

# INDEPENDENT ENVIRONMENTAL AUDIT # 4

## SNOWY 2.0 MAIN WORKS

### FINAL REPORT



<b>Proponent:</b>	Snowy Hydro Limited
<b>Auditee:</b>	Snowy Hydro Limited, Future Generation Joint Venture
<b>Project:</b>	Snowy 2.0 Main Works – Development Consent CSSI 9687
<b>Scope:</b>	Development Consent CSSI 9687 – Compliance to all relevant conditions of consent, commitments made in the approved Management Plans, Main Works Preferred Infrastructure Report and Response to Submissions, Environment Protection Licence (EPL) conditions, and EPBC 2018-8322 Approval conditions. Scope also included: Areas identified in Audit #3 as “ <i>areas to be assessed at next / future audits</i> ”, follow-up of previous IEA non-compliances and other findings and areas identified as a focus by agencies and authorities.
<b>Location(s)</b>	<b>Snowy Hydro Office – Monaro Highway, Cooma</b> <b>Future Generation Office – Cooma</b> <b>Project Sites / Locations:</b> Lobs Hole Ravine Road, Lobs Hole, Rock Forest, Tantangara; Marica; Trunk Services, remote sites
<b>Audit Dates:</b>	10 to 17 July 2023 (on-site)

Revision no.	Author / Auditor	Purpose / Change	Date
0.1	Julie Dickson (Lead Auditor)	Draft for review/comment	28/08/2023
1.0	Julie Dickson	Final for issue	08/09/2023

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Document Information	
<b>Title:</b>	Independent Environmental Audit Report – Snowy 2.0 Main Works – Annual – Audit No. 4.
<b>Audit Organisation:</b>	Dickson Environmental Consulting and Audit
<b>Lead Auditor &amp; Author:</b>	Julie Dickson
<b>Preliminary findings issued:</b>	4 August 2023
<b>Draft Report for comment issued:</b>	28 August 2023
<b>Final Report for issue:</b>	8 September 2023



## EXECUTIVE SUMMARY

A fourth Independent Environmental Audit (IEA) was conducted of the Snowy 2.0 Main Works Project in July 2023. The audit scope was in accordance with the revised Independent Environmental Audit Program (IEAP) approved by the Planning Secretary of the Department of Planning and Environment (DPE) on 19 September 2022.

As noted in the previous IEA reports, due to the sensitive location and scale of the Snowy 2.0 project, Snowy Hydro Limited (SHL) requested that IEAs are to be undertaken at a greater frequency than provided by Schedule 4 Condition 9 of the Main Works approval (after one year, then every 3 years). The initial Independent Environmental Audit (IEA) was held within 12 weeks of commencement of construction, and the following two audits were conducted 26 weeks apart, following the initial audit. In a revised audit program approved by DPE, the audit schedule was re-set to occur every 18 months. The previous (third) IEA was conducted in February 2022, and as required by the revised audit program, this fourth audit was conducted in July 2023.

This IEA covered the full scope of the project in accordance with the IEAP, including all relevant NSW Conditions of Consent, the project Environment Protection Licence (EPL) and all relevant Commonwealth conditions under the Environmental Protection and Biodiversity Conservation (EPBC) Act. The audit generally covered the period February 2022 to July 2023.

The scope of the audit included site visits to all active areas of the project including some remote sites, a follow-up on non-compliances and other findings from Audit #3; management plans and associated systems and processes identified as priority areas; activities relevant to the current phase of the development; and areas of focus identified by the agencies / key stakeholders during the pre-audit consultation process.

Areas of strength identified during the audit included: improved processes for addressing previous audit findings (using the Action Plan); improved preparedness and timely provision of evidence for the IEA; improved waste management practices with the appointment of a Waste Management Coordinator; good communications and cooperation with local traffic management authorities to respond to vehicle incidents, first response etc; increased involvement of operational personnel (Superintendents, Supervisors etc) in the site inspections; and tunnel spoil management in general.

It was noted that there had been several regulatory actions from EPA / agencies over the audit period relating particularly to diffuse water pollution. This was flagged as one of several focus areas for this audit. The site inspections undertaken as part of the audit did not identify any significant erosion and sediment control / diffuse water pollution issues, and site personnel provided evidence of improved practices to better manage diffuse water pollution. It was recognised that considerable work has been undertaken to address the identified issues including: sheeting on unsealed roads (using crushed rock); selective road sealing in problem areas (Nungar Ck); full sealing of Lobs Hole Ravine Road; hydromulching and “stonewalling” of batters; more regular clean out of sumps; and a program of desilting all sediment basins.

**This audit** identified several areas of Non-Compliance (NCs). Observations (OBSs) and Opportunities for Improvement OFIs) have also been raised for action and consideration. In summary:

Thirty two (32) findings were raised at this audit, comprising:

- Twelve (12) non-compliances;
- Eighteen (18) Observations; and
- Two (2) Opportunities

The Non-Compliances from this audit can be grouped into the following main areas:

- Submission of various overdue Management Plans (8) under the NSW Approval and Commonwealth EPBC Approvals (ongoing issue);
- Surrender of Exploratory Works Approval;
- Incident, non-compliance, and notification to authorities (lack of visibility);
- Biodiversity –Weeds hygiene processes, feral animal control (ongoing issue);
- Biodiversity – Annual Report on Biodiversity Matters;
- Chemicals Management – ongoing issue, particularly with segregation and storage compatibility;
- Water Pollution – breaches under Section 120 of the POEO Act (from EPA regulatory action);
- Spoil reports not provided on the project website;

Observations and Opportunities for Improvement from this audit can be grouped into the following areas:

- Waste minimisation, reuse and recycling maximisation (non-spoil related);
- Inconsistency of documentation on the Snowy Hydro website, also on FGJV website;
- Provision of dilapidation survey required by PIR and response to submissions;
- Content of the traffic movement reports, reporting against predicted traffic volumes;
- Emergency egress on secondary roads;
- Labelling of EPL discharge point;
- Issues identified during site inspections that require action.

As noted before, the processes for addressing the previous findings were significantly improved at this audit. The Action Plan prepared by the auditor at the conclusion of the previous audit was used as a tool to systematically address the audit findings, and Snowy Hydro held regular meetings with the FGJV to monitor progress on the closure of the findings as directed.

A significant issue at this audit was the number of management plans overdue for submission / approval, and this was identified as a pre-audit area of focus by various agencies. Snowy Hydro proposed a strategy for resolution of outstanding management plans to DPE in May and June 2023. DPE responded, acknowledging proposed dates for submission, and requested that SHL arrange fortnightly meetings and weekly updates on the status of the plans. These meetings and updates have been occurring, and there has been a major focus by Snowy Hydro to progress the outstanding plans.

Whilst improved processes for addressing audit findings were noted, several findings were not closed out. The Audit Findings Tables in Section 3.2 of this report provides a history of each finding, identifying whether / how often the issue had been previously raised. The details of the follow-up actions taken to address previous audit findings are provided in Appendix A of this report.

**The previous audit** identified fifteen (15) Non-compliances (NC), seven (7) Observations (OBSs) and four (4) Opportunities for Improvement (OFIs). Of those:

- Six (6) NCs and one (1) OBS remains open;
- Twelve (12) NCs were closed (from NCs 2021 & 2022);
- Six (6) OBS, one (1) OFI was addressed and closed, and one remains open;
- 2 OBS escalated to NCs;
- 2 NCs downgraded to OBS.

The auditees were very cooperative throughout the audit process and provided evidence in a timely manner. During the site inspections, several knowledgeable guides (including Superintendents, Supervisors and Environmental specialists) were provided for the duration of each inspection and attended post- inspection debriefs. The Auditor would like to thank all participants for their cooperation and assistance.

### 1.1. Audit definitions and Abbreviations

Abbreviation	Explanation
APZ	Asset Protection Zone
BCA	Building Code of Australia
BCD	Biodiversity Conservation Division (a division of DPE)
BDAR	Biodiversity Development Assessment Report
BMP	Biodiversity Management Plan
BRMP	Biosecurity Risk Management Plan
CCR	Construction Compliance Report
CoC	Conditions of Consent
CMG	Consequence Management Guide
CSSI	Critical State Significant Infrastructure
DAWE	Commonwealth Department of Agriculture Water and the Environment (formerly Department of the Environment and Energy)
Department, the	NSW Department of Planning and Environment
DPE	NSW Department of Planning and Environment (formerly DPIE)
DPIE	Department of Planning, Industry and Environment (now DPE)
EIS	Environmental Impact Statement
ELIANZ	Environment Institute of Australia and New Zealand
EMS	Environmental Management Strategy
EOC	Emergency Operations Centre
HDD	Horizontal Directional Drilling
HMP	Heritage Management Plan
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
ERT	Emergency Response Team
ESCP	Erosion and Sediment Control Plan
ECVT	Emergency, Cabling and Ventilation Tunnel
FGJV	Future Generation Joint Venture (Construction contractors)
FSC	Fisheries Scientific Committee
GDE	Groundwater Dependent Ecosystem
GMP	Groundwater Management Plan
IEAP	Independent Environmental Audit Program
IEA	Independent Environmental Audit
KNP	Kosciuszko National Park
LTRP	Long Term Road Strategy
MAT	Main Access Tunnel
MP	Management Plan
NC	Non-compliance
NHMP	Natural Hazards Management Plan
NPWS	National Parks and Wildlife Service
NRAR	Natural Resources Access Regulator
OBS	Observation
OC	Occupation Certificate
OFI	Opportunity for Improvement
PCT	Plant Community Type
PESCP	Progressive Erosion and Sediment Control Plan
PIC	Person in Charge (relating to emergency management)
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
Project, the	Snowy 2.0 Main Works

Abbreviation	Explanation
PSC	Power Station Cavern
PWTP	Process Water Treatment Plant
RFMP	Recreational Fishing Management Plan
RMP	Rehabilitation Management Plan
RMS	Roads and Maritime Service (now Transport for NSW - TfNSW)
RO	Reverse Osmosis (final water treatment facility)
ROL	Road Occupancy Licence
SAP	Sensitive Area Plans
SDS	Safety Data Sheet
SHL	Snowy Hydro Limited
SMP	Spoil Management Plan
SPAL	Special Purpose Access Licence
STP	Sewage Treatment Plant
SSI	State Significant Infrastructure
SWMP	Surface Water Management Plan
SWMS	Safe Work Method Statement
TBM	Tunnel Boring Machine
TCP	Traffic Control Plan
TFMP	Threatened Fish Management Plan
TfNSW	Transport for NSW (formerly Roads and Maritime Service – RMS)
TMP	Transport Management Plan
VIMP	Visual Impact Management Plan
VWP	Vibrating Wire Piezometer
WAL	Water Access Licence
WMP	Water Management Plan
WTP	Water Treatment Plant

## 1.0 INTRODUCTION

### 1.2. Purpose and Requirement for this Audit

This fourth Independent Environmental Audit was conducted as an independent and objective assessment of the environmental performance and compliance status of the Snowy 2.0 Project with the Department of Planning and Environment (DPE) Conditions of Consent. The Project has been assessed as Critical State Significant Development (SSI 9687) and as such, is required to undergo Independent Environmental Audits (IEAs).

Schedule 4 Condition 9 of the Consent requires that “within one year of the commencement of construction, and every 3 years thereafter unless the Planning Secretary agrees or directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the development”.

Snowy Hydro determined that given the sensitive location and scale of the Snowy 2.0 development, a greater IEA regime should be adopted than that outlined in the Conditions of Consent. Snowy Hydro believes this approach will ensure that a planned and systemic independent review of environmental performance is completed and undertaken at appropriate intervals throughout the project.

Prior to construction commencing, in September 2020, Snowy Hydro proposed to the Department an IEA program for the first two years, setting out the audit frequency, with the initial audit to be conducted within 12 weeks of the commencement of “Construction”, and subsequent audits scheduled at intervals of 26 weeks from the date of the initial audit. The IEA Program was approved on 28 September 2020 and the first three construction phase audits were conducted in January 2021, July 2021, and February 2022 as per the approved program.

Following the completion of the initial IEA program, Snowy Hydro submitted a revised program to DPE, proposing that the next IEA be conducted within 18 months of the 12-month IEA, and then every 18 months onwards unless otherwise updated, with interim targeted internal audits between the IEAs. The revised IEA program was approved by DPE on 19 September 2022. This fourth IEA was conducted 18 months following the annual audit in January 2022 as required by the program.

### 1.3. Background of the Project

Snowy Hydro Limited (Snowy Hydro) is constructing a pumped hydro-electric expansion of the Snowy Mountains Hydro-electric Scheme, called Snowy 2.0. Snowy 2.0 is being built by the delivery of two projects: Exploratory Works and Snowy 2.0 Main Works (subject of this audit). Snowy 2.0 involves linking the existing Tantangara and Talbingo reservoirs through approximately 27 kilometres of new underground tunnels and a hydro-electric power station.

Project documentation notes that Snowy 2.0 would provide an additional 2,000 megawatts of electricity and up to 350 gigawatt hours of energy storage for the National Electricity Market (NEM). On 7 March 2018, the NSW Minister for Planning declared Snowy 2.0 to be State Significant Infrastructure (SSI) and Critical State Significant Infrastructure (CSSI) under the *Environmental Planning and Assessment Act 1979* (EP&A Act) on the basis that it is critical to the State for environmental, economic, or social reasons.

In July 2018, the Environmental Impact Statement for the Exploratory Works for Snowy 2.0 (Exploratory Work EIS) was submitted to the then Department of Planning and Environment. Following public exhibition, the response to submissions was prepared (Response to Submissions Exploratory Works for Snowy 2.0), and on 7 February 2019, approval of Snowy 2.0 Exploratory Works (Exploratory Works) was granted by the Minister for Planning.

The *Snowy 2.0 Main Works Environmental Impact Statement* (Main Works EIS) was submitted to the Department of Planning, Industry and Environment in September 2019 and publicly exhibited between 26 September 2019 and 6 November 2019. A total of 222 submissions were received and in February 2020, the response to submissions was prepared (*Snowy 2.0 Main Works – Response to Submissions*).

Following consideration of this document and the Main Works EIS, approval was granted by the Minister for Planning and Public Spaces (formerly Minister for Planning) on 20 May 2020. The approval for Snowy 2.0 Main Works incorporates the Exploratory Works and Main Works project elements and requires surrender of the Exploratory Works approval within six months of the commencement of construction. At the time of surrender, the conditions and requirements of the Main Works Infrastructure Approval would apply to any Exploratory Works activities required to be completed.

In addition to the State approval, a referral (EPBC 2018/8322) was prepared and lodged with the Commonwealth Department of Agriculture, Water and the Environment (DAWE) under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act). The Commonwealth Minister's delegate determined on 5 December 2018 that Snowy 2.0 Main Works is a "controlled action" under the EPBC Act. The EPBC Act referral decision determined that the project will be assessed by accredited assessment under Part 5, Division 5.2 of the *NSW Environmental Planning and Assessment Act 1979*. The Snowy 2.0 Main Works project was approved with Conditions of Approval by DAWE on 29 June 2020.

Webuild (formerly Salini Impregilo), Clough and Lane formed the Future Generation Joint Venture (FGJV) and are engaged by Snowy Hydro to deliver both Stage 2 of the Exploratory Works project and Snowy 2.0 Main Works.

Construction works for Main Works commenced on 21 October 2020.

#### 1.4. Auditor Credentials

<b>Audit Organisation:</b>	Dickson Environmental Consulting and Audit Pty Ltd
<b>Lead Auditor &amp; Report Author:</b>	Julie Dickson
<b>Lead Auditor Qualification:</b>	Exemplar Global Master / Lead Environmental Auditor Accreditation no. 13573 (exp June 2024)
<b>Affiliations:</b>	EIANZ Certified Environmental Practitioner Reg. no. 221

#### 1.5. Audit Objectives, Scope Development, Scope & Criteria

The objective of this Independent Environmental Audit is to assess the ongoing environmental performance of the development and whether it is complying with the requirements in the NSW approval (CSSI 9687) (including the requirements of any approved strategy, plan or program), the Commonwealth EPBC approval (EPBC 2018/8322) and the project Environment Protection Licence (EPL 21266). Schedule 4 Condition 9 of the NSW Conditions of Consent requires that the audits include a review of the adequacy of the approved strategies, plans and programs and to recommend any appropriate measures to improve environmental performance of the development and approved strategies, plans and programs.

The scope was developed by the Lead Auditor in consultation with Snowy Hydro with input provided by various agencies, based on the approved IEA program, and information provided on the expected activities that would be in progress at the time of the audit.

Therefore, in accordance with the approved IEA program and the agreed approach, the audit scope and criteria included:

- Site inspections at all active areas of the project;
- Follow-up on non-compliances and other findings from Audit #3;
- All relevant / triggered conditions of the NSW Conditions of Consent;
- All relevant / triggered conditions of the Commonwealth EPBC Conditions of Approval;
- All relevant, auditable Environment Protection Licence conditions;



- Management Plans and associated systems and processes identified as priority areas, based on the previous audit report and the activities relevant to the current phase of the development;
- EIS Snowy 2.0 Main Works Preferred Infrastructure Report and Response to Submissions Feb 2020;
- Areas of focus identified by agencies / key stakeholders during the pre-audit consultation process.

The areas of additional scope requested by the agencies and authorities are documented within Section 2.3 – Consultation with Agencies and in Appendix B - Agency Consultation Summary Table.

The scope of the audit is also reflected within the Audit Plan and Scope in Appendix F.

The audit criteria are also reflected within the Compliance Requirements column of the Audit Tables in Appendix G.

## 1.6. List of Approvals and Documents Audited

- Main Works Approval CSSI 9687 Schedules 1 to 4 and relevant appendices including MOD 1;
- Snowy 2.0 Main Works NSW (EPBC 2018/8322) Annexure A – Conditions of Approval Parts A & B and relevant appendices;
- Environment Protection Licence 21266 including Pollution Reduction Program;
- Snowy 2.0 Main Works – Environmental Management Strategy Rev I 11/08/2020 (FGJV) (+ unapproved EMS dated 20/02/2023);
- Snowy 2.0 Main Works – Biodiversity Management Plan Rev I 12/10/2020 (FGJV);
- Snowy 2.0 Main Works – Water Management Plan Rev G 15/10/2020 (FGJV) (+ unapproved Water Management Plan dated 21/11/2022);
- Snowy 2.0 Main Works – Surface Water Management Plan Rev G 15/10/2020 (FGJV);
- Snowy 2.0 Main Works – Surface Water Trigger Action Response Plan 2 19/09/2020 Rev F (Annexure B to Surface Water Management Plan);
- Snowy 2.0 Main Works – Groundwater Water Management Plan Rev G 15/10/2020 (FGJV);
- Snowy 2.0 Main Works – Aquatic Habitat Management Plan Rev F 16/02/2021 (FGJV);
- Snowy 2.0 Main Works - Waste Management Plan Rev C 23/07/2020
- Snowy 2.0 Main Works – Spoil Management Plan Rev P 06/09/2022 (FGJV);
- Snowy 2.0 Main Works – Heritage Management Plan Rev G 13/08/2020 (FGJV);
- Snowy 2.0 Main Works – Transport Management Plan Rev G 03/08/2020 (FGJV) (+ unapproved Transport Management Plan Rev I for issue to external agencies 09/01/2023);
- Snowy 2.0 Main Works – Construction Noise Management Plan – Rock Forest Rev E, 02/12/2020 (+ unapproved CNMP Rev I – for issue to DPE dated 02/12/2022) (FGJV);
- Snowy 2.0 Main Works – Natural Hazards Management Plan Rev C 04/08/2020 (FGJV) (+ unapproved NHMP Rev E – revised to address NPWS & SHL comments 1/11/2022);
- Snowy 2.0 Exploratory Works – Rehabilitation Management Plan Rev C 19/10/2020 (FGJV).
- Draft Main Works Rehabilitation Management Plan (Prepared by SLR Consulting and others) v3.0 28 April (v3.1 later submitted for consultation 21 August 2023)
- Draft Snowy 2.0 Biosecurity Risk Management Plan Confidential Draft v0.3 for NSW DPI, NPWS and DCCEE 28/06/2023 (Snowy Hydro);

- Snowy 2.0 Recreational Fishing Management Plan Rev A 23/06/2023 (unapproved – issued to DPI) (Snowy Hydro)
- Snowy 2.0 Threatened Fish Management Plan Ver A 21/06/2023 (unapproved – issued to DPI);
- Snowy 2.0 Main Works – Visual Impact Assessment Management Plan Rev G 01/03/2023 (unapproved – issued to Snowy Hydro)
- Appendix K in the Main Works Preferred Infrastructure Report and Response to Submissions dated 28 February 2020) for the Snowy 2.0 Main Works– Revised Traffic and Transport Assessment by SLT Consulting 25 Feb 2020;

Evidence sighted to verify compliance to requirements is documented within the Audit Tables in Appendix E.

