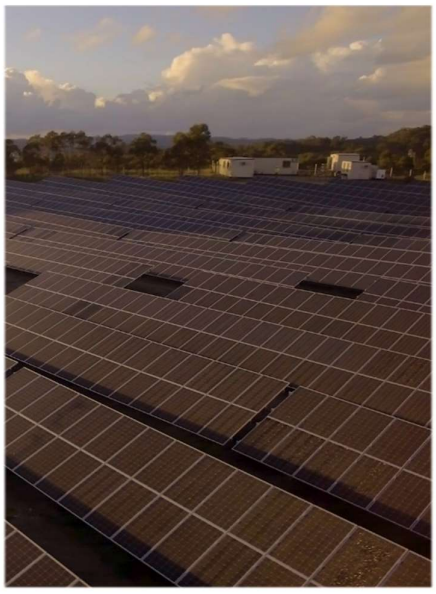
Environmental Management Strategy

Walla Walla Solar Farm

November 2022

Project Number: 22-337



NSW • ACT • QLD • VIC
W. www.nghconsulting.com.au

Document verification

Project Title:	Walla Walla Solar Farm
Project Number:	22-337
Project File Name:	22-337 Walla Walla SF EMS_Final_20221117

Revision	Date	Prepared by	Reviewed by	Approved by
Draft v1.0	17/03/2022	Jane Love	Will Weir	Will Weir
Draft v1.1	6/09/2022	Claire Hobbs	Nicola Smith	Nicola Smith
Final v1.0	17/11/2022	Jane Love	Minor changes	

NGH Pty Ltd is committed to environmentally sustainable practices, including fostering a digital culture and minimising printing. Where printing is unavoidable, NGH prints on 100% recycled paper.

W. www.nghconsulting.com.au

E. ngh@nghconsulting.com.au

BEGA - ACT & SOUTH EAST NSW
Suite 11, 89-91 Auckland Street
(PO Box 470) Bega NSW 2550
T. (02) 6492 8333

NEWCASTLE - HUNTER & NORTH COAST
Level 1, 31-33 Beaumont Street
Hamilton NSW 2303
T. (02) 4929 2301

BRISBANE
T3, Level 7, 348 Edward Street
Brisbane QLD 4000
T. (07) 3129 7633

SYDNEY REGION
Unit 17, 21 Mary Street
Surry Hills NSW 2010
T. (02) 8202 8333

CANBERRA - NSW SE & ACT
Unit 8, 27 Yallourn Street
(PO Box 62) Fyshwick ACT 2609
T. (02) 6280 5053

WAGGA WAGGA - RIVERINA & WESTERN NSW
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650
T. (02) 6971 9696

GOLD COAST
2B 34 Tallebudgera Creek Road
Burleigh Heads QLD 4220
(PO Box 424 West Burleigh QLD 4219)
T. (07) 3129 7633

WODONGA
Unit 2, 83 Hume Street
(PO Box 506) Wodonga VIC 3690
T. (02) 6067 2533

NSW • ACT • QLD • VIC
W. www.nghconsulting.com.au
ABN 31 124 444 622 ACN 124 444 622

Table of contents

Figures

Tables

Appendices

Acronyms and abbreviations

AC	Alternating current
AES	Accommodation and Employment Strategy
AR	Amendment Report
ARA	Appropriate regulatory authority
BCS	Biodiversity, Conservation and Science Directorate
BMP	Biodiversity Management Plan
CCP	Community Consultation Plan
CMSs	Construction Method Statements
CoA	Conditions of Approval
DPE	Department of Planning and Environment (NSW)
EIS	Environmental impact statement
EMS	Environmental Management Strategy
EWMS	Environmental Work Method Statements
EPA	Environment Protection Authority
EP&A Act	*Environmental Planning and Assessment Act 1979* (NSW)
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Cwth)
FRV	FRV Services Australia
FTE	Full time equivalent
ha	hectares
HMP	Heritage Management Plan
HSE	Health, Safety and Environment
GRS	Gransolar
IPC	Independent Planning Commission
km	kilometres
Kv	Kilovolts
LGA	Local Government Area
LP	Landscaping Plan
m	metres
MW	Megawatt
MWh	Megawatt hours
NPW Act	*National Parks and Wildlife Act 1974* (NSW)
O&M	Operations and maintenance

POEO Act	*Protection of the Environment Operations Act 1997*
PV	Photovoltaic
SAPs	Sensitive Area Plans
SR	Submissions Report
SSD	State Significant Development
SWMP	Soil and Water Management Plan
SWMS	Safe Work Method Statements
TfNSW	Transport for NSW
The Project	Walla Walla Solar Farm
TMP	Traffic Management Plan
WMP	Waste Management Plan

1. Introduction

1.1 Background

FRV Services Australia (FRV) (the Proponent) have approval for the construction, operation and decommissioning of a 300 megawatt (MW), alternating current (AC), photovoltaic (PV) solar farm, referred to as Walla Walla Solar Farm (the Project). The Project is located on rural land approximately 4.3 kilometres (km) north-east of Walla Walla and 10 km southwest of Culcairn, southern NSW. Gransolar (GRS) have been engaged by FRV to construct the Project.

The Project would assist in reducing greenhouse gas emissions from electricity generation and contribute to renewable energy targets committed to by the NSW and Federal Governments. Once constructed, the Project would provide around 740,000 megawatt hours (MWh) per year of renewable electricity and would save about 520,000 tonnes of greenhouse gas emissions per year compared to brown coal. In addition, the Project will provide local social and economic benefits associated with the construction and operation of the Project through employment and use of local businesses.

The Project was assessed in an Environmental Impact Statement (EIS) in accordance with Part 4 of the New South Wales (NSW) *Environmental Planning and Assessment Act 1979* (EP&A Act) and Schedule 2 of the Environmental Planning and Assessment Regulation *2000* (EP&A Regulation). It is considered State Significant Development (SSD).

In response to submissions made during exhibition of the EIS, a Submissions Report and Amendment Report was prepared by NGH (2020b, 2020c). The submissions resulted in changes to the EIS proposal and some changes in safeguards and management measures outlined in the EIS.

FRV received approval for the Project on 27 November 2020 from the Independent Planning Commission (IPC). Since its approval, a modification has also been approved for the Project on 3 March 2022 and consolidated conditions of consent have been provided. The modification was to increase the height of the panels and substation transmission towers and amend the construction access and transport route.

The Environmental Assessment documents for the Project include:

- The Project EIS (NGH, 2020a).
- The Project Submissions Report (SR) (NGH, 2020b).
- The Project Amendment Report (AR) (NGH, 2020c).
- Modification 1 Report (NGH, 2021a).
- Modification 1 Submissions Report (NGH, 2021b).
- IPC Consolidated Development Consent (determined 3 March 2022).

The environmental safeguards outlined in the Environmental Assessment documents have been incorporated into this document and associated sub-plans where relevant.

1.2 Purpose of this EMS

This Environmental Management Strategy (EMS) presents the framework for the environmental management for the Project. It has been prepared to outline and describe how GRS and FRV will comply with the environmental assessment and approval during all stages of the Project.

The EMS has been prepared in accordance with:

- Environmental Assessment documents.
- Guideline for the Preparation of Environmental Management Plans (DIPNR, 2004).
- AS/NZS ISO 14001: 2016 Environmental Management systems.
- GRS Management System Requirements.
- Applicable Federal and State Legislation.
- AS/NZS ISO 31000:2009 Risk management.

The purpose of this EMS is to provide a structured approach to the management of environmental issues during all stages of the Project. The EMS outlines the requirements, controls and management procedures that direct the Project team and provides an overall approach to the Project. It also provides requirements for and directs contractors and suppliers for the Project regarding specific measures that they need to adopt for their own work for the Project. Implementing this EMS effectively will ensure that the Project team will meet regulatory and policy requirements in a systematic manner and continually improves environmental performance.

This EMS:

- Describes the Project in detail including activities to be undertaken.
- States obligations, objectives and targets for issues that are important to the environmental performance of the Project.
- Identifies the approvals, licences and permits that relate to the Project.
- Describes the strategic framework for environmental management of the Project.
- Describes the environmental management related roles and responsibilities of personnel.
- Outlines training and induction requirements for employees, contractors and sub-contractors, in relation to environmental and compliance obligations with applicable policies, approvals, licences, permits, consultation agreements and legislation.
- Describes the procedures that will be implemented for community consultation and notification, and complaints management.
- Includes protocols for managing and reporting incidents and non-compliances with applicable policies, approvals, licences, permits, consultation agreements and legislation.
- Outlines a monitoring regime and inspection program to check the adequacy of controls as they are implemented during construction.

This EMS is the overarching document in the environmental management system for the Project that includes a number of management documents as described in Section 4. It is applicable to all staff and sub-contractors associated with the Project.

2. Project description

2.1 Project site and location

Walla Walla is the closest town to the Project, approximately 4.3 km south-west. The closest services are located in the regional centre of Albury, around 35 km south of the Project (Figure 2-1)

Figure 2-1.

The Project is located off Benambra Road, approximately 2.6 km west of the Olympic Highway within the Greater Hume Local Government Area (LGA) and is legally identified as the following Lots:

- Lots 16, 17, 20, 21, 87, 88, 89, 108, 109 118 of DP 753735.
- Lot 3 DP 253113.
- Lot 1 DP 1069452.
- Lot A DP 376389.
- Lot 1 DP 933189.

Benambra Road runs along the northern boundary of the Project site, with Schneider's Road running through the Project site.

The site comprises several large paddocks that are generally flat, largely cleared of native vegetation, and cultivated for pastures and grazing, which is the dominant land use in the area.

There are no residences within the development footprint. There are six direct neighbouring landowners to the Project site referred to as R1, R2, R3, R4, R5 and R6 (Figure 2-1). R3 and R4 are also landowners, who would lease the site to FRV for the life of the Project. The Project site and most adjoining land are unirrigated and used for agriculture, including grazing and cropping.

The existing TransGrid Jindera to Wagga Wagga 330 kilovolts (kV) transmission line runs across the western side of the Project site, which is part of the electricity distribution network that originates at TransGrid's North Wagga Wagga Substation. The solar farm will connect directly to the transmission line where it crosses the site, with a new substation proposed near this location.

2.2 Scope of works

The development footprint would occupy around 493 hectares (ha) of the 605 ha Project site. The Project would involve the construction of a ground-mounted photovoltaic (PV) solar tracking array generating around 300 MW AC of renewable energy. The power generated would be exported to the national electricity grid.

Key development and infrastructure components would include:

- Approximately 700,000 PV solar arrays mounted on single axis tracking systems.
- Electrical cables and conduits.
- Approximately 76 modular inverter units.
- New TransGrid substation and connection point comprising transformers, associated switchgear, control and protection equipment.
- 33 kV/330 kV transformer and protection.
- Operations and maintenance (O&M) building, parking and perimeter fencing.
- Primary access point on Benambra Road.
- Emergency/maintenance access points off Benambra and Schneiders Roads.
- Internal access tracks.
- Reactive lighting, CCTV system, security fencing.
- Vegetative screening and setbacks.

The approved indicative Project layout is shown in Figure 2-2.

2.3 Site access

The Project would be accessed primarily from one access point on Benambra Road on the northern eastern corner of the site, 2.6 km west of Olympic Highway. Substation access would also be via Benambra Road and this access point would only be used by TransGrid. The western land parcel would be accessed at two points crossing Schneiders Road east to west only. Construction traffic would only cross Schneiders Road and not utilise the road itself.

2.4 Project activities and sequence

Project activities and sequencing is provided in Table 2-1.

Table 2-1 Project activities and sequencing

Stage	Activities	Staff
Construction	The main construction activities would include: • Site establishment and preparation for construction - fencing, ground preparation, construction of the internal track system, upgrade of existing access points/intersections, preliminary civil works and drainage. • Installation of steel post and framing system for the solar panels. • Installation of underground cabling (trenching) and installation of inverter stations. • Installation of PV panels. • Construction of O&M building and switchroom. • Construction of the substation and connections. • Removal of temporary construction facilities and rehabilitation of disturbed areas. • Landscaping.	It is anticipated that approximately 250 construction personnel would be required onsite during the peak construction period of 8 to 12 months
Operations	Operation activities would include: • Routine visual inspections, general maintenance and cleaning operations of the solar arrays as required. • Routine visual inspections, general maintenance and cleaning operations of the substation. • Vegetation management, likely using sheep to control grass growth beneath the panels. Groundcover vegetation would be maintained over the site to minimise erosion, dust and weeds (subject to climatic conditions). Groundcover would be monitored and remediation (such as reseeding, soil protection or destocking) undertaken as required. • Site security response (24 hr) if required. • Site operational response (24 hr) if required. • Replacement of equipment and infrastructure as required. • Maintenance of landscaping and screening plantings as required. • Pest plant and animal control as required.	The solar farm would be monitored and operated by approximately 21 full time equivalent (FTE), 16 of which would be based onsite.
Decommissioning	At the end of its operational life, the solar farm would be decommissioned. Key elements of decommissioning would	TBC

Stage	Activities	Staff
	include: • The solar arrays would be removed, including the foundation posts. Materials would be sorted and packaged for removal from the site for recycling or reuse wherever possible. • All site amenities and equipment would be removed including buildings, inverter stations and materials recycled or reused wherever possible. • Posts and cabling would be removed and recycled. • Fencing would be removed including small concrete footings. • Gravel pavement materials will be recovered and recycled as general fill in an appropriate location. • Areas subject to compaction will have the topsoil ripped to a depth suitable for seeding if appropriate. • Sodic soil will be treated as necessary with lime or gypsum.	

