found to have available all required documentation with the exception of the current Traffic Management Plan. The Contact Us page can be utilised to lodge an enquiry, provide feedback, or make a complaint.</p> <p>BSF-2019- IEA-NC-02: At the commencement of this audit, the current version of the Traffic Management Plan (Version 4, 06/09/2019) was not available on the Bomen Solar Farm website as required by the NSW DPIE approval letter dated 18/09/2019.</p> <p>Recommendation: Ensure that the current approved version of the Traffic Management Plan is placed on the website as soon as possible.</p> <p>Note: This finding was addressed and closed at the time of the audit. Auditor accessed website 18/11/2019/.</p>	Non-compliant.

Statement of Commitments (SoC) (i.e. revised EIS mitigation measures in Section 11 of the Response to Submissions report dated 15 June 2018).

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
-	<p>General [note: this requirement is not explicitly written into Statement of Commitments list] As per section 7.1 of the EIS, the following management plans will be prepared before commencement of the relevant stage:</p> <ul style="list-style-type: none"> - construction environmental management plan (CEMP) to address the impacts of the construction phase - operational environmental management plan (OEMP) to address the impacts of the operational phase - decommissioning environmental management plan (DEMP) to address the impacts of the decommissioning phase. 	Work Health Safety and Environmental Management Plan for Construction (WHSEMP).	<p>A Construction Environmental Management Plan has been combined with the WHS management in a document titled Work Health Safety and Environmental Management Plan for Construction (WHSEMP).</p> <p>OEMP and DEMP not triggered.</p>	Compliant.
SoC 1.1.1.1	<p>1. Aboriginal heritage- 1.1 Impacts on Aboriginal heritage items 1.1.1. An Aboriginal Cultural Heritage Management Plan would be developed for the proposal. The plan is to be developed in consultation with RAPs, and to the satisfaction of OEH and DP&E. The plan would contain procedures for consultation and involvement of the RAPs in the management of Aboriginal cultural heritage values. The plan would include details of all the mitigation measures detailed in the final AACHIA, as summarised below.</p>	Refer to CoC Schedule 3 Condition 17 relating to the ACHMP.	Refer to CoC Schedule 3 Condition 17 relating to the ACHMP.	Compliant.
SoC 1.1.2	<p>1. Aboriginal heritage- 1.1 Impacts on Aboriginal heritage items 1.1.2 An archaeological salvage program should be undertaken for the Project prior to the commencement of any ground disturbance works within the proposal site. This would include the following:</p> <ul style="list-style-type: none"> — surface collection of all impacted open artefact sites. Collected artefacts to be relocated adjacent to the potential scarred tree (BS-STI-18). 	Refer to CoC Schedule 3 Condition 15 relating to the salvage program.	<p>Refer to CoC Schedule 3 Condition 15 relating to the salvage program.</p> <p>NOTE: The test excavation component has been struck out because it is no longer relevant. The testing was completed in August 2018 on the selected route and the details of the test excavations are described in the Final Aboriginal Archaeological and Cultural Heritage Impact Assessment (AACHIA) dated 13 Aug 2018.</p>	Compliant.

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>— program of archaeological test excavation and potentially open area excavation along the selected transmission line corridor where it is positioned within areas of identified high Aboriginal archaeological sensitivity.</p> <p>— Open area salvage excavation may be required should the archaeological test excavation program identify significant archaeological features.</p> <p>A detailed research design to be developed for the components of the salvage program.</p>			
SoC 1.1.3	<p>1. Aboriginal heritage- 1.1 Impacts on Aboriginal heritage items 1.1.3. An Aboriginal cultural heritage awareness training package should be developed for use throughout the life of the Project. This package should be developed in consultation with RAPs and completed prior to the commencement any ground disturbance works within the proposal site. A register of all persons having completed the training package should be maintained throughout the life of the Project.</p>	<p>Mandatory Site Induction presentation</p> <p>Email correspondence from Mark Saddler of Bundyi Cultural Tours 21/05/2019.</p> <p>Discussion with Community and Stakeholder Engagement Manager.</p> <p>Record of cultural induction provided by Wiradjuri Community Elder and Members that was attended by all Beon and Spark Infrastructure project personnel on site as at 01/09/2019.</p>	<p>Aboriginal cultural heritage awareness training is incorporated into the mandatory site induction undertaken by personnel online. Evidence of consultation with RAPs was sighted during the audit, including email from Mark Saddler of Bundyi Cultural Tours 21/05/2019. The site induction was modified following consultation with RAP.</p> <p>A cultural induction was provided by Wiradjuri Community Elder and Members, that was attended by all Beon and Spark Infrastructure project personnel on site as at 01/09/2019. The induction was an open communication process with the local Wiradjuri Aboriginal Community to discuss cultural implication of the project, impact on the site, and employment potential for the community.</p>	Compliant.
SoC 1.1.4	<p>1. Aboriginal heritage- 1.1 Impacts on Aboriginal heritage items 1.1.4. Provisions regarding the appropriate management action(s) for previously unrecorded Aboriginal archaeological evidence identified within the study area throughout the operational life of the Project should be incorporated into the ACHMP.</p>	Refer to CoC Schedule 3 Condition 17 relating to the ACHMP.	Refer to CoC Schedule 3 Condition 17 relating to the ACHMP.	Compliant
1.1.5	<p>1. Aboriginal heritage- 1.1 Impacts on Aboriginal heritage items 1.1.5. The unanticipated finds protocol will include the following steps if an Aboriginal object is identified or harmed: 1. Not further harm the object;</p>	<p>Refer to CoC Schedule 3 Condition 17 relating to the ACHMP.</p> <p>Protocols for discovery of unanticipated items.</p> <p>Aboriginal Cultural Heritage Management Plan.</p>	<p>Refer to CoC Schedule 3 Condition 17 relating to the ACHMP.</p> <p>Protocols for discovery of unanticipated items are implemented through the Aboriginal Cultural Heritage Management Plan, however it was</p>	Compliant.

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>2. Immediately cease all work at the particular location;</p> <p>3. Secure the area to avoid further harm to the Aboriginal object;</p> <p>4. Notify OEH as soon as practical on 131555, providing any details of the Aboriginal object and its location; and</p> <p>5. Not recommence any work at the particular location unless authorised in writing by OEH.</p>	Discussion with HSE Advisor.	reported that none have been identified at the time of this audit.	
1.2.1	<p>1. Aboriginal heritage-</p> <p>1.2. Salvaged items.</p> <p>1.2.1. All Aboriginal objects salvaged as part of the excavation program should be curated in an appropriate manner, as determined through consultation with RAPs, OEH and DP&E during preparation of the ACHMP. Temporary off-site storage of salvaged objects should be allowed for the purposes of analysis and recording.</p>	Refer to CoC Schedule 3.Conduction 15.	Salvage completed 24/04/2019 by Geordie Oakes of AECOM, including attendance of two Register Aboriginal Parties, being Yalmambira and Warrabinya Cultural Heritage and Assessment Group.	Compliant.
1.2.2	<p>1. Aboriginal heritage-</p> <p>1.2. Salvaged items.</p> <p>1.2.2. Aboriginal Site Impact Recording (ASIR) forms for all salvaged sites should be submitted to OEH at the completion of the salvage program.</p>	Refer to CoC Schedule 3.Conduction 15.	<p>Aboriginal Site Impact Recording (ASIR) Forms are maintained for AHIMS Site ID: 56-1-0109-1; 56-1-0437-1; 56-1-0536-1; 56-1-0543-1; 56-1-0550-1; 56-1-0551-1; 56-1-0552-1; 56-1-0553-1; 56-1-0555-1; 56-1-0557-1 and 56-1-0590-1.</p> <p>ASIR forms submitted to OEH on 14/5/19.</p> <p>The salvaged artefacts were relocated to the site of the Aboriginal scarred tree on the northern boundary as per the ACHMP, as per photographic record in ASIR forms.</p>	Compliant.
1.3.1	<p>1. Aboriginal heritage-</p> <p>1.3 Protection of items not within impact area</p> <p>1.3.1 All Aboriginal sites not impacted by the Project but within the proposal site should be conserved in-situ. The potential scarred tree site should be protected via permanent stock-proof fencing and appropriate associated signage. Site fencing is to be erected after consultation with a qualified archaeologist and RAP representatives.</p>	<p>Aboriginal Cultural Heritage Management Plan.</p> <p>Site inspection confirmed implemented mitigation measures including:</p> <ul style="list-style-type: none"> • permanent fencing around the scarred tree • temporary fencing around artefact scatter sites in Lot 22 DP1085826. <p>Discussion with HSE Advisor</p>	<p>Consultation undertaken through submission and review of ACHMP. The audit site inspection confirmed implemented mitigation measures including permanent fencing around the scarred tree and temporary fencing around artefact scatters in Lot 22 DP1085826. It was reported that there has been no unidentified finds of Aboriginal heritage items at the time of this audit.</p>	Compliant.

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Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Discussion with Community and Stakeholder Engagement Manager.		
1.3.2	<p>1. Aboriginal heritage-</p> <p>1.3 Protection of items not within impact area</p> <p>1.3.2. All relevant staff and contractors are to be made aware of the nature and locations of all sites as well as Renew Estate’s legal obligations with respect to them. Protected sites will need to be identified on all relevant site plans. Details for the care of protected sites should be incorporated into the ACHMP.</p>	<p>WHSEMP (section 16.3) and layout plans.</p> <p>ACHMP.</p> <p>Site Induction documentation.</p>	<p>The nature and location of sites are identified in the site induction, WHSEMP (section 16.3) and layout plans. The ACHMP appears implemented on site as evidence through site inspection observation including:</p> <ul style="list-style-type: none"> • Permanent fencing around the scarred tree; and • Temporary fencing around artefact scatter sites in Lot 22 DP1085826 	Compliant.
1.4.1	<p>1. Aboriginal heritage-</p> <p>1.4 Identification of potential human remains</p> <p>1.4.1. In the event that potential human skeletal remains are identified within the study area at any point during the life of the Project, the following standard procedure should be followed.</p> <p>1. All work in the vicinity of the remains should cease immediately;</p> <p>2. The location should be cordoned off and the NSW Police notified.</p> <p>3. If the Police suspect the remains are Aboriginal, they will contact the Office of Environment and Heritage and arrange for a forensic anthropologist or archaeological expert to examine the site. Subsequent management actions will be dependent on the findings of the inspection undertaken under Point 3.</p> <p>— If the remains are identified as modern and human, the area will become a crime scene under the jurisdiction of the NSW Police;</p> <p>— If the remains are identified as pre-contact or historic Aboriginal, OEH and all RAPs are to be formally notified in writing. Where impacts to exposed Aboriginal skeletal remains cannot be avoided an appropriate management mitigation strategy will be developed in consultation with OEH</p>	<p>Protocols for discovery of unanticipated items and/or potential human remains documented within the Aboriginal Cultural Heritage Management Plan</p> <p>Discussion with HSE Advisor</p> <p>Discussion with Community and Stakeholder Engagement Manager.</p>	<p>Protocols for discovery of unanticipated items and/or potential human remains are documented within the Aboriginal Cultural Heritage Management Plan, however none have been identified within the audit period.</p>	Compliant.