### 1.7. Period Covered by the Audit

This fourth audit was conducted 18 months after the third audit (February 2022) in accordance with the approved IEA Program. The period covered by the audit was the period from January 2022 to July 2023.

This audit was held over 8 days on site, commencing on Monday 10 July through to Monday 17 July 2023 (including the weekend). The audit commenced with an opening meeting at Snowy Hydro Office, involving all key management and personnel from Snowy Hydro and Future Generation, and office based audit activities were conducted over three days. Site visits were conducted on the following 5 days, and the final day included a follow-up of audit trails and discussion of key issues. The draft findings were issued on 4 August 2023.

Various follow-up activities were undertaken during the following weeks including additional requests for evidence.

The draft Independent Environmental Audit Report was issue to SHL and FGJV for comment on 28 August 2023. Following receipt and consideration of feedback, the Final Report was issued on 8 Sept 2023.

## 2.0 AUDIT PROCESS AND METHODOLOGY

This Independent Environmental Audit was conducted as the fourth Independent Environmental Audit of the Snowy 2.0 Project in accordance with Schedule 4 Condition 9 of the Conditions of Consent and the Post Approval Requirements May 2020.

Audit Tables were developed, based on the conditions of consent requirements (NSW and Commonwealth), EPL conditions, key commitments made in the approved Project Management Plans and scope input by key stakeholders following agency consultation. The Audit Tables were provided to Snowy Hydro and FGJV around 3 working days prior to the audit as a tool to facilitate ready availability of evidence during the audit.

An Audit Plan and Scope was prepared in consultation with the proponent which defined the audit objectives, scope and methodology, proposed/required attendees, timeframes for interviews and document reviews and scheduling of site visits. The Audit Plan and Scope is included in Appendix F.

Post-audit activities included provision of an interim findings table, follow-ups on areas requiring further evidence, clarification, and communications with the auditees to provide further information prior to issuing of draft and final audit reports. An IEA Action Plan was provided to Snowy Hydro (and subsequently to FGJV), requesting confirmation of Agreed Actions and due dates for all audit findings.



The audit was conducted in accordance with the Audit Plan and Scope and in accordance with AS / NZS / ISO 19011:2018 – Guidelines for Auditing Management Systems.

## **2.1. Selection and Endorsement of Auditor**

The Secretary agreed to Julie Dickson of Dickson Environmental Consulting and Audit as the Lead /sole Auditor for IEA #4. A copy of the letter endorsing the auditor is contained within Appendix E of this report.

## **2.2. Site Inspections and Interviews**

Site inspections were undertaken at all active sites of the project. The sites visited included:

- Lobs Hole and Lobs Hole Ravine Road;
- Marica – including Marica Camp, HDD pad and surge shaft;
- Tantangara;
- Trunk Services (various locations – Gooandra trail);
- Rock Forest; and
- Various “remote” locations (including borehole sites etc).

Interviews were held at Snowy Hydro and FGJV offices in Cooma with the management and environmental teams as part of the office-based audit activities. Interviews were held with supervisors, environmental advisors / officers, staff, and contractors at the sites visited. Interviewees are listed on the Attendance Register in Appendix C.

## **2.3. Consultation with Agencies**

The Independent Audit Post Approval Requirements (DPIE May 2020) requires that the auditor consult with the Department (DPE), who may request that other parties or agencies are consulted to obtain their input into the scope of the audit. The consultation undertaken prior to this audit for each agency is summarised below. The initial correspondence to DPE was sent on 24 April 2023, and initial correspondence to all other relevant agencies requesting input were sent on 19 May 2023, with a response due date of 23 June 2023. Further detail and how these comments were addressed is provided in Appendix B of this report.

### Department of Planning, Environment (DPE):

An initial email was sent by the Auditor to DPE via [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) on 24 April 2023 requesting input to the scope of the audit and also requesting the provision of information on other parties or Agencies that should be consulted to obtain their input to the scope of the audit. Detailed proposed areas of focus were provided by the auditor based on the outcomes of the previous audit and other topics relevant to the current construction program and recent regulatory actions. They were:

- Areas identified in Audit #3 as areas of non-compliance / observation / Opportunities for improvement including:
  - Biodiversity Management Plan – with an ongoing focus on weeds management and feral animal control (follow-up and overall);
  - Water Management Plan – with an ongoing focus on chemicals management, storage and handling;
  - Incident, non-compliance, traffic incident and event reporting / notification;
  - Waste minimisation, reuse and recycling maximisation (non-spoil related);
  - Submission of Management Plans for review and approval to various agencies;
  - EPL publication of monitoring results, submission of monitoring reports and use of approved methods for monitoring concentration of pollutants;
  - Environmental Management, monitoring, reporting and access to information;
  - Transport and Traffic, public information relating to traffic, road upgrades;

- Commonwealth EPBC Approval - Annual Compliance Reporting and notification of biodiversity offset.
- Other areas that would be considered (particularly considering recent EPA regulatory action) include:
  - Erosion and sediment controls / management

A response was received from DPE on 15 May 2023 noting that in addition to the topics listed the department would also like the following areas to be focused on:

- Incident and non-compliances (how, who and when they are being reported in accordance with CoA);
- Evidence of management plans being reviewed and if necessary revised and submitted to department for approval;
- All information is on the website and evidence of uploading in a timely manner; and
- Efficiency and effectiveness of closing out the actions from the previous IEA's.

A request was also made by DPE to consult with the relevant Local Aboriginal Land Council/s (in addition to those consulted at the previous audit and listed by the auditor). In a follow-up phone call on 15 May 2023, the auditor requested further clarity on the scope of the consultation required with Aboriginal groups and was advised that the consultation would be in relation to the preparation of the Heritage Management Plan under Condition 35 (Sch 3). In a phone call to DPE on 15 May 2023, it was suggested that NPWS be contacted for appropriate contacts and assistance. See NPWS consultation section in relation to Aboriginal groups consultation.

#### Department of Climate Change, Energy, the Environment and Water (DCCEEW) formerly Department of Agriculture, Water and the Environment (DAWE)

An initial email was sent by the Auditor to DAWE / DCCEEW to the via on 19 May 2023 [audit@environment.gov.au](mailto:audit@environment.gov.au) and [epbcmonitoring@environment.gov.au](mailto:epbcmonitoring@environment.gov.au) with the same list of proposed areas of scope that was sent to DPE (see above) requesting input to the scope of the audit.

A response was received on 6 June 2023 requesting clarification of audit frequency and requesting that incident reporting be included in the audit scope. A response was provided by the auditor on the same day clarifying the frequency of the audits and confirming that incident reporting would be covered by the audit scope.

#### National Parks and Wildlife Service:

An email was sent to Glenn Stroud of NPWS on 19 May 2023 with the same list of proposed areas of scope that was sent to DPE (see above) requesting input to the scope of the audit.

Glenn has since moved to a different role and was requested via email to contact Rod Peel via phone to discuss current concerns on 25 May 2023. An online meeting was organised for and occurred on 6 June 2023 with three NPWS representatives. Following the online meeting, NPWS provided a summary list of the highest priority items for inclusion in the scope on 21 June 2023. The full list of items raised are included in Appendix B and are briefly summarised below:

- Non-compliances/observations/opportunities for improvement from previous audits; erosion and sediment (ERSED) control/management, particularly regarding road and surface water management; road upgrades/maintenance; weed management / effectiveness of controls, particularly in areas where ox-eye daisy is present; compliance with and review of effectiveness of EMP obligations e.g. monitoring requirements; review post non-

compliances/incidents; finalisation of outstanding management plans; waste management across all sites requires improvement; immediate rehabilitation of sites once no longer required for construction purposes including temporary sites (audit site visit requested); clarity on the definition of incidents and non-compliances; and whether reportable issues are always reported.

In a further email on 10 July 2023 (after audit had commenced), further comments were provided regarding the implementation of the Natural Hazard Management Plan, based on notes made by Glenn in January 2023. These comments are also included in the Agency Consultation Table in Appendix B.

#### Aboriginal Group consultation / NPWS (see DPE consultation section for background)

In the online meeting on 6 June 2023 with NPWS, a request was made for information to be provided on the appropriate contacts for Aboriginal groups as per request from DPE. In an email response dated 13 June 2023 from NPWS, it was suggested that the best option would be to initially contact the Manager, Environment and Safety at Snowy Hydro. An online meeting was held with the Environment and Safety Manager on 23 June 2023, and the outcome was that whilst there was initial and ongoing consultation, the most current contact details could not be provided.

Further correspondence was exchanged with NPWS on 3 July 2023, and the email address of the Yala Ngurumbang Yindymarra Executive Advisory Committee was provided on 5 July 2023. A further email was provided on 7 July 2023 noting that the Director of Southern Ranges branch will provide the Southern MOU group contacts, noting that a response may take a few days. No further correspondence was received on this matter.

An email was sent to the chair of the Yala Ngurumbang Yindymarra Executive Advisory Committee on 6 July 2023 asking if they would “please let me know if you have any areas in which you would like me to focus on in relation to the consultation with your committee on this project”, however no response was received.

#### Environment Protection Authority:

An email was sent to EPA on 19 May 2023 with the same list of proposed areas of scope that was sent to DPE (see above) requesting input to the scope of the audit. A response was received on 6 June 2023 noting: In addition to those items the EPA would like the following to be included if there is scope to do so;

1. Spoil Management Plan
2. Including sediment and erosion controls as focus areas under the review of the water management plan
3. Diffuse source pollution controls

Further clarification was requested by the auditor on 11 June 2023 on any specific issues relating to diffuse pollution, and a response was received on 13 June 2023. In summary, the response noted that a Prevention Notice was issued in 2022 which focussed on diffuse source at the Tantangara worksite regarding pollution along Tantangara Road, Spoil Road and Quarry Road. Positive changes were noted along Spoil Road but would like to see similar controls deployed project wide. As a result of the Notice, improvements have been noted.

The EPA were also keen to see controls in place that cease the shedding of sediment off roads in the first instance, and in the second that pull sediment out of dirty water. Further details are included in the Agency Consultation Table in Appendix B.

### Transport for NSW (TfNSW):

An email was sent to TfNSW on 19 May 2023 with the same list of proposed areas of scope that was sent to DPE (see above) requesting input to the scope of the audit. A reminder was sent on 23 June that today is the due date for comments. A response was received on 27 June 2023 from Andrew Lissenden providing a detailed request for scope input.

In summary, the request related to:

- The requirements for a road dilapidation report to be provided, which was referenced in Appendix K Revised Traffic and Transport Assessment dated 25 February 2020 in the Main Works Preferred Infrastructure Report and Response to Submissions dated 28 February 2020;
- General compliance with Transport / Traffic related CoAs;
- Review of management of workers movement to and from sites and between sites;
- Review of traffic volumes referred to in the the Preferred Infrastructure Report and Response to Submissions – Snowy 2.0 Main Works, dated February 2020; and
- Spoil not being taken offsite to other locations;

Further details are included in the Agency Consultation Table in Appendix B.

### Snowy Monaro Regional Council (SMRC):

An email was sent to Snowy Monaro Regional Council on 19 May 2023 with the same list of proposed areas of scope that was sent to DPE (see above) requesting input to the scope of the audit.

No formal written response was provided by SMRC, however the auditor followed up with a phone call to Garry Shakespeare (previous audit contact). It was noted that the Council are generally happy with the way traffic is going in Cooma and had no additional comments to make.

### DPI Fisheries

An email was sent to DPI Fisheries on 19 May 2023 with the same list of proposed areas of scope that was sent to DPE (see above) requesting input to the scope of the audit. A response was provided on 23 May 2023 by Jesús Montilla Tuarezca noting that the email was forwarded to Luke Pearce.

A reminder was sent to Jesús on 23 June 2023 noting that Luke Pearce (Senior Fisheries Manager - Habitat & Threatened Species Unit) had not yet responded to the scope input request. On July 3, the auditor made around 7 calls to various listed DPI Fisheries phone numbers to try to track down Luke's contact details, and left a voice message for Jesús, who later responded with an SMS message with Luke's contact details. The auditor finally contacted Luke on the phone and asked whether he had received the initial email request and if DPI was intending to respond, noting that the consultation period had ended, but would accept comments this week. Luke indicated that he had received the email, and was interested in responding, but was in the field until Wednesday, and will try to respond by the end of the week (7th July).

The phone call was followed up by an email on 3 July 2023, re-forwarding the initial request to Luke for input, noting that formal comments must be received by 6 July as the audit commences on Monday 10 July. A response was received on 7 July 2023 noting that due to being out of the office this week, will be unable to provide any input to this audit, apologised for lack of response and will endeavour to review the material and provide some feedback for the next audit process.

## 2.4. Compliance Status Descriptors

**Table 1: Compliance status descriptors (as per DPIE Independent Audit Post Approval Requirements)**

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

\* Note: where SHL or FGJV were unable to provide sufficient verifiable evidence to fully demonstrate compliance or non-compliance, a determination was made by the auditor based on available information. Limitations on completeness of evidence are documented in the Audit Tables.

## 2.5. Explanation of Finding Classifications

**Table 2 - Audit Findings classifications (within “compliant” status descriptors)**

Status	Explanation
Observation (OBS)	Documented requirement and/or implementation issue which may not strictly affect required performance or compliance outcomes. Also termed a non-conformance (as opposed to non-compliance) in the industry, observations could be an early indication of potential non-compliance and/or an adverse performance outcome.
Opportunity for Improvement (OFI)	A suggestion or opportunity to implement a good or better practice to improve effectiveness, further reduce exposure to risk or improve information management. When specifically stated as a Recommendation, a formal response and action plan are required.

## 2.6. Audit Attendees

Refer to Appendix C - Audit Attendance Register.

## 2.7. Audit Disclaimer

*This report is based on the scope provided in the project audit Program and does not assert to be a definitive confirmation of compliance or otherwise to all Conditions of Approval or conformance obligations contained within the Project documents. The audit was conducted on a sampling basis in accordance with the principles of ISO 19011:2018. Whilst all due care, diligence and professional judgment were exercised, it cannot be guaranteed that all areas of non-compliance, or non-conformance have been detected or identified.*

### 3.0 AUDIT FINDINGS

#### 3.1. Compliance Summary

**Table 3** – Summary of compliance against audit criteria and areas of focus

Focus Area	Key Criteria	No. of compliant conditions / items	IEA #4 STATUS		
			Compliant		Non-Compliant
			OFI	OBS	NC
Sch 2 – Administrative conditions	Terms, limits of approval, surrender of approval (Exploratory works), operation of plant & equipment.	13			1
Sch 3 - Management Plan submission to agencies (newly raised this audit)	Submission of various Management Plans to agencies (NCs on NSW Conditions: 10, 22, 26, 50 & 51, EPBC Cond 12, 13, 14, 15, 31 amalgamated into a single NC).	NA	1		1
Sch 3 - Management Plan submission to agencies (raised at previous audits)	Submission of various Management Plans to agencies (NCs on NSW Conditions: 2, 24, 39, 54; EPBC Cond 12, 31 – amalgamated into a single NC)	NA			1
Sch 3 Cond 1-3– Digital information	Open-source database, digital strategy	3			
Sch 3 (Cond 4 – 8) Spoil Management	Spoil, topsoils, tunnel spoil handling & management	49			
Sch 3 (Cond 9 – 19) Rehabilitation, biodiversity management, groundwater dependent ecosystems (GDEs). Groundwater Management Plan s 5.1.6	Clearing limits, flora and fauna protection and monitoring, rehabilitation, weed and pathogen management, feral predator control, GDEs	68		2	3
Environment Protection Licence (EPL) / POEO Act S 120, PRP	Water pollution Sect 120 POEO Act 1997	41		2	2
Sch 3 – (Cond 29 – 32) Surface and Groundwater, soil, chemicals management	Erosion and sediment control, temporary stabilisation, surface water and groundwater, spoil management, fuel and chemical management, spill prevention	48		4	1
Sch 3 (Cond 33-40) Heritage, recreation	Aboriginal and European heritage, boulder streams, recreation	22			

Focus Area	Key Criteria	No. of compliant conditions / items	IEA #4 STATUS		
			Compliant		Non-Compliant
			OFI	OBS	NC
Sch 3 – (Cond 41-51) Transport and Traffic Management.	Dilapidation report, vehicle movements, Quarterly Traffic reports	42	1	2	
Sch 3 (Cond 52-55) Waste, visual amenity	Waste management, visual amenity	10		2	
Sch 3 – (Cond 56-59) Noise and air quality management	Rock Forest – Noise Management Plan + CNMP, dust	16			
Sch 3 (Cond 60 – 61) Emergency Management	Natural Hazards Management Plan	14		3	
Sch 4 – Environmental management, reporting and auditing	Updates of strategies plans and programs, incident and non-compliance reporting, IEA, monitoring & public reporting, audit actions compliance tracking, responsibilities, inspections, awareness	45		2	3
Other	Internal audit	1		1	
<b>TOTALS</b>		372	2	18	12

\* Note 1 – some conditions are listed more than once due to multiple requirements, however total does not double count.