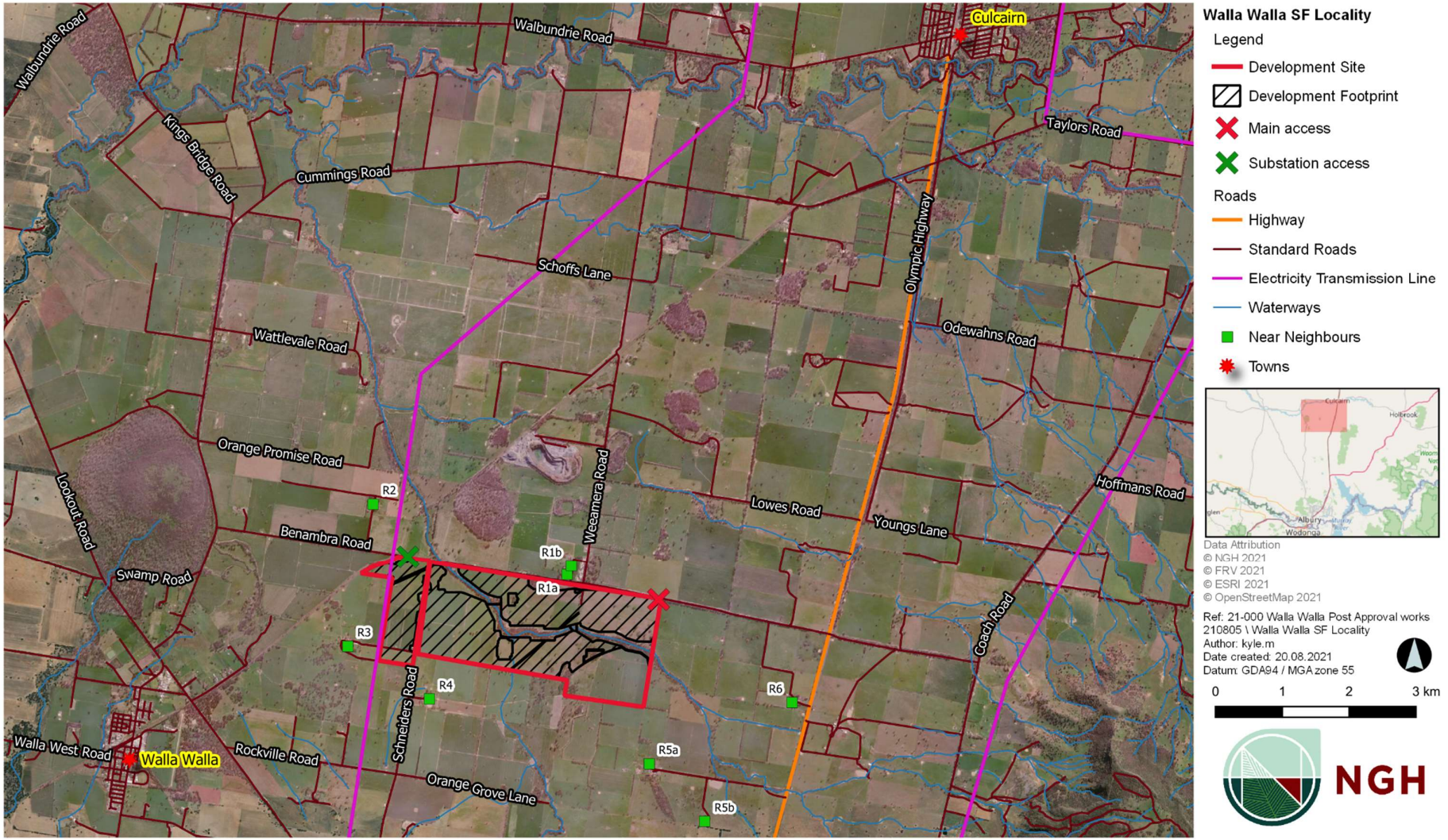


Figure 2-1 Project site locality

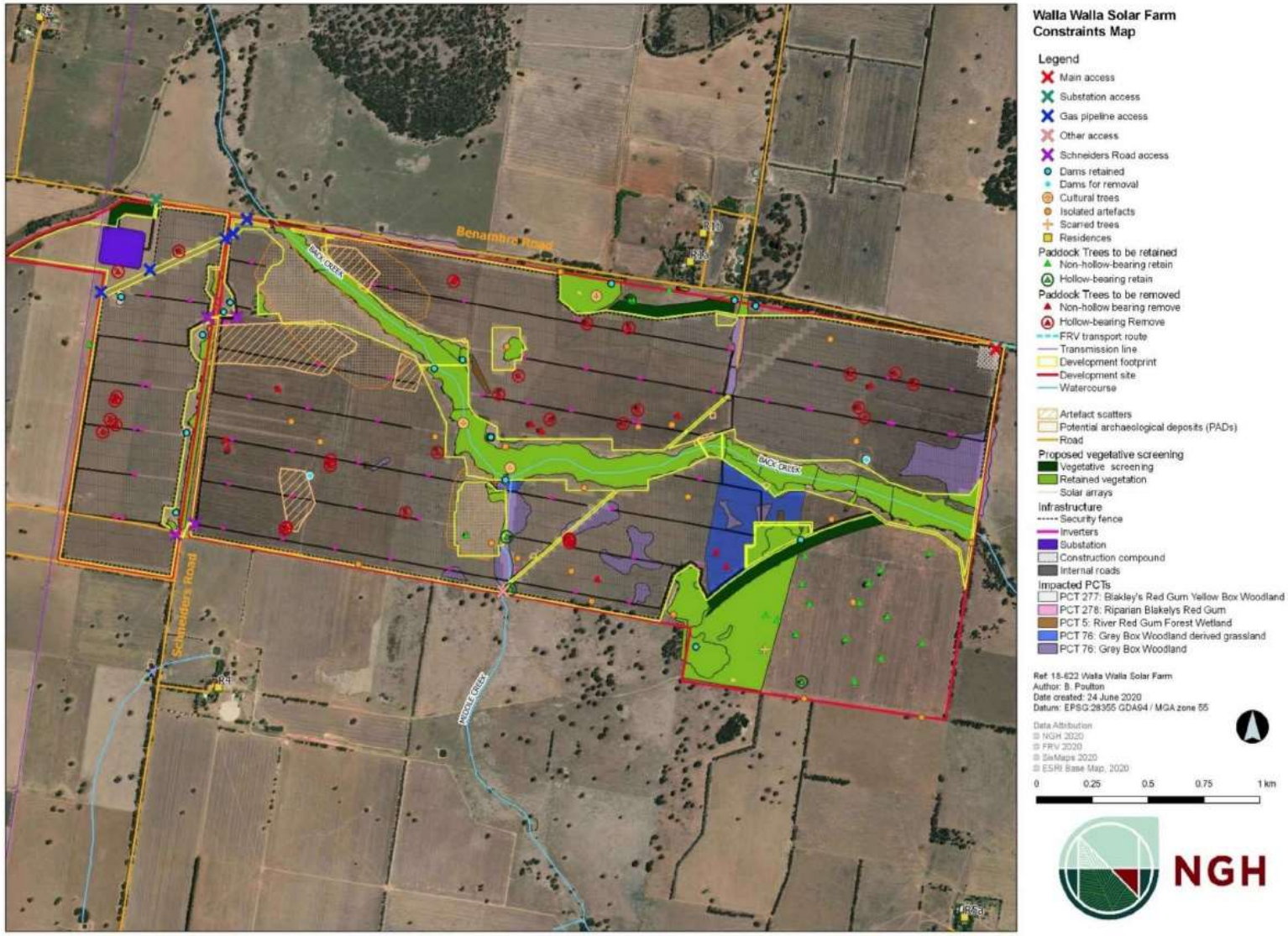


Figure 2-2 Project layout

2.5 Project program

An indicative timeline for the Project is outlined in Table 2-2. It is expected that the solar farm would be commissioned at the end of the 16 to 20 month construction period.

Table 2-2 Indicative timeline

Phase	Approximate commencement	Approximate duration
Construction	Q1 2021	16 to 20 months
Operation	Q4 2022	30 years
Decommissioning	Q4 2052	6 months

2.6 Project hours

Construction activities would be undertaken during standard daytime construction hours (7.00 am to 6.00 pm Monday to Friday and 7.00 am to 1.00 pm on Saturdays).

3. Planning

3.1 Project environmental obligations

All personnel working on the Project have the following general obligations:

- Build and operate the Project as described in the EIS and comply with the conditions of approval.
- Minimise pollution of land, air and water.
- Use pollution control equipment maintained in working order.
- Preserve the natural and cultural heritage environment.
- Notify relevant state authorities of a non-Aboriginal or Aboriginal heritage discovery.
- Minimise the occurrence of offensive noise.
- Be a good neighbour to surrounding land users.
- Keep the community informed of Project milestones, upcoming activities and duration of relevant aspects of the works.
- Use equipment with noise dampeners where available and ensure it is maintained.
- Take all feasible and reasonable steps to ensure compliance with the requirements of this EMS and sub plans.

3.2 Legal and other requirements

A register of legal and other requirements for the Project is contained in Appendix B. This register is maintained as a checklist. This register will be reviewed at regular intervals e.g. during management reviews, and updated with any applicable changes. Any changes made to the legal requirements register will be communicated to the wider team where necessary through toolbox talks, specific training and other methods detailed in Section 6.

3.3 Conditions of approval

The Conditions of Approval (CoA) relevant to this EMS are outlined in Table 3-1 below. The full list of conditions of Approval and mitigation measures from the Environmental Assessment documents are identified in Appendix A, along with the management plan where conditions and measures have been addressed.

Table 3-1 Conditions relevant to the EMS

Condition	Requirement	Where addressed
Schedule 4 Environmental Management and reporting		
Condition 1 Environmental management strategy	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: a) Provide the strategic framework for environmental management of the development; b) Identify the statutory approvals that apply to the development;	This plan

Condition	Requirement	Where addressed
	c) Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; d) Describe the procedures that would be implemented to: • Keep the local community and relevant agencies informed about the operation and environmental • Performance of the development; • Receive, handle, respond to, and record complaints; • Resolve any disputes that may arise; • Respond to any non-compliance; • Respond to emergencies; and e) Include: • 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. Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.	
Condition 2 Revision of Strategies, Plans and Programs	The Applicant must: a) Update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and b) Review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the: • Submission of an incident report under condition 7 of Schedule 4; • Submission of an audit report under condition 13 of Schedule 4; or • Any modification to the conditions of this consent	Section 10 and 11 of this EMS
Condition 3 Updating and staging of strategies, Plans or Programs	With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Planning Secretary for approval. With the agreement of the Planning Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.	Section 10 and 11 of this EMS

Condition	Requirement	Where addressed
	Notes: • While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.	
Condition 7 Incident notification	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7	Section 8.3 of this EMS
Condition 8 Non-compliance Notification	The Department must be notified via the Major Projects website portal 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 non- compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.	Section 0 of this EMS
9 Independent Environmental Audit	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: a) Within 3 months of commencing construction; and b) Within 3 months of commencement of operations.	Section 9.3 of this EMS
10 Independent Environmental Audit	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Section 9.3 of this EMS
11 Independent Environmental Audit	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 9 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.	Section 9.3 of this EMS
12 Independent Environmental	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must:	Section 9.3 of this EMS

Condition	Requirement	Where addressed
Audit	a) Review and respond to each Independent Audit Report prepared under condition 9 of Schedule 4 of this consent, or condition 11 of Schedule 4 where notice is given by the Planning Secretary; b) Submit the response to the Planning Secretary; and c) Make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. Unless otherwise agreed by the Planning Secretary.	
13 Independent Environmental Audit	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.	Section 9.3 of this EMS
14 Independent Environmental Audit	Notwithstanding the requirements of the Independent Audit Post Approvals Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	Section 9.3 of this EMS

3.4 Approvals, permits and licensing

The Project will be undertaken in accordance with the following:

- The Project EIS (NGH, 2020).
- The Project SR (NGH, 2020).
- The Project AR (NGH, 2020).
- Modification 1 Report (NGH, 2021).
- Modification 1 SR (NGH, 2021).
- IPC Consolidated Development Consent (determined 3 March 2022).

Additionally, the Project requires the following permits and licences:

- Roads Act, section 138 Any works to public or classified roads requires consent under this act from the road authority. Greater Hume Shire Council is the roads authority for public roads within the Walla Walla area and RMS is the roads authority for Olympic Highway.
- *Local Government Act 1993*, Section 68 Approval is required to operate an onsite sewage management system and to draw water from a council standpipe. Consent from Greater Hume Shire Council would be required for use of a standpipe and to operate an onsite sewage management system.
- Oversize Overmass Permit An oversize overmass permit will be required from the relevant road authority (Council and/or TfNSW) for any oversized vehicles.

Should any additional environmental or planning approvals, permits or licences be required the following procedure would be implemented:

- Approval, licence or permit need is identified.
- The Project Manager will identify impacts to the Project in relation to the approval (e.g. stop work).
- The Project Manager will complete the necessary work to apply for the approval, licence or permit.
- If changes are necessary to the EMS, the procedure in Section 10 would be followed.
- The Project Manager would notify the Proponent in writing of the outcome of the application.

4. Environmental management system

4.1 Environmental policy

Construction will be undertaken under GRS's Environmental Policy. This policy describes GRS's commitment to managing their environmental and community impact and deliver sustainable development and investment outcomes.

The environmental policy is displayed at the site office and communicated to staff and other interested parties via induction and ongoing awareness programs.

A copy of the environmental policy is provided at Appendix C.

4.2 Objectives and targets

As a means of assessing environmental performance over the life of the Project, environmental objectives and targets have been established. These objectives and targets have been developed with consideration of key issues identified through the environmental assessment and risk assessment process. The objectives and targets are consistent with the Project environmental policy and will assist in monitoring whether the commitments of the policy are being met.

The targets are incorporated into relevant environmental management sub-plans.

The performance of the Project against the objectives and targets will be documented in the Project compliance reports and at least on an annual basis as part of the management review.

Environmental objectives and targets for the Project are provided in Table 4-1 below.

Table 4-1 Environmental objectives and targets.

Objective	Target	Measurement Tool
Construction of the Project in accordance with environmental approvals.	• Compliance with statutory approvals.	Audits, construction compliance reporting, management review.
Construction of the Project in accordance with approved environmental management plans.	• Compliance with EMS and associated Sub-plans. • Compliance with relevant environmental procedures.	Audits, construction compliance reporting, management review.
Compliance with all legal requirements.	• No regulatory infringements (PINs or prosecutions). • No formal regulatory warning.	Audits, construction compliance reporting, management review (construction and operation).
Implement rigorous and comprehensive EMS that meets the requirements of AS/NZS ISO 14001.	• Address non-conformances and corrective actions within specific timeframes.	Audits, management review.
Engage with the affected and broader community, minimise complaints and respond to any complaints	• Disseminate regular Project updates and other information through the Project website and other tools identified in the Project's Community Consultation Plan	Review complaints register, construction compliance report, audits

Objective	Target	Measurement Tool
within a suitable timeframe	(CCP). • Record and respond to complaints in accordance with timeframes specified in the CCP.	
Continuously improve environmental performance.	• Develop and maintain a program of ongoing environmental training. • Capture lessons learnt from environmental incidents to minimise repeat issues. • Encourage and reward innovation and effort throughout the works force.	Construction compliance report, management review, construction and operational audits.

4.3 Environmental management system

This EMS provides the system to manage and control the environmental aspects during Project delivery. It identifies all requirements applicable to activities described in Section 2. The EMS provides the overall framework, system and procedures to ensure the potential for environmental impacts is minimised and legislative requirements are fulfilled. The system and procedures in this EMS have been developed with consideration of the environmental assessment documents and all relevant licences, permits and approvals for the Project. This EMS establishes the system for implementation, monitoring and continuous improvement to minimise impacts from the Project on the environment.

4.4 Environmental management sub-plans and strategy

The EMS and subplan documents are prepared to identify requirements and processes applicable to specific impacts or aspects of the activities described in Section 2. They address the measures identified in the environmental assessment documentation and Project Approval.

The sub-plans for the Project, and their consultation approval requirements, are provided in Table 4-2.

Table 4-2 Environmental management plans and approval and consultation requirements.