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	and RAPs; — If the remains are identified as historic non-Aboriginal, the site is to be secured and the NSW Heritage Division contacted; and If the remains are identified as non-human, work can recommence immediately.			
1.5.1	<p>1. Aboriginal heritage-</p> <p>1.5 Identification of previous unknown item</p> <p>1.5.1. AHIMS sites cards will be completed and submitted to OEH for all newly recorded sites within the study area at the completion of the assessment.</p> <p>In the event that a previously unidentified Aboriginal site is discovered within the study area at any point during the operational life of the Project, an AHIMS site card for that site should be submitted to OEH as promptly as possible. Timing protocols for the submission of AHIMS site cards should be included in the ACHMP for the Project.</p>	<p>Refer to CoC Schedule 3. Conduction 15.</p> <p>Aboriginal Site Impact Recording (ASIR) Forms for AHIMS Site ID: 56-1-0109-1; 56-1-0437-1; 56-1-0536-1; 56-1-0543-1; 56-1-0550-1; 56-1-0551-1; 56-1-0552-1; 56-1-0553-1; 56-1-0555-1; 56-1-0557-1 and 56-1-0590-1. ASIR forms submitted to OEH on 14/5/19.</p> <p>Discussion with HSE Advisor</p> <p>Discussion with Community and Stakeholder Engagement Manager.</p>	<p>Refer to CoC Schedule 3. Conduction 15.</p> <p>Aboriginal Site Impact Recording (ASIR) Forms are maintained and have been submitted to OEH.</p> <p>It was reported that no new sites have been discovered during construction works to the date of this audit.</p>	Compliant.
1.6.1	<p>1. Aboriginal heritage-</p> <p>1.6 Aboriginal Site Database [a commitment made in the Final AACHIA submitted after the RTS report]</p> <p>1.6.1. A comprehensive Aboriginal Site Database for the study area and its immediate environs should be established upon commencement of the Project. Renew Estate would be responsible for the creation and maintenance of this database which will, at a minimum, contain the name, type, size (where applicable), MGA coordinates and status of all Aboriginal sites within and directly adjacent to the study area. The database should be regularly updated throughout the operational life of Project. Printed site lists and maps should be made available to RAPs upon request.</p>	<p>Aboriginal Sites Database, updated on 14 May 2019 upon completion of salvage operations.</p>	<p>The Aboriginal Sites Database was updated on 14 May 2019 upon completion of salvage operations.</p>	Compliant.
2.1.1	<p>2. Biodiversity</p> <p>2.1 Loss of native vegetation and fauna habitat</p> <p>2.1.1. A flora and fauna management plan will be prepared as part of the CEMP to minimise the</p>	<p>Flora and fauna management plan as documented within Section 16.9 of the WHSEMP.</p> <p>NSW DPE correspondence 24/05/2019 approving the</p>	<p>The flora and fauna management plan is documented within Section 16.9 of the WHSEMP, which addresses the requirements of this</p>	Compliant.

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>ecological impacts of the proposal, which will include:</p> <ul style="list-style-type: none"> • Plans at an appropriate scale for the construction site and adjoining area showing biodiversity features as mapped in Figure 3.1 of the Biodiversity Assessment, including vegetation protected under the Wagga Wagga DCP. • plans at an appropriate scale showing areas to be cleared and areas to be retained within the proposal site, and exclusion zones • a landscaping plan for the proposal site (refer to Landscape and visual measures) 	current Landscaping Plan (Version 4, 03/05/2019).	<p>condition.</p> <p>NSW DPE approved the current Landscaping Plan prior to commencement of construction.</p>	
2.1.2	<p>2. Biodiversity 2.1 Loss of native vegetation and fauna habitat 2.1.2. Exclusion zones must include at minimum:</p> <ul style="list-style-type: none"> • native vegetation within areas of the proposal site that are outside the Wagga Wagga Biodiversity Certification Area (refer Figure 3 of Response to submissions report) • all land outside the proposal site (not including road corridors to be used for transport) which will capture the following protected areas: • areas of vegetation identified for conservation under the Wagga Wagga Development Control Plan 2010 • vegetation protected by covenants 	<p>Flora and fauna management plan as documented within Section 16.9 of the WHSEMP.</p> <p>Exclusion zones are 'No Go Zones', as identified in Section 16.9 Figure 6. Section 16.9 Figure 6.</p>	The flora and fauna management plan is documented within Section 16.9 of the WHSEMP, which addresses the requirements of this condition. Exclusion zones are 'No Go Zones', as identified in Section 16.9 Figure 6.	Compliant.
2.1.3	<p>2. Biodiversity 2.1 Loss of native vegetation and fauna habitat 2.1.3. Temporary fencing will be erected to prevent encroachment and clearing of vegetation within exclusion zones.</p>	Site inspection.	Confirmed during site inspection. The site is fully fenced by permanent fencing (mixture of security and farm fencing), including exclusion zones. Access to the APA easement is restricted by only allowing access through designated vehicle crossings which are signed, bunted and formed with earth bunds.	Compliant.
2.1.4	<p>2. Biodiversity 2.1 Loss of native vegetation and fauna habitat 2.1.4. Wildlife Information, Rescue and Education Service (WIRES) is to be made aware of construction commencing starting in advance.</p>	WIRES correspondence 13/05/2019 confirming knowledge of Beon construction work at Bomen Solar Farm.	WIRES confirmed that were aware to construction work at Bomen Solar Farm, approximately three weeks prior to commencement of construction.	Compliant.

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2.1.5	<p>2. Biodiversity</p> <p>2.1 Loss of native vegetation and fauna habitat</p> <p>2.1.5. Pre-clearing surveys will be undertaken to identify exclusion zones and specific habitat features to be retained (including trees identified for protection).</p>	<p>Tree survey completed 08/05/2019 by Will Stone of WIRSOL Energy Pty Ltd.</p> <p>EIS</p> <p>Discussion with Environmental Planning Consultant.</p> <p>Site inspection, including vegetative screening zones.</p>	<p>Tree survey completed 08/05/2019 by Will Stone of WIRSOL Energy Pty Ltd. One tree marked as 'retain' was incorrectly removed by the arborist within the Southern Solar Farm Area. The tree was located within the area now set aside for vegetative screening. This tree was identified to be removed within the EIS and thus is approved to be removed under the Development Consent.</p> <p>The Environmental Planning Consultant reported 20 seedlings were planted within the vicinity of the removed tree. No further recommendations are considered necessary, as all tree clearing has been completed on the project.</p>	Compliant
2.1.6	<p>2. Biodiversity</p> <p>2.1 Loss of native vegetation and fauna habitat</p> <p>2.1.6. Staff will be inducted and informed of the limits of vegetation clearing and the areas of vegetation to be retained.</p>	<p>No go zones and the final vegetation removal plans (including No Go Zones) included the Section 16.9 of the WHSEMP.</p> <p>Discussion with Community and Stakeholder Engagement Manager.</p> <p>Site induction provided to the auditor upon arrival at site.</p>	<p>No go zones and the final vegetation removal plans (including No Go Zones) are included the Section 16.9 of the WHSEMP. This information is also communicated via induction and display of environmental plans on site.</p>	Compliant.
2.1.7	<p>2. Biodiversity</p> <p>2.1 Loss of native vegetation and fauna habitat</p> <p>2.1.7. Where practicable, vegetation removal will occur between January and August, outside the main fauna breeding season, to avoid potential breeding disturbance to fauna.</p>	<p>Discussion with Environmental Planning Consultant.</p> <p>Tree survey completed 08/05/2019 by Will Stone of WIRSOL Energy Pty Ltd.</p>	<p>It was reported that vegetation removal was completed in July 2019 (outside breeding season).</p>	Confirm.
2.1.8	<p>2. Biodiversity</p> <p>2.1 Loss of native vegetation and fauna habitat</p> <p>2.1.2. If tree removal is required during the breeding season, an ecologist will investigate if any of the hollows are being used for breeding by threatened species such as the Superb Parrot during pre-clearing surveys. Controls to prevent breeding disruption will be implemented as necessary.</p>	<p>Discussion with Environmental Planning Consultant.</p>	<p>Not triggered- Vegetation removal completed in July 2019 (outside breeding season).</p>	Not triggered.

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2.2.1	2. Biodiversity 2.2 Spread of weeds 2.2.1. Priority weed control measures will be implemented as part of the CEMP to prevent their spread in the study area.	Section 16.8 of the WHSEMP Site inspection.	Weed management mitigation measures are outlined within Section 16.8 of the WHSEMP, and controls are generally implemented on site. Evidence of previous weed spraying was observed during the audit site inspection.	Compliant
2.2.2	2. Biodiversity 2.2 Spread of weeds 2.2.2. Declared priority weeds will be managed according to requirements of the NSW Biosecurity Act 2015.	Discussion with HSE Advisor.	HSE Advisor reported that Silverleaf Nightshade has not been observed on site at the time of the audit, hence the requirements of this condition have not been triggered at the time of the audit.	Not triggered.
2.2.3	2. Biodiversity 2.2 Spread of weeds 2.2.3. Soil material and stripped groundcover vegetation with the potential to contain Silverleaf Nightshade will not be removed from the proposal site.	Discussion with HSE Advisor	It was reported that no soil material has been removed from the site.	Compliant
2.2.4	2. Biodiversity 2.2 Spread of weeds 2.2.4. Soil disturbance will be avoided as much as possible to minimise the potential for spreading weeds.	Assessed during site inspection.	Soil disturbance appears reasonably well managed and minimised where practicable. Robust regrowth within construction solar panel areas is evident.	Compliant
2.2.5	2. Biodiversity 2.2 Spread of weeds 2.2.5. Inspections and monitoring of weed infestations with prompt response to weed spread (any weed control would be in adherence to the Pesticides Act 1999.	Samples of completed Weekly environmental inspections checklists. Discussion with Environmental Planning Consultant Discussion with HSE Advisor. Initial planting – 26/08. Spraying 24/05 – Photo evidence of post spray inspection. Post planting monitoring register including record of photos, videos and rain. New Product Substance inspection Checklist.	Weed infestations are monitored in the weekly environmental inspections checklists. It was reported that initial planting occurred 26/08/2019. Weed spraying was undertaken 24/05/2019. A post planting monitoring register is maintained and includes record of photos, videos and rainfall totals. It was reported that an Agronomist has been engaged and that a 3-monthly report is being prepared for submission to DPIE.	Compliant
2.2.6	2. Biodiversity 2.2 Spread of weeds	VENM classification report from Aitken Rowe	Excavated material imported on site for establishment of all weather access road is VENM	Compliant

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	2.2.6. Materials imported from quarries are to be certified as weed free.	Environmental Consultancy, dated 13/11/2019.	material from Rocky Point Quarry, Tooyal Road Euberta. Sighted VENM classification report from Aitken Rowe Environmental Consultancy, dated 13/11/2019.	
2.3.1	2. Biodiversity 2.3 Disturbance of aquatic habitat 2.3.1. Disturbance of aquatic habitat in dams will be minimised if possible.	EIS. Discussion with Environmental Planning Consultant. Soil and Water Management plan Site inspection.	EIS states all dams would be decommissioned and the EIS was approved. Soil water management plan recommends widening of dam for sediment and erosion management. Dam is currently being widened and renewed, with aquatic habitat disturbed.	Compliant
2.4.1	2. Biodiversity 2.4 Loss of hollows 2.4.1. Felled limbs with hollows will be placed in woodland or plantings along the boundary of the development area. The woody debris retained will be spread in a fashion that replicates the natural occurrence of woody debris in the environment and will not be stacked.	Site inspection.	Confirmed through site inspection. Felled hollowed limbs have been placed in the perimeter landscaping areas.	Compliant.
2.5.1	2. Biodiversity 2.5 Impacts to fauna 2.5.1. Fauna handling during vegetation removal will be undertaken by a qualified ecologist or Wildlife Information, Rescue and Education Service (WIRES) representative.	Discussion with HSE advisor.	HSE advisor reported that a snake handler has attended site following snake sightings, however no other fauna handling was required during vegetation removal.	Compliant
2.6.1	2. Biodiversity 2.6 Water quality, chemical and fuel impacts on flora and fauna 2.6.1. Any herbicides used for weed control will be applied to the manufacturer's specifications and as outlined in the manufacturer's Material Safety Data Sheet.	Discussion with Environmental Planning Consultant.	It was reported that weed spraying occurred as part of early works. No issues or complaints reported or recorded.	Compliant.
2.7.1	2. Biodiversity 2.7 Pathogen spread and establishment 2.7.1. Vehicle wash down facilities will be provided should evidence of pathogens or fungus such as Phytophthora or Chytrid be found.	Discussion with HSE advisor	It was reported that no pathogens or fungus such as Phytophthora or Chytrid have been found on site at the time of the audit. It was reported that all vehicles, including plant, are visually inspected prior to arrival.	Compliant.