### 3.2. Audit Findings, Actions and Recommendations

Table 4 - Independent Audit Findings – Snowy Hydro 2.0 CSSI No 9687

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
1.	Sch 2 Cond 8 Sch 2 Cond 9	<p><b>Surrender of Approval</b> Within 6 months of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must surrender the infrastructure approval (CSSI 9208) for the Exploratory Works in accordance with Clause 197 of the EP&amp;A Regulation.</p> <p>Prior to surrendering the infrastructure approval (CSSI 9208) for the Exploratory Works, the Proponent must update the approved management plans for the development to incorporate the approved management plans for the Exploratory Works to the satisfaction of the Planning Secretary.</p>	<p>At the time of the audit, the Exploratory Works Approval had not yet been surrendered.</p> <p>It was noted in the previous audit that a surrender request was made in August 2021, however correspondence between DPIE and NPWS indicate that the Exploratory Works approval cannot be surrendered until the Main Works Worker Recreation Management Plan has been approved.</p> <p>At the time of this and previous audits, the issue had not been resolved.</p>	<p><b>Agreed Action</b></p> <p>Once the Main Works Recreation Management Plan has been approved (a prerequisite for surrender), surrender the Exploratory Works Approval</p> <p><b>Responsibility:</b> SHL</p>	Non-compliant NC 1	Raised as non-compliant at IEA #2, 3



No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations (Agreed due dates for each action are in Audit Action Plan issued separately)	Rating (Non-compliant (NC), or OBS/ OFI)	History
<b>NC 2.</b> The following Management Plans have been triggered for submission and approval by DPE and DPI in the last audit period and are raised as a single non-compliance. It is noted that Snowy Hydro are providing fortnightly updates to DPE on the progress of all (except VIMP – FGJV is working with DPE) outstanding Management Plans - latest sighted dated 21 July 2023. Brief commentary is provided in the Audit Finding column on actions undertaken to date, and a detailed commentary is provided on the progress of these Plans in the Audit Tables and in the main body of this report.						
2.	Sch 3, Cond 22, EPBC Cond 12, 13, 14, 15 EPBC Cond 31	<p>Within 2 years of the commencement of construction, the Proponent must prepare a Biosecurity Risk Management Plan for the development to the satisfaction of the Director-General of NSW DPI.</p> <p><b>EPBC Cond. 12:</b> To minimise impacts to the aquatic environment, the approval holder must comply with conditions 20--25 of the NSW approval relating to biosecurity and fish management.</p> <p><b>EPBC Cond. 31:</b> The approval holder must: a) submit plans required by conditions 18, <b>22</b> and 24 of the NSW approval and conditions 18 and 22 of this approval for consultation purposes, electronically to the Department;</p>	<p>The Biosecurity Risk Management Plan was submitted to the agencies later than the due date (October 2022) and had not yet been developed “to the satisfaction of the DG of NSW DPI”.</p> <p>At the time of these findings, Snowy Hydro were awaiting further feedback from DPI and other agencies, and approval of a peer reviewer from DCCEEW. A revised submission date proposed by Snowy Hydro is 1 December 2023.</p> <p>As the Biosecurity Risk Management Plan has not yet been approved, non-compliances against conditions 12, 13, 14 and 15 and 31 have also been triggered.</p>	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>Continue to consult with the relevant agencies including agreement on peer reviewer and submit for final review as soon as possible, and in line with dates committed to in fortnightly meetings with DPE (1 Dec 2023)</li> </ul> <p><b>Responsibility:</b> SHL</p>	Non-compliant NC 2	New

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
	Sch 3 Cond 26	Within 12 months of the commencement of construction, the Proponent must prepare a Recreational Fishing Management Plan for the development to the satisfaction of the Director-General of NSW DPI.	<p>The Recreational Fishing Management Plan (RFMP) was overdue for submission and had not yet been developed “to the satisfaction of the DG of NSW DPI”.</p> <p>The Plan was initially due for submission Oct 2021, and an extension request was made in January 2022 to DPIE/DPI. – DPI noted on 15 Sept 2021, that delaying by a few months will not increase the risk.</p> <p>The Plan was submitted to agencies 28/06/2023.</p> <p>The fortnightly update to DPE noted that additional reviews have been requested by DPI to expert advisory bodies (Recreational Fishing NSW Advisory Council).</p> <p>Snowy Hydro has proposed a new submission date of 01 November 2023 in the fortnightly update 21/07/23.</p>	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>Continue to consult with the relevant agencies and submit for final review as soon as possible, and in line with dates committed to in fortnightly meetings with DPE (1 Nov 2023)</li> </ul> <p><b>Responsibility:</b> SHL</p>		
	Sch 3 Cond 10	Within 18 months of the commencement of construction, the Proponent must prepare a Rehabilitation Management Plan for the development to the satisfaction of the Planning Secretary. (due –21 April 2022)	<p>The Rehabilitation Management Plan had not yet been “developed to the satisfaction of the Planning Secretary”.</p> <p>The Rehabilitation Management Plan had been submitted for consultation to NPWS (5 versions between 22/04/2022 and 02/02/2023) and will be provided to</p>	<p><b>Agreed Action</b></p> <ul style="list-style-type: none"> <li>Continue to consult on the RMP with relevant stakeholders and make progress on the staging strategy for the RMP.</li> </ul> <p><b>Responsibility:</b> SHL</p>		

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations (Agreed due dates for each action are in Audit Action Plan issued separately)	Rating (Non-compliant (NC), or OBS/ OFI)	History
			<p>BCD, EPA, NSW DPI, TfNSW and DPE once NPWS express satisfaction.</p> <p>SHL met with NPWS on 3 July to discuss staging rationale and this was supported in principle by the Department at the fortnightly update on 4 July 2023.</p> <p>Snowy Hydro has proposed a new submission date of 01 October 2023 in the fortnightly update.</p>			
	Sch 3 Cond 50 Sch 3 Cond 51	<p><b>Cond 50:</b> Within 2 years of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Long-Term Road Strategy for the development to the satisfaction of the Planning Secretary.</p> <p>a) be prepared in consultation with the NPWS and TfNSW;</p> <p><b>Cond 51:</b> The proponent must implement the approved Long-Term Road Strategy for the development</p>	<p>Long Term Road Strategy was overdue for submission and had not yet been “developed to the satisfaction of the Planning Secretary”. The Plan was due in October 2022.</p> <p>The fortnightly update to DPE on 5/07/2023 noted <i>“Progress was made on the staging strategy for this plan. SHL met with NPWS on 3 July 2023 to discuss staging rationale and this was supported in principle by the Department at the fortnightly update on 4 July 2023. SHL is organising a time to meet with NPWS to progress discussions on inclusions and exclusions to Stage 1 of this strategy”</i>.</p> <p>The 21/07/2023 fortnightly updated to DPE noted <i>Agreement on</i></p>	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>– Continue to consult with NPWS and submit for final review as soon as possible, and in line with dates committed to in fortnightly meetings with DPE (1 Nov 2023);</li> <li>– Consult with TfNSW on the development of the Long Term Road Strategy</li> </ul> <p><b>Responsibility:</b> SHL</p>		

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations (Agreed due dates for each action are in Audit Action Plan issued separately)	Rating (Non-compliant (NC), or OBS/ OFI)	History
			<p>funding allocation of future road maintenance is the time-consuming part of this process and this was originally planned for Stage 2 of this strategy. It is now evident that this plan needs to be staged geographically and meet conditions of approval for all stages which means Stage 1 will take longer than anticipated to achieve.</p> <p>Snowy Hydro has proposed a new submission date of 01 November 2023 for Stage 1 in the fortnightly update.</p>			
<b>NC 3:</b> The following Management Plans were triggered for submission to and approval by the relevant agencies and were therefore previously raised as non-compliant). Brief commentary is provided in the Audit Finding column on actions undertaken to date, and a detailed commentary is provided on the progress of these Plans in the Audit Tables and main body of this report.						
3.	Sch 3 Cond 24 EPBC Cond 12 EPBC Cond 31	<p>Within 12 months of the commencement of construction, the Proponent must prepare a Threatened Fish Management Plan for the development to the satisfaction of the Director-General of NSW DPI. (due for submission October 2021)</p> <p><b>EPBC Cond. 12:</b> To minimise impacts to the aquatic environment, the approval holder must comply with conditions 20--25 of the NSW</p>	<p>The Threatened Fish Management Plan was overdue for submission and has not yet been “developed to the satisfaction of the Director-General of NSW DPI”.</p> <p>The fortnightly update from SHL to DPE on 21/7/2023 noted “Additional stakeholder consultation requested by DPI to expert advisory bodies (NSW Fisheries Scientific Committee (FSC))”..</p> <p>The Peer review required under Condition 14 of the EPBC approval of the project has been uploaded to the Snowy Hydro website”,</p>	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>– Continue to work with DPE and other agencies to finalise and submit these Management Plans in line with dates committed to in fortnightly meetings with DPE (1 Nov 2023).</li> <li>– Continue to provide regular updates to DPE on progress</li> </ul> <p><b>Responsibility:</b> SHL</p>	Non-compliant NC 3	Raised as non-compliant at previous IEAs

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations (Agreed due dates for each action are in Audit Action Plan issued separately)	Rating (Non-compliant (NC), or OBS/ OFI)	History
		approval relating to biosecurity and fish management.  <b>EPBC Cond. 31:</b> The approval holder must: a) submit plans required by conditions 18, 22 and <b>24</b> of the NSW approval and conditions 18 and 22 of this approval for consultation purposes, electronically to the Department;	however may need to be repeated if feedback from DPE or the FSC requires a revision of the Plan.  Snowy Hydro has proposed a new submission date of 01 November 2023 in the fortnightly update.			
	Sch 3 Cond 2	Within 6 months of the commencement of construction, the Proponent must prepare a Digital Strategy for the development to the satisfaction of the Planning Secretary. (due for submission April 2021)	The Digital Strategy is overdue for submission and is not yet developed "to the satisfaction of the Planning Secretary".  At Audit #3, it was noted that the Digital Strategy was submitted by Snowy Hydro to DPIE on 4 June 2021 requesting endorsement of the Planning Secretary to submit this plan on a staged basis.  On 15 Nov 2021, an extension was received from DPE until April 2022 for management plans including the Digital Strategy.  In the fortnightly update to DPE (5 July 2023) it was noted <i>that "The draft plan is almost complete and will be provided to NPWS for review within the next week. SHL is organising a time to meet with NPWS to present this plan.</i>	<b>Agreed Action</b> – Continue to consult with NPWS and submit the Digital Strategy on 01 November 2023 as per the DPE fortnightly update 21/07/2023.  <b>Responsibility:</b> SHL		

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
			Snowy Hydro has proposed a new submission date of 01 November 2023 in the fortnightly update 21/07/2023.			
	Sch 3 Cond 39	Within 12 months of the commencement of construction, the Proponent must prepare a Recreation Management Plan for the development to the satisfaction of the Planning Secretary. (due Oct 2021)	<p>The Recreation Management Plan was overdue for submission and is not yet developed "to the satisfaction of the Planning Secretary". The Recreation Management Plan was due for submission October 2021.</p> <p>The fortnightly update to DPE on 5/07/2023 noted that <i>"Some progress was made on the staging strategy for this plan. SHL met with NPWS on 3 July to discuss staging rationale with feedback and agreement that the preference for both groups was to stage by level of design if possible."</i></p> <p>The fortnightly update on 21/07/2023 noted that <i>the plan requires ongoing consultation with NPWS to satisfy their requirements. NPWS would like to see final landforms and visualizations of the areas and views, before then can commit to a design.</i></p> <p>Snowy Hydro has proposed a new submission date of 01 October 2023 for Stage 1 in the fortnightly update 21/07/2023.</p>	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>– Continue to consult with NPWS and submit the Stage 1 of the Recreation Management Plan on 01 October 2023 as per the DPE fortnightly update 21/07/2023.</li> </ul> <p><b>Responsibility:</b> SHL</p>		

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
	Sch 3 Cond 54	Within 12 months of the commencement of construction, the Proponent must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary.	Whilst the Visual Impact Management Plan has been submitted to DPE and consultation has occurred with NPWS (initially submitted for review 23/12/2021), it is not yet developed "to the satisfaction of the Planning Secretary". The Plan was due October 2021.	<b>Completed Action:</b>  The VIMP was submitted to DPE on 13 July 2023 by FGJV for approval following consultation with agencies and the incorporation of comments by NPWS and DPE.  No further action required.		
4.	Sch 2, Cond 13(c) Sch 3, Cond 17 (i) and 19 Biodiversity Management Plan Section 5.1	Sch 2 Cond 13 (c): The Proponent must ensure that all plant and equipment used on site, or in connection with the development, is: (c) kept free of weeds, seeds and pathogens when entering or leaving the site.	Findings were raised at IEA#1, 2 & 3 regarding adequacy of processes to ensure plant, equipment and vehicles are free of weeds, seeds and pathogens when leaving site.  Various actions had been agreed and documented in the Action Plan. Whilst some actions are now closed, other agreed actions still remain open.  Closed actions include installation of wheel washes at all areas (most now permanent), toolbox talks delivered and Wheel Wash Operating and Management Procedure prepared and distributed for consultation with relevant departments (not yet formally issued at time of the audit).  The current wheel wash procedure states that "Where vehicles are	<b>Agreed Actions:</b>  – Review the effectiveness of the current weed, seed and pathogen protocols and facilities once the other corrective actions have been undertaken (by and ecologist with input by SHL).  Depending on the outcome of the risk assessment the following will be conducted.  <b>Close out:</b> 1st November 2023  – Fully implement the Wheel Wash Operating and Management Procedure; – Implement the recommendations from the previous audit – namely: – Investigate the root causes of this failure including the potential consequences and take relevant action to address root causes;	Non-compliant NC 4	Raised as non-compliant at IEAs 1, 2 & 3



No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/OFI)	History
			<p>unable to pass through the automated wheel wash, the completed hygiene certificates will be provided to security staff at the gate. Security staff will note in the Entry Checklist if hygiene certificates have been provided and that these are completed.</p> <p>The procedure also notes responsibilities of the Environment Team include reviewing compliance by checking Security staff are ensuring hygiene certificates are completed.</p> <p>Insufficient evidence was provided to demonstrate Entry Checklists are completed prior to entry to sites as per the procedure, or that the Environmental Team review the completed certificates.</p> <p>Other key actions not yet adequately completed from the previous audit recommendations include:</p> <ul style="list-style-type: none"> <li>• Investigate the root causes of this failure including the potential consequences;</li> <li>• Undertake a risk assessment on the operation of the wheel washes;</li> <li>• Review of the effectiveness of the current weed, seed and pathogen protocols and</li> </ul>	<ul style="list-style-type: none"> <li>– Undertake a risk assessment on the operation of the wheel washes – implement outcomes;</li> <li>– Review the Biodiversity Management Plan and update to reflect any changes / improvements.</li> </ul> <p><b>Completed Actions:</b></p> <ul style="list-style-type: none"> <li>– Formal communication of latest version of Wheel Wash Operation Procedure (done 4 Aug 23)</li> </ul> <p><b>Responsibility:</b> FGJV</p>		



No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
			facilities once the other corrective actions have been undertaken (by and ecologist with input by SHL).			
5.	Sch 3 Cond 19  Biodiversity Management Plan – Section 6.5	<p><b>Sch 3 Cond: 19:</b> Proponent must implement the approved Biodiversity Management Plan for the development</p> <p><b>Section 6.5 – BMP:</b> Reporting and Incidents – Annual Report on Biodiversity Matters.</p> <p>a) An annual report will be prepared to report on the variety of biodiversity matters addressed in this plan. This report, which will be made available to NPWS, DAWE and BCD will include the following matters:</p> <p>In summary (see full list in audit tables) will include: Weed and vertebrate pest control; clearing activities against clearing limits; post-clearing ecology reports; results of threatened species, GDE, weed and pest monitoring; account of fauna strike mitigation strategy, relevant incidents and non-compliances; and efficacy of implemented biodiversity</p>	<p>Annual Reports addressing the biodiversity matters listed in Section 6.5 of the Biodiversity Management Plan (BMP) and in Appendix F of the BMP had not been completed / undertaken.</p> <p>Whilst the EMM Year 1 and Year 2 reports were prepared to report on the Biodiversity Monitoring program documented in Appendix B of the BMP, they did not address all the information on biodiversity matters required by the BMP.</p> <p>Section 6.5 (Reporting of Incidents) of the Biodiversity Management Plan (BMP), requires an Annual Report to be prepared and made available to SHL, NPWS, DAWE (now DCCEEW) and BCD on a variety of Biodiversity matters including (but not limited to) weed and pest control activities, clearing activities, post clearing ecology reports, results of threatened species, GDE, weed and pest monitoring, fauna strike mitigation and efficacy of management measures.</p>	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>Finalise Annual Report for the 2020-2021 period;</li> </ul> <p><b>Close out:</b> Dec 2023</p> <ul style="list-style-type: none"> <li>Prepare Annual Report of the 2021-2022 period;</li> <li>Ensure these reports are prepared and submitted annually on an ongoing basis.</li> <li>Submit reports to Snowy Hydro,</li> </ul> <p><b>Close out:</b> Jan 2024</p> <p><b>Responsibility:</b> FGJV</p> <ul style="list-style-type: none"> <li>Make the 2020-2021 report available to NPWS, DCCEEW and BCD;</li> </ul> <p><b>Close out:</b> Jan 2024</p> <ul style="list-style-type: none"> <li>Make report 2021-2022 and all future reports available to NPWS, DCCEEW and BCD</li> </ul> <p><b>Responsibility:</b> SHL</p> <p><b>Close out:</b> Feb 2024</p>	Non-compliant NC 5	<p>OBS raised Audit #3</p> <p>Escalated to NC this audit</p>

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	Biodiversity Management Program - App B Sect 10 to Biodiversity Management Plan)	management measures detailed in Table 6.2.  Where adaptive management other than feral animal control or weed control has been triggered this will be reported to DPIE and DAWE (for MNES), with liaison around adaptive management proposed.	Section 6.1 Appendix F of the BMP also requires that details of the weed control actions, vertebrate pest control activities and the efficacy of other control measures are included in an annual report (and made available to the agencies listed above) and integrated into the broader biodiversity management Plan required by Appendix B.  As the biodiversity matters listed in Section 6.5 and Appendix F had not been integrated into the Annual Reports by EMM, FGJV had started to prepare a separate Year 1 draft report to include these matters, however it was noted as incomplete at the previous audit (raised as an Observation).  The Year 1 and Year 2 reports had not yet been prepared.			
6.	Sch 3 Cond 29, 30(f)  EPL 20266 - cond. L1.1	Unless an environment protection licence authorises otherwise, the Proponent must comply with Section 120 of the POEO Act.  EPL 20266 - cond. L1.1 (pollution of waters)	Water pollution incidents have been recorded over the audit period and reported in the Environment Protection Licence Annual Return. Key incidents included: – Sediment laden water discharged to the Yarrangobilly River 16/06/2022. An Official Caution letter (3504699) was issued by EPA on 29/03/2023;	No specific actions detailed in this report. Agreed actions to be determined in consultation with EPA.  <b>Responsibility:</b> SHL	Non-compliant NC 6	New

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			<ul style="list-style-type: none"> <li>– Surface water discharge at Tantangara Road Nungar Creek 27/09/23. A Show Cause letter was issued by EPA on 19/12/2022, and a \$15k Penalty Notices was issued by EPA on 29/03/2023;</li> <li>– Diluted leachate water mixed with sediment laden water leak from spoil emplacement area at Lobs Hole on 30/01/2023 (Cond O1.1). An Official Caution letter (3505349) was issued by EPA to SHL on 23/05/2023;</li> <li>– Sediment laden water discharged to Gooandra Creek (23/03/23). An Official Caution (3505611) was issued by EPA to SHL 06/06/2023.</li> </ul>			
7.	<p>Schedule 3, Cond 30 (p)</p> <p>EPBC Cond 17</p> <p>EPL 20266 Cond O1 (a)</p>	<p><b>30 (p):</b> store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards”</p> <p>EPL Cond O1.1 Licensed activities must be carried out in a competent manner. This includes a) the processing, handling, movement and <b>storage of</b> materials and <b>substances</b> used to carry out the activity; and</p>	<p>Whilst various actions have been undertaken to address inadequate / inappropriate / incompatible chemicals management since the last audit, the site inspection again identified issues at various sites including:</p> <p><b>General:</b></p> <ul style="list-style-type: none"> <li>– Bunds and bunded pallets were not always covered allowing ingress of water, leading to the need to pump</li> </ul>	<p><b>Proposed Actions:</b></p> <ul style="list-style-type: none"> <li>– Further strategies need to be determined and implemented to address this issue, particularly in regard to storage of bulk liquids with potential incompatibilities as it appears that previous strategies have not been effective. Given the large quantities of chemicals involved, this issue needs to be urgently addressed, as it is a safety as well as environmental issue;</li> </ul>	Non-compliant NC 7	Raised as non-compliant at IEA's #1, 2 & 3

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
			<p>out potentially contaminated water;</p> <p><b>Lobs Hole</b></p> <ul style="list-style-type: none"> <li>Water Treatment Plant – Sodium Hydroxide, Hypochlorite, sulphuric acid, hydrochloric acid all stored within same bund – incompatible chemicals – need full segregation (it was believed that they just needed to be 5m apart)</li> <li>Sewage Treatment Plant STP – Citric acid in bund (half and IBC) in bund with Sodium Hydroxide</li> <li>Minor storage cabinet – Class 3 (flammable liquids) and Class 2 (flammable gases) stored in same cabinet (not compatible for storage).</li> </ul> <p><b>Tantangara:</b></p> <ul style="list-style-type: none"> <li>Some spill kit materials not suitable for the material in the area (e.g. – organic absorbent in Sewage TP for hazardous chemicals (can be reactive). Need to supply Hazchem type. Spill kits should be labelled with the correct type.</li> <li>The “bunded” area containing Sodium Hydroxide IBCs was only bunded on 3 sides – open on one side (said to slope inwards).</li> </ul> <p>–</p>	<ul style="list-style-type: none"> <li>Review the content of the chemical training and the personnel who receive it to ensure training is appropriately targeted;</li> <li>Review may include a high-level review with potential engagement of an SME to develop and implement.</li> </ul> <p><b>Close out</b> 1 December 2023</p> <p><b>Auditor Note:</b> Previously implemented actions included: reviews of sites, inspections, toolbox talks, training courses developed and delivered. The effectiveness of these actions requires review as the same issues continue to recur.</p> <p><b>Responsibility:</b> FGJV</p>		