Plan	Location	Consultation Requirements	Approval requirements
EMS	This Plan	Development in consultation with APA Group (Mitigation measure LU14)	To the satisfaction of the Planning Secretary
Traffic Management Plan (TMP; CoA 10)	Appendix G	Developed in consultation with Transport for NSW (TfNSW), Greater Hume Shire Council, Hurricane Hill Hardrock Rock	To the satisfaction of the Planning Secretary in writing
Landscaping Plan (LP; CoA 12)	Appendix G	Developed in consultation with R1a, R1b, R2 and Ra	To the satisfaction of the Planning Secretary in writing

Plan	Location	Consultation Requirements	Approval requirements
Biodiversity Management Plan (BMP; CoA 16)	Appendix G	Developed in consultation with Biodiversity, Conservation and Science Directorate (BCS)	To the satisfaction of the Planning Secretary in writing
Heritage Management Plan (HMP; CoA 25)	Appendix G	Developed in consultation with Heritage NSW and Aboriginal Stakeholders	To the satisfaction of the Planning Secretary in writing
Emergency Plan (CoA 32)	Appendix G	-	To the satisfaction of the Fire and Rescue NSW and Rural Fire Service
Accommodation and Employment Strategy (AES, CoA 34)	Appendix G	Developed in consultation with Greater Hume Shire Council	To the satisfaction of the Planning Secretary in writing
Soil and Water Management Plan (SWMP; Mitigation measure SO1)	Appendix G	ESCP developed in consultation with soil scientist and an agronomist	-
Waste Management Plan (WMP; Mitigation measure WM1)	Appendix G	-	-

4.5 Consultation

Consultation has been completed in accordance with the requirements of the Project approvals as outlined in Table 4-2. A summary of the consultation is outlined below.

Table 4-3 Consultation record

Organisation	Response details
TfNSW	TMP
Greater Hume Shire Council	TMP AES
Hurricane Hill Hardrock Rock	TMP
Sensitive receivers (R1a, R1b, R2 and Ra)	LP
APA	EMS
BCS	BMP
Heritage NSW	HMP
Aboriginal Stakeholders	HMP
Fire and Rescue NSW	Emergency Plan
Rural Fire Service	Emergency Plan
Soil scientist and an agronomist	SWMP

4.6 Environmental Work Method Statements

Environmental work method statements (EWMSs) or Construction Method Statements (CMSs) will be prepared for all activities that carry an inherent level of environmental risk. EWMSs or CMSs will be prepared prior to the commencement of relevant construction activities on site and will incorporate relevant mitigation measures and controls from management sub plans. EWMSs / CMSs will be prepared to identify risks, ensure sound environmental practices are implemented, and to minimise the risk of environmental incidents or system failures. EWMSs / CMSs are to be designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions.

EWMSs / CMSs will be developed for at least the following activities:

- Pre-construction activities including topsoil stripping and earthworks.
- Activities that impact on environmentally sensitive areas.

- Vegetation clearing and grubbing.
- Working in or near waterways.
- Temporary waterway crossings.
- Site compound and other ancillary facilities establishment.
- Dewatering.
- Topsoil stripping.
- Concreting activities (where required).
- Drainage works.

All Project personnel and sub-contractors undertaking a task governed by an EWMS must participate in training on the EWMS and acknowledge that they have read and understood their obligations prior to commencing work.

Regular monitoring, inspections and auditing against compliance with the EWMS will be undertaken by Project management, quality, and environmental personnel to ensure that all controls are being followed and that any non-conformances are recorded and corrective actions implemented.

4.7 Sensitive area plans

To aid in the identification and protection of significant environmental features associated with the Project, a set of Sensitive Area Plans (SAPs) have been prepared. The SAPs are included in Appendix E.

The sensitive area plans include information relating to (for example):

- Threatened ecological communities.
- Watercourses.
- Heritage items.
- Threatened species.
- Sensitive receivers.

The SAPs are working documents and will be updated throughout the Project, as required.

4.8 Roles and responsibilities

The key environmental management roles and responsibilities for the construction phase of the Project are described below. An organisational structure is provided in Appendix F.

GRS shall ensure specific responsibilities are communicated to all personnel via appropriate environmental management training (part of the initial safety and environment induction).

4.8.1 Environmental management team

The GRS environmental management team is provided in Table 4-4.

Table 4-4 GRS environmental management team

Role	Name	Responsibility
Project Manager	Sri Sahaarenghan	• Ensure all works comply with relevant regulatory and Project requirements. • Ensure the requirements of this EMS are fully implemented, and environmental requirements are not secondary to other construction requirements. • Endorse and support the Project environmental policy attached at Appendix C. • Liaise with FRV and Government authorities as required. • Participate and provide guidance in the regular review of this EMS and supporting documentation. • Provide adequate resources (personnel, financial and technological) to ensure effective development, implementation and maintenance of this EMS. • Ensure that all personnel receive appropriate induction training, including details of the environmental and community requirements. • Ensure that complaints are investigated to ensure effective resolution. • Stop work immediately if an unacceptable impact on the environment is likely to occur.
Construction Manager	Hesham Shehatat	• Plan construction works in a manner that avoids or minimises impact to environment. • Ensure the requirements of this EMS are fully implemented. • Ensure construction personnel manage construction works in accordance with statutory and approval requirements. • Support the HSE Manager in achieving the Project environmental objectives. • Ensure environmental management procedures and protection measures are implemented. • Ensure all Project personnel attend an induction prior to commencing works. • Liaise with FRV and other Government authorities as required. • Stop work immediately if an unacceptable impact on the environment is likely to occur.
Superintendent	Chris Bugden	• Communicate with all personnel and sub-contractors regarding compliance with the EMS and site-specific environmental issues. • Ensure all site workers attend an environmental induction prior to the commencement of works. • Coordinate the implementation of the EMS. • Coordinate the implementation and maintenance of pollution control measures. • Identify resources required for implementation of the EMS. • Support the HSE Manager in achieving the Project environmental

Role	Name	Responsibility
		objectives, including on ground implementation of the EWMS. • Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the HSE Manager. • Coordinate action in emergency situations and allocate required resources. • Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager and HSE Manager.
HSE Manager	Paul Cannington	• Control field works and implement/maintain effective environmental controls. • Ensure site activities comply with EWMS and relevant records are Ensure all site workers are site inducted prior to commencement of works kept. • Attend to any spills or environmental incidents that may occur on-site. • Ensuring that the EWMS is established, implemented and maintained in compliance with all Environmental Assessment documents and approvals, including all sub-plans, procedures and supplementary EWMS, and upgrades to these documents (as needed) to remain current with the progress of the Works • Overall responsibility for the establishment, management, monitoring and maintenance of erosion and sediment controls within the site. • Carrying out daily inspections and auditing of the works at least every fortnight to ensure that environmental safeguards are being followed. • Identifying where the implemented environmental measures are not meeting the targets set, and identifying areas where improvement can be achieved. • Preparing reports outlining the works that have been undertaken and the achievements that have been met, as well as identifying those areas where improvements were made and detailing environmental performance. Environmental performance is to include all non-compliances with the requirements of any other environmental reporting requirements. • Facilitating and developing the material for all environmental induction and toolbox talks for all site personnel. • Specific authority to stop work on any activity where the Construction Environmental Manager deems it necessary to prevent environmental non-conformities, and notification to the relevant parties of any environmental incidents. • Notify environmental incidents and reportable events immediately and submit reports.
HSE Supervisor/Coordinator	Jennifer Klease Dale Walton	• Support the HSE Manager on activities outlined above
Project/Site		• Provide input into the preparation of environmental planning

Role	Name	Responsibility
Engineers		documents as required. • Ensure that instructions are issued and adequate information provided to employees that relate to environmental risks on-site. • Ensure that the works are carried out in accordance with the requirements of the EMS and supporting documentation, including the implementation of all environmental controls. • Identify any environmental risks. • Identify resource needs for implementation of EMS requirements and related documents. • Ensure that complaints are investigated to ensure effective resolution. • Take action in the event of an emergency and allocate the required resources to minimise the environmental impact. • Report any activity that has resulted, or has the potential to result, in an environmental incident or reportable event immediately to the Construction Manager and HSE Manager.
Foreman		• Undertake any environmental duties as defined by the superintendent or Project/Site Engineer. • Control field works and implement/maintain effective environmental controls. • Where required, undertake environmental risk assessment of works prior to commencement. • Ensure site activities comply with EWMS and relevant records are kept. • Ensure all site workers are site inducted prior to commencement of works. • Attend to any spills or environmental incidents that may occur on-site. • Report any activity that has resulted, or has the potential to result, in an environmental incident or reportable event immediately to the Superintendent. • Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager and HSE Manager.

4.8.2 Sub-Contractors and sub-contractor management

Sub-contractors and their employees will be required to comply in full with the requirements of the EMS and relevant environmental requirements as it applies to site environmental management and control. Sub-contractors' personnel are considered equivalent to GRS Project personnel in all aspects of environmental management and control. Their responsibility in this respect mirrors those of GRS personnel.

In accordance with Subcontractor HSE Document Approval Process, Subcontractors are appointed and reviewed to determine suitability. Specifically, this process ensures that subcontractors' Safe Work Method Statements (SWMS) and Work Method Statements (WMS) have been assessed and are appropriate for the tasks being conducted.

The Project Manager is responsible to ensure the subcontractor documentation, plant and equipment has been approved prior to commencing on site.

Sub-contractors working on the Project will be required to:

- Undertake environmental awareness training (refer to Section 6).
- Observe sub-contract and statutory requirements relating to environmental protection and other environmental legislation and to follow instructions issued by GRS management, supervisory personnel.
- Nominate site representatives to liaise with GRS representatives with respect to, and take responsibility for, environmental requirements for the site activities.
- Adhere to GRS's environment management system as it applies to their operations on the site.
- Undertake weekly environmental inspections of their work areas.
- Co-operate fully with the site emergency incident procedures and consultative arrangements.
- Follow procedures incorporated in the EMS.

All Subcontractors are monitored on site by the site supervisor and are required to work in accordance with their SWMSs/Work methods at all times. All subcontractors are monitored on site for compliance in the same manner as GRS employees. Monitoring will include but is not limited to:

- Undertaking daily checks of environmental controls in high-risk sites or in environmentally sensitive environments.
- Documenting findings on daily checks.
- Completing checklist as required.

Observations will be made by the HSE Manager to assess the effectiveness of environmental protective measures being used onsite by the sub-contractor and to determine compliance with the requirements of the EMS.

Internal audits will also be conducted by GRS to assess:

- Communication with sub-contractors.
- Compliance with contractual requirements.
- Knowledge of and compliance with the EMS.
- Work procedures and environmental management controls on site.

5. Environmental risk assessment

The management of environmental impacts for the Project would follow a risk-based approach to determine the severity and likelihood of an activity's impact on the environment and to prioritise its significance. This process considers potential regulatory and legal risks also taking into consideration the concerns of community and other stakeholders.

Risk assessments are undertaken at various stages of the Project and documented in management plans, EWMS and other Project documents. The objectives of these risk assessments are to:

- Identify activities, events or outcomes that have the potential to adversely affect the local environment and/or human health/property.
- Qualitatively evaluate and categorise each risk item.
- Assess whether risks can be managed by environmental protection measures.
- Qualitatively evaluate residual risk with implementation of measures.

An environmental risk assessment has been undertaken for the Project and is included as Appendix D. This risk assessment details the environmental aspects identified for the Project, the initial risk category prior to appropriate management strategies, and reference to the appropriate document which detailing proposed mitigation strategies. Risk assessments for the Project are based on AS/NZS 4360:1999, the Australian Standard for risk assessments.

The GRS will maintain the environmental risk register to address risks specific to the scope. Risks will be required to be reviewed on a regular basis and will also be reviewed in response to incidents, changes in legal requirements, change in Project scope, findings of inspections and audits and management reviews.

6. Training, awareness, and competency

To ensure that this EMS is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this EMS. The HSE Manager will coordinate the environmental training in conjunction with other training and development activities (e.g. safety).

6.1 Environmental induction

Prior to working on site, all personnel and sub-contractors will undertake an environmental induction as part of the site induction. This is done to ensure all personnel involved in the Project are aware of the requirements of the EMS and to ensure the implementation of environmental management measures.

Short-term visitors to site for purposes such as deliveries will be required to be accompanied by inducted personnel at all times.

The Project Manager is responsible to ensure that all employees and contractor employees attend an induction prior to starting work.

Records of all inductions and copies of relevant qualifications and or licences will be retained for the life of the Project.

All staff attending site will be required to attend a health and safety, quality and environment induction prior to starting work on the Project. The environment section covers core issues including (but not limited to):

- Relevant details of the EMS including purpose and objectives.
- Requirements of due diligence and duty of care.
- Conditions of environmental licences, permits and approvals.
- Potential environmental emergencies on site and the emergency response procedures.
- Reporting and notification requirements for pollution and other environmental incidents or reportable events, including identification of contaminated land and damage and maintenance to environmental controls.
- High risk activities and associated environmental safeguards.
- Controls when working in or near environmentally sensitive areas.
- Specific environmental management requirements and responsibilities.
- Mitigation measures for the control of environmental issues.
- Incident response and reporting requirements.
- The existence of EWWMS for high-risk activities.
- Information relating to the location of environmental constraints.
- Site specific issues including:
    - Site flagging protocol.
    - Erosion and sediment controls, water quality controls and sediment basin management.
    - Management of contaminated material.
    - Groundwater and surface water management and controls.

- Obligations under the *Biosecurity Act 2015* to prevent the spread of weeds during construction.
- Responsibilities under the following legislation and permits:
  - *National Parks and Wildlife Act 1974*, including the need to cease. work immediately and report any object of potential Aboriginal heritage unearthed during clearing, grubbing and earthworks operations.
  - *Protection of the Environment Operations Act 1997.*
- Noise, vibration and air quality management controls.
- Requirement to maintain surrounding property access for residences, business owners, and their visitors, and to minimise disruptions to these properties for the duration of construction.
- Location of refuse bins, washing, refuelling and maintenance of vehicles, plant and equipment.
- Waste minimisation and disposal protocols.
- Boundaries for vegetation clearing, fauna and fauna habitat management, including awareness of threatened fauna species and fauna rescue.
- Incident management processes.
- Environmental emergencies including pollution incidents, floods and bushfires.

- Key environmental issues.
- Site-specific training will be provided to personnel engaged in activities or areas of higher risk, including but not limited to:
  - Working in and near waterways.
  - Construction noise management.
  - Areas of Aboriginal heritage sensitivity.

The site induction will also include communications training including:

- How to respond to community queries.
- Aware and abide by the requirements for the release of information.
- Understand the identity of the community.

A record of all environment inductions will be maintained and kept on-site in hard copy or in database. The HSE Manager may authorise amendments to the induction at any time. Possible reasons for changes to the induction may be Project modifications, legislative changes or amendments to this EMS or related documentation.

An induction register is kept on site as part of Project Quality System to demonstrate compliance with EMS activities.

6.2 Toolbox talks, training and awareness

The HSE Manager is responsible to ensure that all Project personnel are competent to perform tasks that affect the performance and effectiveness of the environmental management system.

Specific consideration shall be given to those personnel who are promoted or placed in supervisory positions during the course of the Project that they are provided with suitable training to manage their Environmental responsibilities.

Toolbox talks will be one method of raising awareness and educating personnel on issues related to all aspects of construction including environmental issues. The toolbox talks are used to ensure environmental awareness continues throughout construction.

Toolbox talks will include, but not be limited to:

- A description of the activity and the area.
- Identification of the environmental issues and risks for the area.
- Outline the mitigation measures for the works and the area.
- Details of EWMS for relevant personnel.

Toolbox talks will also be tailored to specific environmental issues relevant to upcoming works.