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2.8.1	<p>2. Biodiversity 2.8 Sedimentation [a commitment made in the BDAR submitted after the RTS report] 2.8.1. A site specific erosion and sediment control plan will be prepared as part of the CEMP. All erosion and sediment control measures shall be designed, implemented and maintained in accordance with relevant sections of 'Managing Urban Stormwater: Soil and Construction Volume 1' (Landcom 2004) ('the Blue Book) (particularly section 2.2) and 'Managing Urban Stormwater: Soil and Construction Volume 2A – Installation of Services' (DECC 2008). The ESCP will include stockpiles, stormwater runoff, trees, site boundaries, site access and storage areas.</p>	<p>Erosion and sediment control plan (ESCP) Discussion with HSE Advisor Discussion with Environmental Planning Consultant.</p>	<p>Soil erosion is managed on site in accordance with the erosion and sediment control plan (ESCP), including sediment fences and maintaining existing vegetation were possible. Coir logs described in the ESCP have not been implemented on site due to the dry weather experienced during construction and the practicalities of maintaining these controls with the number of vehicle movements on site. At the time of the audit site inspection the HSE team was actively monitoring weather forecasts and proactively preparing the site for an imminent wet weather event.</p> <p>Re-seeding earthwork zones to occur upon completion of panel installation.</p>	Compliant.
2.8.2	<p>2. Biodiversity 2.8 Sedimentation [a commitment made in the BDAR submitted after the RTS report] 2.8.2. Areas disturbed during the works will be rehabilitated, including stabilising disturbed soils to resist erosion and weed invasion</p>	<p>Site inspection. Discussion with HSE advisor</p>	<p>Re-seeding earthwork zones to occur upon completion of panel installation. At the time of this audit, robust regrowth was evident within constructed solar panel areas.</p> <p>It was reported that a Groundcover Management Plan currently being drafted.</p>	Compliant.
2.8.3	<p>2. Biodiversity 2.8 Sedimentation [a commitment made in the BDAR submitted after the RTS report] 2.8.3. Stabilisation activities will be carried out progressively to limit the time disturbed areas are exposed to erosion processes</p>	<p>As above.</p>	<p>As above.</p>	Compliant.
2.8.4	<p>2. Biodiversity 2.8 Sedimentation [a commitment made in the BDAR submitted after the RTS report] 2.8.4. Activities with a risk of soil erosion such as earthworks will not be undertaken immediately before or during high rainfall or wind events.</p>	<p>Erosion and sediment control plan (ESCP). Discussion with HSE Advisor Discussion with Environmental Planning Consultant.</p>	<p>Soil erosion is managed on site in accordance with the erosion and sediment control plan (ESCP), including sediment fences and maintaining existing vegetation were possible. At the time of the audit site inspection the HSE team was actively monitoring weather forecasts and proactively preparing the site for an imminent wet weather event.</p>	Compliant.
3.1.1	<p>3. Landscape and visual 3.1 Visual impacts of solar farm</p>	<p>NSW DPE correspondence 24/05/2019 approving the</p>	<p>NSW DPE approved the current Landscaping Plan prior to commencement of construction. The</p>	Compliant.

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	3.1.1. A landscape plan (see draft in Figure 3.16 of the EIS) will be further developed to outline the location and type of plantings to assist in minimising impacts on views of the proposal site from nearby properties. The landscape plan will be prepared in consultation with all impacted nearby property owners. The plan will outline the species to be used on site and will use species from native vegetation communities found in the local area. All selected species will be determined in consultation with Riverina Local Land Services, the Rural Fire Service and property owners (where required).	current Landscaping Plan (Version 4, 03/05/2019).	approval letter notes that Wagga Wagga City Council and relevant surrounding landowners were consulted on the Landscaping Plan.	
3.1.2	<p>3. Landscape and visual</p> <p>3.1 Visual impacts of solar farm</p> <p>3.1.1. A review of the landscaping plan will be carried out within two months of operation commencing. This will include consultation with nearby landowners to discuss requests for further screening.</p>	Discussion with Environmental Planning Consultant NSW DPE correspondence 24/05/2019 approving the current Landscaping Plan (Version 4, 03/05/2019).	It was reported that 'this requirement was in response to submissions report but is no longer relevant because it was written prior to the project being appealed by nearby owners on the basis of landscaping. Now that there is a Deed of Settlement committing the project owner to additional landscaping, further consultation within two months of operation to discuss further screening is not appropriate and should not be undertaken. This was discussed with DPE and they accepted this and approved the Landscape Plan without this commitment'. NSW DPE has approved the current Landscaping Plan.	No triggered
3.2.1	<p>3. Landscape and visual</p> <p>3.2 Visual impacts of structures (including glare)</p> <p>3.2.1. The materials and colour of on-site infrastructure will, where practical, be non-reflective and be of a colour that will blend with the landscape.</p>	Nil.	Not yet triggered. O&M building designs are being drafted. Construction has not commenced on this yet.	No triggered
3.2.2	<p>3. Landscape and visual</p> <p>3.2 Visual impacts of structures (including glare)</p> <p>3.2.2. Security fencing posts and wire will be non-reflective.</p>	Site inspection.	Checked during site inspection. Fencing appears to be galvanised steel, which is not reflective.	Compliant
3.3.1	<p>3. Landscape and visual</p> <p>3.3 Visual impacts during construction</p>	Site inspection.	Checked during site inspection. No items of plant, equipment, waste or excess material was observed	Compliant

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	3.3.1. All construction plant, equipment, waste and excess materials will be contained within the designated boundaries of the work site and shall be removed from the site following the completion of construction.	Sample of completed Weekly Environmental Site Inspection Checklists.	outside the boundaries of the work site. This is monitored through the weekly environmental site inspection, a sample of which was reviewed during the audit.	
3.3.2	3. Landscape and visual 3.3 Visual impacts during construction 3.3.2. Work sites shall be kept tidy at all times.	Site inspection. Sample of completed Weekly Environmental Site Inspection Checklists.	Checked during site inspection. This is monitored through the weekly environmental site inspection, a sample of which was reviewed during the audit. No issues identified by the auditor.	Compliant
4.1.1	4. Hazards and risk 4.1 Emergency response 4.4.1. A Fire Management and Emergency Response Plan will be developed and implemented addressing the below items: <ul style="list-style-type: none"> • Foreseeable on-site and off-site fire events and other emergency incidents (e.g fires involving solar panel arrays, bushfires in the immediate vicinity or potential hazmat incidents). • Appropriate risk control measures that would need to be implemented in order to safely mitigate potentials risks to the health and safety of firefighters and other first responders (including electrical hazards). Such measures would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic system (either in its entirety or partially, as determined by the risk assessment). • Other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site. • Two copies of the Fire Management and Emergency Response Plan will be stored in a prominent 'Emergency Information Cabinet' that shall be in a position directly adjacent to the entry of the solar farm control building. 	Drill – Site evacuation report, 08/08/2019 for emergency fire mock drill. Fire fighting equipment register. 4 x water carts also a trailer mounted water tank and pump. Fire extinguishers on site and on all plant. Section 6 of the Fire and Emergency Management Plan addresses fire risks.	The auditor is not a fire safety expert. Compliance was assessed on implementation of the Fire and Emergency Management Plan including completion of evacuation drills and the availability of fire fighting equipment.	Compliant

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	<ul style="list-style-type: none"> Once constructed and prior to operation, the operator of the facility will contact the relevant local emergency management committee (LEMC). 			
4.2.1	4. Hazards and risk 4.2 Vehicle interactions 4.2.1. Prepare a construction traffic management plan including standard traffic rules and signage	Traffic Management Plan (TMP) Version 4 NSW DPIE correspondence 18/9/19 approving the TEMP and confirming that it was prepared in consultation with Council.	A Traffic Management Plan (TMP) has been prepared, updated and implemented on site. Version 4 of the TMP was updated to reflect conditions under SSD 8835 MOD 1. TMP V4 was submitted to and approved by NSW DPIE.	Compliant
4.2.2	4. Hazards and risk 4.2 Vehicle interactions 4.2.2. Implement site speed limits	Site inspection. Site signage.	Checked during site inspection. Site limit of 20km/h is implemented on internal access roads and 10km/hr in shared areas.	Compliant.
4.2.3	4. Hazards and risk 4.2 Vehicle interactions 4.2.3. Provide designated pedestrian areas	Site inspection.	Checked during site inspection. No issues identified by the auditor.	Compliant
4.2.4	4. Hazards and risk 4.2 Vehicle interactions 4.2.4. Ensure driver competency	Drivers Code of Conduct, part of the TMP. Verified a sample of operator competencies and induction records including: <ul style="list-style-type: none"> - B.McCarthy LE, LL, LS WC Haul truck. - L.Burns CN Non-slewing mobile crane. Discussion with HSE Advisor.	Driver competency is embedded into the Drivers Code of Conduct, part of the TMP. A sample of operator competencies and induction records were checked and found to be consistent with competency requirements. It was reported that traffic management and code of conduct is included in the site induction.	Compliant.
4.3.1	4. Hazards and risk 4.3 Fire 4.3.1. The following fire management measures are to be incorporated into the Fire Management and Emergency Response Plan in consultation with the NSW RFS Riverina Fire Control Centre: <ul style="list-style-type: none"> • 24 hour emergency contact details including alternative contact • site infrastructure plan • fire fighting water supply plan • site access and internal road plan • construction of Asset Protection Zones (APZ) and their continued maintenance • location of hazards (Physical, Chemical Electrical) that will affect fire fighting operations; 	Fire and Emergency Management Plan (FEMP).	A Fire and Emergency Management Plan (FEMP) has been prepared for the construction phase to manage risk during construction. This was prepared in consultation with NSW Rural Fire Service and Fire & Rescue NSW.	Compliant.

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	<ul style="list-style-type: none"> such additional matters as required by the NSW RFS District Office (FMP review and updates). management of activities with a risk of fire ignition management of fuel loads on site storage and maintenance of firefighting equipment operational procedures relating to mitigation and suppression of bush fire relevant to the operation of a solar farm 			
4.3.2	<p>4. Hazards and risk</p> <p>4.3 Fire</p> <p>4.3.2. The entire solar array development footprint to be managed as an Asset Protection Zone as outlined within section 4.1.3 and Appendix 5 of 'Planning for Bushfire Protection 2006' and the NSW Rural Fire Service's document 'Standards for Asset Protection Zones'.</p>	<p>Section 6.2 of the FEMP</p> <p>Site inspection.</p>	<p>The management of the Asset Protection Zone is outlined by Section 6.2 of the FEMP and was confirmed as being maintained during site inspection.</p>	Compliant
4.3.3	<p>4. Hazards and risk</p> <p>4.3 Fire</p> <p>4.3.3. A 20,000 litre water supply (tank) fitted with a 65mm storz fitting shall be located adjoining the internal property access road within the required APZ.</p>	<p>Water tank draft design locations shown on page 53 and 55 of the FEMP.</p> <p>Discussion with Environmental Planning Consultant.</p>	<p>It was reported that this is considered to be an operational requirement. Water tank draft design locations are shown on page 53 and 55 of the Fire and Emergency Management Plan and are to be installed during construction for use during the operational phase of the project.</p>	Not triggered
4.3.4	<p>4. Hazards and risk</p> <p>4.3 Fire</p> <p>4.3.4. To allow for emergency service personnel to undertake property protection activities, a 10 metre wide defensible space (APZ) that permits a minimum 4 metre wide, unobstructed vehicle access is to be provided around the perimeter of the solar array and associated infrastructure.</p>	<p>Final layout plans (refer CoC Schedule 2 Condition 5).</p> <p>Site inspection.</p>	<p>The auditor undertook a site inspection of the project boundary. The defensible space shown in final layout plans (refer CoC Schedule 2 Condition 5) appears to be available and maintained.</p>	Compliant
4.3.5	<p>4. Hazards and risk</p> <p>4.3 Fire</p> <p>4.3.5. Design buildings and structures to appropriate codes and standards</p>	<p>The following Construction Certificates have been obtained from David Whitwell – Building Certification and BCA Advisor:</p> <ul style="list-style-type: none"> Construction certificate for fencing, 18/07/2019 	<p>Considered to be addressed through receipt of construction certificates obtained from David Whitwell – Building Certification and BCA Advisor.</p> <p>Note: Construction certificate has not yet been sought for the Operation and Maintenance building, for which construction has not yet</p>	Compliant