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations (Agreed due dates for each action are in Audit Action Plan issued separately)	Rating (Non-compliant (NC), or OBS/ OFI)	History
			<b>Marica:</b> <ul style="list-style-type: none"> <li>– No spill kits located in the surge shaft area;</li> <li>– Unbunded 200 litre drums of oil stored in unbunded workshop;</li> <li>– Oil drums (200 litre) (recently delivered to site) not stored in a bunded area.</li> </ul> <p>As condition 30 (p) is non-compliant, this also triggers a non-compliance to EPBC Condition 17.</p>			
8.	Sch 4 Cond 6  EMS Sect 7.2.1  EMS App A5 – Environmental Incident Process / “Guideline Document to improve external incident classification and reporting” (Feb 2023 version)	The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.	<b>Incident Reporting / Notification to Authorities</b>  Adequate evidence was not provided to demonstrate that <b>all</b> incidents are reported to the appropriate authority with required timeframes.  Various reports were reviewed in detail, and found that whilst nine of the reports reviewed were verified as having been notified to the relevant agencies, three could not be verified as notified: <ul style="list-style-type: none"> <li>– (INC 2660 -disturbance outside the boundary),</li> <li>– INC 2896 – breach of water quality discharge to Talbingo Reservoir – also see NC9)</li> <li>– INC 2935 – sediment laden water to creek)</li> </ul>	<b>Proposed Actions:</b> <ul style="list-style-type: none"> <li>– A joint incident / event register to be developed and shared by SHL and FGJV to ensure that the actual notification details can be entered accurately into the register. (was in early phase of development at the time of the audit)</li> <li>– Additional fields in the register need to be developed to capture whether event is an Incident, a Non-compliance or both, and to which agency it was reported.</li> <li>– Maintain records of all notifications to the relevant agencies in a dedicated file to provide evidence of ongoing compliance to notification requirements.</li> <li>– Provide resources / specific role responsibilities to ensure all</li> </ul>	Non-compliant NC 8	Raised as non-compliant at IEA's # 2 & 3

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			<p>One was notified late (INC 1641), and it was not clear whether some of the other incidents required notification under the current definitions (e.g. wheel wash failure for 2 days (INC 2387), and treated water tank overflow (INC 2390) sink hole formation at Tantangara).</p> <p>There were inconsistencies between the information provided in the FGJV Event and Incident Register; the notification requirements / status documented within the Incident / Investigation reports and the actual incidents notified to the agencies.</p> <p>It was noted that the Environmental Management Strategy (EMS) has been revised and updated in response to a direction from DPE, which provides greater clarity on reporting of incidents / non-compliances, however is not yet approved or implemented.</p> <p>It is not clear whether there have been any incidents which have triggered a notification to DAWE / DCCEE. See OBS No 2</p>	<p>relevant events are appropriately notified, and accurate records are maintained to reflect the status of reports and notifications;</p> <ul style="list-style-type: none"> <li>– It is recommended that the EMS be further reviewed and revised to clearly define the circumstances in which incidents are to be notified to DCCEE;</li> <li>– Ensure incident / non-compliance reporting in future is in accordance with the approved, updated EMS</li> </ul> <p><b>Close out:</b> 1 Jan 2024</p> <p><b>Responsibility:</b> SHL</p> <ul style="list-style-type: none"> <li>– Incident report forms may need to be revised to capture the same information as the register.</li> </ul> <p><b>Responsibility:</b> FGJV</p> <p><b>Close out:</b> 1 Jan 2024</p>		

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9.	EPL 20266 Cond L2.1- 2.4  EPL Cond R2.2, R4.1	<p>For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.</p> <p>R2.2: The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.</p> <p>R4.1: The licensee must notify the EPA within 24 hours by phone or in writing of any results from monitoring required by condition M2 that exceed the Australian and New Zealand Environment Conservation Council Guidelines and NSW Water Quality Objectives and caused by activities carried out by or on behalf of the Licensee</p>	<p>There have been discharges of treated water from the reverse osmosis treatment plant into Talbingo reservoir over a period between January and May 2023 that exceeded water quality discharge parameters (non-compliant to EPL conditions).</p> <p>The incident (INC 2896) was reported internally on 19 June 2023 and was not formally notified to EPA until 28 June 2023. (Late report).</p>	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>– Ensure all non-compliances with the EPL are reported to the EPA in a timely manner;</li> <li>– Include non-compliance in the next Annual Return;</li> </ul> <p><b>Close out:</b> ongoing and next annual return</p>	Non-compliant NC 9	New
10.	Sch 4 Cond 7	Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department via the	A review of FGJV incident reports raised since the last audit found that whilst most of the incidents that were non-compliant to the approval were notified to DPE, evidence was not provided that a	Same actions as NC on Sch 4 Cond 6 above and OBS under Sch 4 Cond 7.:	Non-compliant NC 10	Raised as non-compliant at IEA's # 2 & 3



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		Major Projects portal of the non-compliance.  This notice must set out the non-compliance, the reasons for the non-compliance (if known) and what actions have been taken, or will be taken, to address the non-compliance.	disturbance outside the boundary at Marica was notified (INC 2660).  It is also considered that significant failures of wheel wash facilities would be non-compliant to the conditions of approval and should be notified. (See OBS under Sch 4 Cond 7)  Also refer to NC under Sch 4 Cond 6			
11.	Sch 4 Cond 8 Sch 3 Cond 7(f) & 8 Sch 3 Cond 12 (a)  Spoil Mgmt Plan (SMP) Section 9.5 and Table 9-4	<b>Sch 4 Cond 8:</b> The Proponent must provide regular reporting on the environmental performance of the development on its website in accordance with the requirements in any approved strategies, plans or programs.  <b>Spoil Management Plan – Section 9.5,</b> -Spoil specific reporting is presented in Table 9-4 and will be completed and made publicly available in accordance with schedule 3 condition 7 (f) and EPL 21266.  <b>Table 9-4</b> requires (in summary) 6 monthly reporting for the duration of construction of: – volume of spoil excavated from tunnelling,	<b>Sch 4 Cond 8:</b> Six (6) monthly Spoil specific reports have not been provided on the Project website as required by Table 9-4 of the Spoil Management Plan, however have been developed by FGJV (? How many – awaiting evidence):  Detailed Quarterly Spoil Monitoring Reports are prepared to satisfy the reporting requirements of the Environmental Protection Licence 21266 (5 October 2022), Condition R4.5. The EPL does not require the Spoil Monitoring Reports to be made publicly available.  The quarterly reports provide detailed information relating to the location, quantities and characteristics of the spoil generated and emplaced, which	<b>Agreed Actions</b> – Finalise 6-monthly Summary Spoil reports to meet the requirements of Table 9-4 of the Spoil Management Plan based on the information provided in the Quarterly Spoil Management Reports. – The 6 monthly Spoil Reports are to cover the period from the commencement of tunnel spoil generation / emplacement.  <b>Close out:</b> Oct 1 2023  <b>Responsibility:</b> FGJV  – Upload Summary Spoil Reports to the project website  <b>Responsibility:</b> SHL  <b>Close out:</b> Nov 1 2023	Non-complaint NC 11	New



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		<ul style="list-style-type: none"> <li>– volume placed at each emplacement area with a brief summary of progress towards design objectives listed in Table 7-1</li> <li>– Volume disposed of off-site, reused elsewhere in KNP, volume of AMD treated and volume of NOA excavated and placed in encapsulation (if any)</li> </ul>	may not be appropriate for provision on a public website.			
12.	Biodiversity Management Plan App F; 5.2.2 BM32 BM33  Yr 1 & Yr 2 Biodiversity Monitoring Report	<p>A routine pest predator control program will be implemented throughout construction of the project.</p> <p>An experienced and suitably qualified pest control contractor will be employed to manage feral predators including wild dogs, foxes and cats. This program will be prepared in conjunction with the NPWS activities occurring in the broader area.</p> <p>The Year 1 and Year 2 Annual Biodiversity Monitoring Reports noted: "The sighting of feral animals within proximity to known Smoky Mouse habitat or project infrastructure is a trigger for adaptive management. Adaptive management actions</p>	<p>Evidence of a pest predator control program or the engagement of a suitable pest control contractor could not be provided. It was advised that discussions have occurred between NPWS and Snowy Hydro regarding the use of a "felixer" and AI to control predators, however no evidence was provided of these discussions.</p> <p>A review of the trapping tab of the Fauna Encounter Register managed by FGJV indicated that no feral predator pests have been trapped over the audit period (only mice and rats), and the last time a trap was set was in April 2021</p>	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>– Review options for suitable professionals or programs for engagement</li> <li>– Consult with NPWS as part of the development of the program.</li> </ul> <p><b>Close out:</b> 1 Feb 2023</p> <ul style="list-style-type: none"> <li>– Implement a feral predator control program using an experienced and qualified pest control contractor as required by the BMP and the adaptive management trigger.</li> </ul> <p><b>Close out:</b> 1 May 2023</p> <p><b>Responsibility:</b> Snowy Hydro</p> <ul style="list-style-type: none"> <li>– Recommence the trapping program at sites</li> </ul>	Non-compliant NC 12	Raised as OBS Audit #3 Escalated to NC

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	Appendix F 5.3.2	<p>have been triggered as a result of the monitoring.</p> <p>In addition to the routine pest predator control program, cage trapping will be carried out to capture feral predators which are incidentally observed frequenting areas of human habitation such as camps and construction compounds.</p>		<p><b>Close out:</b> 1 March 2024</p> <p><b>Responsibility:</b> FGJV</p>		
13.	Groundwater Management Plan Annexure B Groundwater TARP 1 – Groundwater Level	<ul style="list-style-type: none"> <li>– Trigger level 2 reached (early warning - trending towards exceedance) - conduct preliminary review of activities</li> <li>– Trigger level 3a reached (exceedance of threshold trigger level) - report results of trigger investigation to SHL, report results in Annual Review</li> <li>– Trigger level 3b reached (exceedance identified as related to construction activities) - notify DPIE and NPWS within 7 days of trigger investigation report, provide trigger exceedance report within 30 days of notification, identify mitigations etc in consultation with DPIE.</li> </ul>	<p>A draft “ECVT/PSC Depressurisation Event Memo - preliminary assessment” by SHL into the “reduction of the groundwater levels in a number of groundwater monitoring points” during the excavation of the ECVT in 2022 cited a noticeable change in trend from mid-year 2022 and a sharp decrease in levels from the end of 2022 requires further investigations.</p> <p>Subsequent investigations in late August 2023 noted that the TARP 1 has been triggered</p>	<p><b>Agreed Actions:</b></p> <ul style="list-style-type: none"> <li>– Continue with investigation into recorded groundwater level reduction;</li> <li>– Implement any recommendations from the detailed investigation;</li> <li>– Report any triggers in the annual report;</li> </ul> <p><b>Close out:</b> ongoing / as required</p>	Compliant OBS 1	New

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14.	EPBC Cond 34, 35	Reporting incidents and non-compliances: The approval holder must notify the Department in writing of any incident as soon as practicable after becoming aware of the incident and no later than two business days.	<p>The Environmental Management Strategy (EMS) (original and unapproved revised version) is not clear on what incidents would trigger a notification to DAWE / DCCEEW.</p> <p>The EMS states that DAWE/ DCCEEW is to be notified in writing of <b>any</b> (auditor emphasis) incident as soon as practicable, however does not clarify whether this would only be for matters pertaining only to protected matters / Matters of National Environmental Significance (MNES).</p>	<p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li>EMS Incident guideline to be further reviewed and revised to clearly define the circumstances in which incidents are to be notified to DCCEEW</li> </ul> <p><b>Close out:</b> 1 Jan 2024</p>	Compliant OBS 2	New
15.	Sch 4 Cond 12 (a), (b)	<p>From the commencement of the development of the Main Works until the completion of the ecological rehabilitation of the areas used for operations, the Proponent must:</p> <p>a) make copies of the following information publicly available on its website:</p> <ul style="list-style-type: none"> <li>Approved strategies, plans or programs;</li> </ul>	<p><b>Sch 4 Cond 12(a):</b></p> <p>Management Plans were available on both the Snowy Hydro Project website (some were updated, but not approved documents), and on the Future Generation JV website (non-updated / approved documents).</p> <p>For consistency, the Snowy Hydro website should be designated as the main website that holds all relevant project documentation.</p> <p>Management Plans that were not necessarily the approved versions on the Snowy Hydro website (but on FGJV website) included:</p>	<p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>To maintain consistency, ensure the approved version of all relevant project documents required under this approval are uploaded to a single Project Website (Snowy Hydro);</li> <li>Review the need to maintain project documents on both the Snowy Hydro and Future Generation websites.</li> <li>Assign responsibilities to a person / position (Snowy Hydro) to regularly review website content to ensure all required documents are uploaded and are current (recommend monthly check).</li> </ul>	Compliant OBS 3	New

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			<ul style="list-style-type: none"> <li>– Natural Hazards Management Plan</li> <li>– Surface Water Management Plan (Appendix A to Water Management Plan);</li> <li>– Groundwater Management Plan (Appendix B to Water Management Plan);</li> <li>– Transport Management Plan.</li> </ul>	<b>Responsibility:</b> SHL  <b>Close out:</b> 1 Jan 2024		
16.	Sch 2 Cond 2(a) Notes and Definition of Main Works; Section 5.4, Appendix K Revised Traffic and Transport Assessment prepared by SCT Consulting, Revision 6.2 dated 25 February 2020 in the Main Works Preferred Infrastructure Report and Response to Submissions dated 28 February 2020)	<p>Prior to construction commencing, an independent and qualified expert will survey and prepare a Road Dilapidation Report for the main roads used during construction. Prior to operations commencing, a Road Dilapidation Report should be prepared for the main transport route. The report would assess the current condition of the road surfaces the construction vehicles would traverse, including the external road network, and describe mechanisms to restore any damage that may result due to its use by traffic and transport related to the project.</p> <ul style="list-style-type: none"> <li>– <i>The Road Dilapidation Report will be submitted to the relevant road authority for review prior to</i></li> </ul>	<p>Evidence could not be provided to demonstrate that a Road Dilapidation Report was submitted to relevant road authorities prior to commencement of heavy vehicle movements as required by Appendix K of the PIR and response to submissions. (Note- not a Condition of Approval).</p> <p>A Road Condition survey dated 29 April 2019 was provided as evidence at previous audits and included an inspection of Miles Franklin Drive, Link Road, Goats Ridge Road and Kings Cross Road and was provided to NPWS.</p> <p>This requirement from Appendix K was flagged as a pre-audit consultation concern by Transport for NSW. Evidence of a Risk Workshop and other dialogue provided by Snowy Hydro and FGJV was reviewed and assessed at this audit.</p>	<b>Agreed Actions</b> Snowy Hydro should seek to resolve this issue through dialogue with Transport for NSW.  <b>Responsibility:</b> SHL  <b>Close-out:</b> ongoing	Compliant OBS 4	New

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		<i>commencement of heavy vehicle movements</i>	<p>Snowy Hydro also formally responded to DPE in March 2023 on questions from TfNSW related to the Dilapidation Report. (See commentary in main report)</p> <p>Independent Environmental Audits are required to include: all conditions of consent; all post approval and compliance documents prepared to satisfy the conditions of consent; and all environmental licences and approvals. As this requirement is documented in Assessment documents only, it is not necessarily non-compliant with Post Approvals documents listed above.</p> <p>However, it is identified that the project Assessment documents have not necessarily been complied with. An Observation is therefore raised.</p>			
17.	Sch 3 Cond 46 (e) Sch 3 Cond 49  Transport Management Plan – Section 6.1, Table 6-1	<p><b>Cond 46:</b> The Transport Management Plan must: (e) include a program to:</p> <ul style="list-style-type: none"> <li>• record and track vehicle movements; and</li> <li>• monitor and publicly report on the effectiveness of these measures.</li> </ul> <p><b>Cond 49:</b> The Proponent must implement the approved</p>	<p>In response to a previous non-compliance, Quarterly Vehicle Movement Summary Reports have now been developed and uploaded to the project website.</p> <p>Whilst the reports provide weekly light and heavy vehicle movements on Ravine Road, Tantangara, Marica and Polo Flat roads, the</p>	<p><b>Agreed Actions:</b></p> <p>Revise the format of the Quarterly Vehicle Movement Summary Reports to include:</p> <ul style="list-style-type: none"> <li>– Commentary on the effectiveness of measures to achieve satisfactory traffic, transport and</li> </ul>	Compliant OBS 5	Previously non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
		<p>Transport Management Plan for the development.</p> <p><b>TMP Section 6.1, Table 6.1:</b> Monitoring will be undertaken to confirm the satisfactory traffic, transport and access outcomes are achieved during construction. Key parameters to be included in the Cumulative Summary Report include:</p> <ul style="list-style-type: none"> <li>• Movement of project vehicles on key roads utilised by the project;</li> <li>• Delivery traffic movements</li> <li>• Vehicle use of Lobs Hole Ravine Road – North (max 120 movement / day – 60 each way) and annual average maximum of 60 movements / day (Quarterly Report);</li> </ul> <p>Quarterly Cumulative Summary Report submitted to project website.</p>	<p>reports do not include Snowy Mountains Highway movements, insights on the effectiveness of measures, or reflect all requirements of TMP Table 6-1.</p> <p>Areas not currently reported on include:</p> <ul style="list-style-type: none"> <li>– Vehicle movements on Snowy Mountains Highway);</li> <li>– Delivery traffic movements;</li> <li>– Vehicle use of Lobs Hole Ravine Road North;</li> </ul>	<p>access outcomes during construction;</p> <ul style="list-style-type: none"> <li>– Vehicle movements on Snowy Mountains Highway);</li> <li>– Delivery traffic movements;</li> <li>– Vehicle use of Lobs Hole Ravine Road North;</li> </ul> <p><b>Responsibility:</b> FGJV</p> <p><b>Close out:</b> Next quarterly report to be in new format</p>		
18.	TMP Table 4-2 Pre-audit consultation - TfNSW	As part of pre-audit consultation, TfNSW noted that they have observed a greater number of vehicle movements along the northern half of the Snowy Mountains Highway (north of Link Road) than predicted in the TMP and	The Project (FGJV) should consider reporting against the predicted daily traffic volumes documented in Table 4-2 of the Transport Management Plan (TMP) and as forecast in the Preferred Infrastructure Report and Response to Submissions (PIR &	<p><b>Recommendation:</b></p> <ul style="list-style-type: none"> <li>– Include heavy vehicle movements along the two sections of the Snowy Mountains Highway (north and south of Link Road) in the Quarterly Vehicle Movement Reports.</li> </ul>	Compliant Opportunity OFI 1	New