Relevant environmental issues include (but are not limited to):

- Erosion and sedimentation controls.
- Working hours.
- Emergency and spill response.
- Weed management.
- Water management.
- Construction noise management.
- Working in or near waterways.
- Dust control.
- Vegetation trimming and clearing.
- Waste storage and segregation.
- Management of identified heritage items.

Toolbox attendance is mandatory, and attendees of toolbox talks are required to sign an attendance form and the records maintained.

As required, targeted environmental training will be provided for nominated personnel.

All environmental monitoring and testing is to be conducted by persons who are appropriately qualified and trained.

6.3 Environmental awareness training

Staff and sub-contractors working on site will be provided with environmental training that will incorporated into ‘toolbox’ and inductions. Formal qualifications for specialist staff may be required in relation to activities such as animal handling and the design of erosion and sedimentation control plans. The aim will be to achieve a level of awareness and competence appropriate to their assigned activities.

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

This training will generally be prepared and delivered by the HSE Manager. The target groups and suggested topics for this training are detailed in Table 6-1.

Another way to inform construction personnel will be through the development and distribution of awareness notes. These will typically take the form of a poster, booklet, or similar and will be distributed to engineers, leading hands, foreman and others with a responsibility for managing

specific work locations or activities. This documentation will be used to inform the broader workforce through either daily pre-start meeting (see section below) or provision in worker crib sheds/break facilities.

Refresher environmental awareness training will be undertaken as required, but not less than 6 monthly intervals, based on environmental risks and turnover of personnel. Refresher environmental awareness training will be recorded on the Environmental Training Register.

A training register is kept on site as part of Project Quality System to demonstrate compliance with EMS activity training records.

Table 6-1 Example Environmental Training Schedule.

Training	Senior Managers	Superintendents	Engineers	Environmental Staff	Foreman	Leading Hands	Sub-Contractors	Administrative Staff
Project Inductions	✓	✓	✓	✓	✓	✓	✓	✓
Biodiversity Awareness (Induction and Toolbox talks)	✓	✓	✓	✓	✓	✓	✓	
Heritage Awareness (Induction and toolbox talks)	✓	✓	✓	✓	✓	✓	✓	
Noise, Dust, Erosion & Sediment Control (Induction and Toolbox talks)	✓	✓	✓	✓	✓	✓	✓	
Spill Response (Induction and toolbox talks)	✓	✓	✓	✓	✓	✓		
Erosion and sedimentation controls (including leachate drainage	✓	✓	✓	✓	✓	✓	✓	
Emergency procedures	✓	✓	✓	✓	✓	✓	✓	✓

6.3.1 Daily Pre-Start Meetings

The pre-start meeting is a tool for informing the workforce of the day's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination issues with other trades, hazards and other information that may be relevant to the day's work.

The Foreman will conduct a daily pre-start meeting with the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. Daily pre-start meetings are generally succinct in nature and take about 10–15 minutes.

The environmental component of pre-starts will be determined by relevant foreman and environmental personnel and will include any environmental issues that could potentially be

impacted by, or impact on, the day's activities. All attendees will be required to sign on to the pre-start and acknowledge their understanding of the issues explained.

Pre-start topics, dates delivered and a register of attendees will be recorded and kept on site as part of Project Quality System to demonstrate compliance with EMS activities.

7. Communication

7.1 Internal communication

Clear lines of communication through all levels and functions (e.g. management, staff and sub-contractors), is key to minimise environmental impacts and achieving continual improvements in environmental performance.

The methods of communication on site will include:

- Pre-start meetings.
- Inductions.
- Toolbox talks.
- Alerts, bulletins and / or initiatives.
- EWMS.

The HSE Manager will meet as part of Project meetings to discuss any issues with environmental management onsite, any amendments to plans that may be required or any new/ changes to Project activities.

Fortnightly environmental inspections will be scheduled with the HSE Manager and relevant Project staff. The purpose of these inspections will be to communicate ongoing environmental performance and to identify any issues to be addressed.

In addition, the HSE Manager will participate in toolbox talks on at least a weekly basis. This forum will provide an opportunity for the environment team members to communicate on environmental performance, to advise on any upcoming sensitive environmental matters for future work areas and receive feedback from onsite personnel.

Further internal communication regarding environmental issues and aspects will be through awareness training as described in Section 6.3.

7.2 External communication

7.2.1 Agencies and authorities

The HSE Manager has the responsibility to report on the ongoing environmental performance of the Project to FRV, DPE and any other relevant authorities. The HSE Manager will report regularly to FRV on progress and any key environmental matters and to DPE through the monitoring and reporting requirements listed in Section 9.4.

The Project Manager, and the HSE Manager are the two 24-hour contacts. They have the authority to halt the progress of the works if necessary. They are the key emergency response personnel during an environmental site emergency.

The HSE Manager is the authorised contact person for communications with the client, DPE, EPA and any other relevant authorities on environmental matters. FRV will be included in all correspondence with any regulatory Authorities, unless agreed otherwise.

A report will be prepared on each occasion the site is visited by EPA and any other relevant authorities, and FRV will be immediately notified. The Report will be provided to FRV within 1 working day of the visit.

7.2.2 Community and stakeholders

A Community Consultation Plan (CCP) has been developed to provide an approach to stakeholder and community communications for the Project. The plan identifies opportunities for providing information and consulting with the community and stakeholders during the Project. The plan contains:

- Identification of community stakeholders that are likely to be affected by the Project.
- Level of involvement and community engagement regarding activities that could cause impacts on the stakeholder.
- Locality map of potentially affected properties.
- Risk assessment of the potential construction impacts and mitigation actions to minimise the impacts on the stakeholders.
- Notification procedure for the community and FRV regarding activities that could cause impacts.
- The format in which the notification will be provided
- Procedures to manage and implement the CCP.
- Training procedures for Project personnel.
- Procedure for managing complaints and enquiries including a contact name and number.

The Communications Manager will be responsible for management of the Community Contacts Database. Details regarding the specific requirements for maintaining this database and reporting will be included in the CCP.

7.3 Complaint procedure

External complaints are defined as complaints received from parties outside of the normal lines of communication.

This complaint procedures applies to all workers and impacted public or communities and is to be compliant with Equator Principles.

Complaints and enquiries regarding the works would be received through the contact details provided on the Project website. All other complaints received are reportable incidents and shall be immediately reported to FRV.

On receiving a complaint, the Project Manager and HSE Manager will promptly conduct a review to determine the appropriate response and whether issues relating to the complaint could be avoided or minimised.

Records of all complaints received will include the following details:

- Date and time of the complaint.
- Method by which the complaint was made.
- Any personal details of the complainant.
- The nature of the complaint.
- Action taken in relation to the complaint and any follow up.
- Any monitoring to confirm that the complaint has been satisfactorily resolved.
- If no action taken, reasons why.

This information will be included in a Complaints Register to developed by FRV. The information contained within the register will be made available DPE on request.

All concerns will be resolved promptly using an understandable and transparent process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern.

Attempts will be made to resolve all complaints in accordance with the CCP. All complaints will be acknowledged within 2 hours. An initial response to complaints will be provided within 24 hours of a complaint being received. A further detailed response, including steps taken to resolve the issue(s) that lead to the complaint, will be provided within 10 days. All complaints will be closed off in the stakeholder database. At all times the stakeholder will be kept informed of when they will receive a response.

The HSE Manager will apply an adaptive approach to ensure that corrective actions are applied in consultation with the appropriate construction staff to allow modifications and improvements in the management of any environmental issues resulting in community complaints. Access to judicial or administrative remedies would be available.

Within one working day of receiving a complaint a written report would be provided to FRV, this would outline the complaint and action taken to remedy the problem. A final report which would include proposed measures to prevent reoccurrence would be submitted to FRV within five working days.

8. Incidents and emergencies

8.1 Emergency and incident preparedness

The following plans relating to emergency and incident response have been prepared for the Project:

- Emergency Plan
- Soil and Water Management Plan.

During the course of the Project, the following preventative strategies will be implemented onsite:

- Daily inspections of active work sites.
- Completion of Environmental Inspection Checklist (weekly).
- Issue and quick close-out of non-compliance notices (as required).
- Prompt maintenance and repairs.
- Ongoing environmental training.
- Access for emergency services vehicles will be maintained throughout the site at all times.
- Environmental audits of worksites, subcontractors and general compliance.

Spill kits will be available at the main site office and where liquid substances are to be stored. Spill kits and other emergency supplies (e.g. silt fences, pumps) will also be located at site compounds, machinery park up areas and on refuelling vehicles.

Personnel involved in emergency response activities will be provided with specific training. As a minimum for environmental response, all light vehicles and light trucks/heavy vehicles shall carry a vehicle spill kit to provide immediate response to an event. Hydrocarbon spills are noted as the most likely type of occurrence on the works.

Consulting with emergency services and NSW Police as required throughout construction to ensure that any potential impacts to emergency services are identified and appropriately managed.

An up-to-date list of emergency response personnel and relevant organisations (emergency services, EPA, etc.) will be maintained at the main office and site compounds.

8.2 Environmental incidents

An Environmental Incident is defined as an unplanned event impacting or potentially impacting the environment with consequences.

Various environmental incidents may have the potential to occur on site, which may include but not be limited to the following:

- Spills of fuels, oils, chemicals and other hazardous materials.
- Unauthorised discharge from sediment basins or other containment devices.
- Unauthorised clearing or clearing beyond the extent of the Project boundary or premises.
- Inadequate installation and subsequent failure of temporary erosion and sediment controls.
- Unauthorised damage or interference to threatened species, threatened ecological communities or critical habitat.
- Unauthorised harm or desecration to Aboriginal objects and Aboriginal places.

- Unauthorised damage or destruction to any State or locally significant relic or Heritage item.
- Unauthorised dredging or reclamation works within a watercourse.
- Potential contamination of waterways or land.
- Accidental starting of a fire or a fire breaking out of containment.
- Any potential breach of legislation, including a potential breach of a condition of: An environment protection licence, approval, or any agency permit condition.
- Works done that are not covered by the Project approval, or not found to be consistent with the approval, or done without a modification of the approval.
- Works undertaken that are not in accordance with the Environmental Assessment documents.
- Unauthorised dumping of waste.

Should an incident occur, the Supervisor will ensure that work ceases in that area and that the site is not disturbed until the appropriate level of investigation is conducted to ensure that any potential evidence is preserved.

8.3 Incident reporting

All workers (employees and contractors) are responsible for ensuring timely and effective initial internal reporting of Incidents that they are involved with or witness.

FRV are to be informed of any environmental incidents immediately verbally and within 24 hours in writing. Incident reports will include lessons learnt from each environmental incident occurring. Including lessons learnt from each environmental incident and proposed measures to prevent the occurrence of a similar incident. All efforts will be undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place. Incidents will be closed out as quickly as possible, taking all required action to resolve each environmental incident.

GRS must liaise with FRV prior to notifying any agencies of any incident on site (i.e. EPA). Within 7 days of the date of the incident, GRS must provide the client and/or any relevant agencies with a detailed report on the incident, and such further reports as may be requested.

Where an incident involves an Aboriginal site, relevant authorities such Heritage NSW and Registered Aboriginal Parties will be notified, and their input sought in closing out the incident.

8.3.1 Incident reporting in accordance with the conditions

GRS will immediately notify FRV of an incident which arises through the Infrastructure Approval.

In accordance with Condition 7 of Schedule 4 of the infrastructure Approval, the Planning Secretary must be notified in writing via the Major Projects website immediately after the FRV 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.

Non-compliances will be reported in accordance with Section 9 of this Strategy.

All written requirements of the Planning Secretary or relevant public authority, which may be given at any point in time, to address the cause or impact of an incident must be complied with, within any timeframe specified by the Planning Secretary or relevant public authority.

8.3.2 Incident reporting in accordance with the POEO Act

GRS will notify the EPA of any environmental incidents or pollution incidents on or around the site via the EPA Environment Line (telephone 131 555) in accordance with Part 5.7 of the *Protection of the Environment Operations Act 1997* (NSW) (POEO Act). The circumstances where this will take place include:

a) If the actual or potential harm to the health or safety of human beings or ecosystems is not trivial.
b) If actual or potential loss or property damage (including clean-up costs) associated with an environmental incident exceeds $10,000 (Material Harm).

Pollution incidents posing material harm to the environment shall be notified by FRV to each 'relevant authority' as defined in Section 148 (8) of the POEO Act. 'Relevant authority' means:

- NSW EPA as the appropriate regulatory authority (ARA) on **131 555 or (02) 9995 5555.**
- The Environment Protection Authority (EPA) if they are not the ARA.
- Safe Work NSW (formerly WorkCover) on **13 10 50.**
- Fire and Rescue NSW on **000** or for Mobiles Only **112.**

9. Inspections, monitoring and auditing

9.1 Environmental inspections

Throughout the Project, the HSE Manager will be responsible for carrying out weekly environmental and rainfall inspections using standard forms, Table 9-1

The sub-contractors will attend inspections in relevant areas as required. The HSE Manager will attend debriefing session following inspections.

At completion of the inspection, the HSE Manager will prepare the following:

- A site inspection report.
- A site inspection action plan listing deficiencies and corrective actions required.
- Sub-contractor notices for major/ serious deficiencies.

All deficiencies must be promptly issued to the applicable parties, actioned, verified and closed out within an appropriate time frame based on the risk score associated with each deficiency. Actions listed will be identified and an appropriate time frame to close out will take into consideration risks (e.g. location, weather).

Other environmental specialists may be engaged to enter site for the purposes of surveillance or inspection, to liaison with Project personnel, and to attend site meetings to discuss aspects of the work.

Table 9-1 Inspection schedule

Activity	Frequency	Responsibility	Record
Environmental site inspection	Weekly	HSE Manager	Site inspection checklist
Joint Environmental site inspection	Fortnightly	FRV Environmental Manager GRS HSE Manager	Site inspection checklist
Pre-rainfall inspection	Within 3 hours of the start of a rainfall event during work hours Within 24 hours of the start of a rainfall event (or on the following working day) Rainfall event being greater than 80% potential for 10mm or more with 24 hours	HSE Manager	Pre-rainfall inspection checklist
Post-rainfall inspection	Within 24 hours of rainfall event occurring	HSE Manager	Post-rainfall inspection checklist

9.2 Environmental monitoring

The objective of the monitoring and reporting will be to validate the impacts predicted for the Project, to measure the effectiveness of environmental controls and implementation of this EMS, and to address specific requirements. The monitoring requirements for required aspects are included in the relevant environmental management sub plans.

9.3 Auditing

9.3.1 Internal audits

Internal audits are to be carried out within three (3) months of commencing work onsite and then at least every six (6) months after that (Refer Table 9-2). These audits will be risk-based and verify that the work under the contract complies with the EMS, sub-plans and approval requirements. More frequent auditing may occur if environmental checks indicate major deficiencies with environmental management of the site.

Internal audits will be conducted in accordance with ISO 19011:2014 - Guidelines for Quality and/or Environmental Management Systems Auditing, however where a specific issue arises internally, this will not necessarily follow this standard.

Internal audit reports would be submitted to FRV within ten (10) working days of the audit. A final audit report will be submitted to the principal within five working days of the contract completion date.

