



08 October 2025

The Planning Secretary
Department of Planning and Environment

Re: Walla Walla Solar Farm (SSD-9874)
Subject: Response to the Non-Compliances Identified from the Independent Environmental Audit

Dear Sir / Madam,

In accordance with the requirements of Development Consent SSD-9874, Walla Walla Solar Farm has completed an Independent Environmental Audit for the operational phase, undertaken by Mr Richard Peterson of Trigalana Environmental Pty Ltd, and submitted via DPHI Planning Portal.

The audit identified several non-compliances and observations relating to specific consent conditions. This document provides Walla Walla Solar Farm's formal responses and proposed corrective actions to address these findings. The responses outline the measures that have been implemented or are scheduled to ensure full compliance with the relevant conditions of consent. For non-compliances that have already been addressed and closed to the satisfaction of DPHI, no further action is required.

A summary of the audit findings and project responses is provided below.

1. Open Non-Compliances Requiring Action

1.1 Schedule 3 Condition 31

- **Audit Finding**

The water tank on site does not have a compliant 65mm Storz fitting.

- **Recommendation**

Replace the current fitting with a 65mm Storz compliant fitting and place a sign identifying the tank as the firefighting water supply to assist the RFS.

- **Project Response and Proposed Corrective Action**

A compliant 65mm Storz fitting will be installed by the EPC contractor, GRS. A permanent sign indicating "Firefighting Water Supply - 50,000L" will also be installed at the tank location to assist RFS identification.

- **Target Completion Date:** March 2026

1.2 Schedule 4 Condition 02

- **Audit Finding**

Management plans were not formally reviewed following incidents during the audit period.

- **Recommendation**

Review and update the Fire Management Plan and Emergency Management Plan in consultation with the RFS.



- **Project Response and Proposed Corrective Action**

A formal review of the Fire Management Plan and Emergency Management Plan is progress. The review will be completed in consultation with the RFS during their next site visit to ensure alignment with current operational arrangements and fire response protocols.

- **Target Completion Date:** March 2026

1.3 Schedule 4 Condition 07

- **Audit Finding**

Several incidents were not reported to DPHI immediately as required.

- **Recommendation**

Review the incident classification and reporting procedure to clearly define what constitutes a “reportable incident” and ensure immediate reporting of incidents that cause or threaten material harm.

- **Project Response and Proposed Corrective Action**

The Incident Reporting Procedure is being revised to clarify the definition and escalation process for incidents under Schedule 4 Condition 7. Training will be provided to site personnel and contractors on the updated procedure to ensure future compliance with immediate notification requirements.

- **Target Completion Date:** March 2026

2. Observations

2.1 Schedule 3 - Condition 11

- **Audit Finding**

Landscape planting has been implemented. Maintenance is undertaken monthly by a company called GMC, including watering, weeding, and replacement of dead plants.

- **Recommendation**

Annual visual assessment should be undertaken to determine the growth of landscaping plants and to determine whether any additional measures or planting are required.

- **Project Response and Corrective Action**

Walla Walla will engage a third-party consultant to assess the condition of the screening annually, commencing in April 2026. If insufficient screening is identified, supplementary planting will be undertaken in the next suitable planting season.

3. Closed Non-Compliances (No Further Action Required)

3.1 Schedule 2 - Condition 02

- **Audit Finding**

A Development Control Order was issued by DPHI on 7 March 2024 relating to the unauthorised construction of a levee bank adjacent to Back Creek. The levee was subsequently removed, and DPHI confirmed compliance closure following their site inspection on 3 May 2024.



- **Project Response**

The requirements of the Development Control Order have been completed and verified by DPHI. No further action is required.

3.2 Schedule 3 - Condition 05

- **Audit Finding**

During the construction phase, two vehicles accessed an unapproved route on 17 April 2023. No further breaches were identified, and all vehicles now use the designated Benambra Road access.

- **Project Response**

The incident occurred during construction and was an isolated case. Site induction and contractor briefings now emphasise access requirements. No further action is required.

3.3 Schedule 4 - Condition 04

- **Audit Finding**

Operations commenced on 31 May 2025; however, notification to DPHI was submitted on 10 June 2025.

- **Project Response**

The Independent Certifier reviews the construction completion claim and issues the certificate once all conditions are met, a process that typically takes up to ten business days. Notification of commencement of operations was submitted to DPHI promptly upon confirmation of completion. No further action is required.

3.4 Schedule 4 - Condition 06

- **Audit Finding**

Work as executed plans were submitted to DPHI on 11 June 2025, after commencement of operations.

- **Project Response**

Work as executed plans have been submitted to DPHI as required. No further action is required.

Walla Walla Solar Farm remains committed to maintaining compliance with the Development Consent and implementing continuous improvement measures. Please do not hesitate to contact Edison Jiang at edison.jiang@frv.com or on 0415 504 222 should further information or clarification be required.

Yours sincerely,

Edison Jiang

Edison Jiang
Asset Manager