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
		PIR & RtS). TfNSW have the view that as a direct consequence of this, the section of the Snowy Mountains Highway between Tumut and Yarrangobilly Caves Road is experiencing road pavement issues.	<p>RtS) dated 28 February 2020, particularly for the Snowy Mountains Highway.</p> <p>It should be noted that figures provided by FGJV Transport Department confirmed that delivery vehicles travelling from Tumut (this could constitute the majority of project vehicles from the north) were well within the predicted volume (see Section 4.1.10 of this report for details).</p>	<b>Close out:</b> Next quarterly report to be in new format		
19.	Pre-audit consultation	Pre-audit consultation comment – NPWS: <i>Lobbs Hole Ravine Rd Nth Trail was inspected by RFS and NPWS over 18 months ago with a view to ensure it complied with fire trail standards and was accessible by Cat1 Fire Tanker which at the time didn't, with the required passing bays and corners and would be inspected again once standard had been met. We would like a report on its current status and progress.</i>	<p>A site inspection during the audit found that the passing bays on Lobs Hole Ravine Road North not yet completed.</p> <p>It was noted during the inspection, that works are ongoing on this road by Leed and the passing bays are part of those planned works. (no timeframe provided).</p> <p>The FGJV ERT Captain commented in an interview, that "Lobs Hole Ravine Road North is fully capable of navigating the road safely".</p> <p>The accessibility of Lobs Hole Ravine Road North for the Cat 1 fire truck still needs to be formally tested and reported back to NPWS.</p>	<p><b>Completed Actions:</b></p> <ul style="list-style-type: none"> <li>Complete the passing bays on Lobs Hole Ravine Road North as soon as practically possible (and before fire season) completed 7/9/23;</li> </ul> <p><b>Responsibility:</b> SHL</p> <p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>Verify that a Cat 1 fire truck is fully capable of navigating Lobs Hole Ravine Road North and report the outcome to NPWS.</li> </ul> <p><b>Responsibility:</b> FGJV</p> <p><b>Close out:</b> 1 November 2023</p>	Compliant OBS 6	New



No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations (Agreed due dates for each action are in Audit Action Plan issued separately)	Rating (Non-compliant (NC), or OBS/ OFI)	History
20.	Environmental Management Strategy S 8.5  Sch 4 Cond 6a  Sch 4 Cond 7	Where a non-conformance has been identified, a corrective action /preventative action will be developed and implemented to minimise the potential for recurrence.  The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site.  Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department via the Major Projects portal of the non-compliance.	Incidences of failure of Wheel Wash facilities have been identified both internally and externally. During the site inspection, the wheel wash at Marica did not operate when the vehicle the auditor was travelling in passed through the wheel wash. Failures have also been observed during previous IEAs and regulator visits. Whilst there have been 2 incidents reported internally in the Event and Incident Register, over the past 12 months the actual incidence may be under-reported given the frequency of failures identified by external bodies.  The Incident reporting procedures (including draft Guideline Document to improve external incident classification and reporting) are not clear on any triggers for external reporting / notification of wheel wash failures, or other process failures designed to prevent weed and pathogen spread.  It was advised by the FGJV Environmental Manager that as a result of the incident INC 2387 in Jan 2023, if the wheel wash wasn't working for 24 hours, it would be reported, however this is not documented.	<b>Agreed Actions</b>  – Document triggers for reporting / notification of wheel wash failure; – Ensure the triggers include consideration of the potential consequences (did the failure result in potential spread of weeds / pathogens, which may be dependent on location, season, weed prevalence etc).  <b>Responsibility:</b> FGJV  <b>Close out:</b> 1 November 2023	Compliant OBS 7	Previous OBS

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
21.	EPL Cond O2	O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Dewatering operations – permit was one day out of date (awaiting new one), Pump was leaking from a damaged / incorrectly joined fitting within a bunded pallet. The water flowed into the bund then into a drain (potential contamination issue). The fitter explained that there was an insufficient supply of fittings to replace the faulty fitting;	<b>Agreed Actions</b> <ul style="list-style-type: none"> <li>– Communicate the importance of ensuring the dewatering permits are current to the dewatering team (staff and subcontractors);</li> <li>– Ensure appropriate spare parts / fittings are held for environmental compliance related key equipment.</li> </ul> <b>Responsibility:</b> FGJV  <b>Close out:</b> 1 October 2023	Compliant OBS 8	New
22.	Sch 3 Cond 30(f) Site observation – Marica / Marica Trail Spoil Management Plan App B – Topsoil Strategy	(f) minimise erosion and the generation and dispersion of sediment using suitable controls in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction guidance series  Topsoil will be stockpiled, signposted and separated from other materials, and tracked	A topsoil stockpile was not to be adequately protected (silt fences not dug in / stabilised (see photos – Marica)  The topsoil stockpile above the Marica Camp was not signposted.	<b>Agreed Actions</b> <ul style="list-style-type: none"> <li>– Stabilise the stockpile and install adequate protection;</li> <li>– Communicate the importance of maintaining ERSED controls around stockpiles</li> <li>– Provide signage for the topsoil stockpile area above Marica camp.</li> </ul> <b>Close out:</b> 1 October 2023  <b>Responsibility:</b> FGJV	Compliant OBS 9	New

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
23.	Sch 3 Cond 52(d) Site observation - Marica	Store and handle all waste generated on site in accordance with its classification. General requirement to adequately store waste	A large skip bin located at a temporary site at the Coppermine trail intersection with Marica Trail was overfull / overflowing, with waste lying around (see photos – Marica).	<b>Completed Actions</b> <ul style="list-style-type: none"> <li>– Cleaned-up / removed all waste from the area (evidence sighted)</li> <li>– Improve waste bin monitoring processes at site (noted that overall improvements have been made elsewhere). Evidence of updated waste contractor of KPIs sighted)</li> </ul> <b>Responsibility:</b> FGJV  <b>Closed:</b> August 2023	Compliant OBS 10	New
24.	Site Observation – Marica Sch 3 Cond 30 f)	f) Minimise erosion and the generation and dispersion of sediment using suitable controls in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction guidance series	Some washouts of a berm at the bottom of the HDD Pad batter were observed during the site inspection. This requires repair / maintenance (see photos – Marica)	<b>Agreed Actions</b> <ul style="list-style-type: none"> <li>– Repair and maintain berm</li> </ul> <b>Close out:</b> 1 October 2023	Compliant OBS 11	New
25.	Site Observation – Lobs Hole Ravine Road	Good environmental practice	Materials used for bank stabilisation on Lobs Hole Ravine Road (and potentially other sites) were made from a plastic / plastic like material. At the time of the audit, the material was actively breaking down, resulting in release of plastic pieces into the environment (refer to photos – Lobs Hole Ravine Road)	<b>Agreed Actions</b> <ul style="list-style-type: none"> <li>– Develop a risk-based strategy for removal of all plastic based stabilisation material, including any recoverable broken-down materials;</li> <li>– Investigate how these materials were specified for use on the project;</li> <li>– Review procurement systems to ensure only “environmentally appropriate” materials are used in future.</li> </ul>	Compliant OBS 12	New

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
				<b>Responsibility:</b> SHL  <b>Close out:</b> 1 December 2023		
26.	EPL 20266 Cond G2.1  Site Observation – Lobs Hole	Lobs Hole STP/PWTP Final Effluent Quality Monitoring Point. Downstream of final treatment, prior to discharge to Talbingo Reservoir. Labelled <b>EPL 41</b> in the document titled 'MWEPL_Premises_Maps_202205 13' (DOC22/373247)	The EPL monitoring point prior to discharge point to Talbingo Reservoir is mis-labelled - it is labelled 14 but should be labelled 41 (refer to photos – Lobs Hole)	<b>Completed Action</b>  – Properly label EPL monitoring point with the correct EPL monitoring point number  <b>Responsibility:</b> FGJV  <b>Closed:</b> August 2023	Compliant OBS 13	New
27.	Sch 3 Cond 30 f)	f) Minimise erosion and the generation and dispersion of sediment using suitable controls in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction guidance series;	Sediment controls have been installed on the edge of the Gooandra trail, however further sediment controls may be required in areas inundated with natural spring water while it is closed for the winter season.	<b>Agreed Action</b>  – Undertake periodic checks of the sediment and erosion controls and maintain as necessary.  <b>Close-out:</b> during winter months until re-opened	Compliant OBS 14	New
28.	Sch 3, Cond 52 (a) and (b)	Excluding the spoil generated by the development, the Proponent must: a) minimise the waste generated by the development; b) maximise the reuse and recycling of any waste;	Whilst the separation and recycling of water bottles has improved since the last audit, bottled water continues to be provided extensively across the project, with minimal provision of potable water for drinking (or refilling own containers). Disposable cutlery is also provided at sites (not reusable) - made from timber.	<b>Agreed Actions:</b>  – Provide potable water for drinking and positively encourage workers to refill their own containers; – FGJV could consider providing reusable vessels and reusable cutlery to workers (among other things);	Compliant OBS 15	Raised as non-compliant at previous IEA.  Component of the finding in Audit #3 relating to waste to

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/ OFI)	History
			Interviews with site personnel indicated an intention to provide filling stations with the larger reusable type bottles to allow personnel to refill their own containers.	<b>Responsibility:</b> FGJV  <b>Close out:</b> 1 December 2023  The extensive provision of bottled water remains an issue – re-raised as OBS.  <b>Note: failure to take further action on provision of potable water for drinking will result in re-escalation to non-compliance.</b>		landfill has been closed (NC).  Bottled water issue remains open.
29.	Approved IEA Audit Program	Internal audit(s) to be conducted as part of the approved Audit Program.	An Internal audit spoil management was conducted by SHL on FGJV in March 2023. The Audit Action Plan indicates that several of the findings remain open in either overdue, incomplete, ongoing and WIP status	<b>Agreed Actions:</b> Work with Snowy Hydro to address all issues raised in the Spoil audit in a timely manner.  <b>Responsibility:</b> FGJV  <b>Close out:</b> 31 October 2023	Compliant OBS 16	New
30.	Sch 3 Cond 61 (e)	Prior to the commencement of construction, the Proponent must prepare an Emergency Management Plan for the development to the satisfaction of the NPWS. This plan must:  e) monitor and review the effectiveness of these measures.	The Natural Hazards Management Plan is required to be updated to meet the requirements of comments provided by NPWS and the CoA. It is noted that the Plan has been under review and is being finalised based on comments received by FGJV.  There are some aspects of the NHMP that have not been adequately addressed in the past as identified in the NPWS comments. (refer to Agency consultation table in Appendix B)	<b>Agreed Actions</b> – Finalise the NHMP taking NPWS comments into consideration; <b>Close out:</b> 1 November 2023  – Implement the requirements of the NHMP in line with NPWS expectations.  <b>Close out:</b> 1 December 2023	Compliant OBS 17	New

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations (Agreed due dates for each action are in Audit Action Plan issued separately)	Rating (Non-compliant (NC), or OBS/ OFI)	History
31.	Natural Hazards Management Plan s 4.2, 4.3.1	<p>4.2: A Consequence Management Guide (CMG) relating to evacuation will be in place prior to works mobilisation. This will include notification triggers to the local Emergency Operations Centre (EOC).</p> <p>4.3.1: A specific incident action plan and a back-up plan that carefully considers all the local risk factors associated with a bushfire in the vicinity of each Refuge Assembly Area must be prepared</p>	<p>Whilst CMGs had been prepared, they were still in final draft form awaiting feedback from RFS;</p> <p>Whilst Emergency Response Plans (ERPs) were in place for each main site – Lobs Hole, Marica and Tantangara, the Tantangara ERP provided as evidence did not include a bushfire section. In addition, the Marica ERP contained references to Lobs Hole requirements in 2 places (s 3.4 and 3.5.2)</p>	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>Finalise the CMGs following receipt of feedback from RFS / other agencies;</li> <li>Update the Tantangara ERP to include a bushfire section similar to the Lobs Hole and Marica ERPs;</li> <li>Update the Marica ERP to correctly reference location.</li> </ul> <p><b>Responsibility:</b> FGJV</p> <p><b>Close-out:</b> before next revision</p>	Compliant OBS 17	New
32.	Sch 3 Cond 60(b)	Emergency Management: The Proponent must: b) ensure all buildings developed on site comply with the relevant requirements of the BAL-29 construction standards of Australian Standard AS 3959-2018: Construction of buildings in bushfire prone areas or the NASH Standard (1.7.14 updated) in National Standard Steel Framed Construction in Bushfire Areas – 2014	Compliance Assessment Reports for permanent buildings prepared for future buildings including the GIS, Headrace Surge Tank, Lower Intake, Upper Intake and Main Access Tunnel (MAT) buildings do not include reference to BAL 29 or AS 3959-2018.	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>Ensure reference is made to the appropriate standards the design documentation.</li> </ul> <p><b>Responsibility:</b> SHL</p> <p><b>Close out:</b> When next design documentation review is due</p>	Compliant OBS 18	New

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Rating (Non-compliant (NC), or OBS/OFI)	History
33.	Sch 3 Cond 10 (e), (f), (g), (h),	Within 18 months of the commencement of construction, the Proponent must prepare a Rehabilitation Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: Refer to Audit Table – sections e, f, g and h.	The current Draft Rehabilitation Management Plan appear to omit some of the requirements of this condition, and incorrectly references some section of the plan that do not exist. Refer to examples in the Audit Tables.	<b>Proposed Actions</b> <ul style="list-style-type: none"> <li>– Take these comments into consideration when finalising the Rehabilitation Plan</li> </ul> <b>Close-out:</b> Upon update of RMP	Compliant Opportunity OFI 2	New



### 3.3. Previous Audit findings – Actions, Progress and Status

The previous audit findings were followed-up and a significant improvement in the process for addressing and closing out the findings was noted. At the last audit, the audit team prepared and issued an Action Plan which was issued along with the IEA Report to be used as a tool to address the findings, track the progress of the actions and report the outcomes to the Department. Snowy Hydro used the tool effectively to track the progress of the actions taken by FGJV.

Whilst the process has improved, and many of the actions from IEAs 2 and 3 have been closed, several remain open, and some of the observations raised at the previous audit have now been escalated to non-compliance. The current audit findings table includes a column to provide information on the history of each finding, indicating whether it was raised at (a) previous audit(s) or whether it is a new finding raised at this audit #4.

A previous findings update table is included in Appendix A of this report. The table provides follow-up comments on how each finding was addressed (including IEA #3 findings and those that remained open from IEAs # 1 & 2), and the status (Closed, or transferred to current findings).

In summary:

Twenty (20) non-compliances (NC) were followed up. Of those:

- Twelve (12) NCs were closed;
- Seven (7) NCs remain open and are transferred to current finding table as NCs;
- One NC remains open but is not re-raised at this audit;
- Three OBS have been escalated to non-compliance.

An Action Plan is also provided to Snowy Hydro and FGJV as attachment to this audit report to once again facilitate an effective process to address and close out the audit findings.

Agreed FGJV actions include keeping the Action Plan up to date, providing regular updates on the progress to address the actions to SHL through monthly compliance meetings, and participation in an internal follow-up audit (by Snowy Hydro) by December 2023 to monitor progress and close-out completed actions.

## 4.0 OVERVIEW OF ENVIRONMENTAL PERFORMANCE

### 4.1.1. Provision of audit evidence

As noted in the executive summary, there was significant improvement from the construction contractor FGJV in the provision of audit evidence at this audit. The previous audit found that the provision of audit evidence was problematic both during and following the audit, however it was pleasing that the auditees were better prepared in general and also provided evidence in a timely manner at this audit.

In addition, it is also acknowledged that overall, there was better participation of “operational personnel” such as Superintendents and supervisors in addition to the environmental specialists than previously.

### 4.1.2. Environmental Management, Notification of Incidents/non-compliances, Monitoring, Reporting, Access to Information

The reporting and notification of incidents and non-compliances, was somewhat improved from the previous audit, however once again, it was difficult to obtain sufficient evidence to give confidence that **all** required notifications and reports were provided to the appropriate regulatory authorities. Of the 22 Incidents (20 reports) that were reviewed, the auditor determined that 11 were likely to have been notifiable, however only 9 could be verified as having been notified to the relevant authorities. Two incidents could not be verified as notified (INC 2660 and 2935), one was notified late (INC 1641), and it was not clear whether some of the other incidents required notification under the current definitions (e.g. wheel wash failure for 2 days (INC 2387), treated water tank overflow (INC 2390), and sink hole formation at Tantangara).

At the time of the audit, FGJV maintain their own Event and Incident Register, and provide Snowy Hydro with the Incident / non-compliance reports. The Register and report forms reflect the information available at the time of the incident, and assumptions are made on whether the event threatens or causes material harm and if it involves a non-compliance with the planning approval conditions. A review of the Register against the Incident reports found inconsistencies between the two documents on the criteria which would indicate whether notification is required.

The decision to notify the relevant authorities ultimately lies with Snowy Hydro, and at times, this may not be consistent with the information in the FGJV documentation. Snowy Hydro do not maintain their own centralised Register indicating which incidents have been notified, and do not appear to have a system for systematically retaining evidence of the notifications issued to the relevant authorities. For these reasons, it was difficult and time consuming for the auditor to determine whether all relevant events had been notified to the appropriate authorities.

Based on the above, the auditor could not confirm with confidence that all incidents and non-compliances are notified in accordance with the approval conditions, and as such, a non-compliance has been raised.

To address this issue, it is recommended that Snowy Hydro maintain readily accessible and accurate summaries of incidents and non-compliances notified. This could be developed as a joint register with FGJV to ensure consistency. In addition, Snowy Hydro need to improve their internal processes for retaining evidence of notifications to provide greater visibility of ongoing compliance.

There was, however, an improvement in the notification of overtopping events and traffic incidents, with an overtopping tab added to the Event and Incidents Register, and a new Traffic Incident Log has been developed and maintained.

On 13 January 2023, DPE sent a letter to Snowy Hydro regarding an incident reported to DPE and NPWS on 15 December 2022 regarding the formation of a sink hole at Tantangara / Tunnel Boring Machine (TBM). In the letter, DPE provided a Direction to undertake a review of, and update, the Environmental Management Strategy (EMS). The letter directs that the review is to be undertaken in consultation with NSW Planning, NPWS, EPA, TfNSW, NSW Fisheries and Water NSW and address issues including expanding the definition of what is an emergency and clarification of incidents associated with the Project. The due date for the updated EMS to be submitted to the Planning Secretary was 28 February 2023. An extension to the due date of 24 March 2023 was requested and granted, and was submitted to DPE on 24 March 2023. At the time of the audit, the revised EMS had not yet been approved by DPE.

Consultation was in progress with the agencies regarding incident reporting process (DPE, EPA, NPWS).

It is not clear whether there have been any incidents which have triggered a notification to DAWE / DCCEEW. The EMS states that DAWE/ DCCEEW is to be notified in writing of **any** (auditor emphasis) incident as soon as practicable, however does not clarify whether this would only be for matters pertaining to protected matters / Matters of National Environmental Significance (MNES). It is recommended that the EMS be further reviewed and revised to clearly define the circumstances in which incidents are to be notified to DCCEEW.

Public reporting of environmental performance and monitoring outcomes has generally improved with the Quarterly Environmental Water Reports and the Quarterly Cumulative Traffic Summary Reports now made publicly available. However, Spoil reports have not been uploaded to the Project website and are therefore non-compliant to the requirement to publicly report on spoil.

The Exploratory Works approval had not been surrendered within required timeframes as this is dependent on the submission of further Management Plans (Remains non-compliant from previous audit).

#### 4.1.3. Submission of Management Plans for approval

The previous audit identified several Management Plans that were required to be developed and submitted to the relevant agencies (DPIE/DPE/ and DAWE/DCCEEW/ DPI), however had not yet been submitted / developed to the satisfaction of the relevant agencies (previously non-compliant). The following Management Plans were still under various stages of development and review, and remained overdue (non-compliant):

- Threatened Fish Management Plan;
- Digital Strategy;
- Recreation Management Plan;
- Visual Impact Management Plan.

Since the last audit, the preparation and submission of various other Management Plans have been triggered, and these had not been submitted within the required timeframes. The following newly triggered Management Plans were still under various stages of development and review, and remained overdue (non-compliant):

- Biosecurity Risk Management Plan;
- The Recreational Fishing Management Plan;
- Rehabilitation Management Plan;
- Long Term Road Strategy.