An audit checklist will be developed and amended as necessary to reflect changes to this EMS, subsequent approvals and changes to Acts, regulations or guidelines.

9.3.2 Independent external audits

External auditing will be undertaken by an independent environment auditor in accordance with ISO 19011:2014 - Guidelines for Quality and/or Environmental Management Systems Auditing.

In accordance with Condition 9-14 of Schedule 4 of the infrastructure Approval, Independent Audits of the Project must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency:

- Within 3 months of commencing construction; and
- Within 3 months of commencement of operations.

The proposed independent auditor for the Project must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.

In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), FRV must:

- Review and respond to each Independent Audit Report prepared under condition 9 of Schedule 4 of this consent, or condition 11 of Schedule 4 where notice is given by the Planning Secretary.
- Submit the response to the Planning Secretary.
- Make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. Unless otherwise agreed by the Planning Secretary.

Independent Audit Reports and FRV's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.

Table 9-2 presents auditing requirements that are applicable to the Project.

Table 9-2 Audit summary table.

No.	Audit	Requirement	Timing	Responsibility	Recipient
1	Internal Audit.	Verify compliance with legal requirements, specifications and construction documentation.	The first audit within 3 months of commencement of construction and then at six monthly intervals thereafter. The final submitted within five working days of contract completion date.	HSE Manager	FRV
2	External independent audit	Verify compliance with approval and legal requirements, construction documentation and any other commitments.	Within 3 months of commencing construction; and Within 3 months of commencement of operations.	FRV	DPE

9.4 Reporting

Table 9-3 sets out the reporting requirements applicable to the Project, timing of the reporting, who is responsible for managing preparation of the reports, and the intended recipient(s).

Additional reporting may be necessary as the works progress. In such a circumstance, Table 9-3 will be amended to reflect these changes.

Table 9-3 Reporting requirements

No.	Report	Requirement	Timing	Responsibility	Recipient
1	Monthly environmental report. Formalised in meeting minutes with client.	For incorporation in Project Monthly Reports including environmental statistics (i.e. incidents, regulatory action, complaints on environmental issues), regulatory and authority considerations, monitoring program performance, key environmental issues,	Monthly	Project Manger, HSE Manager	FRV

No.	Report	Requirement	Timing	Responsibility	Recipient
		environmental controls implemented, details of any non-compliances and actions undertaken to address the non-compliance, and any predicted environmental impacts for the following month.			
2	FRV environmental inspection report	Response to matter raised in FRV site inspections.	As required. Typically, every two weeks for FRV inspection reports.	HSE Manager	FRV
3	Compliance Tracking Report	Prepared on a 6-monthly basis, commencing prior to any works being carried out on the construction site, compliance tracking reports providing the following details for the six months: (a) compliance with the relevant, licences/permits approval conditions, Environmental Assessment document safeguards and management measures; (b) environmental performance for environmental issues including air quality, noise, soil and water, biodiversity, traffic, vibration, heritage, waste, incidents and community; (c) copies of environmental records and monitoring results; (d) record of inspections; (e) record of any internal audits; (f) evidence of any approval or permits obtained for works during	Prepared on a 6-monthly basis, commencing prior to any works being carried out. The final compliance tracking report must be submitted within 20 days of the date of Construction Completion of the Contractor's Work.	HSE Manager	FRV/DPE

No.	Report	Requirement	Timing	Responsibility	Recipient
		the reporting period; (g) complaint register and complaints resolution; and (h) summary of non-compliances for the reporting period. The final compliance tracking report must be submitted within 20 days of the date of Construction Completion of the Contractor's Work. The final compliance tracking report must also provide details of how the relevant Environmental Assessment document requirements have been closed out.			
4	Waste Avoidance and Resource Recovery Report.	Information relating to wastes generated or recycled.	Annual within one month from 1 July and at actual completion date.	HSE Manager	FRV

9.5 Non-conformity, corrective and preventative actions

Any member of the Project team may raise a non-conformance or improvement opportunity. Environmental non-conformances might include:

- Failing to comply with the environmental regulations or license/ permit conditions.
- A serious breach of EMS requirements.
- Carrying out an unsafe work practice that has the potential to cause harm to the environment (i.e. near misses).
- Activities that have caused actual harm to the environment not permitted by the Project or covered in the environmental assessment documentation.
- Deficiencies or concerns raised by client representatives and/or by state and local authorities or agencies.

The GRS management system shall be used to monitor and verify:

a) That planned actions, work processes and procedures are effectively implemented.
b) That inspection, testing and verification reports are maintained as objective evidence that Project activities are being carried out in compliance with client contract conditions and specifications, NSW Acts and regulations, license conditions and referenced publications.

Environmental non-conformances will be dealt with through the Incident Management Procedures detailed in Section 8.3.

For each non-conformance identified a corrective/preventative action (or actions) must be implemented. In addition, any environmental management improvement opportunities can be initiated as a result of incidents or emergencies, monitoring and measurement, audit findings or other reviews. Improvement opportunities may also result in the implementation of corrective/preventative actions.

Corrective/preventative actions and improvement opportunities will be entered into the contractor's quality system database and include detail of the issue, action required and timing and responsibilities. The record will be updated with date of close out and any necessary notes. The database will be reviewed regularly to ensure actions are closed out as required.

Non-conforming activities may be stopped, if necessary, by the HSE Manager following consultation with the Construction Manager or delegate. The works will not commence until a corrective/preventative action has been closed out. FRV may also stop works in these circumstances. In such circumstances a non-conformance report must be prepared in accordance with the Quality Plan.

Procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management are also documented in the Quality Plan.

In accordance with Condition 8 of Schedule 4 of the infrastructure Approval, DPE must be notified via the Major Projects website portal 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 non- compliance (if known) and what actions have been done, or will be, undertaken to address the non- compliance.

10. Review and improvement

10.1 Revision

A document review process ensures that environmental documentation including this EMS is updated as appropriate for the specific works that are occurring on-site. Reviews of the EMS are expected to be triggered by:

- Formal system audits.
- Client audits.
- Additional environmental aspects and risks.
- Environmental near misses and incidents.

Should the document review process identify any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the HSE Manager to prepare the revised documents in consultation with FRV.

In accordance with condition 2 of Schedule 4 of the Infrastructure Approval, within 1 month, unless otherwise agreed with the Planning Secretary, of:

- The submission of an incident report under condition 7.
- The submission of an audit report under condition 13.
- Any modification to the conditions of the consent.

The HSE Manager (acting on behalf of FRV) must review, and if necessary revise the strategies, plans, and programs required under the Infrastructure Approval to the satisfaction of the Planning Secretary.

Where this review leads to revisions in any such document, then within four weeks of the review, the revised document will be submitted to the Planning Secretary for approval, unless otherwise agreed with the Planning Secretary.

Where any revisions to the approved management plans, strategies or programs are made, the revised document will be issued to FRV for certification / acceptance of the changes prior to submission to DPE for approval. In accordance with condition 3 of Schedule 4, revised strategies, plan or programs may be prepared without undertaking consultation with all parties nominated under the applicable condition in this approval. Any updates to other management plans which form part of the environmental management system however were not required by the approval, are to be submitted to FRV for review and certification / acceptance.

Only the HSE Manager, or delegate, has the authority to change any of the environmental management documentation.

Should the EMS or management plans not require review or revision under condition 2, then they will be reviewed at least annually by the HSE Manager.

The approved EMS will be held in the site office and be available upon request.

10.2 Continuous improvement

Continuous improvement of this Strategy will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance.
- Determine the cause or causes of non-conformances and deficiencies.
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies.
- Document any changes in procedures resulting from process improvement.
- Make comparisons with objectives and targets.

11. Documentation

11.1 Environmental records

The HSE Manager is responsible for maintaining all environmental management documents as current at the point of use. Types of records include:

- All monitoring, inspection and compliance reports/records.
- Correspondence with public authorities.
- Induction and training records.
- Reports on environmental incidents, other environmental incidents non-conformances, complaints and follow-up action.
- Environmental events and Investigation reports, and trends.
- Environmental monitoring data (Should it be developed).
- Waste quantity reports and regulated waste documentation where required
- Weed Hygiene Checklists.
- Community engagement information.

All environmental management documents are subject to ongoing review and continual improvement. This includes times of change to scheduled activities or to legislative or licensing requirements.

11.2 Document control

GRS will coordinate the preparation, review and distribution, as appropriate, of the environmental management plans as well as the conditions of approval, and environmental assessment documents. During the Project, the environmental documents will be stored at the main site compound.

GRS will implement a document control procedure to control the flow of documents within and between stakeholders and sub-contractors.

The procedure will also ensure that documentation is:

- Developed, reviewed and approved prior to issue.
- Issued for use.
- Controlled and stored for the legally required timeframe.
- Removed from use when superseded or obsolete.
- Archived.

A register and distribution list will identify the current revision of particular documents or data.

12. References

DIPNR, 2004, *Guideline for the Preparation of Environmental Management Plans*. Prepared by the Department of Infrastructure, Planning and Natural Resources.

Independent Planning Commission of NSW, 2022, Consolidated Development Consent - SSD 9549. Sydney

NGH, 2020a, Walla Walla Solar Farm EIS. Report prepared for FRV.

NGH, 2020b, Walla Walla Solar Farm Submissions Report. Report prepared for FRV.

NGH, 2020C, Walla Walla Solar Farm Amendment Report. Report prepared for FRV.

NGH, 2021a, Walla Walla Solar Farm Modification 1 Report. Report prepared for FRV.

NGH, 2021b, Walla Walla Solar Farm Modification 1 Submissions Report. Report prepared for FRV.

Appendix A Project conditions of approval

SCHEDULE 4
ENVIRONMENTAL MANAGEMENT AND REPORTING

ENVIRONMENTAL MANAGEMENT

Environmental Management Strategy

1. Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the **Planning Secretary**. This strategy must:
   (a) provide the strategic framework for environmental management of the development;
   (b) identify the statutory approvals that apply to the development;
   (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;
   (d) describe the procedures that would be implemented to:
   - keep the local community and relevant agencies informed about the operation and environmental performance of the development;
   - receive, handle, respond to, and record complaints;
   - resolve any disputes that may arise;
   - respond to any non-compliance;
   - respond to emergencies; and

   (e) include:
   - 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.

   Following the **Planning Secretary**'s approval, the Applicant must implement the Environmental Management Strategy.

Appendix B Environmental legislation

Act	Activity / aspect	Requirement	Reference	Applicability
General				
Protection of the Environment Operations Act 1997.	Harming the environment.	Do not risk harming the environment by wilfully or negligently: disposing of waste unlawfully causing any substance to leak, spill or otherwise escape (whether or not from a container); or emitting an ozone depleting substance. The works do not trigger the requirement of Environmental Protection Licence under schedule 1.	S115 S116 S117	Yes
Protection of the Environment Operations Act 1997.	Notification of Pollution incidents.	Notify the EPA, NSW Ministry of Health via local Public Health Unit, Safe Work NSW, Local authority and Fire and Rescue NSW immediately of pollution incidents where material harm to the environment is caused or threatened.	S148	Yes
Dangerous Goods (Road and Rail Transport) Act 2008.	Hazards and risks.	Ensure that dangerous goods are transported in a safe manner.	S9	Yes
Pesticides Act 1999.	Hazards and risks.	Use pesticides in an environmentally sensitive manner. Do not use an unregistered pesticide without a permit. Read the label or permit for the pesticide. Use registered pesticides in accordance with instructions on the label. Do not use any restricted pesticide unless authorised by a certificate of competency or a pesticide control order under the Act. Compliance with pesticide codes of practice is required.	S12 S13 S14 S15 S17	Yes
National Greenhouse and Energy Reporting Act,	Greenhouse gas emissions.	Accounting and reporting of greenhouse gases produced and energy consumed during construction. Applicability dependent	-	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
2007 and Regulations 2008.		on thresholds.		
Privacy and Personal Information Protection Act 1998 (NSW).	Community Liaison.	Legislation relevant to community liaison.	-	Yes
Environmental Planning and Assessment Act 1979.	All	Comply with approved conditions.	Part 4, s4.10	Yes
Water				
Water Management Act 2000. With the exception of controlled activity approvals, the Water Management Act 2000 (WM Act) only applies in relation to those water sources covered by operational water sharing plans – these areas cover most of the State's major regulated river systems.	Water access and use.	Do not take water from a water source (a lake, river or estuary or place where water occurs naturally on or below the surface of the ground and includes coastal waters) without an access licence. Do not use of water on land (unless supplied by a water utility, irrigation corporation etc. or in accordance with basic landholder rights) without a water use approval.	S56 S60A S89 S 89 S91A	The EIS identify that controlled activity approvals are not required as most Projects are exempt as the work is being undertaken by or on behalf of a public authority.
Protection of the Environment Operations Act 1997.	Water pollution	Do not cause water pollution.	S120 S122	Yes
Noise				

Act	Activity / aspect	Requirement	Reference	Applicability
Protection of the Environment Operations Act 1997.	Plant maintenance and operation.	Do not operate plant if it emits noise caused by poor maintenance or operation.	S139	Yes
Protection of the Environment Operations Act 1997.	Materials management.	Do not cause noise by failing to properly and efficiently deal with materials.	S140	Yes
Contaminated soil				
Protection of the Environment Operations Act 1997.	Land pollution.	Do not cause or permit land pollution other than under authority of a licence or regulation (However it is not a land pollution offence to place virgin excavated natural material or lawful pesticides and fertilisers on land, or by placing matter on land that has been notified to the EPA as an unlicensed landfill and which is operated in accordance with the regulations.)	S142A – S142E	Yes
Contaminated Land Management Act 1997.	Reporting contamination.	Notify the EPA if contaminants exceed thresholds contained in guidelines or the regulations where contamination has entered or will foreseeably enter neighbouring land, the atmosphere, groundwater or surface water. Contaminants in soil are equal to or exceed guideline levels with respect to the current or approved use of the land. Contamination meets other criteria that may be prescribed by the regulations.	S60	Yes
Biodiversity				
Biosecurity Act 2015.	Weed, pest and disease control.	The duty to prevent, eliminate and minimise biosecurity risks posed by biosecurity matters as defined by the Act.	s22 Schedule 1	Yes
Biosecurity Regulation	Pests and diseases.	Notify the presence any pest or disease listed in Schedule 1 of	cl. 7, Schedule 1	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
2017.		the Biosecurity Regulation 2014, within 1 working day after suspecting or becoming aware of the pest or disease.		
Biodiversity Conservation Act 2016.	Threatened flora and fauna.	Do not harm any animal that is; of a threatened species, that is part of a threatened ecological community or is a protected animal, unless authorised under other legislation (e.g. planning approval). Do not damage habitat of a threatened species or ecological community unless authorised under other legislation (e.g. planning approval). Do not damage declared areas of outstanding biodiversity value unless authorised under other legislation (e.g. planning approval). Do not pick a plant that is; of a threatened species, that is part of a threatened ecological community or is a protected plant, unless authorised under other legislation (e.g. planning approval).	S2.1-2.4 S2.8	Yes
Fisheries Management Act 1994.	Mangroves, seagrasses and marine vegetation.	Do not harm any mangroves, seagrasses or other marine vegetation on public water land protected by the regulations without a permit.	S205	No
Fisheries Management Act 1994.	Fish passage.	Do not block fish passage without a permit.	S219	No, Project is exempt
Environment Protection Biodiversity Conservation Act 1999 (Commonwealth).	Flora and fauna conservation.	Comply with the terms of any EPBC Act approval for the Project.	N/A	Not applicable to this Project as EPBC Approval not required to be obtained.
Waste				

