



8 December 2023

NSW Department of Planning & Environment
Director Resource Assessments
Attention: Steve O'Donoghue

Dear Steve,

**SSI 12590060 – Hunter Power Project: Snowy Hydro's Response to the April 2023
Independent Environmental Audit findings**

Ken Holmes of Barnett & May was engaged by Snowy Hydro to conduct the October 2023 Independent Audit of the Hunter Power Project as required by Conditions C15 to C19.

The audit, undertaken in accordance with the Department's Independent Audit Post Approval Guidelines (May 2020), covered the period from 1 April 2023 to 30 September 2023 and did not identify any non-compliances. The Independent Environmental Audit Report dated 5 December 2023 is attached.

The table below provides Snowy Hydro's response to the observations from the Independent Environmental Audit Report.

Yours sincerely,

DocuSigned by:
Daryl Young
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Daryl Young
Project Director
Hunter Power Project

Condition Number	Compliance Requirement	IEA Finding	IEA Recommendation	Proposed Action	Proposed Action Due Date
S2 A25	<p>Within 6 months of the date of commencement of development under this approval, or other timeframe agreed by the Secretary, the Proponent must enter into a Planning Agreement with Council:</p> <p>(a) in accordance with Division 7.1 of Part 7 of the EP&A Act; and</p>	<p>DPE have granted SHL three extensions of time (to 29 February 2024) to finalise the Planning Agreement with Council noting that an in principal Agreement has been reached and additional time is required to execute the agreement.</p> <p>This is the third extension of time granted for this condition.</p>	<p>It is recommended that the Planning Agreement is finalised as a priority so that no further extension of time is required. The auditor notes that SHL have proactively taken steps to finalise the agreement in consultation with Council.</p>	<p>The Draft Planning Agreement was presented to council on 20 September 2023 before being publicly exhibited from 27 September until 25 October. The Agreement was executed by Council's General Manager and Mayor on 22 November 2023.</p>	Complete
S3 B38	<p>Prior to the commencement of any construction the Proponent must install and maintain suitable sediment and erosion controls onsite, in accordance with the relevant requirements of <i>Managing Urban Stormwater: Soils and Construction – Volume 2A Installation of Services</i> (DECC 2008).</p>	<p>SHL have engaged the services of a Certified Professional in Erosion and Sediment Control (CPESC) who (during the audit period) has prepared several progressive erosion and sediment control plans (PESCPs) for the site. The CPESC currently visits the site and undertakes inspections on an as required basis, which is approximately monthly.</p> <p>Erosion and sediment control measures implemented include a site sediment basin and water treatment plant, rock lined drains, energy dissipators, sediment fences, stabilised site access roads and revegetated stockpiles. Erosion and sediment controls were observed to be operating effectively</p> <p>During the audit period there were no reported incidents relating to erosion or sediment laden discharges from site.</p> <p>While overall the erosion and sediment controls appear to be effective with improvement since the previous audit, ongoing maintenance is required to ensure their operational effectiveness</p>	<p>The continued focus and prioritization of the planning and maintenance of erosion and sediment controls focusing on;</p> <ul style="list-style-type: none"> • Early installation of final landscaping/rehabilitation work and paved surfaces to provide effective groundcover. • Ensuring effective coverage of stockpiles and batters. • Maintenance of sediment basin walls, inlets and outlets to prevent scour and damage to erosion and sediment controls. <p>It is also recommended that the CPESC continues to be engaged throughout the project and visits the site at least quarterly to review and update the plans and inspect the site to assess compliance with the plans and make any recommendations to further enhance water management and erosion and sediment control during the construction phase.</p>	<p>Continue to engage a CPESC who will visit site quarterly, as a minimum, to review and update the PESCPs (as necessary) and inspect the site to assess compliance with the plans and make any recommendations to further enhance water management and erosion and sediment control.</p>	<p>This will continue for the remainder of the construction phase of the project.</p>

Condition Number	Compliance Requirement	IEA Finding	IEA Recommendation	Proposed Action	Proposed Action Due Date
		until rehabilitation and permanent works are complete.			
S3 B12	<p>Prior to the commencement of the installation of the gas turbines, unless otherwise agreed by the Secretary, the Proponent must prepare and submit to the satisfaction of the Secretary:</p> <p>A Fire Safety Study based on the detailed design of the development. This study must cover the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. The study must be prepared in consultation with NSW Rural Fire Service to verify the required Asset Protection Zone (APZ) in view of up to 14 MPa gas releases from the gas receiving station. The study must also be submitted for the approval of Fire and Rescue NSW.</p>	<p>While condition S3 B12 relates to the operational phase, the auditor notes that the project is entering a high-risk period for bushfire with the Bushfire Danger Period declared for NSW on the 1st of October. Given the heightened bushfire risks across NSW due to increased fuel loads and the declaration of an El Nino in September 2023</p>	<p>Conduct a pre-bushfire season readiness review to ensure the project is fully equipped to prevent and respond to any fire related incidents.</p> <p>Involve suitably qualified personnel in the review as required. A record of the review should be kept.</p>	<p>Have suitably qualified personnel conduct and document a review to ensure the project is fully equipped to prevent and respond to any fire related incidents.</p>	31 January 2024