The overdue status of Management Plans was identified as a pre-audit area of focus by various agencies. Correspondence from DPE in April 2023 requested that Snowy Hydro provide details regarding the status of Management Plans including a chronology of dates, emails, correspondence, portal lodge dates etc. for each Management Plan listed. Snowy Hydro responded, providing a table with a history of the development, consultation undertaken to date, and some justifications for the overdue status to DPE on each of the overdue Management Plans.

Snowy Hydro proposed a strategy for resolution of outstanding Management Plans to DPE in May and June 2023. DPE responded, acknowledging proposed dates for submission, and requested that SHL arrange fortnightly meetings and weekly updates on the status of the plans. These meetings and updates have been occurring, and there has been a major focus by Snowy Hydro to progress the outstanding plans.

Since then, Snowy Hydro has been providing weekly / fortnightly updates on the progress of the overdue Management Plans and revised proposed dates for submission. Considerable effort and progress have been made over the past few months to further develop and finalise the overdue plans.

#### 4.1.4. Surface Water Management, Diffuse Water Pollution, Erosion and Sediment Control

Since the last audit, there have been several incidents resulting in water pollution and the issue of official caution letters, Show Cause letters and Penalty Infringement Notices issued to Snowy Hydro and the construction contractor by the EPA. In addition, various agencies including the EPA, NPWS and DPE expressed concerns during pre-audit consultations relating to diffuse water pollution. The EPA were “keen to see controls in place that cease the shedding of sediment off roads in the first instance, and in the second that pull sediment out of dirty water. These may include sealing roads that have a high risk of sediment run off; semi-sealing roads that have a high risk of sediment run off, slowing down dirty water and pulling sediment out before it reaches sediment basins through regular check dams and rock lining”.

Strategic Environmental Engineering and Consulting (SEEC) provided FGJV and Snowy Hydro an “Assessment of Diffuse Water Source Pollution Management” Report (December 2022). The report was prepared to address the requirements of the PRP under the EPL, and the site inspection undertaken as part of the report included all active construction areas of the project. It was undertaken over 3 days on 7-9 November 2022.

A Prevention Notice was issued by the EPA in 2022 which focused on diffuse source pollution along Tantangara Road, Spoil Road and Quarry Road (all at the Tantangara worksite). The EPA “saw positive change along Spoil Road but would like to see similar controls deployed project wide. A Pollution Reduction Program was also issued on the EPL and “as a result of that Snowy Hydro/FGJV have committed to installing a range of additional controls to help them manage diffuse source pollution. The PRP has been updated to capture these actions”.

The site inspections at all sites generally found that the key measures identified by the EPA and other agencies have been implemented or were in the process of being implemented. No specific significant issues relating to erosion and sediment control, or diffuse water pollution were identified during the site inspection, however some minor issues were identified at some sites (see Photo section of report), and these were raised as Observations.

Positive observations included the sealing of the full length of Lobs Hole Ravine Road, sealing a section of Tantangara Road in the vicinity of Nungar Creek, sheeting of unsealed road with crushed rock, a renewed program for inspection and desilting of sediment basins, stabilisation of berms with hydromulch and jute mesh, use of geofabric around construction near waterways (eg – Eucumbene River), and installation of gabion baskets around waterway crossings. Photos of these various controls are included in the Photo section of this report.

Progressive Erosion and Sediment Control Plans were in place for all key areas. They are prepared and by SEEC are updated by them when works in the area change and implemented by FGJV.

A Pre-and Post Grouting in TBM tunnel Construction Method Statement is used to provide the scope of works, method statements, environmental health and safety plan, work instructions etc to perform the pre and post grouting in the TBM (Tailrace Adit at Talbingo sighted). It includes the measurement of water inflow and guidance on when post grouting is required.

The sewage treatment plants and process water treatment plants were operational, and some treated water has been released to Talbingo Reservoir following further treatment in the reverse osmosis (RO) treatment plant at a maximum rate of 50 l/s in accordance with EPL 21266. The mixing zone verification program was in progress with verification monitoring being undertaken for the treated wastewater and process water discharge point in Talbingo Reservoir in November 2022. At the time of the audit, the mixing zone verification was awaiting review by FGJV to ensure that the comments from SHL have been addressed.

Treated water continues to be reused on site for dust suppression and irrigation.

#### 4.1.5. Storage and Management of Chemicals and Fuels

The storage and management of chemicals continued to be identified as an issue at this audit. Whilst various actions have been undertaken to address inadequate / inappropriate / incompatible chemicals management since the last audit, the site inspection again identified issues at various sites including large volumes of incompatible chemicals stored together within bunds at various water treatment plants and sewage treatment plants.

Other ongoing issues included bunds and banded pallets not always being covered (allowing ingress of water and potential overflow of contaminants), some spill kit materials not being suitable for the material stored in the vicinity, inadequate bunding of an IBC chemical storage area (only 3 sides to the bund), and no provision of spill kits in the vicinity of some of the chemical storage areas.

Previous actions implemented since the last audit included: reviews of sites, inspections, toolbox talks, training courses developed and delivered. It is clear that these strategies have not been effective to ensure long-term compliance to chemical storage requirements. The effectiveness of these actions requires review and further actions need to be developed and implemented as the same issues continue to recur. Given the large quantities and reactive properties of chemicals

involved, this issue needs to be urgently addressed, as it is a safety as well as environmental issue.

#### 4.1.6. Biodiversity

The following commentary provides an overview of performance in key areas:

##### Vegetation Clearing

The Master Tracker Clearing Register continues to track the predicted and projected clearing areas on total areas cleared, native vegetation cleared and for various PCTs and habitats. A review of the register found that there had been no exceedance of limits to date. As at June 2023, the projection for approved limits was 84% (total disturbance); 90% (Native Vegetation) and generally between 89% and 97% for specific habitats;

FGJV continues to track and monitor the clearing of native vegetation and habitat in detail, with any new clearing checked against the allowable limits prior to commencement of clearing. Pre-clearing survey reports continue to be prepared prior to clearing. Recent surveys included Tantangara Intake Stage 2 and Tantangara Moxy Haul Road (Sept 2022), and ECVT Lay down pads (Mar 2023).

Clearing (Land Disturbance) Permits continue to be used as a key tool by the construction contractors to manage and ensure compliance with land clearing requirements and are reviewed and approved by Snowy Hydro. Post Clearing reports also continue to be prepared (e.g. Gooandra Trail Trunk Services – Sept 2022).

Pre-clearing survey reports continue to be prepared by ecologists prior to clearing, providing detailed information for input to the clearing permits to ensure required protocols are followed. Post-clearing survey reports by ecologists continue to be reported via a KML survey file, which is uploaded to the WebGIS system.

##### Weeds, Seeds and Pathogens

Findings were raised at IEA#1, 2 & 3 regarding adequacy of processes to ensure plant, equipment and vehicles are free of weeds, seeds and pathogens when leaving site. Various actions had been agreed and documented in the Action Plan. Whilst improvements have been made, and some actions are now closed, other agreed actions continue to remain open.

Closed actions include installation of wheel washes at all areas (most now permanent), toolbox talks delivered and a Wheel Wash Operating and Management Procedure prepared and distributed for consultation with relevant departments (not yet formally issued at time of the audit).

The current wheel wash procedure states that “Where vehicles are unable to pass through the automated wheel wash, the completed hygiene certificates will be provided to security staff at the gate. Security staff will note in the Entry Checklist if hygiene certificates have been provided and that these are completed. The procedure also notes responsibilities of the Environment Team include reviewing compliance by checking Security staff are ensuring hygiene certificates are completed.

Insufficient evidence was provided to demonstrate Entry Checklists are completed prior to entry to sites as per the procedure, or that the Environmental Team review the completed certificates.

Other key actions not yet adequately completed from the previous audit recommendations include: Investigate the root causes of this failure including the potential consequences; undertake a risk assessment on the operation of the wheel washes; and review of the effectiveness of the current weed, seed and pathogen protocols and facilities once the other corrective actions have been undertaken (by an ecologist with input by SHL). Further actions are required to ensure that processes undertaken to control the spread of weeds are effective (refer to findings table for detail).

The previous audit identified that the weed spraying program had not been implemented as required. The follow-up to this found that the spraying program had been implemented this year, however the spring component (Nov 2022) was not undertaken. In the auditor's opinion, the delay is justified as there was significant rainfall during the months of November and December 2022, and spraying at this time would have been ineffective and lead to runoff of herbicides and potential water pollution.

#### Feral predator control:

The Biodiversity Management Plan requires that a pest predator control program to manage feral predators including wild dogs, foxes and cats will be implemented throughout construction of the project, which would be undertaken by an experienced and suitably qualified pest control contractor. The Year 1 and Year 2 Annual Biodiversity Monitoring Reports also noted that adaptive management has been triggered as feral animals have been sighted with proximity to known Smoky Mouse habitat or project infrastructure.

Evidence could not be provided to demonstrate that the pest predator control program has been implemented to date. It was advised that discussions have occurred between NPWS and Snowy Hydro regarding the use of a "felixer" to control predators. However no evidence was provided of these discussions. A non-compliance has therefore been raised against the requirements of the Biodiversity Management Plan. This was also raised as a focus area by Biodiversity Conservation Division (BCD).

A Fauna Encounter Register is maintained by FGJV. The Register shows that significant numbers of mice and some rats have been trapped and euthanised, however there have been no/limited records of feral predators such as cats or foxes trapped since 2020. The fauna encounter section of the Register indicates that there have been various sightings of foxes, cats dogs/dingos (12 since Jan 2022 recorded).

#### Fauna

Fauna strike is recorded in Incident reports and entered into the Event and Incident Register. It was advised that there have been no reported strikes of threatened species such as Smoky Mouse, Broad Toothed Rat, or Eastern Pygmy Possum, and none had been recorded in the Event and Incident Register.

In-Vehicle Management System (IVMS) is installed on project vehicles (verified at this and previous audits), and it was verbally confirmed by FGJV and SHL that this requirement is ongoing, including for subcontractors to minimise and report fauna strike;

Six wildlife underpasses had been installed under Lobs Hole Ravine Road (completed prior to previous audit) and are now in operation (see photos in report).



#### Annual Reporting – Appendix B of the Biodiversity Monitoring Program:

The previous audit identified that the Annual Report was in draft and had not yet been released or provided to the agencies. At this audit, the Year 1 and Year 2 reports have been completed and are uploaded to the project website. The Year 1 and Year 2 reports provide detailed information on the outcomes of the Biodiversity Monitoring Program

#### Annual Reporting - Appendix F and Section 6.5 of Biodiversity Management Plan:

In addition to the Biodiversity Monitoring Program report, Section 6.5 of the Biodiversity Management Plan (Reporting of Incidents) and Appendix F (Weed Pest and Pathogen Management Plan) require that an annual report be prepared on a variety of Biodiversity matters to be made available to Snowy Hydro, NPWS, DAWE (now DCCEEW) and BCD.

Section 6.5 of the BMP requires the following to be reported on:

- summary of weed and vertebrate pest control activities undertaken since last report (as detailed in Appendix F);
- account of all clearing activities including tracking against clearing limits and threatened species habitat limits;
- post-clearing ecology reports since last report (as detailed in Appendix C);
- results of threatened species, groundwater-dependant ecosystem, weed and pest monitoring (as detailed in Appendix B);
- account of fauna strike mitigation strategy management actions (as detailed in Appendix G);
- account of any relevant incidents and non-compliances; and
- efficacy of the implemented biodiversity management measures against the performance measures included in section 6.5.1 of this plan.

Section 6.1 of Appendix F requires the following to be reported on:

- details on the weed control actions undertaken since the last report including:
  - a list of the control activities undertaken;
  - map of areas where control activities were undertaken;
  - efficacy of the control measures in relation to the objective of minimising weed, pest
  - pathogen distribution and/or abundance in the project area;
  - recommendations for future control activities.
- details on the vertebrate pest control activities undertaken since the last report including:
  - a list of the control activities undertaken;
  - cage trapping results;
  - baiting and shooting results (where undertaken);
  - recommendations for future control activities.
- summary of the efficacy of other control measures outlined in this plan and recommendations for revisions to controls.

The Annual Reports as required by Section 6.5 and Section 6.1 of Appendix F have not been prepared, or provided to appropriate agencies as required, and are therefore determined as non-compliant at this audit.

#### 4.1.7. Groundwater monitoring / Groundwater Dependent Ecosystems

Since the last audit, groundwater telemetry has been installed / progressed to provide better real-time groundwater monitoring data. As noted in a Groundwater Telemetry Installation and as-built report, “as underground construction progresses, this will allow rapid assessment of groundwater data to inform critical construction decisions relating to groundwater inflows and drawdown”.

At the time of the audit, tunnelling has been undertaken at the Lobs Hole Main Access Tunnel (MAT) at Lobs Hole and the ECVT (Lobs Hole). It was generally expected that the Lobs Hole area is not in an area that presents a significant risk of groundwater drawdown in a GDE area. However, a recent preliminary assessment into the “reduction of the groundwater levels in a number of groundwater monitoring points” during the excavation of the ECVT in 2022 found that there was “a noticeable change in trend from mid-year 2022” and a “sharp decrease in levels was then observed from the end of the year 2022”.

The draft preliminary assessment– ECVT/PSC Depressurisation Event Memo (14 July 2023) notes that the mandatory probe holes in advance of the TBMs did not encounter inflows in excess of the triggers for the area and provides some preliminary suggestions as to the cause. It also notes that category 2 (facultative – opportunistic) and category 3 (entirely dependent / obligate) groundwater dependent ecosystems (GDE) are potentially located within the zone of influence of the measured drawdown.

Subsequent reviews of the groundwater level data by EMM Consulting in mid-August 2023 noted “model validation works which are currently underway will validate groundwater drawdown response to groundwater inflow. The updated model will incorporate all relevant, additional monitoring and output corresponding performance criteria”. In summary, EMM noted that there is no need for further action at this stage, however do note the importance of establishing the shallow monitoring network in PCT 637 and that proposed sites will be captured in the GMP revision and installed as soon as possible.

At the time of the finalisation of this report, (30 August 23) it was determined by EMM that there has been no trigger for TARP 1 or to notify relevant agencies at this stage. Confirm with Ben/Neve

In areas of high expected inflow, the tunnel alignment is to be drilled at least 24m ahead of the cutter head to determine inflow rates, which is compared with trigger levels. Pre-grouting and post-grouting would be undertaken based on water inflows, and rock type and are informed by design. Primary grouting is undertaken as standard practice as the tunnel advances.

Flow meters have been installed at the tunnels to measure inflow and outflow data to calculate a simple water balance, however the process was delayed. Data has been available since September 2022. Currently, a Totalizer Calculator spreadsheet is updated with meter readings at all tunnels by the FGJV dewatering team once a shift (every 12-hours).

Water balance calculations at each extraction point are done monthly by SHL and reported to NRAR annually. SHL advised that the data supplied in the Totalizer Calculator spreadsheet is sufficient for water balance calculations to ensure the water intake is within the licensed allocation. It was also advised that water meters at the site are in the process of being upgraded in accordance with the Non-Urban Water Metering Policy.

Water Licences continue to be in place for the project, and water take is monitored.

#### 4.1.8. Spoil Management – Tunnel Spoil Management

Since the last audit, there has been a significant increase in the volume of tunnel spoil generated, as tunnelling had only recently commenced at that time. Tunnel spoil is now being generated at Lobs Hole, Tantangara and Marica. Tunnel boring machine (TBM) material is being placed in the permanent emplacement areas at Lobs Hole and Tantangara, while spoil is being temporarily stockpiled at Marica to eventually be placed as fill around the concrete collar to shape the final surface of the surge shaft.

An internal audit was conducted by Snowy Hydro in March 2023 as part of their commitments made in the approved Audit Program and forwarded the report to DPE. In the letter to DPE, it was noted that the audit provided valuable insight into the project's spoil management practices, and it identified a number of focus areas for improvement. In the report, 34 Opportunities for Improvement, 3 Observations and 3 non-conformances were noted. An Action Plan is maintained by Snowy Hydro providing current status of findings (various overdue / incomplete / WIP / ongoing status noted). An Observation is raised on the overdue status of actions.

An interview with a Spoil Advisor was conducted at Marica and the processes and procedures for managing tunnel spoil were discussed, including the processes for testing, sampling, storage and processing at the Marica surge shaft. Spoil advisors are allocated across the project to ensure spoil is appropriately managed. At Marica, core samples are taken in advance of the excavation, so the characteristics of the material are known prior to full excavation. Once excavated, the spoil is temporarily stockpiled, and any material suspected of being potentially acid forming (PAF) is taken to a designated area for later treatment (blending with non-acid forming (NAF) material).

Key processes for managing spoil include spoil tracking, detailing the sources and final location and preparation of placement maps, and completion of spoil placement permits (include sources, samples and test results including NAF and PAF), spoil treatment required (where required), and permanent placement site. Fortnightly Spoil Testing Samples and results reports are also prepared (includes location, number of samples, TR numbers, results and comments)

Consultants (WSP) provide a report and determine a blending rate to neutralise any identified PAF, and the blending is then undertaken in accordance with the reports. Further validation is carried out to ensure that the blended material meets the characteristics of NAF, and it is then transported to the temporary spoil storage area. An Inspection and Test Plan (ITP) Handling and Characterisation Spoil Management provides a tool to manage the testing, classification, and management of spoil on sites.

Site inspections at all sites included an inspection of the spoil placement areas and the leachate collection system and basins installed to collect any leachate from spoil storage areas. Signage was in place on stockpiles at Marica and Tantangara. A Leachate Detection Procedure (LDP) is in place for Lobs Hole Main Yard, GF01 (Lobs Hole) Tantangara and Marica. It is noted that there was an incident reported in January 2023 at Lobs Hole (GF01) in which diluted leachate water mixed with sediment laden water had leached through the clay capped layer during a heavy rain event. Remedial work and updates have been made to the Leachate Detection Procedures where relevant for each site in consultation with the EPA.

Quarterly Spoil Reports are prepared as part of the Environment Protection Licence requirements and include spoil quantities, characterisation results, treatment and validation results, cumulative spoil volumes of each type (NAF, ANC, PAF, other), and any additional spoil management requirements, including whether the Trigger Action Response Plan (TARP) was required to be implemented, and leachate (volume, quality and remediation actions).

Six monthly spoil reports are also required to be prepared and made publicly available in accordance with Table 9-4 of the Spoil Management Plan. These had not been made available on the Project website and a non-compliance has been raised.

Overall, the management of tunnel spoil appeared satisfactory based on the evidence sighted and interviews conducted.

#### 4.1.9. Emergency Management

Pre-audit consultation comments were received in relation to emergency requirements detailed in the Natural Hazards Management Plan. The comments were primarily regarding the review and update of the Natural Hazards Management Plan and the consultation that was required as part of the update.

The Natural Hazards Management Plan was under review at the time of the audit and the latest version Rev E dated Nov 2022 had not yet been finalised or issued. A comments register was sighted, which included comments from NPWS and responses by FGJV. There has also been email correspondence between FGJV and NPWS with Glenn Stroud up to Jan 2023.

One of the issues raised by NPWS was in relation to the preparation of Consequence Management Guides (CMGs). At the time of the audit, it was advised that a signed CMG for each site has been sent to the RFS to be commented on and approved. The draft versions were sighted.

Evidence was provided of:

- Temporary signage installed on firebreaks and trails – photos showing No Entry – Steep and Narrow – No go Zone and a sign No Entry at CH7. Should include dead end, no access, steep and narrow as required;
- Whilst it was verbally discussed that a Cat 1 Fire truck could use ravine Road North, this has not been confirmed in writing as requested by NPWS (refer to OBS);
- Consequence Management Guide (CMG) – Lobs Hole prepared, however appears incomplete (sections not fully completed and questions still arising) (refer to OBS);
- Consequence Management Guide (CMG) – Marica prepared and appears complete;
- Consequence Management Guide (CMG) – Tantangara prepared – appears incomplete (refer to OBS);
- Lobs Hole Emergency Response Management Plan Dec 2022 Rev E – provides information on fire management and references the NHMP;
- Tantangara Emergency Response Management Plan Mar 2022 – Rev E (bushfire not addressed); (refer to OBS);
- Marica Emergency Response Management Plan Dec 2022 – Rev E – addresses bushfire but refers to Lobs Hole, not Marica (refer to OBS).