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		<ul style="list-style-type: none"> Construction certificate obtained for on-site substation and associated infrastructure works, dated 25/08/2019. Construction certificate obtained for bored piers for Power Station Units, dated 09/09/2019. Construction certificate for Stage 2 piling, array and tracking system works, dated 30/07/2019. 	commenced.	
4.3.6	4. Hazards and risk 4.3 Fire 4.3.6. Manage fuel for vehicles and machinery on site to appropriate standards	Site inspection. Samples of completed weekly environmental site inspections.	Checked during site inspection. This is monitored through the weekly environmental site inspection, a sample of which was reviewed during the audit. No issues identified by the auditor.	Compliant
4.4.1	4. Hazards and risk 4.4 Loss of containment and contact with chemicals, including dangerous goods 4.4.1. Store chemicals in line with appropriate standards	Site inspection.	All chemicals are stored in a container within internal bund, which was observed during site inspection. Skill kits were also available within the site compound.	Compliant
4.4.2	4. Hazards and risk 4.4 Loss of containment and contact with chemicals, including dangerous goods 4.4.2. Implement a regular inspection and maintenance regime for chemical storage areas	Site inspection. Samples of completed weekly environmental site inspections.	Checked during site inspection. Chemical storage container provided. Spill kits available. Portable bunds used (e.g. at refuel point). This is monitored through the weekly environmental site inspection, a sample of which was reviewed during the audit. No issues identified by the auditor.	Compliant
4.4.3	4. Hazards and risk 4.4 Loss of containment and contact with chemicals, including dangerous goods 4.4.3. Implement standard handling procedures	Handling and Storage Procedure - Section 16.4 of the WHSEMP.	A Handling and Storage Procedure is included within the WHSEMP. No issues observed on site.	Compliant
4.5.1	4. Hazards and risk 4.5 Contact with chemicals, including dangerous goods 4.5.1. Provide a Safe Work Method Statement detailing methods for handling chemicals	Discussion with HSE Advisor. Chemical risk assessments observed within the Site Office.	HSE Advisor reported a SDS database is maintained and chemical risk assessments were observed within the Site Office.	Compliant
4.5.2	4. Hazards and risk	Site inspection.	Checked during site inspection. This is monitored	Compliant

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	4.5 Contact with chemicals, including dangerous goods 4.5.2. Provide spill kits to be used in the event of an incident involving release of chemicals	Samples of completed weekly environmental site inspections.	through the weekly environmental site inspection, a sample of which was reviewed during the audit. No issues identified by the auditor. Sighted spill kit provided at site compound near refuelling point.	
4.5.3	4. Hazards and risk 4.5 Contact with chemicals, including dangerous goods 4.5.3. Implement standard transfer and handling procedures	Site inspection. Samples of completed weekly environmental site inspections.	Checked during site inspection. This is monitored through the weekly environmental site inspection, a sample of which was reviewed during the audit. No issues identified by the auditor. Sighted spill kit provided at site compound near refuelling point.	Compliant
4.5.4	4. Hazards and risk 4.5 Contact with chemicals, including dangerous goods 4.5.4. Provide personal protective equipment (PPE) to all staff	Site inspection.	PPE is provided and was observed to be worn by all contractors on site.	Compliant.
4.6.1.	4. Hazards and risk 4.6 Fall from heights 4.6.1 Implement working at heights procedures	Site inspection. Section 14 of WHSMP.	No work at heights observed during audit site inspection. Section 14 of the WHSEMP outlines requirements for working at heights, including a working at heights checklist. A review of the adequacy of work at heights procedures was not completed.	Compliant.
4.6.2	4. Hazards and risk 4.6 Fall from heights 4.6.2 Ensure all staff working at heights have completed the necessary training	Site inspection.	No work at heights activities being undertaken at time of the audit.	Not triggered.
4.6.3	4. Hazards and risk 4.6 Fall from heights 4.6.3 Use fall prevention equipment	WHSEMP references a Standard Work Practice for Fall Prevention. Site inspection.	WHSEMP references a Standard Work Practice for Fall Prevention. No work at heights activities being undertaken at time of the audit.	Not triggered.
4.7.1	4. Hazards and risk 4.7 Contact with electricity 4.7.1. Implement isolation procedures	Toolbox talk – Sighted commissioning general induction overview for site construction workers. Green exclusion bunting observed on site. Presentation by Commissioning Supervisor at pre-start.	This was assessed based on commissioning works that had recently started on site. A toolbox talk was completed by the by Commissioning Supervisor to provide workers with a general overview of commissioning works. Green exclusion bunting observed on site, which represents a 'Commissioning No Go Zone'. The auditor did not assess the implementation of	Compliant.

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			isolation procedures.	
4.7.2	4. Hazards and risk 4.7 Contact with electricity 4.7.2 Install fit for purpose electrical systems	Discussion with HSE Advisor.	All construction activities are non-live. A commissioning process is established and being implemented on site. The auditor did not review installation of electrical systems.	Compliant.
4.7.3	4. Hazards and risk 4.7 Contact with electricity 4.7.3. Follow underground utility identification protocols, including Dial Before You Dig	Discussion with HSE Advisor. Hazard controls outlined in Section 14 of WHSEMP.	Discussion with HSE Advisor reported that Dial before you dig processes has been completed for the site. Hazard controls outlined in Section 14 of WHSEMP.	Compliant.
4.7.4	4. Hazards and risk 4.7 Contact with electricity 4.7.4. Flash protective PPE	Discussion with HSE Advisor.	Did not verify on site. No live work observed. Specialised PPE is determined by risk assessments and SWMS.	Compliant.
4.8.1	4. Hazards and risk 4.8 Mechanical or chemical damage of lithium-ion battery assemblies 4.8.1. Ensure batteries are Quality Assured to AS 9001	Discussion with Environmental Planning Consultant.	Not triggered, no battery being constructed at this stage.	Not triggered.
4.8.2	4. Hazards and risk 4.8 Mechanical or chemical damage of lithium-ion battery assemblies 4.8.2. Install bollards/protective barriers around key battery areas	Discussion with Environmental Planning Consultant.	Not triggered, no battery being constructed at this stage.	Not triggered.
4.8.3	4. Hazards and risk 4.8 Mechanical or chemical damage of lithium-ion battery assemblies 4.8.3. Batteries will be stored as per suppliers specifications	Discussion with Environmental Planning Consultant.	Not triggered, no battery being constructed at this stage.	Not triggered.
4.8.4	4. Hazards and risk 4.8 Mechanical or chemical damage of lithium-ion battery assemblies 4.8.4. The battery system will be containerised and banded	Discussion with Environmental Planning Consultant.	Not triggered, no battery being constructed at this stage.	Not triggered.
4.8.5	4. Hazards and risk 4.8 Mechanical or chemical damage	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.

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	of lithium-ion battery assemblies 4.8.5. Implement a regular inspection and maintenance regime for the battery assemblies			
4.9.1	4. Hazards and risk 4.9 Overheating of lithium batteries 4.9.1. Provide ventilation systems in cabinets	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.9.2	4. Hazards and risk 4.9 Overheating of lithium batteries 4.9.2. Batteries will be stored as per suppliers specifications	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.9.3	4. Hazards and risk 4.9 Overheating of lithium batteries 4.9.3. Fusible separators to isolate cells	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.9.4	4. Hazards and risk 4.9 Overheating of lithium batteries 4.9.4. Provide insulation around batteries	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.9.5	4. Hazards and risk 4.9 Overheating of lithium batteries 4.9.5. Battery Management System (BMS) to properly manage the batteries state of charge	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.9.6	4. Hazards and risk 4.9 Overheating of lithium batteries 4.9.6. Integrated circuit control systems, to avoid over heating of cells	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.9.7	4. Hazards and risk 4.9 Overheating of lithium batteries 4.9.7. Battery balancing devices, to avoid deterioration and individual cell over/under voltage	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.9.8	4. Hazards and risk 4.9 Overheating of lithium batteries 4.9.8. Factory cell matching	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.10.1	4. Hazards and risk 4.10 APA high pressure gas pipeline 4.10.1. Pipeline easement delineated on site as a no go zone	Site inspection.	Confirmed during site inspection. The site is fully fenced by permanent fencing (mixture of security and farm fencing), including exclusion zones. Access to the APA easement is restricted by only allowing access through designated vehicle crossings which are signed, bunted and formed with earth bunds.	Compliant

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4.10.2	4. Hazards and risk 4.10 APA high pressure gas pipeline 4.10.1. Positive location during detailed design	Discussion with HSE Advisor and Construction Manager.	The HSE Advisor and Construction Manager reported that this was completed.	Compliant
4.10.3	4. Hazards and risk 4.10 APA high pressure gas pipeline 4.10.1. Electrical studies in accordance with AS 4853 and AS 2832	Pipeline Earthing Hazard Assessment Report, Safearth Consulting, Rev 1, May 2019. Pipeline Hazard Assessment Report, GHD, Rev 0, August 2018. Discussion with Environmental Planning Consultant and Beon Site Team.	Pipeline Earthing Hazard Assessment Report has been completed to address the requirements of this condition. The contents of this report were not assessed during the audit. This is outside the competency of the auditor. Finding based on information provided by Beon Site Team and discussion with Environmental Planning Consultant.	Compliant.
4.10.4	4. Hazards and risk 4.10 APA high pressure gas pipeline 4.10.1. Pipeline Safety Management Study AS 2885 with APA	Safety Management Study Report, SAGE Consulting Solutions Pty Ltd, Rev 0 June 2018. Discussion with Environmental Planning Consultant	A Safety Management Study Report has been completed to address the requirements of this condition. The contents of this report were not assessed during the audit.	Compliant.
4.10.5	4. Hazards and risk 4.10 APA high pressure gas pipeline 4.10.1. Battery storage site located outside pipeline to avoid cascading consequential loss	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.11.1	4. Hazards and risk 4.11 Battery storage site located adjacent to substation and/or control building 4.11.1. Separation distances between battery storage and other equipment as per AS 2067, or installation of a blast wall if separation distances cannot be achieved	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.11.2	4. Hazards and risk 4.11 Battery storage site located adjacent to substation and/or control building 4.11.1 Construct to National Construction Code & AS 2067	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.
4.11.3	4. Hazards and risk 4.11 Battery storage site located adjacent to substation and/or control building 4.11.1 Installation of equipment in accordance with manufacturer's instructions and by qualified	Discussion with Environmental Planning Consultant	Not triggered, no battery being constructed at this stage.	Not triggered.

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	personnel			
5.1.1	5. Noise and vibration 5.1 Construction noise 5.1.1. A noise management plan will be prepared and implemented as part of the CEMP.	Section 16.10 of the WHSEMP. Site inspection.	Noise minimisation measures are outlined in Section 16.10 of the WHSEMP. Implementation was assessed during the audit site inspection and found to be generally consistent and effective.	Compliant.
5.1.2	5. Noise and vibration 5.1 Construction noise 5.1.1. All engine covers will be kept closed while equipment is operating.	Section 16.10 of the WHSEMP. Site inspection.	This requirement is incorporated into the noise management plan, assessed via weekly site inspection (records sighted). Implementation was assessed during the audit site inspection with no issues identified.	Compliant.
5.1.3	5. Noise and vibration 5.1 Construction noise 5.1.1. As far as possible, heights from which materials are dropped, into or out of trucks, will be minimised	Section 16.10 of the WHSEMP. Site inspection. Complaints Register.	This requirement is incorporated into the noise management plan. No complaints received with regard to noise of loading / unloading on site.	Compliant.
5.1.4	5. Noise and vibration 5.1 Construction noise 5.1.1. Machines found to produce excessive noise compared to industry best practice will be removed from the site or stood down until repairs or modifications can be made.	Section 16.10 of the WHSEMP. Site inspection. Samples of completed Weekly Environmental Site Inspection Checklists.	This requirement is incorporated into the noise management plan, assessed via weekly site inspection (records sighted). Implementation was assessed during the audit site inspection with no issues identified.	Compliant.
5.1.5	5. Noise and vibration 5.1 Construction noise 5.1.1. To reduce the annoyance associated with reversing alarms, broadband reversing alarms (audible movement alarms) will be used for all site equipment. Satisfactory compliance with occupational health and safety requirements will need to be achieved and a safety risk assessment may need to be undertaken to determine that safety is not compromised. Refer to Appendix C of the ICNG (2009) for more information	Section 16.10 of the WHSEMP. Site inspection. Complaints Register.	This requirement is incorporated into the noise management plan, assessed via weekly site inspection (records sighted). Implementation was assessed during the audit site inspection with no issues identified. No complaints received with regard to reversing alarms.	Compliant.
5.1.6	5. Noise and vibration 5.1 Construction noise 5.1.1. Piling works and works to construct the transmission line will not occur during evening/night periods.	Refer to CoC Schedule 3 Condition 10. Discussion with HSE Advisor.	No applicable. No evening/night works permitted. Refer to CoC Schedule 3 Condition 10. It was reported that no evening or night works have been undertaken at the time of this audit.	Not triggered.