Act	Activity / aspect	Requirement	Reference	Applicability
Protection of the Environment Operations Act 1997.	Littering.	Do not litter in a public place or an open private place. Do not litter from a vehicle. Only deposit advertising material in receptacles provided for mail or newspapers or under the door of the premises. Do not deposit advertising material on or in vehicles.	Part 5.6A	Yes
Protection of the Environment Operations Act 1997.	Waste and transportation.	Do not undertake a scheduled waste activity unless in accordance with an environment protection licence. Refer also to the Resource Recovery Exemptions.	Part 3.2 Schedule 1	Yes
		Only transport waste to a facility that can lawfully accept the waste within 150 km from Project.	S143	Yes
		Do not dispose of waste in a manner that harms or is likely to harm the environment.	S115	Yes
Protection of the Environment Operations (Waste) Regulation 2014.	Waste and transportation.	Comply with general requirements for the transport of waste. For example, any vehicle used by the person to transport waste must be kept in a clean condition and be maintained so as to prevent spillage of waste. For some wastes only licensed transporters can be used.	Regulation cl.49	Yes
	Comply with record keeping requirements in relation to the transport of certain types of waste.	Regulation Part 3.	Yes	Comply with record keeping requirements in relation to the transport of certain types of waste.
Heritage				
Heritage Act 1977.	Heritage.	Do not undertake an activity that will affect a place, building,	S56-57	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
		work, relic, moveable object or precinct which is subject to an Interim Heritage Order or is listed on the State Heritage Register without approval from the Heritage Council.		
		Do not disturb or excavate land with knowledge or reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed; or Do not disturb or excavate land on where a relic has been discovered or exposed unless an excavation permit in place.	S139	No
		Notify the heritage Council on discovery of a relic.	S146	Yes
		Give the Heritage Council at least 14 days' notice before removing or demolishing any item listed in a section 170 register.	S170A	Yes
National Parks and Wildlife Act 1974.	Aboriginal places and objects.	Do not harm or desecrate an Aboriginal object or Aboriginal place without consent.	S86 S90	Yes
	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.	S89A	Yes	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.
Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth).	Protection of areas and objects.	Report any discovery of Aboriginal remains to the Federal Minister for the Environment and Heritage.	S20	Yes
	Comply with the provisions of any		S22	Yes Comply with the

Act	Activity / aspect	Requirement	Reference	Applicability
	declaration in relation to a significant Aboriginal area or object.			provisions of any declaration in relation to a significant Aboriginal area or object.

Appendix C Environmental Policy

QUALITY AND ENVIROMENTAL POLICIES

GRANSOLAR GROUP

The Management of **GRUPO GRANSOLAR**, constituted by

- GRUPO GRANSOLAR, S.L.
- GRANSOLAR CONSTRUCCIÓN DE PROYECTOS, S.L.U. (GRS)
- GRANSOLAR OYM, S.L.U. (GRS O&M)
- PV HARDWARE SOLUTIONS, S.L.U. (PVH)
- INGENIA SOLAR ENERGY, S.L.U. (ISE)
- INGENIA POWER SOLUTIONS, S.L. (IPS)
- GRANSOLAR INVESTMENT, S.L.
- GRANSOLAR DESARROLLO DE PROYECTOS, S.L. (GRS Development)
- DEEPTRACK, S.L.U.
- ENERGY STORAGE SOLUTIONS, S.L. (E22)
- GRANSOLAR SERVICIOS COMPARTIDOS, S.L.

is committed to developing and implementing the quality and environment management system and continually improving its effectiveness by defining its policy of quality and environment:

MISSION

Leading the field of solar energy and being a leader in the construction and management of photovoltaic solar installations.

VISION

Providing economic value to our customers through the construction and management of photovoltaic solar systems, and social and environmental value for our commitment to the environment.

VALUES

- Adaptation to the expectations and needs of our customers and other interest groups, providing a complete, professional, and personalized service.
- Commitment to the effectiveness and continuous improvement in all company processes.
- Transparency and collaboration with our sub-contracted, suppliers, customers and social environment.
- Analysis and management of training, motivation and preparation required by our staff to ensure the necessary skills for each post, professional development, training on environmental aspects arising from its activities and the importance of their contribution to the organization in the daily activity.
- Respect to environment and prevention of contamination, personal damages and healthy deterioration of all interested parties.

1

QUALITY AND ENVIROMENTAL POLICIES

GRANSOLAR GROUP

- Compliance with legal requirements, those established by our clients and those that the organization subscribes, as well as those related to its environmental aspects.
- Legal requirement compliment, those stablished by our customers and those from the own company, as well as all those related with their environmental aspects.
- Implementation of appropriate reference framework for establishing and reviewing the objectives of the company, ensuring that the policy is documented, implemented, maintained and communicated to all persons working for the organization or on its behalf, so that builds trust on customers, institutions and government agencies.
- Extend the practices of environmental care and pollution prevention at subcontractors in the process of execution of work.
- Achieve a work environment for the satisfaction of all staff.
- Efficiency in processes management and continue improving of management system.
- Focus based on risk.
- Availability of the resources needed to allow a correct quality and environment management.

For this, the Quality and Environment Policy is based on:

- The review of the Policy in terms of the evolution of its environment, objectives and indicators of quality and environment, to ensure that is appropriate to the nature, extent, and impact of its activities.
- The establishment and monitoring of quality and environment objectives to measure the degree of compliance and adequacy of the concepts in the policy.
- Monitoring of the defined environmental aspects.
- The review and analysis of the above stated objectives.

Madrid, March 27th, 2018

Appendix D Environmental risk assessment

Environmental risk assessment is as a separate attachment

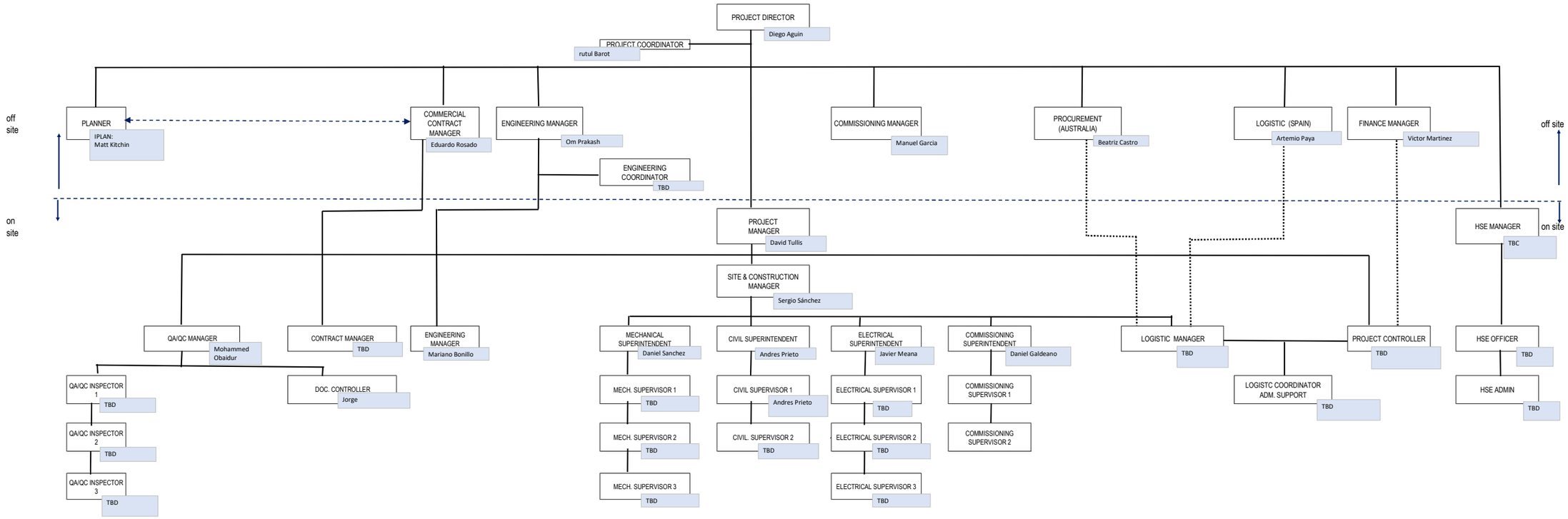
Risk identified	Proponent in the EIS	Pre-mitigated risks					Mitigation			Post-mitigated risks					Risk Outcome
		Likelihood	Consequence	Risk ranking	Nature	Duration	Mitigation to reduce likelihood	Mitigation to reduce consequence	Confidence	Likelihood	Consequence	Risk Rating	Category	Duration	
During preliminary assessment	Loss of habitat and/or mortality of threatened fauna species	Possible	Major	High	Adverse	Long Term	Biodiversity Management Plan (BMP)	BMP	Moderate	Unlikely	Major	Medium	Adverse	Long Term	Risk reduced
	Removal of vegetation	Almost Certain	Moderate	High	Adverse	Long Term	BMP	BMP	Moderate	Almost Certain	Minor	High	Adverse	Long Term	Risk reduced
	Loss of fauna habitat from removal of vegetation	Almost Certain	Moderate	High	Adverse	Long Term	BMP	BMP	Moderate	Almost Certain	Minor	High	Adverse	Long Term	Risk reduced
	Habitat fragmentation from removal of vegetation	Almost Certain	Moderate	High	Adverse	Temporary	BMP	BMP	Moderate	Possible	Moderate	Medium	Adverse	Long Term	Risk reduced
	Fauna displacement injury or mortality from removal of vegetation	Possible	Moderate	Medium	Adverse	Temporary	BMP	BMP	Moderate	Unlikely	Minor	Low	Adverse	Short Term	Risk reduced
	Fauna strike (vehicle)	Possible	Catastrophic	High	Adverse	Temporary	Traffic Management Plan	Speed restrictions	Moderate	Unlikely	Catastrophic	High	Adverse	Temporary	Risk reduced
	Removal of vegetation resulting in edge effects	Almost Certain	Minor	High	Adverse	Temporary	BMP	BMP	Moderate	Possible	Minor	Medium	Adverse	Short Term	Risk reduced
	Altered hydrology leading to flora mortality and loss of habitat	Possible	Minor	Medium	Adverse	Long Term	Water Management Plan	Detailed engineering design	Moderate	Unlikely	Minor	Low	Adverse	Long Term	Risk reduced
	Contamination of soil and water	Possible	Minor	Medium	Adverse	Long Term	Sediment and Erosion Management Plan (SEMP)	Bunding and detailed engineering	Moderate	Eliminated	Minor	Eliminated	Neutral	Non Applicable	Risk reduced
	Erosion and sedimentation of soils	Likely	Major	High	Adverse	Long Term	SEMP	Bunding and detailed engineering	Moderate	Unlikely	Major	Medium	Adverse	Temporary	Risk reduced
	Dust deposition from vehicle traffic and earthworks	Almost Certain	Minor	High	Adverse	Long Term	Air Quality Management Plan (AQMP)	AQMP	Moderate	Possible	Minor	Medium	Adverse	Temporary	Risk reduced
	Construction light, noise and vibration	Almost Certain	Minor	High	Adverse	Long Term	Noise Management Plan (NMP)	NMP	Moderate	Likely	Minor	Medium	Adverse	Temporary	Risk reduced
	Operational light, noise and vibration	Almost Certain	Minor	High	Adverse	Long Term	NMP	NMP	Moderate	Likely	Minor	Medium	Adverse	Long Term	Risk reduced
	Introduction and spread of weeds and invasive species	Likely	Minor	Medium	Adverse	Long Term	Weed Management Plan	Weed Management Plan	Moderate	Unlikely	Minor	Low	Adverse	Short Term	Risk reduced
	Increased predator species	Likely	Minor	Medium	Adverse	Long Term	Pest Management Plan (PMP)	PMP	Moderate	Unlikely	Minor	Low	Adverse	Short Term	Risk reduced
	Increased introduced fauna	Likely	Minor	Medium	Adverse	Long Term	PMP	PMP	Moderate	Unlikely	Minor	Low	Adverse	Short Term	Risk reduced

Appendix E Organisation chart

Organisation chart is as a separate attachment

WAL-GRS-QA-ORG-0001 ORGANIZATION CHART

WALLA WALLA SOLAR FARM



Appendix F Sub-plans

N/A

COMMUNITY AND STAKEHOLDER MANAGEMENT PLAN

Walla Walla Solar Farm

September 2022

NSW • ACT • QLD • VIC
W. www.nghconsulting.com.au

DOCUMENT VERIFICATION

Project Title:	Walla Walla Solar Farm
Project Number:	22-377
Project File Name:	22-377 Walla Walla SF Engagement Plan V1.0

Revision	Date	Prepared by	Reviewed by	Approved by
Draft 2.0	26/09/2022	Bree Schubach & Bec Jones	Richard Payne	

NGH Pty Ltd prints all documents on environmentally sustainable paper including paper made from bagasse (a by-product of sugar production) or recycled paper.

W. www.nghconsulting.com.au

E. ngh@nghconsulting.com.au

BEGA - ACT & SOUTH EAST NSW
Suite 11, 89-91 Auckland Street
(PO Box 470) Bega NSW 2550
T. (02) 6492 8333

NEWCASTLE - HUNTER & NORTH COAST
Unit 2, 54 Hudson Street
Hamilton NSW 2303
T. (02) 4929 2301

BRISBANE
Suite 4, Level 5, 87 Wickham Terrace
Spring Hill QLD 4000
T. (07) 3129 7633

SYDNEY REGION
Unit 17, 21 Mary Street
Surry Hills NSW 2010
T. (02) 8202 8333

CANBERRA - NSW SE & ACT
Unit 8, 27 Yallourn Street
(PO Box 62) Fyshwick ACT 2609
T. (02) 6280 5053

WAGGA WAGGA - RIVERINA & WESTERN NSW
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650
T. (02) 6971 9696

GOLD COAST
19a Philippine Parade
Palm Beach QLD 4221
(PO Box 466 Tugun QLD 4224)
T. (07) 3129 7633

WODONGA
Unit 2, 83 Hume Street
(PO Box 506) Wodonga VIC 3690
T. (02) 6067 2533

NSW • ACT • QLD • VIC
W. www.nghconsulting.com.au
ABN 31 124 444 622 ACN 124 444 622

TABLE OF CONTENTS

Tables

ACRONYMS AND ABBREVIATIONS

CBS	Community Benefit Scheme
DPE	Department of Planning and Environment (NSW)
EIS	Environmental Impact Statement
ha	Hectare
km	kilometres
LGA	Local Government Area
MW	Megawatt
NSW	New South Wales
SSD	State Significant Development
VIA	Visual Impact Assessment

1. ENGAGEMENT OVERVIEW

1.1. The Proposal

FRV Services Australia (FRV) (the Proponent) have approval for the construction, operation and decommissioning of a 300 megawatt (MW), alternating current (AC), photovoltaic (PV) solar farm, called the Walla Walla Solar Farm (the Project). The Project is located on rural land approximately 4.3 kilometres (km) north-east of Walla Walla and 10 km southwest of Culcairn, in southern NSW. Gransolar (GRS) have been engaged by FRV to construct the Project.