#### 4.1.10. Transport and Traffic Management, Road Upgrades, Incidents

The previous two IEAs identified that insufficient evidence was provided to demonstrate that all traffic incidents that required notification were notified to the appropriate authorities including that the Traffic Incident Register did not provide adequate information. At this audit, significant improvements were noted to the recording of traffic incidents. A fully revised Traffic Incident Log has been developed and now includes columns to record details on who the incident was reported to, date and time, consequence ratings, whether it was a breach of requirements and comments.

The previous two audits also identified that Quarterly Cumulative Summary Reports had not been prepared, submitted to SHL or uploaded to the project website. In response to the previous non-compliance, Quarterly Vehicle Movement Summary Reports have now been developed and uploaded to the project website.

Whilst the reports provide weekly light and heavy vehicle movements on Ravine Road, Tantangara, Marica and Polo Flat roads, the reports do not include Snowy Mountains Highway movements, insights on the effectiveness of measures, or reflect all requirements of TMP Table 6-1.

Areas not currently reported on include:

- Vehicle movements on Snowy Mountains Highway);
- Delivery traffic movements;
- Vehicle use of Lobs Hole Ravine Road North.

It is recommended that the format of the Quarterly Vehicle Movement Summary Reports is revised to include commentary on the effectiveness of measures to achieve satisfactory traffic, transport, and access outcomes during construction; vehicle movements on Snowy Mountains Highway); delivery traffic movements; and vehicle use of Lobs Hole Ravine Road North. This is raised as an Observation.

As part of pre-audit consultation, TfNSW noted that they have observed a greater number of vehicle movements along the northern half of the Snowy Mountains Highway (north of Link Road) than predicted in the TMP and PIR & RtS). TfNSW have the view that as a direct consequence of this, the section of the Snowy Mountains Highway between Tumut and Yarrangobilly Caves Road is experiencing road pavement issues.

Figures provided by FGJV Transport Department confirmed that delivery vehicles travelling from Tumut (this would constitute the majority of project vehicles from the north) were well within the predicted volume. Predicted daily traffic volumes in Table 4.2 of the TMP for heavy vehicles on the Snowy Mountains Highway north of Link Road (Garden Gully Creek) and North of Yarrangobilly Caves Intersection of the Transport Management Plan for the Main Works are **146** and **64** respectively.

The traffic volumes provided by FGJV in the “HV deliveries to site” spreadsheet is summarised below:

- The maximum daily truck movements recorded on a single day (included trips from Tumut to Lobs Hole, Tantangara and Marica) to date in 2023 was **33** (recorded on 4/5/23). There was no day in which the predicted volumes were exceeded.
- The highest recorded HV volumes for a full month was in April 2023 with 403 truck movements in total.

In addition, maximum daily traffic volumes for Lobs Hole Ravine Road North are 120 vehicle movements per day. Figures provided by FGJV based on a camera that is activated by vehicle movement on Lobs Hole Ravine Road confirmed that the volumes are well within the limit. The maximum on one day (based on records provided) was 11 vehicles per day.

An interview was held with the Transport Manager and Transport Coordinator, and an overview of the actions being taken regarding traffic and transport were discussed and the outcomes are noted below.

Traffic and transport supervisors are stationed at Lobs Hole (2) and Tantangara (3 also looking after Marica) which is double the number compared with at the previous audit. A person is allocated to heavy vehicle booking. Daily road inspections are undertaken (particularly in winter) from 4am to 6pm – any issues identified are communicated to users on WhatsApp including

condition of the road. Once the roads are deemed safe, messages are sent out to traffic controllers. Decisions are made on whether the road should be closed for project vehicles, based on safety considerations, and it often happens that roads are not opened for project traffic until later, when road conditions improve. Crib sheds are provided for drivers to wait in until the road opens.

PBS trucks continue to be used on the project. They each have 4 cameras which record the trip and can detect poor driving. Where unsafe driving is detected, drivers are removed from the project. Traffic controllers on the project have often been the first responders to incidents (not necessarily project related), and VMS boards have been deployed to warn of issues on the roads.

Previous audits / stakeholder input identified that convoying had been occurring with heavy vehicles. At the last audit, trucks were required to maintain a minimum of 250m between vehicles. This has now been increased to 500m, and this requirement is signposted at the entry to Lobs Hole site. Where convoying is detected, drivers are reminded of requirements, and toolbox talks are held reiterating the requirement.

A winterisation plan was prepared for this winter and a workshop was held with TfNSW in February 2023 to discuss traffic and transport matters on the project.

Pre-audit consultation from TfNSW requested that a check be made that the management of worker movements to and from sites and between sites is being undertaken as detailed in approved documentation. Site inspections, interviews, review of bus timetables, provision of bus stops and lack of private vehicles on sites confirmed that the project is in compliance with this requirement.

#### 4.1.11. Complaints

The Complaints Register is maintained by SHL and has been published on SHL's website. There have been eleven recorded complaints since Feb 2022, six related to traffic, 2 to parking and 3 others relating to worker behaviour. There is a hotline number (1800 Snowy 2) for general enquiries including complaints (however it is not a dedicated line for complaints but is staffed 24x7).



## 4.2. Site Inspection Photographs

### 4.2.1. Site Inspection Photographs – Lobs Hole Ravine Road

Site inspection Photos – Lobs Hole Ravine Road Thursday 13 July 2023	
	
LRR 1 & LRR 2: Fauna underpass #2 – Lobs Hole Ravine Road – road pavement now fully sealed.	
	
LRR 3: Entry to fauna underpass – wire mesh to restrict size of fauna that can use it (restricting predator access)	LRR 4: Roadside stabilisation
	
LRR 5: Erosion on embankment R8 batter slip – originally stabilised with a plastic mesh (removed) – under repair using rock bolts	LRR 6: Area stabilised with plastic mesh – requires replacement (see OBS)



**Site inspection Photos – Lobs Hole Ravine Road Thursday 13 July 2023**



LRR 7: Further view of plastic mesh that requires replacement with a non-plastic, approved stabilisation material



LRR 8: Close-up of plastic mesh – breaking down, releasing plastic pieces into the environment.



LRR 9: Further close-up of plastic mesh– small pieces breaking off and entering environment



LRR 10: Stabilised / shotcreted rock face



LRR 11: Stabilised / shotcreted rock face. Road pavement fully sealed (from gatehouse to site).



LRR 12: Roadside berm treated with "Stonewall" to stabilise

**Site inspection Photos – Lobs Hole Ravine Road Thursday 13 July 2023**



LRR 13: Lay-bye with stabilised berms – treated with "Stonewall" for stability



LRR 14: View of Lobs Hole worksite from Lobs Hole Ravine Road



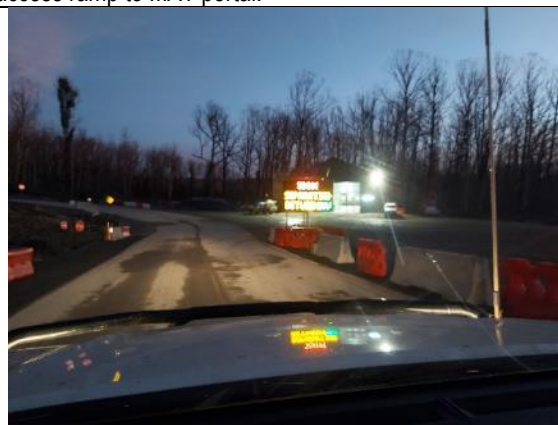
LRR 15: Roadside berms – treated with Stonewall



LRR 16: Turkeys nest (temp storage from WTP) bottom of access ramp to MAT portal.









LRR 17 & LRR 18: Lobs Hole Ravine Road entry / exit – signage says Project Heavy Vehicles must maintain 500m between heavy vehicles (to prevent convoying – previously 250m)





#### 4.2.2. Site Inspection Photographs – Lobs Hole

Site inspection Photos – Lobs Hole Thursday 13 July 2023	
	
LH 1: Water Treatment Plant – Lobs Holes	LH 2: Water Treatment Plan – Lobs Hole
	
LH 3: Large number of IBCs (at least 90 in the bund) containing water treatment chemicals, some of which are not compatible for storage together.	LH 4: Close-up view of IBCs - in foreground is Sodium Hypochlorite, IBC at rear, left is hydrochloric acid (incompatible).
	
LH 5: ECVT Portal	LH 6: MAT Portal - TBM decommissioned and moved to Talbingo Adit.



**Site inspection Photos – Lobs Hole Thursday 13 July 2023**



LH 7: Sheeted haul road, stabilised berm at Main Yard Pad 50 – hydromulched



LH 8: Tunnel spoil area from MAT and ECVT – looking down from Pad 50 to yard 4



LH 9: Storage tunnel segments on Pad 50 at Main Yard



LH 10 Stabilised batter looking towards Pad 40 from Yard 4



LH 11: Pad 50 – Mechanical Workshop



LH 12: Washington Hotel ruins remain protected by fencing adjacent to Yarrangobilly Bridge

**Site inspection Photos – Lobs Hole Thursday 13 July 2023**



LH 13: Cat 1 fire truck – located at Pad 2 – Lobs Hole



LH 14: Mobile fire fighting water cart at Pad 2. Wrecked vehicles in background are used for practice rescues



LH 15: Topsoil stockpile – covered, with signage – “Clean topsoil” at Pad 2



LH 16: Water cart refilling – for irrigation and haul road dust suppression – Pad 2 standpipe



LH 17: Recycling (return and earn) bins onsite (main camp) for recycling of water bottles



LH 18: General waste at main camp – lids on bins to prevent wildlife and feral animals from accessing waste



## Site inspection Photos – Lobs Hole Thursday 13 July 2023



LH 17: Drinking water (main camp) provided by the pallet load at all sites visited (refer to OBS – opportunities to reduce plastic waste generation)



LH 20: STP – Lobs Hole Main Camp



LH 21: Sewage Treatment Plant Main camp



LH 22: Sewage treatment plant UN 2922 (Phenyl isothiocyanate) stored with Sodium hydroxide (base - to right of photo) – incompatible to be stored with acids, bases or oxidising agents.



LH 23: Stabilised Batter Pad F



LH 24: Tunnel spoil – PAF storage area – awaiting validation testing prior to blending Sign says PAF UC PAF Spoil – GF01

## Site inspection Photos – Lobs Hole Thursday 13 July 2023



LH 25: GF01 showing water diversion/access trail around spoil area. Has since been upgraded to be a clean-water diversion drain – see next photo.



LH 26: Updated photo (31/07/23) of diversion drain. Following a joint agency meeting, a temporary clean water drain is being installed to replace the current access road, as per the approved erosion and sediment control plan



LH 27: View from GF01 stockpile to leachate basin (Turkeys Nest - process water / leachate basin).



LH 28: View to GF01 – leachate basin in foreground, spoil stockpile on left, diversion drain / access track on right.



LH 29: End of water diversion drain – geofabric and rock



LH 30: Continuation of diversion water drain – GF01



**Site inspection Photos – Lobs Hole Thursday 13 July 2023**



LH 31: Contaminated soil skip at entrance to GF01 - labelled



LH 32: Fire danger signage near GF01



LH 33 Jute mesh and rock –upgraded basin – F10 on low side of GF01



LH 34: Irrigation line from basin near irrigation area



LH 35: Talbingo intake



LH 36: Talbingo Adit TBM location



LH 37: TBM cradle and attaching gantries to the TBM Talbingo Adit



38:LH Bunded fuel tank on Talbingo Adit site.



**Site inspection Photos – Lobs Hole Thursday 13 July 2023**



LH 39: Minor DG and Hazardous substances storage at Talbingo Adit. Incompatible storage (class 2 gas and class 3 liquids, signage incorrect), see NC on general chemical management



LH 40: Reverse Osmosis (RO) water treatment plant – adjacent to Talbingo Reservoir (all water treated prior to discharge to the reservoir).



LH 41: RO water treatment plant with signage for EPL outlet (incorrectly / inconsistently labelled as EPL 14 – should be 41) (fixed Aug 2023)



LH 42: EPL point correctly labelled on apparatus



LH 42: Entry to Lobs Hole Ravine Road (LHRR) North Works being undertaken to widen (for emergency access)



LH 44: Berms stabilised and seeded LHRR North, drain protected

**Site inspection Photos – Lobs Hole Thursday 13 July 2023**



LH 45 and LH 46 Section of gravel road sealed with concrete and stabilised with rock on low side of LHRR North



LH 47: LHRR North – site of proposed turn around bay to facilitate fire truck emergency turn around.



LH 48: LHRR North – MC 83 - stockpile of crushed rock for road base –



#### 4.2.3. Site Inspection Photographs – Tantangara

##### Site inspection Photos – Tantangara Road, Tantangara site, Quarry Road / Spoil Road, Water Intake, Accommodation Camp Friday 14 July 2023



TT1: Tantangara road – Hydromulched batter



TT2: Tantangara – stabilised berm on road edge



TT3 TT4: Tantangara Creek - Nungar Creek crossing – road in the vicinity has been sealed to prevent / minimise unsealed road runoff / diffuse water pollution as response to EPA regulatory actions



TT5: Unnamed creek feeding into Nungar Creek



TT6: Hydromulching and natural regeneration observable -- adjacent to Tantangara road on the line-of-sight road upgrade area



**Site inspection Photos – Tantangara Road, Tantangara site, Quarry Road / Spoil Road, Water Intake, Accommodation Camp Friday 14 July 2023**



TT7: Entrance to the Tantangara site (gatehouse) showing fire risk sign, Speed limit (10kmh), no unauthorised entry



TT8: Tantangara Gatehouse



TT9: Berms and ground stabilised with hydromulch (recent damage by wild horses (widespread issue))



TT10: Hydromulched berms – germinated seeds. Road surface has been sheeted with crushed rock



TT11: Hydromulched stabilised batter – damage by brumbies



TT12: Stabilised verges, road surface sheeted with crushed rock / DGB20

**Site inspection Photos – Tantangara Road, Tantangara site, Quarry Road / Spoil Road, Water Intake, Accommodation Camp Friday 14 July 2023**



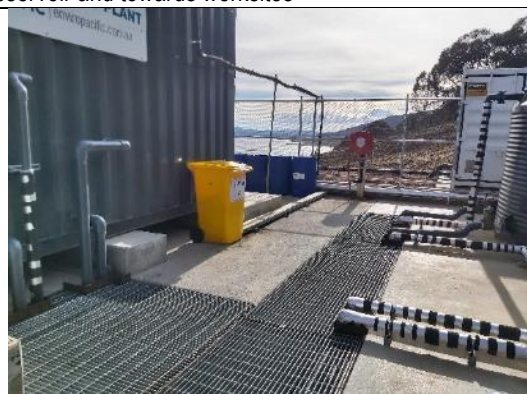
TT13: Tantangara Camp (extensions occurring), off Tantangara Camp Access Road



TT14: View from Tantangara Camp looking over Tantangara Reservoir and towards worksites



TT15: Sewage Treatment Plant (STP)– Tantangara Camp



TT16: STP – Tantangara Camp



TT17: Organic absorbent is spill kit – STP – may not be suitable for strong corrosives (should be inert absorbent)



TT18: Fire trailer at Tantangara Camp



TT19: Tantangara Camp – bus stop (no private vehicles permitted), return and earn – plastic bottles and containers



**Site inspection Photos – Tantangara Road, Tantangara site, Quarry Road / Spoil Road, Water Intake, Accommodation Camp Friday 14 July 2023**



TT20: Pallet load of drinking water for the Camp. Waste cooking oil tank (valve positioned outside bund – ineffective for spill containment)



TT21: Sink hole work site. Behind fenced area is outside EIS boundary (no entry sign on fence). Drilling / grouting works to stabilise area around the sinkhole.



TT22: Segment storage at Q5 Pad



TT23: Quarry Trail Road – Tantangara Adit. Road sheeted with crushed rock



TT24: 3 Tantangara Adit Portal



TT25: Chemical storage container at Adit Portal



**Site inspection Photos – Tantangara Road, Tantangara site, Quarry Road / Spoil Road, Water Intake, Accommodation Camp Friday 14 July 2023**



TT26: Inside the chemical storage container



TT27: Outside chemical storage in portable bunds



TT28: Fuel Farm at Fill 2



TT29: Fuel Farm. Sumps around storage and filling area



TT30: Water treatment Plant chemical storage – not fully bunded – one side open.



TT31: Container – chlorine storage.



**Site inspection Photos – Tantangara Road, Tantangara site, Quarry Road / Spoil Road, Water Intake, Accommodation Camp Friday 14 July 2023**



TT32: Chlorine storage inside container



TT33: Tantangara Intake under construction



TT34: Gate Shaft - Tantangara



TT35: Water collection system around the gate shaft



TT36: Plastic mesh used to stabilise embankment around the gate shaft



TT37: Upgraded sediment basins (S2) along Spoil Road.



TT38: Sediment Basins – Spoil Road



TT39: Environmental Protection Zone – roped off and signage installed – Spoil Road



**Site inspection Photos – Tantangara Road, Tantangara site, Quarry Road / Spoil Road, Water Intake, Accommodation Camp Friday 14 July 2023**



TT40: Additional erosion and sediment controls installed along Spoil Road to prevent splash of sediment to the creek line



TT41: Sediment sumps along Spoil Road



TT42: Tantangara spoil emplacement area S1C -



TT43: New shotcrete lined grout pits from sinkhole consolidation works under construction in spoil area – it is a waste management process to allow grout to be removed from water not suitable for the WTP to allow water to be reused on site.



TT44: Roped off heritage area in temporary spoil area – S1



TT45: Concrete washout point in temp spoil area (with signage). Removed since inspection – not to go into the emplacement area.