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5.1.7	<p>5. Noise and vibration</p> <p>5.1 Construction noise</p> <p>5.1.1. Apart from works involving installing trackers and modules, all works in evening/night periods will be limited to the central work area (see Figure 1.2 of the EIS).</p>	<p>Refer to CoC Schedule 3 Condition 10.</p> <p>Discussion with HSE Advisor.</p>	<p>No applicable. No evening/night works permitted.</p> <p>Refer to CoC Schedule 3 Condition 10.</p> <p>It was reported that no evening or night works have been undertaken at the time of this audit.</p>	Not triggered.
5.1.8	<p>5. Noise and vibration</p> <p>5.1 Construction noise</p> <p>5.1.1. Works involving installing trackers and modules during evening/night periods will not occur in the area between the southern boundary of the solar farm and 250 metres north of the southern boundary. This provides a 700 metre buffer from the residential receiver at R8 and will reduce the noise level to within the noise management level of 35 dBA.</p>	<p>Refer to CoC Schedule 3 Condition 10.</p> <p>Discussion with HSE Advisor.</p>	<p>No applicable. No evening/night works permitted.</p> <p>Refer to CoC Schedule 3 Condition 10.</p> <p>It was reported that no evening or night works have been undertaken at the time of this audit.</p>	Not triggered.
5.1.9	<p>5. Noise and vibration</p> <p>5.1 Construction noise</p> <p>5.1.1. During night-works, quiet forklifts (electric – sound power level <100 dBA) will be used for construction activities around the solar array areas.</p>	<p>Refer to CoC Schedule 3 Condition 10.</p> <p>Discussion with HSE Advisor.</p>	<p>No applicable. No evening/night works permitted.</p> <p>Refer to CoC Schedule 3 Condition 10.</p> <p>It was reported that no evening or night works have been undertaken at the time of this audit.</p>	Not triggered.
5.1.10	<p>5. Noise and vibration</p> <p>5.1 Construction noise</p> <p>5.1.1. All site workers will be briefed on the potential for noise impacts on local residents and the requirement to implement practical and reasonable measures to minimise noise impacts during the course of their activities. This will include:</p> <ul style="list-style-type: none"> – avoiding the use of loud radios – avoiding shouting and slamming doors – where practical, machines would be operated at low speed or power and switched off when not being used rather than left idling for prolonged periods – keeping truck drivers informed of designated vehicle routes, parking locations and delivery hours – minimising reversing 	<p>Section 16.10 of the WHSEMP.</p> <p>Site Inspection, no excessive noisy works identified.</p> <p>Complaints register.</p>	<p>These noise management measures are incorporated into the site induction. Noise minimisation measures are outlined in Section 16.10 of the WHSEMP. Implementation was assessed during the audit site inspection and found to be generally consistent and effective.</p> <p>3 of 11 complaints relate to LVs driving on site after 6pm. Beon investigated and identified LVs were moving from site to site amenities. There have been no other complaints or non-conformities identified or reported with regard to working hours.</p> <p>As the above complaints were attributed to light vehicles moving on site rather than undertaking</p>	Compliant.

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	<ul style="list-style-type: none"> — avoiding dropping materials from height and avoiding metal to metal contact on material — keeping engine covers closed while equipment is operating. 		construction activities it is generally considered that the requirements of this condition have been complied with.	
5.1.11	<p>5. Noise and vibration</p> <p>5.1 Construction noise</p> <p>5.1.1. Once the selection of equipment has been finalised, a review will be carried out to ensure that the noise levels do not exceed the assumed levels in the noise assessment in Appendix F of the EIS.</p>	<p>Beon correspondence 29/05/2019 regarding a review of EIS noise assumptions and populated noise assumptions table.</p> <p>Complaints register.</p>	Beon conducted a review of EIS noise assumptions and found all to be correct. No equipment noise specific complaints received to date on the project.	Compliant.
5.2.1	<p>5. Noise and vibration</p> <p>5.2 Community impacts</p> <p>5.2.1. Consultation and cooperation with the nearest sensitive receivers will assist in minimising uncertainty, misconceptions and adverse reactions to noise. The following community relation measures will be implemented:</p> <ul style="list-style-type: none"> — regular communication will be maintained with the residents affected by construction noise. The construction program and progress will be communicated on a regular basis, particularly when noise generating activities are planned. <p>Communication with the local community will be maintained throughout the construction period</p> <ul style="list-style-type: none"> — a community liaison phone number and details of permanent site contact will be provided so that noise complaints can be received and addressed in a timely manner. — upon receipt of a noise complaint, monitoring will be undertaken and reported as soon as possible. If exceedances are detected, the situation will be reviewed to identify means to attempt to reduce the impact to acceptable levels. 	<p>Discussion held with Community and Stakeholder Engagement Manager.</p> <p>Stakeholder and Community Engagement Plan (Beon, Rev3, 02/10/2019)</p> <p>Bomen Solar Farm Newsletter, August 2019.</p> <p>Bomen Solar Farm Newsletter, June 2019.</p> <p>Bomen Solar Farm Newsletter, May 2019.</p> <p>Bomen Solar Farm Newsletter, April 2019.</p> <p>Bomen Solar Farm Newsletter, October 2018.</p> <p>Bomen Solar Farm Newsletter, April 2018.</p> <p>Bomen Solar Farm Newsletter, March 2018.</p> <p>Complaints contact details are on the website, Contact Us page and on the newsletters. https://www.bomensolarfarm.com.au/contact-us</p> <p>Complaints register.</p>	Community relation measures appeared to be effectively implemented on site, including the publishing of the Bomen Solar Farm Newsletter and the management of complaints and enquiries.	Compliant.
6.1.1	<p>6. Land use</p> <p>6.1 Impacts to utilities</p> <p>6.1.1. Renew Estate will consult with relevant service providers to confirm measures to be implemented to minimise impacts to existing utilities in the proposal site.</p>	<p>Discussion with Community And Stakeholder Engagement Manager.</p>	IT was reported that Beon has had ongoing liaison with APA (gas), Essential Energy and TransGrid throughout the project. No formal evidence was provided.	Compliant.

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6.2.1	<p>6. Land use</p> <p>6.2 Biosecurity general</p> <p>6.2.1. Establish a vehicle high pressure wash down facility well away from livestock and crops to clean vehicles, boots and equipment which need to enter the property</p>	<p>Discussion with Environmental Planning Consultant.</p> <p>A sample of vehicle inspection records was reviewed.</p>	<p>BSF-2019- IEA-NC-03: A vehicle high-pressure wash down facility has not been established for the site as per the requirement of this commitment.</p> <p>Recommendation: Establish a vehicle high-pressure wash down facility or seek approval from the Secretary that a wash down facility is not required.</p> <p>Environmental Planning Consultant reported that the area is not a designated weed and seed zone, and there is no livestock or crops within site.</p> <p>A vehicle inspection process is implemented to ensure plant and equipment is clean before commencement on site, thus a wash down facility is not required.</p> <p>It was reported that if cleaning was required, this would be done off site.</p>	Non Compliant
6.3.1	<p>6. Land use</p> <p>6.3 Biosecurity risk – people</p> <p>6.3.1. Limit worker contact with livestock, crops or plant materials as much as possible and eliminate any unnecessary contact altogether.</p>	<p>Discussion with Environmental Planning Consultant.</p> <p>Figure 6 of WHSEMP.</p> <p>Easement agreement with Land Holder.</p>	<p>No livestock or crops within the site. No Go zones limit unnecessary contact with vegetation (refer fig 6 of WHSEMP).</p> <p>It was reported that Beon maintains an Easement agreement with the Land Holder and Beon waited until cropping before using this as a temporary access route.</p>	Compliant.
6.3.2	<p>6. Land use</p> <p>6.3 Biosecurity risk – people</p> <p>6.3.2. Keep a visitor register</p>	<p>Visitor Register.</p>	<p>Visitor register is held digitally onsite.</p>	Compliant.
6.4.1	<p>6. Land use</p> <p>6.4 Biosecurity risk – vehicles</p> <p>6.4.1. Clearly sign and lock restricted access areas</p>	<p>Discussion with Environmental Planning Consultant.</p>	<p>No restricted access areas relevant to biosecurity.</p>	Not triggered
6.4.2	<p>6. Land use</p> <p>6.4 Biosecurity risk – vehicles</p> <p>6.4.2. Ensure construction vehicles are clean and are parked in a designated area away from livestock or crops</p>	<p>Discussion with Environmental Planning Consultant.</p> <p>A sample of vehicle inspection records was reviewed.</p>	<p>No livestock or crops within the site or near the designated parking area at the compound. Vehicle inspection checklist prior to commencement on site.</p>	Compliant.

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6.4.3	6. Land use 6.4 Biosecurity risk – vehicles 6.4.3. Ensure construction vehicles remain on designated tracks	Site inspection.	Observed during site inspection. Vehicles generally remain on designated tracks to move around the site as is practicable.	Compliant.
6.5.1	6. Land use 6.5 Biosecurity risk – equipment 6.5.1. Clean machinery and equipment from the top down and dismantle where practicable to gain access to internal spaces	Discussion with Environmental Planning Consultant. A sample of vehicle inspection records was reviewed.	Vehicle inspection prior to entry. Vehicles are required to be cleaned before entering/leaving the site if required (as per WHSEMP). Sighted a sample of vehicle inspection checklists.	Compliant.
6.6.1	6. Land use 6.6 Impacts to land capability 6.6.1. Grazing within the site to be considered to minimise impacts of loss of land and also to manage groundcover vegetation within the proposal site	Discussion with Community and Stakeholder Engagement Manager	Sheep grazing is currently being investigated and considered. Sheep grazing trial might be implemented.	Compliant
6.6.2	6. Land use 6.6 Impacts to land capability 6.6.2. Prior to decommissioning, a Decommissioning and Rehabilitation Management Plan will be prepared.	Nil.	Project under construction at the time of this audit, hence the requirements of this commitment have not been triggered.	Not triggered
6.6.3	6. Land use 6.6 Impacts to land capability 6.6.3. During decommissioning all aboveground and underground infrastructure owned by the project will be removed	Nil.	Project under construction at the time of this audit, hence the requirements of this commitment have not been triggered.	Not triggered
6.6.4	6. Land use 6.6 Impacts to land capability 6.6.4. Rehabilitation of the site following decommissioning works will be carried out to ensure that the land can be used for agricultural purposes (cropping and grazing).	Nil.	Project under construction at the time of this audit, hence the requirements of this commitment have not been triggered.	Not triggered
7.1.1	7. Traffic, transport and access 7.1 Traffic impacts during construction 7.1.1. A Traffic Management Plan shall be prepared in consultation with Council and Roads and Maritime Services which addresses, but not necessarily be limited to the following; <ul style="list-style-type: none"> • Require that all vehicular access to the site be via the approved access route. • Details of traffic routes to be used by heavy and 	Traffic Management Plan (TMP) V3. Traffic Management Plan (TMP) V4. NSW DPIE correspondence 23/5/2019 approving TMP V3 and confirming that the TMP was prepared in consultation with RMS and Council. NSW DPIE correspondence 18/09/2019 approving TMP V3 and confirming that the TMP was prepared in	A Traffic Management Plan (TMP) has been prepared, updated and implemented on site. Version 4 of the TMP was updated to reflect conditions under SSD 8835 MOD 1. TMP V4 was submitted to and approved by NSW DPIE, sighted letter dated 18/9/19. This letter also confirms that the revised TMP was prepared in consultation with	Compliant.