Walla Walla is the closest town to the proposal. During the approvals process consultation, it was evident that the community affiliate more closely with Walla Walla than Culcairn. This rural town has therefore been identified as the main town that could be either impacted by or benefit from development and operation of the proposal.

The town's population in 2016 was recorded as 836 persons (ABS 2016). The closest regional services are in Albury, 32 km south of the proposal. Walla Walla supports two schools, two churches, a supermarket, post office, service stations, restaurants, medical services and recreation facilities.

Although Walla Walla was identified as being a pivotal community for the proposed solar farm, some community members also affiliate with Culcairn.

Located along Olympic Highway between Wagga Wagga (80 km north) and Albury (50km south), Culcairn is the centre of an agricultural district famed for its wheat, wool and lamb farming. The town's population in 2016 was recorded as 1,473 people (ABS 2016). Like Walla Walla, it is situated within the Greater Hume Shire LGA.

The town is an important supply centre for nearby towns and villages including, Morven, Gerogery, Henty, Walla Walla and Pleasant Hills. Billabong Creek runs along the southern edge of town, lending its name to the local high school.

European settlement of Culcairn began in 1834, following favourable reports on extensive grass cover and the potential for grazing.

1.2. The context

The Project would assist in reducing greenhouse gas emissions from electricity generation and contribute to renewable energy targets committed to by the NSW and Federal Governments. Once constructed, the Project would provide around 740,000 megawatt hours (MWh) per year of renewable electricity and would save about 520,000 tonnes of greenhouse gas emissions per year compared to brown coal. In addition, the Project will provide local social and economic benefits associated with the construction and operation of the Project through employment and use of local businesses.

The Project was assessed in an Environmental Impact Statement (EIS) in accordance with Part 4 of the New South Wales (NSW) *Environmental Planning and Assessment Act 1979* (EP&A Act) and Schedule 2 of the Environmental Planning and Assessment Regulation *2000* (EP&A Regulation). It is considered State Significant Development (SSD).

The engagement undertaken during EIS phase aligned with the requirements of the Secretary's Environmental Assessment Requirements (SEARs) and the NSW Department of Planning and Environment's (DPE) *Community & Stakeholder Engagement Guideline*, part of the Draft EIA Guidance Series (June 2017). Guidance was also taken from the DPE's (2007) *Guidelines for Major Project Community Consultation* and the Australian Renewable Energy Agency's (ARENA's) *Establishing the social licence to operate large scale solar facilities in Australia: insights from social research for industry* (ARENA n.d.).

This Community and Stakeholder Engagement Report (CSER) was prepared to:

- Document the community engagement approach followed by the Proponent before and during the EIS preparation.
- Document key concerns, issues and/or comments raised by the community during this engagement, as well as how they have been addressed in the EIS.
- Document the future, ongoing community engagement approach for the project, should the proposal be approved.

1.3. IAP2 Core Values

The IAP2 Public Participation Spectrum '*is designed to assist with the selection of the level of participation that defines the public's role in any community engagement program. It states that public participation:*

- Is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process
- Includes the promise that the public's contribution will influence the decision
- Promotes sustainable decisions by recognising and communicating the needs and interests of all participants, including decision makers
- Seeks out and facilitates the involvement of those potentially affected by or interested in a decision
- Seeks input from participants in designing how they participate
- Provides participants with the information they need to participate in a meaningful way
- Communicates to participants how their input affected the decision.

Different levels of engagement suit varying degrees of potential impacts in the community. Where impacts are less significant, for example, the IAP2 Spectrum suggests approaches such as 'Inform' and 'Consult'. Greater impacts on communities require approaches such as 'Involve', 'Collaborate' and 'Empower'.

Although the Project is now approved, wherever possible, the supporting community engagement was aligned to the public participation goals of:

- *Involvement* – to work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.
- *Collaboration* – to partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.

Now that the Project is approved, collaboration and empowerment will continue to be the driving community engagement tools in construction and operation phases.

1.4. Other industry guidelines

The following guidelines were developed by industry and advocacy bodies to help guide the planning and delivery of community benefits and establishment of trust for large scale renewable energy projects, including transmission corridors.

Future engagement activities for the Walla Walla Solar Farm will need to demonstrate alignment with the requirements outlined in these documents:

Table 1-1: Industry and advocacy group guidelines for renewable energy infrastructure

Publication	Relevant inclusions
A Guide to Benefit Sharing Options for Renewable Energy Projects – Clean Energy Council (2019)	Includes methods for developing a benefit sharing strategy and working in partnership with local communities. It outlines ways to: • calculate a benefit sharing budget • develop a theory of change to deliver the desired impact • undertake social feasibility to refine and test the strategy in the community • implement, monitor and evaluate the project in the community.
Re-Alliance *Community Benefits Handbook, September 2021*	The purpose of this handbook is to equip local community leaders with information and ideas to get started thinking big about how to leverage the renewables boom into local opportunities that address local needs and desires. It covers what kinds of benefits regional communities are already seeing in different parts of the country from large-scale renewables and begins to picture what these might look like on a bigger scale with industry investment concentrated across a region.
Re-Alliance *Building Trust for Transmission – Earning the social licence needed to plug in Australia's Renewable Energy Zones, July 2021*	RE-Alliance recommends that consideration of the social and environmental impacts of new transmission infrastructure be included within the RIT-T process. They propose that there should be early engagement with stakeholders including: • landholders and asset owners along potential transmission line routes • local community members and groups • local Councils and State Planning Departments • First Nations people, environment, and other special interest groups. This early engagement may reveal the level of challenge associated with this project and the possible strategies to

Publication	Relevant inclusions
	mitigate community concerns, such as alternative route selection or technical solutions such as undergrounding.

1.5. Key issues

The key issues highlighted in the EIS include:

- Visual impact
- Loss of prime agricultural land
- Financial devaluation of adjacent properties
- Biodiversity impacts
- Loss of agricultural 'sense of place'
- Loss of secondary agriculture and tourism-related job streams
- Changes to surface water flow patterns
- Land management
- Fire management

1.6. Engagement objectives

To ensure continuing community engagement is effective capturing and addressing community queries and concerns throughout the construction and operation, the following review actions should be undertaken alongside project design and implementation

Objectives	Measures
Engage broadly to capture progressive views and support	Reach of engagement – including with targeted groups and advocates within the Greater Hume.
Engage proactively on decisions and opportunities through construction and operation.	Proactive delivery of tools that address key issues. Delivery of tools and information to outline consideration of and proactive response to identified issues. Always provide clarity on next steps.
Produce clear information on the Project, potential impacts (positive and negative) and benefits for the environment, community, and region.	Delivery of high-quality communications across all targeted channels. Appoint and maintain a consultation manager.

Objectives	Measures
Demonstrate how the Project has a positive impact on the region.	Clear demonstration of shared local and broader regional social, economic, and environmental benefits.
Demonstrate sharing of Project benefits.	Implementation of a successful community-led Community Benefit Scheme.
Support and engage local capabilities	Number of local suppliers engaged. Number of local opportunities identified.
Maintain a positive corporate image for FRV and the renewable energy industry.	Management of social and reputational risks.

1.7. Proactive measures to address issues

Through our understanding of the local setting and concerns, we recommend that the Walla Walla Solar Farm engagement and community benefits sharing activities include:

- Strong visuals and narrative, using tools such as desktop film to provide balance to the discussions around the change of land use, visual impact management and investment in the local community
- Proactive development of vegetation screening designs and planting to demonstrate proactive mitigation of visual impacts. This may include screening on stakeholder's properties in addition to the project site
- Near neighbour and local community benefit sharing schemes that include opportunities like discounted electricity, buy-in opportunities, annual contributions to community activities in the form of grants, etc
- Clear and transparent engagement as the construction commences
- Investigation of a potential shopfront to host drop in sessions
- Opportunity to partner with other renewable energy projects
- Proactive media briefing, storytelling, and liaison
- Consider add value elements such as arranging tours for local landholders to view similar solar farms with the idea of demonstrating solar grazing and the likely visual impact once screening is in place.

1.8. EIS Engagement Strategies

The consultation strategies listed below formed part of the overall community engagement approach followed for the proposed solar farm.

- Project website, emails and telephone calls
- Face-to-face meetings

- Community Information Sessions
- Community Feedback Forms
- Ongoing correspondence and media
- Newsletters
- Letter box drop.

2. FUTURE ENGAGEMENT APPROACH

2.1. Key messages

2.1.1. The Proposal

FRV Services Australia (FRV) have approval for the construction, operation and decommissioning of a 300 megawatt (MW), alternating current (AC), photovoltaic (PV) solar farm, called the Walla Walla Solar Farm (the Project).

The Project is located on rural land approximately 4.3 kilometres (km) north-east of Walla Walla and 10 km southwest of Culcairn, southern NSW. Gransolar (GRS) have been engaged by FRV to construct the Project.

The project would save around 130,000 tonnes of CO2 entering the atmosphere per year (compared to brown coal).

The site was chosen for these reasons:

- High solar irradiance
- Cost-effective grid connection with capacity
- Relatively flat and clear land with few environmental constraints

2.1.2. The Proponent

FRV Services Australia (FRV) is a global renewable energy solutions provider and leading solar developer. With a strong presence in Australia, FRV has a portfolio of successful solar projects currently operating and under development across the country.

Since entering the Australian market in 2010, FRV has initiated multiple large - scale solar farm developments in NSW, Victoria, South Australia, and QLD. This includes the Moree Solar Farm and more recently, the Goonumbla Solar Farm, near Parkes.

2.1.3. Proposal benefits

Local benefits

The Proposal will bring numerous benefits to the Greater Hume area including:

- Supporting the transition to clean energy and healthier environment
- Production of renewable energy and reduction in emissions:

    - enough to power 90,000 homes
  - Creation of jobs for the area:
    - 250 in the construction period
    - 15-19 jobs once operational.
- Supports local services such as hospitality and accommodation
- Diversified investment in the area to strengthen the economy
- Strengthens the network with battery storage and peaking power.

Broader benefits

- The Proposal will significantly contribute towards the NSW Government's aim of reaching net-zero emissions by 2050, by supplying clean renewable energy into the grid
- This clean energy is critical to replace the fossil energy from nearby coal-fired power plants
- It would also reduce greenhouse gas emissions, contribute to meeting international climate change commitments and aid transition towards cleaner electricity generation
- The Project is also consistent with the current goals and targets for renewable energy generation in NSW. These include:
    - Contributing to the national renewable energy target [i.e. 20% renewable energy supply] by promoting energy security through a more diverse energy mix, reducing coal dependence, increasing energy efficiency, and moving to lower emission energy sources
    - Contributing to achieving the NSW target of zero net emissions by 2050.

Benefits for owners and operators of solar farms where grazing continues

- Pasture prevents soil erosion as it adheres to the root of the plant. Prevents landslides and runoff that affect the structure of the panels
- Sheep control the growth of vegetation around the panels constantly, which prevents the appearance of shadows on the solar modules
- Reduces health and safety risks for solar farm personnel due to reduced need for operation of mowers and machinery
- Increased health and wellbeing of sheep due to protection from elements
- Less water consumption by sheep
- Safety from predators for livestock due to secure fencing
- Access to greener pasture, particularly during dry conditions or drought, leading to reduce operating costs.

2.2. Applying a mix of engagement tools

It is always important to apply a mix of engagement tools and techniques to allow for a range of inputs and participation opportunities.

Given the impacts of COVID-19, there is a growing emphasis and uptake of digital tools. At the same time, digital engagement platforms are providing improved sophistication in terms of providing

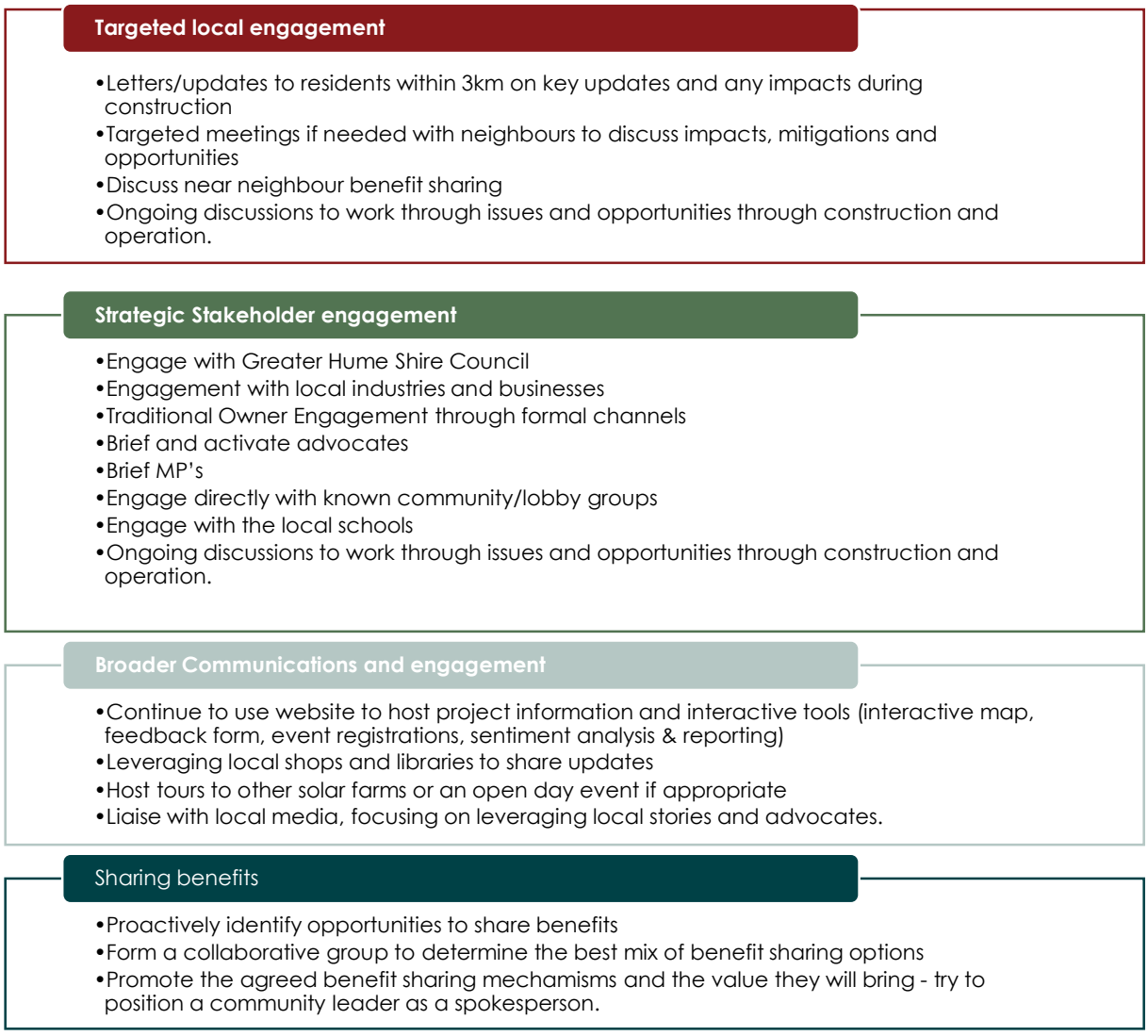
integrated tools to capture conversations, analyse sentiment and issues and generate reports in a very efficient way.