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	<p>light vehicles, and any associated impacts and any road-specific mitigation measures.</p> <ul style="list-style-type: none"> • Details of measures to be employed to ensure safety of road users and minimise potential conflict with project generated traffic, • Proposed hours for construction activities, as night time construction presents additional traffic related issues to be considered. • The management and coordination of the movement of vehicles for construction and worker related access to the site and to limit disruption to other motorists, emergency vehicles, school bus timetables and school zone operating times, • loads, weights and lengths of haulage and construction related vehicles and the number of movements of such vehicles, • procedures for informing the public where any road access will be restricted as a result of the project, • any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project, • a Driver Code of Conduct to address such items as; appropriate driver behaviour including adherence to all traffic regulations and speed limits, safe overtaking and maintaining appropriate distances between vehicles, etc. and appropriate penalties for infringements of the Code, • details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements to and from the site 	<p>consultation with RMS and Council.</p> <p>No road closures required to date on the project.</p>	<p>Council.</p> <p>No road closures required to date on the project.</p> <p>Given the recent revision, review and approval of the TMP it is considered adequate and up to date.</p>	
7.1.2	<p>7. Traffic, transport and access</p> <p>7.1 Traffic impacts during construction</p> <p>7.1.2. Appropriate exclusion barriers, signage and site supervision are to be employed at all times to ensure that the works area is controlled and that unauthorised vehicles and pedestrians are excluded from the works area.</p>	<p>Site inspection.</p>	<p>Verified during site inspection, including site signage and fencing. Designated visitor parking area.</p>	<p>Compliant.</p>

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7.1.3	<p>7. Traffic, transport and access</p> <p>7.1 Traffic impacts during construction</p> <p>7.1.3. All traffic control devices are to be in accordance with AS 1742.3-2009 – ‘Manual of uniform traffic control Devices: Traffic control for works on roads’ and the Roads and Maritime Services ‘Traffic control at worksites manual’.</p>	Site inspection.	No specific traffic controls implemented or required at time of audit.	Not triggered.
7.1.4	<p>7. Traffic, transport and access</p> <p>7.1 Traffic impacts during construction</p> <p>7.1.4. A condition assessment of Trahairs Road will be conducted before and after construction.</p>	Pre-construction dilapidation report.	A Pre-construction dilapidation report has also been completed and was provided for review during the audit.	Compliant.
7.1.5	<p>7. Traffic, transport and access</p> <p>7.1 Traffic impacts during construction</p> <p>7.1.5. If glint or glare from the solar panels is demonstrated to be a nuisance, distraction and/or hazard to the public road, glare mitigation measures shall be implemented.</p>	Not triggered	Not triggered	Not triggered
8.1.1	<p>8. Hydrology and water quality</p> <p>8.1 General</p> <p>8.1.1. An erosion and sediment control plan (ESCP) will be prepared as part of the CEMP. All erosion and sediment control measures shall be designed, implemented and maintained in accordance with relevant sections of ‘Managing Urban Stormwater: Soil and Construction Volume 1’ (Landcom 2004) (‘the Blue Book’) (particularly section 2.2) and ‘Managing Urban Stormwater: Soil and Construction Volume 2A – Installation of Services’ (DECC 2008). The ESCP will include stockpiles, stormwater runoff, trees, site boundaries, site access and storage areas.</p>	<p>Erosion and sediment control plan (ESCP).</p> <p>Discussion with HSE Advisor.</p>	Soil erosion is managed on site in accordance with the erosion and sediment control plan (ESCP), including sediment fences and maintaining existing vegetation where possible. Coir logs described in the ESCP have not been implemented on site due to the dry weather experienced during construction and the practicalities of maintaining these controls with the number of vehicle movements on site. At the time of the audit site inspection the HSE team was actively monitoring weather forecasts and proactively preparing the site for an imminent wet weather event.	Compliant.
8.1.2	<p>8. Hydrology and water quality</p> <p>8.1 General</p> <p>8.1.2. The Department of Primary Industries – Water controlled activity guidelines will be considered as part of the detailed design of the proposal.</p>	Discussion with Environmental Planning Consultant.	The Environmental Planning Consultant for the project reported that “ <i>The Guidelines for Controlled Activities on Waterfront land (2012) do not apply to the drainage lines in the site because they do not meet the definition of ‘waterfront land’ for the purposes of the WM Act. This is because they ‘do not exhibit the features of defined channel with bed and banks’.</i> As the drainage lines	Compliant.

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			<i>are very unlikely fish habitat the Fish Passage Requirements do not warrant further consideration".</i> Based on these discussions the auditor considers that the Controlled Activity Guidelines have been satisfactorily considered on the project.	
8.2.1	8. Hydrology and water quality 8.2 Rehabilitation 8.2.1 Rehabilitation works are to commence as soon as practicable to stabilise the land surface after works are completed in any area.	Site Inspection.	Trenches are reinstated as soon as practicable (observed during site inspection). Re-seeding groundcover is to be incorporated into the Groundcover management plan currently being drafted.	Compliant.
8.3.1	8. Hydrology and water quality 8.3 Increased run-off 8.3.1 Groundcover vegetation would be maintained beneath the solar arrays during operation, to minimise potential for increased run-off.	Not triggered	Not triggered	Not triggered
8.3.2	8. Hydrology and water quality 8.3 Increased run-off 8.3.2. A groundcover management plan would be developed that includes measures to manage any bare areas and erosion that develop beneath the solar arrays.	Not triggered. Discussion with Environmental Planning Consultant.	Not triggered Groundcover management plan currently being drafted.	Not triggered.
8.4.1	8. Hydrology and water quality 8.4 Contamination of surface water 8.4.1. All fuels, chemicals, and liquids will be stored at least 50 metres away from waterways and will be stored in an impervious bunded area within the compound site.	Site inspection.	Checked during site inspection. A diesel fuel bund is located at the main compound. It is a fuel skinned self bunded tank. It is >50m from the closest waterway. A chemical storage container is located next to the fuel bund.	Compliant.
8.4.2	8. Hydrology and water quality 8.4 Contamination of surface water 8.4.2. The refuelling of plant and maintenance of machinery will be undertaken in impervious bunded areas in the compound site	Site inspection.	A diesel fuel bund is located at the main compound. It is a fuel skinned self bunded tank. It is >50m from the closest waterway. Drip bund also provided for refuelling purposes.	Compliant.
8.4.3	8. Hydrology and water quality 8.4 Contamination of surface water 8.4.3. Vehicle wash downs and/or concrete truck washouts will be carried out within a designated	Site inspection. Discussion with Environmental Planning Consultant. Discussion with HSE Advisor.	Concrete wash out off site. It was reported that concrete wash outs pits may be provided for the construction of operational	Compliant.

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	bunded area on an impervious surface or carried out off-site.		buildings. No evidence of vehicle wash down or concrete wash out on site.	
8.4.4	<p>8. Hydrology and water quality 8.4 Contamination of surface water 8.4.4. Machinery will be regularly checked to ensure there is no oil, fuel or other liquids leaking from the machinery. All staff will be appropriately trained through toolbox talks for the minimisation and management of accidental spills</p>	<p>Vehicle maintenance records associated with vehicle inspection checklists.</p> <p>Samples of Plant and equipment – Mobile Plant Hazard and Operation Inspection checklists were obtained for a random selection of plant observed on site during the audit site inspection including:</p> <ul style="list-style-type: none"> • CAT LADEX Grader. 140M Service history and plant risk assessment. Last service record 26/06. Also sighted Operation checklist. • POSI-Track CAT 259D – Sighted risk assessment. Hazard checklist signed off 27/09/19. • Excavator P404 Plant inspection checklist – 20/08/19. • Vermeer Trencher P660 Service inspection record and risk assessment. • Pronto vehicle inspection checklist for Plant T558 P660 Trencher 26/08/2019. <p>Daily plant inspection records for All Energy equipment including excavators and graders.</p> <p>Plant maintenance register.</p> <p>Daily pre-start inspection records for all BEON vehicles including ATVs, Utes, Trucks, Mini busses and Telehandler.</p> <p>PRONTO records and tracking of completion compliance on Dashboard.</p>	<p>Implemented through WHSEMP and included in the environmental inspection checklist and vehicle checks. Samples of records reviewed during the audit, including for a selection of plant on site.</p>	Compliant.
8.5.1	<p>8. Hydrology and water quality 8.5 Spills and leaks 8.5.1. A site specific emergency spill plan will be developed as part of the Fire Management and Emergency Response Plan, and will include spill</p>	<p>Section 7.6 of the Fire and Emergency Response Plan (FEMP) for construction.</p>	<p>This requirement is addressed in Section 7.6 of the Fire and Emergency Response Plan (FEMP) for construction.</p>	Compliant.

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	management measures in accordance relevant EPA guidelines. The plan will address measures to be implemented in the event of a spill, including initial response and containment, notification of emergency services and relevant authorities (including Roads and Maritime and EPA officers).			
8.5.2	<p>8. Hydrology and water quality</p> <p>8.5 Spills and leaks</p> <p>8.5.2. An emergency spill kit will be kept on site at all times. All staff will be made aware of the location of the spill kit and trained in its use.</p>	<p>Site Inspection.</p> <p>Discussion with HSE Advisor.</p>	Sighted spill kit available in site compound. HSE advisor aware of its location and how to use it.	Compliant.
8.6.1	<p>8. Hydrology and water quality.</p> <p>8.6 Groundwater monitoring bores</p> <p>8.6.1. Registered groundwater monitoring bores in and around the proposal site will be identified, located and protected during construction and operation as necessary. Any removal of groundwater monitoring bores will be carried out in consultation the DPI Office of Water.</p>	<p>Minimum Construction Requirements for Water Bores in Australia, February 2012.</p> <p>Correspondence 09/07/2019 from Project Engineer P.Oxley provides that the two bores licenced by the Natural Resource Access Regulator (NRAR) will not be impacted and thus will not be decommissioned.</p> <p>Correspondence 11/06/2019 from WaterNSW advising there is no licence or approval for the bores to be decommissioning. This email was in response to an enquiry by the Environmental Planning Consultant regarding process for decommissioning. No records required to be maintained.</p>	<p>A copy of the Minimum Construction Requirements for Water Bores in Australia, February 2012 was provided for reference during the audit.</p> <p>Correspondence from Project Engineer provides that the two bores licenced by the Natural Resource Access Regulator (NRAR) will not be impacted and thus will not be decommissioned.</p> <p>Correspondence from WaterNSW provides there is no licence or approval for the bores to be decommissioning and that no records are required to be maintained.</p>	Compliant
9.1.1	<p>9. Electric and magnetic fields</p> <p>9.1 EMF</p> <p>9.1.1. Design and selection of all electrical equipment is to minimise EMF levels and comply with the ICNIRP exposure levels.</p>	<p>Design Management Plan, Rev 2, Section 6.5 Design Considerations.</p> <p>Discussion with Beon Site Engineers.</p>	<p>It was reported that the design of electrical equipment meets this requirements. Section 6.5 or the Design Management Plan, Rev 2, includes these requirements as design considerations.</p> <p>Note: Auditor is not an EMF specialist, and compliance has been assessed based on discussion with Site Engineers.</p>	Compliant
9.1.2	<p>9. Electric and magnetic fields</p> <p>9.1 EMF</p> <p>9.1.2. Monitoring of electromagnetic levels would be undertaken during the commissioning of the substation to confirm exposure levels. Should levels be above the ICNIRP exposure levels the potential</p>	Nil.	Not triggered. Commissioning had just commenced at time of site audit and records were not available to support this commitment.	Not triggered

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	need for further mitigation would be considered.			
10.1.1	10. Soils and geology 10.1 Soil impacts 10.1.1. The erosion and sediment control plan developed as part of the CEMP will include measures to manage any potential soil erosion issues identified by a geotechnical study in relation to the characteristics of soils at the site.	Section 2 of the Erosion and Sediment Control Plan.	Section 2 of the Erosion and Sediment Control Plan includes its own risk assessment of soil erosion potential.	Compliant.
10.2.1	10. Soils and geology 10.2 Contamination 10.2.1. The CEMP will contain an unexpected finds protocol for land contamination that directs workers to cease work and implement pre-determined procedures before further works proceed, including reporting of the potential find to the Council as the applicable pollution control authority.	Section 16.5 of WHSEMP.	Section 16.5 of WHSEMP includes protocol for unexpected contamination finds.	Compliant.
10.3.1	10. Soils and geology 10.3 Soil impacts 10.3.1. Erosion and sediment control measures would be in place during the entire construction period and during any required rehabilitation.	Erosion and Sediment Control Plans. Site Inspection.	Soil erosion is managed on site in accordance with the erosion and sediment control plan (ESCP), including sediment fences and maintaining existing vegetation where possible. Coir logs described in the ESCP have not been implemented on site due to the dry weather experienced during construction and the practicalities of maintaining these controls with the number of vehicle movements on site.	Compliant.
10.3.2	10. Soils and geology 10.3 Soil impacts 10.3.2. Activities with a risk of soil erosion such as earthworks will not be undertaken immediately before or during high rainfall or wind events.	Section 16.5 of the WHSEMP.	This is a requirement of section 16.5 of the WHSEMP. At the time of the audit site inspection the HSE team was actively monitoring weather forecasts and proactively preparing the site for an imminent wet weather event.	Compliant.
10.3.3	10. Soils and geology 10.3 Soil impacts 10.3.1. Where soil disturbance is required, an	Section 3.3.3. of the ESCP.	Section 3.3.3. of the ESCP identifies that soils on site are not considered dispersive.	Not triggered.

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	ameliorant such as gypsum will be applied to manage soil sodicity.			
10.3.4	10. Soils and geology 10.3 Soil impacts 10.3.1. Where possible, groundcover on site would be retained particularly in the areas of the solar arrays where disturbance would be limited to the installation of the poles for the mounting structure.	Site Inspection.	Existing grass cover has been retained where possible. Observed during site inspection.	Compliant.
10.3.5	10. Soils and geology 10.3 Soil impacts 10.3.1. Any disturbed areas (with no existing groundcover) would be stabilised promptly and progressively during and following the end of construction.	Site Inspection. Discussion with Environmental Planning Consultant.	Observed during site inspection. It was reported that this is also to be managed as part of the Groundcover Management Plan.	Compliant.
10.3.6	10. Soils and geology 10.3 Soil impacts 10.3.1. Groundcover vegetation would be established and maintained beneath the solar arrays as much as possible before and during construction, to minimise areas exposed to erosion.	Site Inspection.	A site inspection was undertaken and the requirement to being implemented on site.	Compliant.
10.3.7	10. Soils and geology 10.3 Soil impacts 10.3.1. A groundcover management plan would be developed that includes measures to manage any bare areas and erosion that develop beneath the solar arrays.	Site Inspection. Discussion with Environmental Planning Consultant.	Not triggered Groundcover management plan currently being drafted.	Not triggered.
11.1.1	11. Socio-economic 11.1 Community consultation 11.1.1. A community and stakeholder consultation plan will be implemented to manage the concerns of stakeholders and any impacts on adjacent property owners. The plan will include (but not be limited to) the following: <ul style="list-style-type: none"> • protocols to keep the community and stakeholders updated about the progress of the project and its benefits • protocols to inform relevant stakeholders of potential impacts of construction activities such as changes to traffic conditions and night works 	Discussion held with Community and Stakeholder Engagement Manager. Stakeholder and Community Engagement Plan (Beon, Rev3, 02/10/2019) Bomen Solar Farm Newsletter, August 2019. Bomen Solar Farm Newsletter, June 2019. Bomen Solar Farm Newsletter, May 2019. Bomen Solar Farm Newsletter, April 2019. Bomen Solar Farm Newsletter, October 2018.	The Community and Stakeholder Plan established and implemented on site. Discussions held with Community and Stakeholder Engagement Manager.	Compliant.

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	protocols to allow the community to identify any concerns or issues with the project, particularly during construction and decommissioning.	Bomen Solar Farm Newsletter, April 2018. Bomen Solar Farm Newsletter, March 2018. Complaints contact details are on the website, Contact Us page and on the newsletters. https://www.bomensolarfarm.com.au/contact-us Complaints register.		
12.1.1	12. Air quality 12.1 General air quality impacts 12.1.1. The CEMP will include measures to minimise impacts on air quality including: <ul style="list-style-type: none"> • a map identifying locations of sensitive receivers • identification of potential risks/impacts through dust generation activities • management measures to minimise risk including progressive stabilisation • a process for altering management measures as required a process for reviewing and updating the plan before decommissioning works start.	Dust minimisation measures are outlined in Section 16.11 of the WHSEMP. Site inspection.	Dust minimisation measures are outlined in the WHSEMP. Implementation was assessed during the audit site inspection and found to be generally consistent and effective. Four water carts were observed in operation at time of audit site inspection. At the time of the site inspections, dust from construction activities was localised and settled on site.	Compliant
12.2.1	12. Air quality 12.2 Dust emissions 12.2.1. Surveillance for visible dust generation will occur at all times.	Dust minimisation measures are outlined in Section 16.11 of the WHSEMP. Site inspection.	Dust minimisation measures are outlined in Section 16.11 of the WHSEMP. Implementation was assessed during the audit site inspection and found to be generally consistent and effective. Four water carts were observed in operation at time of audit site inspection. At the time of the site inspections, dust from construction activities was localised and settled on site.	Compliant
12.2.2	12. Air quality 12.2 Dust emissions 12.2.2. Works that disturb vegetation, soil or stockpiles will not be carried out during strong winds (over 40 km/h) when this may affect receivers (visibility on roads, dust and debris near residences).	Section 16.11 of the WHSEMP and environmental inspection checklist. Discussion with HSE Advisor.	This requirement is incorporated into section 16.11 of the WHSEMP and environmental inspection checklist. It was reported that works may be modified or stopped due to weather conditions. Conditions were mild at the time of the audit.	Compliant.
12.2.3	12. Air quality 12.2 Dust emissions	Section 16.11 of the WHSEMP.	Incorporated into section 16.11 of the WHSEMP Stockpiles observed were temporary and/or	Compliant.

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	12.2.3. Stockpiled materials will be covered, stabilised or stored in areas not subject to high wind.	Site inspection.	located in less exposed areas.	
12.2.4	12. Air quality 12.2 Dust emissions 12.2.4. All trucks will be covered when transporting loose materials to and from the site.	Section 16.11 of the WHSEMP. Discussion with HSE Advisor. Site inspection. Complaints register.	The requirement is incorporated into section 16.11 of the WHSEMP It was reported that this occurs. The Auditor did not see trucks leaving site at the time of the audit. No complaints received.	Compliant.
12.2.5	12. Air quality 12.2 Dust emissions 12.2.5. Work activities will be reprogrammed if the safeguards and management measures implemented do not adequately restrict dust generation	Section 16.11 of the WHSEMP. Discussion with HSE Advisor, Environmental Planning Consultant and Community and Stakeholder Engagement Manager.	Incorporated into in section 16.11 of the WHSEMP. The practice of modifying or reprogramming work activities was confirmed through discussion with HSE Advisor, Environmental Planning Consultant and Community and Stakeholder Engagement Manager. No formal evidence reviewed.	Compliant.
12.2.6	12. Air quality 12.2 Dust emissions 12.2.6. Maximum speed limits will be enforced for construction traffic within the site to limit dust generation	Site Inspection.	Site limit of 20km/h is implemented on internal access roads and 10km/hr in shared areas. Observed during site inspection.	Compliant.
12.2.7	12. Air quality 12.2 Dust emissions 12.2.7. A water tanker or similar will be used to spray unpaved roads and exposed areas during construction where required.	Site Inspection.	Four water carts were observed operating during the audit site inspection.	Compliant.
12.3.1	12. Air quality 12.3 Exhaust emissions 12.3.1. Construction machinery and equipment will be maintained in good working condition to limit impacts on air quality.	Section 16.11 of WHSEMP. Refer to evidence in Project Approval Schedule 2 Condition 13.	Incorporated into section 16.11 of WHSEMP. Observed during site inspection. No issues identified. No complaints.	Compliant.
12.3.2	12. Air quality 12.3 Exhaust emissions 12.3.2. Construction equipment, machinery and vehicles will be appropriately sized for the task.	Section 16.11 of WHSEMP. Site inspection.	The requirements is incorporated into section 16.11 of WHSEMP. Observed during site inspection. No issues identified.	Compliant.
12.3.3	12. Air quality 12.3 Exhaust emissions 12.3.3. Machinery and equipment will be serviced regularly to ensure it is operating efficiently.	Section 16.11 of WHSEMP. Refer to evidence in Project Approval Schedule 2 Condition 13.	Incorporated into section 16.11 of WHSEMP. Vehicle maintenance records are part of the vehicle inspection checklist. Sample of records	Compliant.

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			verified during audit for plant operating on site.	
12.4.1	<p>12. Air quality 12.4 Impacts on sensitive receivers 12.4.1. A community and stakeholder consultation plan will be implemented to manage the concerns of stakeholders and any impacts on adjacent property owners. The plan will include protocols for informing adjacent property owners of the construction program and protocols to allow the community to identify any concerns or issues.</p>	<p>Discussion held with Community and Stakeholder Engagement Manager.</p> <p>Stakeholder and Community Engagement Plan (Beon, Rev3, 02/10/2019)</p> <p>Bomen Solar Farm Newsletter, August 2019.</p> <p>Bomen Solar Farm Newsletter, June 2019.</p> <p>Bomen Solar Farm Newsletter, May 2019.</p> <p>Bomen Solar Farm Newsletter, April 2019.</p> <p>Bomen Solar Farm Newsletter, October 2018.</p> <p>Bomen Solar Farm Newsletter, April 2018.</p> <p>Bomen Solar Farm Newsletter, March 2018.</p> <p>Complaints contact details are on the website, Contact Us page and on the newsletters. https://www.bomensolarfarm.com.au/contact-us</p> <p>Complaints register.</p>	<p>Community relation measures appeared to be effectively implemented on site, including the publishing of the Bomen Solar Farm Newsletter and the management of complaints and enquiries.</p>	Compliant.
12.5.1	<p>12. Air quality 12.5 Climate change 12.5.1. The use of alternative fuels and power sources for construction machinery and equipment will be considered.</p>	<p>Discussion with Environmental Planning Consultant.</p>	<p>The Environmental Planning Consultant reported that the Fire and Emergency management plan requires that all vehicles are to be diesel powered to minimise risk of fire ignition from vehicles.</p>	Compliant
12.5.2	<p>12. Air quality 12.5 Climate change 12.5.2. Energy efficiency and related carbon emissions will be considered in the selection of vehicles and machinery</p>	<p>Discussion with Environmental Planning Consultant.</p>	<p>The Environmental Planning Consultant reported that the Fire and Emergency management plan requires that all vehicles are to be diesel powered to minimise risk of fire ignition from vehicles.</p> <p>The Environmental Planning Consultant reported that the project owner Spark Infrastructure are exploring the possibility of a major tree planting project offsite that would offset the carbon footprint of all fuel used onsite.</p>	Compliant

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
12.5.3	12. Air quality 12.5 Climate change 12.5.3. Local suppliers will be used to limit transport where practicable.	Procurement Plan.	A Procurement Plan has been established and implemented to identified description of works, company and locality. A priority process is implemented through a procurement strategy to engage local suppliers.	Compliant
13.1.1	13. Non-Aboriginal heritage 13.1 Unexpected finds 13.1.1. In the event that a relic (as defined by the Heritage Act 1977) is identified during construction works, works will cease at the location. The find will be immediately reported to the Heritage Council in accordance with legislation. No work will commence in the vicinity of the find until any required approvals have been given by the regulator.	Protocol in section 16.3 of WHSEMP. Discussion with HSE Advisor.	Unexpected Finds Protocol is provided within Section 16.3 of WHSEMP. It was reported that no unexpected finds had been identified at the time of this audit.	Compliant.
14.1.1	14. Waste management 14.1 General 14.1.1. A waste management plan will be developed for the proposal and will form part of the CEMP. It will include but not be limited to the following: <ul style="list-style-type: none"> • identifying opportunities to avoid, reuse and recycle, in accordance with the waste hierarchy • quantifying and classifying all waste streams • providing for recycling management onsite • providing toilet facilities for on-site workers and management of sewage • tracking of all waste leaving the site • disposal of waste at facilities permitted to accept the waste requirements for hauling waste (such as covered loads).	Section 16.6 of the WHSEMP. Waste disposal register Weekly HSE Performance Reports for June – October 2019. Site Inspection. Discussion with Community & Stakeholder Engagement Manager. Discussion with HSE Advisor.	Waste management plan is included within Section 16.6 of the WHSEMP. A Waste disposal register is maintained and reports into waste generation are produced. Sighted HSE Performance Reports (weekly) for June – October 2019. General waste removed from site and packaging is recycled. Recycling waste including cardboard, steel, and insulated cable. Community & Stakeholder Engagement Manager reported they are currently in discussion with an external stakeholder with regard to the collection and re-use of wooden pallets on site. It was reported that no waste classification has been required no there has been no offsite disposal (all soils retained on site). Due to time limitation the auditor was not able to validate how waste generation was minimised	Compliant.

EIS Statement of Commitments - Section 11 of the Response to Submissions report dated 15 June 2018				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
14.2.1	14. Waste management 14.2 Wastewater management 14.2.1. Septic tanks will be installed and operated in accordance with Council's requirements.	Discussion with HSE Advisor.	Not triggered. Pump out tanks installed.	Not triggered.
15.1.1	15. Cumulative impacts 15.1 Cumulative traffic impacts 15.1.1. The construction traffic management plan will consider other developments that may be under construction to minimise traffic conflict and congestion that may occur due to the cumulative increase in construction vehicle traffic.	Discussion with Environmental Planning Consultant.	The Environmental Planning Consultant reported 'This requirement is included in the Traffic Management Plan, to be considered during preparation of any Traffic Control Plans (which are for public roads). No traffic control plans have been required for public roads and there are no other new developments currently using the same access road as the project'.	Not triggered.