For this Plan, it is recommended that a mix of traditional face to face methods and innovative digital tools are used to support the engagement plan.

2.2.1. Engagement activities

It is recommended that a broad engagement approach is needed for the Project as it will help build awareness and engagement with attitudes in the wider community and region. It is proposed that the activities are broken across four types as outlined in Figure 2-. This is coordinated through an Engagement Action Plan in Section 2.

Figure 2-2 Proposed mix of engagement activities



3. ENGAGEMENT ACTION PLAN

A broad future engagement action plan is outlined below. Note that the timing for delivery is subject to the Proponent's construction schedule.

Table 3-1 Community and Stakeholder Engagement Action Plan

Date (subject to change)	Activity	Status	Actions	Who	Complete
December	Set up future meetings with near neighbours to discuss construction timeframes and mitigate any concerns.		Develop a letter outlining key project updates.	Proponent	
December	Meet with Greater Hume Shire Council and arrange Councillor Briefing regarding construction milestones and where Council will play a part i.e. roads.		Prepare materials for Council meeting – Project updates, Presentation, maps, actions	Proponent	
December-January	Review and develop engagement materials for construction phase including: • Website content • Key maps • Social Media • EDMs		Update content on project website with clear construction timelines and information	Proponent	

Date (subject to change)	Activity	Status	Actions	Who	Complete
December-Onwards	Activate email and phone contacts on the Project website and activate the stakeholder record management system for construction phase.		Keep updating through construction and operation phase after each engagement. Be proactive in reaching out to stakeholders to keep them informed.	Proponent	
December onwards	Set up meetings with local MPs and other key community groups including key First Nations stakeholders to ensure they are kept informed on the process.		Present updated materials and discuss Community Benefit Sharing.	Proponent	
April onwards	Capture footage of construction for social media and website		Update website and media with key updates share key images, respond to questions, etc. Video, imagery and drone footage if appropriate.	Proponent	
April onwards	Engage media for localised success stories and key community updates in relation to construction phase.		Interview local suppliers that may be engaged in the Project. Community Benefit Sharing stories and how the investments are making a positive impact on the community.	Proponent	

Date (subject to change)	Activity	Status	Actions	Who	Complete
May onwards	Prepare responses to ongoing questions from stakeholders.		Build topic specific information that address key concerns and questions.	Proponent	
April onwards	Establish a list of key issues/risks and opportunities arising in construction and operation phases and identify how they will be managed and mitigated.	To be updated and reviewed as part of this management plan	Build on issues identified during EIS and conversations with stakeholders during construction.	Proponent	
April onwards	Take calls, answer questions, and arrange any required follow up meetings that can help proactively address issues during the construction phase.	Ongoing	Liaise with stakeholders Track issues and confirm mitigations/resolutions	Proponent	
Operation	When constructed, liaise with media around a story announcing operation commencement and also updates on Community Benefit Sharing implementation.		Contractors, local businesses (hospitality & accommodation), community organisations who may be benefiting from the Project.	Proponent	
Operation-ongoing	Host Solar Farm tours with near neighbours, local schools, businesses, community groups and other community members who may be interested.		Engage media Should enough interest occur, explore an Open Day event involving the entire community.	Proponent	

Date (subject to change)	Activity	Status	Actions	Who	Complete
	Take calls, answer questions, and arrange any required follow up meetings that can help proactively address issues during the construction phase.	Ongoing	Liaise with stakeholders Track issues and confirm mitigations/resolutions	Proponent	

3.1. Stakeholder analysis

It is critical to understand the stakeholder setting surrounding the Project and the Greater Hume Region. This analysis can inform the future engagement approach, identify risks and enable development of long-term relationships.

The engagement approach recommended for each stakeholder group refers to the IAP2 Engagement Spectrum.

Table 2-3: Broader stakeholder analysis

Stakeholder Group	Inclusions/details	Objectives and opportunities	Influence (H/M/L)	Impact (H/M/L)	Engagement approach
Host Landowner	1 involved landholder.	• Develop a strong ongoing relationship. • Contribution to engagement planning and delivery. • Contribution to the Project's progress during construction and operation, ability to provide local knowledge, advice and input. • Involvement in development and of Community Benefit-Scheme.	H	H	Consult Involve Collaborate
Near neighbours within 3km	Neighbouring property owners listed in Figure 2-2	• Develop a strong partnership with the community. • Keep neighbours informed about the Project from early in the construction phase. • Discuss impacts and mitigations – such as visual screening) through a collaborative process. • Discuss neighbour benefit sharing options directly.	H	M	Consult Involve Collaborate
Local community	General Greater Hume community	• Develop an understanding of and opportunity to participate in the Project. • Provide opportunities to raise issues and provide feedback during construction and operation via project website.	M	M	Consult Involve

Stakeholder Group	Inclusions/details	Objectives and opportunities	Influence (H/M/L)	Impact (H/M/L)	Engagement approach
		• Discuss Community Benefit Sharing options.			
Greater Hume Shire Council	Regional Development and Planning Team	• Maintain a positive relationship • Build on previous discussions • Identify opportunities to support the local economy • Identify and leverage council communication channels	H	M	Consult Involve Collaborate
State MP	Justin Clancy MP Deputy Premier Member for Albury (Liberals)	• Reintroduce the Project and its approval details. • Identify the members policies, concerns, and opportunities in relation to the Project.	M	M	Inform Consult
Federal MP	The Hon. Angus Taylor MP Member for Hume (Liberals)	• Reintroduce the Project and its approval details. • Identify the members policies, concerns, and opportunities in relation to the Project.	M	M	Inform Consult
Traditional Owners – Indigenous community	Wiradjuri RAPs and Local Aboriginal Land Council	• Look for opportunities to contribute to the local story of country and contribute to the local Aboriginal Community. • Involve local community organisations in Community Benefit Sharing initiatives.	H	H	Consult Involve Collaborate

Stakeholder Group	Inclusions/details	Objectives and opportunities	Influence (H/M/L)	Impact (H/M/L)	Engagement approach
RFS/ Urban fire/emergency services	RFS and emergency services	• Organise meeting and solar farm tour to show where main access point is for RFS should they need to access.	M	L	Consult Involve
Schools and Universities	Charles Sturt University, Public, Private Schools St Paul's Walla Walla	• Ensure organisations are updated on education and vocational opportunities associated with the Project. • Identify relevant community benefit scheme opportunities.	L	L	Consult Involve
Business groups / industry stakeholders	Local businesses identified in EIS Kotzue Pty Ltd PJN Steel Fabrication Weisners Holden Blaire's Produce Co. DJs Fine Fast Food Billabong Café and Post Office Walla Walla Hotel Motel	• Work with the chamber to identify any local businesses that may be impacted by the construction and operation phases (positive or negative). • Identify opportunities to develop or utilise local capability during construction and operation.	M	M	Consult Involve
Groups of solar farm objectors	Emerging Action Group if applicable	• Identify and address concerns as required • Prepare responses to known concerns based on previous engagements • Manage issues constructively and efficiently	M/L	L	Consult Involve

Stakeholder Group	Inclusions/details	Objectives and opportunities	Influence (H/M/L)	Impact (H/M/L)	Engagement approach
Advocacy groups	Emerging Advocacy groups if applicable	• Consider opportunities for partnerships and community events • Consider advocacy opportunities • Potential for partnerships	M	M	Consult Involve
Community organisations	Rural Fire Service, Farmers Association	• Identify interests and opportunities to partner and contribute	M	M	Consult Involve

4. COMMUNITY BENEFIT SHARING OPTIONS

A Community Benefit Scheme (CBS) can ensure benefits are shared with the community in a way that enhances its resilience. From an industry best practice standpoint, several principles are seen as being helpful guides in developing or assessing a benefit sharing strategy, as outlined below[1]:

Table 3-4-1: Benefit sharing principles

Principle	Description
Appropriate	– Benefit sharing is tailored to local circumstances, culture and need, helping to address (not create or reinforce) patterns of conflict or inequality. It makes sense and is appropriate in the local context. – The local community provides guidance on how benefit sharing can create a positive, lasting and meaningful impact for their local community. We work with the local community to develop specific benefit sharing strategies that respond to their unique local context and need.
Flexible	– Benefit sharing is an aspect of Proposal development that will greatly benefit from being open to community involvement, influence, and negotiation. Having the flexibility to respond to local context will ensure benefit sharing has the best and biggest local impact. – The lifecycle of renewable energy developments is significant (25 years or more), a lot can change in a community during that period. Therefore, it is important to build in flexibility so that benefit sharing can evolve as the community needs do.
Transparent	– The benefit sharing strategy is transparently available to the community and provides a clear and understandable rationale for the various programs and who is eligible to participate. – Benefits are freely given for the sake of sharing the proceeds of the Proposal and building relationships. Benefit sharing must not come with conditions of silence or consent.
Integrated	– Benefit sharing seeks to integrate the Proposal owner/operators as valuable community members by building links and relationships into the community.
Mutually Beneficial	– The approach is designed to bring mutual benefit to local communities and the Proposal.

[1] Lane, T & Hicks, J, (forthcoming) Benefit Sharing Options for Renewable Energy, 2019, Clean Energy Council

Principle	Description
Proportionate	– The benefits are perceived as being proportionate to the scale of the Proposal and the level of change or disturbance experienced by local people. Given community members living closest to Proposals experience greater impacts, they should receive a proportionate benefit.
Strategic	– Create a positive legacy in the local community. Look to bring ongoing and lasting value to the local area. Integrate benefit sharing opportunities with broader strategies by building local partnerships.
Accountable	– Systems and processes are deployed to ensure the credibility and reputation of the benefit sharing program. – Benefit sharing is managed in a transparent and accountable way that involves local stakeholders.

4.1. Typical CBSP scope

In general terms, it is important to note that a CBSP does not include:

- Required activities under our permit conditions such as for visual screening
- Annual council rates payments or fire levies (where applicable)
- Host landowner payments
- The value of local jobs and investment.

A successful CBSP is typically a mix of benefit-sharing mechanisms including:

- Near Neighbour payments or similar
- Community Benefit Fund
- Energy deals or discounts through solar and/or storage subsidies or a partnership with an energy retailer
- Community co-investment
- Investment to address specific local issue
- Establishment of a VPA with Council to help guide governance
- Identification of local benefit sharing activities that already exist and align with the project intent.

More general model options are included below.

Table 4-2 Options for benefit sharing

Option	Pros	Cons	Requirements	Constraints
Near Neighbour payments	• Provides benefit-sharing option for near neighbours who may be most affected by the Proposal, particularly during construction.	• Can be difficult to ascertain an appropriate radius. • Can be perceived by some as 'buying out' neighbours.	• Needs to be tailored to the local context. • Must be offered without conditions in relation to complaints, avoidance of compliance activities etc. • Must be equally applied and transparent.	• Population, topography, visual impact, scale. • Not applicable to involved landholders.
Community Benefit Fund	• Can create strong regional economic development outcomes. • Can create a strong legacy in community.	• Local government can negotiate to 'own' the fund – which may result in a higher cost of administration and potential politicisation of the program. • There can be a lack of sophisticated local programs or Proposals to apply to fund– may need to co-develop.	• Strong governance with community representation. • Strong evaluation and acquittal. • Flexible funding streams to enable longer term Proposals to access the fund. • Consider other existing regional funding bodies and look to enhance or offer point of difference.	• Not applicable to committed activities funded by any level of government. • A goal of the fund to be allocated to Proposals within Glanmire local community.

Option	Pros	Cons	Requirements	Constraints
Lower energy bills through solar and/or storage subsidies	• One off deployment of offer.	• Onerous to organise a defendable procurement contract.	• Delivered by local CEC accredited installers. • Easiest model is to select an installer – perform due diligence and deploy initiative at a fixed price (bulk buy approach).	• May be competing subsidies – such as state government that need to be taken into consideration – how to complement?
Lower energy bills through retail offer	• Possibility to 'skin' a retailer offers, and brand it per Proposal. • Offer that is equitable across the community – anyone can access it. • Connection to the renewable energy Proposal.	• Long term issues must be accounted for in the design – new arrivals, transition to solar and battery, competitive retail offers in the future. • Locals need to transfer to new energy supplier • Customer churn.	• Needs the right scale – minimum participation levels. • Needs the 'right' discount – i.e. minimum of 25-30%.	• Retailer desire to partner. • Marketing and customer acquisition needs to be resourced locally.
Community co-investment	• Enhancing regional economic benefits. • Sharing the profits with community retail investors. • Enabling participation in the development and deepening the connection and	• Can be challenging to integrate the investment in the back end of the Proposal finance structure. • May not be a supported concept in all communities – may be dependent on social economic factors.	• Can be delivered through fractional investment platforms. • Need to determine investment structure, debt vs equity, length of term, rate of return etc, and what is negotiable for community feedback.	• Considerations around equity or debt structures. • Consider timing of offer to reduce community investor exposure to issues such as connection delays.

Option	Pros	Cons	Requirements	Constraints
	interaction with the Proposal. • The economies of scale of large-scale Proposals can deliver significant returns.	• Can be onerous to administrate – ensure the impact/costs/ delegations are well modelled.		• Consider budget for marketing and development and impacts on other benefit sharing initiatives.
Investment to address specific local issue	• Can enable direct solutions to broader community needs/issues.	• Longevity of solution and appropriateness of solution can be difficult to establish.	• Community needs assessment to harvest ideas and then validate a chosen approach.	• Consider the budget allocation and how this may impact on other benefit sharing items.

4.2. Media liaison

It will be worth applying a proactive media strategy, where local media are proactively briefed to help provide balanced coverage during construction and operation and each phases' critical milestones. Such a strategy would help to build awareness of the Project, proactively explain management of issues, and promote benefit sharing activities.

This liaison should focus on the proactive management of impacts, the benefits the Project is bringing to the local area and the everyday people stories – the people planning, building, supporting, and supplying the Project (particularly if they are local). The relevant media outlets are listed in Table 4-3.

Table 4-3 Media types and outlets

Media type	Outlets
Local media	• Local newspaper (eg Border Mail) • Local radio (eg 2AAA FM, 2RW Riverina) • Local television news (Nine, Prime 7) • Social media (Facebook, Instagram).
Digital / owned media	• Facebook • Instagram • Project Website • LinkedIn.

The proponent would need to develop story ideas and suitable content and image opportunities to support local media in developing the story.

Potential stories could be cultivated around these topics:

- Engagement of local suppliers
- Partnerships with local community-based organisations
- Creation and launch of the Community Benefit Scheme.

5. EVALUATION AND NEXT STEPS

This engagement plan will be ongoing throughout construction and operation phases of the Walla Walla Solar Farm.

5.1. Next steps

- Develop the required supporting materials needed to engage successfully throughout construction and operation phases
- Complete messaging around impacts that may arise
- Continue adjusting this plan as the Project moves through construction and operation phases with any new issues or opportunities arise.