Other permits

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	S138 Roads Act 1993 permit- Establishment of site entrances on Trahairs Road	City of Wagga Wagga – Works Permit: Activity on Council Road Reserve – Permit No ROC19/0054, dated 29/05/2019. Discussion with HSE Advisor.	No breach notice was reported.	Compliant.
	S138 Roads Act 1993 permit- Installation of underground electrical cables across Trahairs Road (Council road)	Sighted City of Wagga Wagga – Works Permit: Activity on Council Road Reserve – Permit No ROC19/0071, dated 06/08/2019 Discussion with HSE Advisor	No breach notice was reported.	Compliant.
	S138 Roads Act 1993 permit- Installation of underground transmission line across East Bomen Road (Council road).	Sighted City of Wagga Wagga – Works Permit: Activity on Council Road Reserve – Permit No ROC19/0077, dated 30/08/2019. Discussion with HSE Advisor	No breach notice was reported.	Compliant.
	S138 Roads Act 1993 permit- Any maintenance works required following post-construction, post-upgrading or post-decommissioning dilapidation survey	-	Not triggered – Project is currently under construction.	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	S68 Activity Approval Local Government Act 1993- Any maintenance works required following post-construction, post-upgrading or post-decommissioning dilapidation survey	-	Not triggered – Project is currently under construction.	Not triggered
	Rural Fires Act 1997 Hot Works Exemption Prior to conducting any Hot Works in a Total Fire Ban an exemption under Section 99 of the Rural Fires Act 1997 must be obtained from the Commissioner of the NSW Rural Fire Service (RFS).	Discussion with HSE Advisor.	It was reported that this condition has not yet been triggered. The auditor was not aware how to back check Total Fire Bans.	Not triggered

Appendix B: Secretary Approval of Audit Team



Contact: Katrina O'Reilly
Phone: 02 62297909
Email: Katrina.oreilly@planning.nsw.gov.au

Lauren Serjeantson
Senior Environmental Planner
Renew Estate

email: Lauren@renewestate.com.au

1 October 2019

Dear Lauren,

**Bomen Solar Farm SSD 8835
Independent Environmental Audit**

I refer to your letter dated 30 September 2019 seeking the Secretary's endorsement for Mr Peter Marsham of J2M Systems Pty Ltd to undertake the Independent Environmental Audit (audit) as required under Schedule 4 Condition 5 of SSD 8835 (the approval).

Having considered the qualifications and experience of Mr Marsham the Secretary endorses the appointment of Mr Marsham to undertake the audit in accordance with Schedule 4 Condition 5 of the approval. This approval is conditional on the Mr Marsham being independent of the development.

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

Within 3 months of commissioning the audit, or otherwise as agreed by the Secretary, in accordance with Schedule 4 Condition 5 of the approval, Renew Estate Pty Ltd is to submit a copy of the audit reports to the Secretary together with its response to any recommendations contained in the audit reports and a timetable to implement the recommendations.

Prior to submitting the audit report to the Secretary, it is recommended that Tronox review the report to ensure it complies with the relevant approval condition.

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

Yours sincerely

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

Appendix C: Consultation

Subject: Bomen Solar Farm IEA

From: Katrina O'Reilly - To: peter@j2m.com.au - Cc: - Date: 9 October 2019 at 11:54 am, Attachments: image001.jpg

Good morning Peter,

Further to your email dated the 8 October 2019. The Department would like focus on the below issues:

Extended hours conditions (complying with the type of activity/machinery use/times etc as agreed with surrounding landholders);

Dust management;

Noise management;

Management of vehicles on site and associated noise;

Planting and management thereof as per landscape management;

Vehicle movements to and from site and within site;

Management and recording of complaints and community consultation and liaison;

Waste management;

Visual impacts (glare from infrastructure).

If you have any questions please give me a call on 0429400261.

Thank you

Regards

Katrina

Katrina O'Reilly

Team Leader Compliance

Compliance | Department of Planning, Industry and Environment

T 02 6229 7909 | M 0429 400261 | E katrina.oreilly@planning.nsw.gov.au

PO Box 5475 | Level 1 11 Farrer Place Queanbeyan NSW 2620

www.dpie.nsw.gov.au



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

Subject: FW: Request for Consultation - Bomen Solar Farm Independent Environmental Audit

From: Craig Bretherton - To: peter@j2m.com.au - Cc: - Date: 9 October 2019 at 2:17 pm

Hi Peter

The EPA has no feedback or comments to make on this project.

If you have any further enquiries please contact me.

Thanks

Craig Bretherton

Manager Regional Operations

Riverina Far West Region

South & West Branch, NSW Environment Protection Authority

☎ 02 6969 0700 Mobile ☎ 0427 223 516

craig.bretherton@epa.nsw.gov.au www.epa.nsw.gov.au [@EPA_NSW](https://twitter.com/EPA_NSW)

Report pollution and environmental incidents 131 555 (NSW only) or +61 2 9995 5555



Please send all official electronic correspondence to riverina.farwest@epa.nsw.gov.au

----- Forwarded Message -----

From: Peter Marshman [peter@j2m.com.au]

Sent: 8/10/2019 11:21 AM

To: info@epa.nsw.gov.au

Subject: Request for Consultation - Bomen Solar Farm Independent Environmental Audit

To whom it may concern,

I have been engaged by Spark Infrastructure to undertake an independent environmental audit on the Bomen Solar Farm Project as required by their Project Approval SSD-8835. I am seeking consultation with regard to this audit in accordance with the requirements of the Schedule 4, Condition 5 of the Approval. The audit is reviewing works undertaken since construction commenced approximately 6 months ago. The audit will be conducted by myself and two days are allocated for site inspection and auditing of records. The onsite component of the audit is scheduled for 30 - 31 October 2019. If you have any feedback or comments on this project, please provide a response prior to the onsite audit.

Kind regards,

Peter Marshman

Director

J2M Systems Pty Ltd

[0422 925 598](tel:0422925598) | www.j2m.com.au

P.O. Box 163 Newport Beach NSW 2106

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

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Subject: RE: Request for consultation - Bomen Solar Farm Independent Environmental Audit.

From: Chris Bamberly - To: peter@j2m.com.au - Cc: Development South West - Date: 24 October 2019 at 2:45 pm

Hi Peter,

Thank you for the providing the opportunity to provide comment in relation to the proposed audit on the Bomen Solar Farm project. Some key items that Transport for NSW (RMS) recommend are addressed in the audit process include:

- Records of actual traffic generation.
- At what stage is the development at – percentage of work undertaken and potential completion date.

Please note that the project site is remote to the Classified road network and that the impact of the project on traffic is primarily on local roads. Please consult with Wagga Wagga City Council for advice on any items they require to be included in the audit as Council is the Authority for the affected roads. Transport for NSW suggests that the following traffic related items should be included as a minimum:

- Compliance with conditions of the development consent relating to traffic generation and road impacts.
- Impacts of project related traffic on roads which are part of the haulage route, particularly the intersection of Byrnes Road and Trahairs Road.
- Verification that a dilapidation survey that was undertaken prior to commencement of works.
- Have the required upgrades to Trahairs Road, as specified in the EIS, been completed to Councils satisfaction?

If you would like to further discuss or require any additional information in relation to this matter please give me a call.

Regards

Chris Bamberly

Development Assessment Officer
South West Region | Regional & Freight
T 02 6923 6588

www.rms.nsw.gov.au

Every journey matters

Roads and Maritime Services

193-195 Morgan Street Wagga Wagga NSW 2650

From: Peter Marshman [mailto:peter@j2m.com.au]

Sent: Tuesday, 8 October 2019 1:39 PM

To: Chris Bamberly

Subject: Request for consultation - Bomen Solar Farm Independent Environmental Audit.

Hi Chris,

I got your contact details of Lauren Serjeantson of Renew Estate.

I have been engaged by Spark Infrastructure to undertake an independent environmental audit on the Bomen Solar Farm Project as required by their Project Approval SSD-8835. I am seeking consultation with RMS in regard to this audit in accordance with the requirements of the Schedule 4, Condition 5 of the Approval. The audit is reviewing works undertaken since construction commenced approximately 6 months ago. The audit will be conducted by myself and two days are allocated for site inspection and auditing of records. The onsite component of the audit is scheduled for [30 - 31 October](#) 2019. If you have any feedback or comments on this project, please provide a response prior to the onsite audit.

Kind regards,

Peter Marshman

Director
J2M Systems Pty Ltd
[0422 925 598](tel:0422925598) | www.j2m.com.au
P.O. Box 163 Newport Beach NSW 2106

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Appendix D: Independent Audit Declaration Form

Independent Audit Declaration Form


Project Name	Bomen Solar Farm
Consent Number	SSD 8835 Mod 1
Description of Project	Solar Farm (Construction)
Project Address	Trahairs Road, Bomen NSW
Proponent	Spark Infrastructure
Title of Audit	Independent Environmental Audit – Bomen Solar Farm
Date	04 December 2019

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

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

Notes:

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

Name of Audit	Peter Marshman
Signature	
Qualification	Lead EMS Auditor – Exemplar Global No. 114942
Company	J2M Systems
Company Address	P.O. Box 163 Newport Beach NSW 2106

Appendix E: Site Inspection Photographs.








1.1 Site Inspection Observations







A site inspection was carried out as part of this audit and no environmental performance issues were observed. Appendix F presents commentary of photos taken during the audit site.

	
<p>Photo 1: Evidence of hollow log placement within protected vegetation zones around site.</p>	<p>Photo 2: Internal access track adjacent to perimeter fencing and landscape tree-planting zone. Aboriginal scar tree left side.</p>
	
<p>Photo 3: Aboriginal scar tree with permanent environmentally sensitive area fencing and signage.</p>	<p>Photo 4: Contractor observed watering seedlings using water cart.</p>
	
<p>Photo 5: Evidence of flagging below power lines at crossover points.</p>	<p>Photo 6: Evidence of perimeter fencing and plantings for screening within the Northern solar farm development area.</p>

	
<p>Photo 7: Evidence of sediment fence installed as per erosion sediment control plan within the Northern Solar Farm development area.</p>	<p>Photo 8: Stage 1 solar farm infrastructure installation – Northern solar farm development area.</p>
	
<p>Photo 9: Evidence of waste pallet storage in preparation for reuse / recycling or removal.</p>	<p>Photo 10: Waste collection truck on site at time of audit.</p>
	
<p>Photo 11: Internal access road, with material storage for infrastructure works.</p>	<p>Photo 12: Trahairs Road, Site compound (left), between northern and southern solar farm development areas.</p>
	
<p>Photo 13: Trahairs Road, heading from site compound towards Byrnes Road.</p>	<p>Photo 14: Site access gate and signage. Access off Trahairs Road into southern solar farm development area.</p>

	
<p>Photo 15: Stage 1 solar farm infrastructure installation – southern solar farm development area.</p>	<p>Photo 16: Grading of internal access road. Dust localised on site.</p>
	
<p>Photo 17: Evidence of internal access road within southern solar farm development area.</p>	<p>Photo 18: Evidence of sediment erosion controls within Site compound of southern solar farm development area.</p>
	
<p>Photo 19: Site compound within – southern solar farm development area. Water cart recently at location.</p>	<p>Photo 20: Transmission line trenching.</p>
	
<p>Photo 21: Evidence of vegetation planting within southern solar farm development area.</p>	<p>Photo 22: Evidence of vegetation planting within southern solar farm development area.</p>

	
<p>Photo 23: Evidence of screening plantings within protected vegetation zones around site.</p>	<p>Photo 24: Trenching machinery on site, with localised dust.</p>
	
<p>Photo 25: Sediment basin / dam on site.</p>	<p>Photo 26: Main site compound.</p>
	
<p>Photo 27: Storage containers within main site compound.</p>	<p>Photo 28: Spill kit within main site compound.</p>
	
<p>Photo 29: Vegetative screening and internal access to site compound.</p>	<p>Photo 30: Trahairs Road near Byrnes Road.</p>

	
<p>Photo 31: Vegetative screening area within southern development area, with secure perimeter fencing.</p>	<p>Photo 32: Evidence seedling growth within vegetative screening area.</p>
	
<p>Photo 33: Transmission line route towards Wagga North Substation.</p>	<p>Photo 34: Transmission line easement into Wagga North Substation.</p>
	
<p>Photo 35: Transmission line route towards Wagga North Substation. Water cart for dust suppression.</p>	<p>Photo 36: Eunony Bridge Road, bridge load limits.</p>