**Site inspection Photos – Tantangara Road, Tantangara site, Quarry Road / Spoil Road, Water Intake, Accommodation Camp Friday 14 July 2023**



TT46: Spoil stockpiles in spoil emplacement area with signage indicating lot number – awaiting validation then placement into designated areas according to spoil maps



TT47: Topsoil stockpile – for later rehabilitation (recently placed – to be stabilised with stonewall and covered)



TT48: Temporary Stockpile area S1



TT49: S1 spoil area – sediment basin








#### 4.2.4. Site Inspection Photographs – Rock Forest

Site inspection Photos – Rock Forest Friday 14 July 2023	
	
RF1: Rock Forest segment laydown / storage area	RF2: Stabilised drain behind segment laydown area
	
RF3: Basin has been recently re-sized to accommodate for the pad extension	
	
RF4, RF5: Adjacent to Offices and toilet block – bunding needed repair – repaired during site visit	
	
RF6: Stabilised area beneath the segment storage pad	RF7: VMS signage at the Rock Forest site



#### 4.2.5. Site Inspection Photographs – Marica, Marica Trail, Surge Shaft

Site inspection Photos – Marica Trail, HDD Pad, Marica site, Surge Shaft, and Marica Camp - Saturday 15 July 2023	
	
MC1: Near entrance to Marica Trail – Dip creek – culvert, stabilisation – recently upgraded	MC2: Dip Creek – right hand side of Marica trail. Stabilised batter, upgraded in-stream works
	
MC3: Bottom of batter – Dip Creek, also showing “No Entry environmental protection zone” roped off and signposted	
	
MC4: Marica trail – newly constructed permanent wheel wash facility. (did not operate second time vehicle entered site- OBS / NC)	MC5: Marica trail – geofabric line road verges, road surface sheeted with DGB material, mulched batters



**Site inspection Photos – Marica Trail, HDD Pad, Marica site, Surge Shaft, and Marica Camp -  
Saturday 15 July 2023**



MC6: Sediment basin MT03



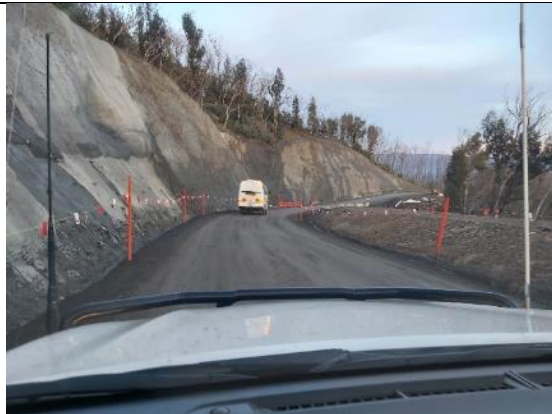
MC7: In-progress works – crossing of Eucumbene River on Marica trail



MC8: Eucumbene River crossing – gabion baskets being installed



MC9: Batter stabilisation – wire mesh



MC10: Marica trail – stabilised batters



MC11: Small rehabilitation site (from accidental over clearing incident)





**Site inspection Photos – Marica Trail, HDD Pad, Marica site, Surge Shaft, and Marica Camp -  
Saturday 15 July 2023**

MC12: Stockpile area – topsoil and timber / woody debris – for later rehab



MC13: Horizontal Directional Drilling (HDD) Pad



MC14: HDD Pad, pump used for dewatering (placed on "plant nappy"). Permits required for dewatering



MC15: Batter at edge of the HDD pad – some washout of berm observed at base of batter – requires repair and maintenance (OBS)



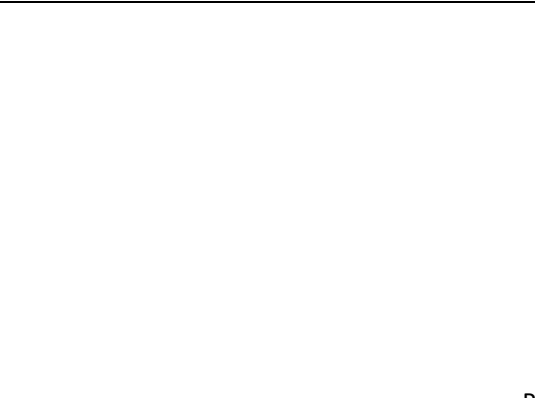
MC16: As previous photo – washout at base of batter.



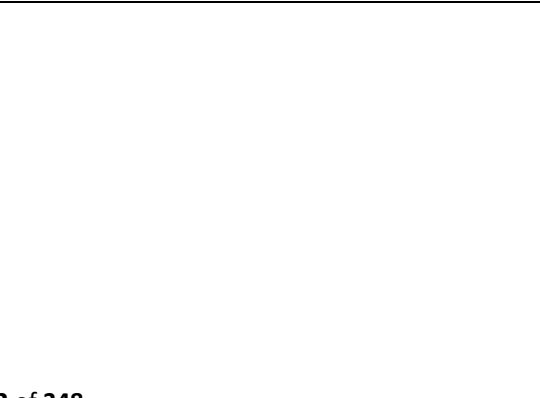
MC17: Diesel storage at HDD pad – double skinned tank



MC18: Waste skip – containing used geofabric – Marica West



MC19: Concrete washout area – Marica West trail





**Site inspection Photos – Marica Trail, HDD Pad, Marica site, Surge Shaft, and Marica Camp -  
Saturday 15 July 2023**



MC20: Marica Trail – “blind corner” stabilised batter



MC21: Coppermine trail intersection with Marica trail topsoil and unsuitable soil stockpile area – bin overfull and required cleanup (confirmed completed)



MC22: Laydown pad and topsoil storage above Marica Camp – No signage indicating for topsoil.



MC23: Topsoil storage area – above Marica camp



MC24: Dewatering operations at MC03 near Marica Camp. Water was leaking from a hose fitting and overtopping the bund. Dewatering permit was one day out of date (OBS)



MC25: Leaking hose fitting



**Site inspection Photos – Marica Trail, HDD Pad, Marica site, Surge Shaft, and Marica Camp -  
Saturday 15 July 2023**



MC25: Marica camp – stabilised ground



MC27: Marica Camp STP – storage on bunded pallet



MC28: Marica Surge Shaft building



MC29: Marica Surge Shaft building



MC30: Fenced off surge shaft – no works on the day of the audit due to safety issue / incident



MC31: Workshop area – drums of oil not bunded (refer to overall NC relating to chemicals / bunding management)



MC32: MC233: Marica Surge shaft – aggregate bins – materials used at the concrete batching plant





**Site inspection Photos – Marica Trail, HDD Pad, Marica site, Surge Shaft, and Marica Camp -  
Saturday 15 July 2023**



MC34: MC35: Recent upgrade to surface water controls beneath surge shaft pad



MC36: Part of upgrade of surface water controls below the surge shaft

MC37: Temporary spoil area – material from the surge shaft stored for later use for land forming around the surge shaft when completed.



MC38: Leachate basin below temporary spoil area



#### 4.2.6. Site Inspection Photographs – Gooandra Trail Trunk Services

Site inspection Photos – Gooandra Trail Trunk Services — Saturday 15 July	
	
GTS1: Entry to Gooandra Trail - gated, now closed for winter period – no works scheduled for winter	GTS2: Near start of Gooandra trail
	
GTS3: Eucumbene River crossing – Gooandra trail	GTS4: No go zone – site of track-out incident from HDD in Spring 2022 (sign posted for monitoring – advised no impacts observed to date.
	
GTS5: covered stockpile	GTS6: Sump to capture spring water

**Site inspection Photos – Gooandra Trail Trunk Services — Saturday 15 July**



GTS7: Sediment fencing installed to capture surface water runoff



GTS8: Approaching Gooandra Creek – covered stockpile in foreground, road near crossing sheeted with DGB



GTS9: Gooandra Creek crossing – sheeted with DGB



GTS10: Groundwater bore site



GTS11: Sediment controls on track edge – controlling water from natural springs. Further sediment controls may be required in areas inundated with natural spring water.



GTS12: Sump installed on low side of track



**Site inspection Photos – Gooandra Trail Trunk Services — Saturday 15 July**



GTS13: Laydown area – adjacent to access track BH3108



GTS14: Natural water ponding – (recent heavy rains) one of the reasons the trail is closed for winter



GTS15: Tantangara Creek crossing – high flowing water



GTS16: Tantangara Creek – Gabion baskets installed to limit scour on the creek banks, stabilised road verges with jute mesh, coir logs and sediment fencing



GTS17: Covered stockpiles and stabilised drilling pad area



GTS18: Gooandra Trail site exit near Snowy Mountains Highway – required to pass through wheel wash (sign installed behind the vehicle)



**Site inspection Photos – Gooandra Trail Trunk Services — Saturday 15 July**



GTS19: Rehabilitated access track adjacent to Snowy Mountains Highway (part of HDD works package)

#### 4.2.7. Site Inspection Photographs – Remote / rehabilitation / bore sites

##### Site inspection Photos – Remote / rehabilitation bore sites — Sunday 16 July



Site 1: Link Road approximately 600 m from Ravine Road turnoff. Rehabilitation area pullover bay opposite TBM turn-around, Straw bales placed to delineate / exclude vehicles – seeded with approved native seed mix, straw mulch and thatch on top



Site 2: Link Road – Powerline Hill – rehabilitation of roadside verge near the NPWS / Transgrid trail. Involved replanting, seeding, topsoil, ripping, thatching, straw mulch and logs placed to prevent vehicles entering the area.



Site 3. Three Mile Dam turn-off. Observed that gate was closed for winter (previous issues relating to parking by project vehicles)



**Site inspection Photos – Remote / rehabilitation bore sites — Sunday 16 July**



Site 4: Snowy Mountains Highway – Coppermine Laydown area opposite Bullocks Hill fire trail



Site 4 cont'd: Coppermine trail was the initial access point to Marica site. Now gated with No Entry sign. Wheel wash was previously located near the gate. Photo on right – rehabilitation of the trail verges



Site 5: Site of 3 water bores including a vibrating wire piezometer (VWP). A weed control program is in place for all bore pads and access tracks – sprayed once to twice yearly using hand spraying techniques and selective weed spray.



**Site inspection Photos – Remote / rehabilitation bore sites — Sunday 16 July**



Site 6 – Mobile safety project and bore hole site. Located between Coppermine laydown and Long Plain Road. Site is generally maintained by the NSW government. Evidence of weed spraying behind the compound.



Site 7 – Three Mile Creek MB02 borehole site



## 5.0 Appendix A – Previous Audit follow-up table

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
34.	Sch 4 Cond 11  EMS Section 8.5	<p>The Proponent must implement any approved audit action plan for the development.</p> <p>Where a non-conformance has been identified, a corrective action /preventative action will be developed and implemented to minimise the potential for recurrence. In the event of a non-conformance the following will occur:</p> <ul style="list-style-type: none"> <li>– the nature of the event will be investigated;</li> <li>– advice may be sought from a specialist;</li> <li>– monitoring may be undertaken;</li> <li>– the effectiveness or need for new/additional</li> </ul>	<p>The internal FGJV corrective action process is not effective to adequately address and satisfactorily close non-compliances and observations raised in the Independent Environmental Audits.</p> <p>Limited evidence could be provided to demonstrate that the processes described within the EMS were implemented to address and prevent recurrence of non-compliances and observations raised in the last two audits.</p> <p>The follow-up of previous findings found that a significant number had not been</p>	<p><b>Agreed Actions (FGJV):</b></p> <p>The Auditor has developed an Audit Action Plan spreadsheet for use by FGJV to respond to audit actions.</p> <ul style="list-style-type: none"> <li>– Use the Audit Action Plan to document all corrective actions taken to address the IEA findings. FGJV may enhance / improve the Plan to include investigation and other preventive action elements where appropriate.</li> <li>– Submit the latest version of the Audit Action Plan to SHL that will be provided to DPIE;</li> <li>– Keep the Audit Action Plan up to date (minimum of</li> </ul>	NC 1	<p>Whilst a number of previous audit items have been re-raised at this audit, the process for responding to findings was substantially improved.</p> <p>The Audit Action Plan was generally well utilised and provided structure for addressing the previous findings. The Audit Action Plan was also appropriately used as a tool to report progress to DPE, and to facilitate better communications on progress between Snowy Hydro and FGJV.</p> <p>Considering the above, this non-compliance is closed.</p>	Closed

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
		<p>controls will be reviewed;</p> <ul style="list-style-type: none"> <li>– an appropriate preventative and corrective action will be implemented;</li> <li>– environmental documentation will be reviewed and revised; and</li> <li>– the activities may be stopped, if necessary, by the Future Generation Environmental Manager in consultation with the Project Director and Project HSE Manager.</li> </ul> <p>Corrective/preventative actions will be entered into Future Generation's quality system database and include details of the issue raised, the action required, and timing and responsibilities. The close out details</p>	<p>adequately addressed. Fourteen (14) non-compliances (NC), four (4) Observations (OBS) and two (2) Opportunities for Improvement (OFI) were raised at the previous audit. Of those, eight (8) NCs and three (3) OBSs remain open and require further action to complete and close out</p> <p>A review of the SHL Aconex corrective actions export document found that most issues raised at the last audit were still in open status (16) or "ready to inspect" (5 – partially addressed but not closed / verified). One finding had been formally closed.</p>	<p>monthly review), providing commentary on actions taken to date. To be reviewed at SHL monthly compliance meetings;</p> <ul style="list-style-type: none"> <li>– <b>Participate in a follow-up audit by SHL</b>, providing evidence of audit actions completed to date within 6 months of commencement of IEA#3</li> </ul> <p><b>Responsibility:</b> FGJV</p> <p><b>Agreed Action (SHL)</b></p> <ul style="list-style-type: none"> <li>– Use the Audit Action Plan to document SHL progress'</li> <li>– Monitor FGJV progress on addressing IEA findings at least monthly through monthly</li> </ul>			

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
		shall include the date closed and the name of the person verifying completion of the required action.	The majority of actions assigned to FGJV have not been closed. Refer to the Follow-up of Audit Findings Table for full details of the status of non-compliances and other findings.	<p>compliance meetings</p> <ul style="list-style-type: none"> <li>Undertake an internal follow-up audit on FGJV progress against agreed actions within 6 months of commencement of IEA#3 (by 30 July 2022).</li> </ul> <p><b>Responsibility:</b> SHL</p>			
35.	Sch 4 Cond 6  EPL 21266 R2.2	<p>The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.</p> <p><b>R.2.2: The licensee</b> must provide written details of the notification to the EPA <b>within 7 days</b> of the date on which the incident occurred.</p>	<p><b>Incident Reporting / Notification to Authorities</b></p> <p>Adequate evidence was not provided to demonstrate that all incidents are reported to the appropriate authority with required timeframes.</p> <p>Evidence was not provided to demonstrate that an incident notified verbally to EPA on</p>	<p><b>Agreed Actions:</b></p> <ul style="list-style-type: none"> <li>Ensure all incidents triggered by this condition are reported to DPIE and NPWS in addition to the EPA within the required time frames</li> <li>Review and update the Environmental Incident and Event Register to <ul style="list-style-type: none"> <li>include an area to record which agency</li> </ul> </li> </ul>	NC 2	<p><b>July 2023 Update:</b> The visibility of notification of Incidents to authorities remained as issue. Responsibility for reporting incidents has reverted to SHL. Re-raised as NC in July 2023 findings table.</p> <p>However, it was noted that the notification of overtopping events to NPWS is significantly improved with an addition of an “overtopping” tab in the Events and Incident Register.</p> <p><b>Jan 2022 update:</b> FGJV are now undertaking the notification process to all agencies (EPA, DPIE, NPWS).</p>	Transferred to current 2023 audit findings



No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
		<p><i>Note: The definition of an incident for reporting to EPA and under Condition 6 are similar (both referring to “causes or threatens to cause material harm”), and therefore, notifications of incidents are required for both agencies.</i></p>	<p>22/12/2021 was also notified to DPIE and NPWS (INC 1140 level spreader - ECVT Lobs Hole).</p> <p>The incident notified verbally to EPA on 22/12/2021 was not followed up with a written report within the 7 day timeframe (reported 30/01/2022)</p> <p>The reporting and notification information in the FGJV Environmental Incident and Event Register is not always consistent with the information included in the Incident Reports. The Register recorded that the incident did not cause or threaten material harm, however it was notified to EPA under the Cond R2.1 – “</p>	<p>was notified and when.</p> <ul style="list-style-type: none"> <li>○ Include date each agency was notified;</li> <li>○ Provide more detail regarding nature of the incident</li> </ul> <p><b>Responsibility: FGJV</b></p>		<p>Various incident reports recorded on the “External Agency Incident Notification Form” (form0013 – (DPIE) and 0014 – (EPA) were sighted (INC 898, 1058, 1140</p> <p>Whilst reporting has improved, it could not be demonstrated that all incidents involving overtopping of basins were reported to DPIE.</p>	

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
			...must notify EPA of environmental harm ..."				
36.	Sch 4 Cond 7	<p>Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department via the Major Projects portal of the non-compliance.</p> <p>This notice must set out the non-compliance, the reasons for the non-compliance (if known) and what actions have been taken, or will be taken, to address the non-compliance.</p>	<p>A review of FGJV incident reports raised since the last audit found that some of the incidents were noted as non-compliant to the approval conditions however evidence was not provided that these were notified to DPIE.</p> <p>Note: this NC has been re-raised from previous IEA non-compliance. Examples sighted included: INC 1166 relating to process water release and INC 911 relating to procedural breach to Biodiversity Plan – clearing without ecologist on site. The monthly reports sighted also included a section noting non-</p>	<p><b>Agreed Actions:</b></p> <ul style="list-style-type: none"> <li>– Review and update the Environmental Incident and Event Register to include notification of non-compliances</li> <li>– Ensure all non-compliances triggered by this condition are reported to DPIE through the Major Project Portal, records are kept and notification is recorded in the Environmental Incident and Event Register.</li> </ul> <p><b>Responsibility:</b> FGJV / SHL</p>	NC 3	<p><b>July 2023 Update:</b> The visibility of notification of non-compliances to authorities remained as issue. Re-raised as NC in July 2023 findings table.</p> <p><b>Jan 2022 Update:</b> <b>Part 1:</b> Post approval Form SSI-9687-PA-37 and related email from <a href="mailto:reply@majorprojects.planning.nsw.gov.au">no-reply@majorprojects.planning.nsw.gov.au</a> acknowledging receipt of the 6 monthly IEA Report, 6 monthly IEA and compliance letter and 6 monthly IEA non-compliance summary (Audit response and Action Plan) sighted. <b>This component (Part 1) of the NC is closed</b></p> <p><b>Part 2:</b> Further examples of non-compliances not being notified to DPIE were noted during Audit #3 (raised as new non-compliance)</p>	Transferred to current 2023 audit findings

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
			compliance to approval conditions.				
37.	Sch 3 Cond 2	Within 6 months of the commencement of construction, the Proponent must prepare a Digital Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: (a) be prepared in consultation with the NPWS; (b) identify innovative ways to give effect to the requirements in condition 1 above; and (c) include a program to develop a digital application for users of the Kosciuszko National Park to bring key information to life in an interactive way and enhance the enjoyment of the park.	Whilst a Digital Strategy has been prepared, the Strategy had not been prepared within the required 6-month time frame.  At Audit #3, it was noted that the Digital Strategy was submitted by Snowy Hydro to DPIE on 4 June 2021 requesting endorsement of the Planning Secretary to submit this plan on a staged basis.  On 15 Nov 2021, an extension was received from DPE until April 2022 for management plans including the Digital Strategy	<b>New Agreed Actions (Audit #4):</b>  – Continue to consult with DPE and NPWS on the staging and completion of the Digital Strategy;	07/21/ NC 3	Snowy Hydro has been providing weekly updates to DPE regarding the submission of all outstanding Management Plans.  The latest update (5 July 2023) noted that <i>"The draft plan is almost complete and will be provided to NPWS for review within the next week. SHL is organising a time to meet with NPWS to present this plan. As noted last week, the submission date may be at risk depending on the level of revision required for the plan post consultation".</i>  This NC therefore remains open.	Transferred to current 2023 audit findings.
38.	Sch 4 Cond 8	The Proponent must provide regular reporting on the	At the time of the audit, the following reports relating to	<b>Agreed Actions:</b>	NC 4 2022	Quarterly Environmental Water Reports have now been prepared and uploaded to the website. <b>(Closed)</b>	<b>Closed</b>



No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
	Sch 4 Cond 12 (a) and (b)	<p>environmental performance of the development on its website in accordance with the requirements in any approved strategies, plans or programs.</p> <p>From the commencement of the development of the Main Works until the completion of the ecological rehabilitation of the areas used for operations, the Proponent must:</p> <p>a) make copies of the following information publicly available on its website:</p> <ul style="list-style-type: none"> <li>– a comprehensive summary of the monitoring results of the development, reported in accordance with the requirements in the conditions of this approval, or</li> </ul>	<p>environmental performance had not been completed or uploaded to the website:</p> <ul style="list-style-type: none"> <li>– The Quarterly Environmental Water Reports as required by the Water Management Plan (also non-complaint at previous audit);</li> <li>– The Quarterly Traffic Reports required by the Transport Management Plan (also non-complaint at previous audit);</li> <li>– A record of all incidents and non-compliances</li> </ul> <p>It was noted that the Annual Report required by the Biodiversity Management Plan</p>	<ul style="list-style-type: none"> <li>– Finalise Quarterly Environmental Water Reports;</li> <li>– Finalise Quarterly Traffic Reports;</li> <li>– Develop a register to record incidents and non-compliances suitable for upload to the website (summary documentation).</li> </ul> <p><b>Responsibility:</b> FGJV</p> <p><b>Actions:</b></p> <ul style="list-style-type: none"> <li>– Upload the documents to the project website once documents have been provided by FGJV</li> </ul> <p><b>Responsibility:</b> SHL</p>		<p>Quarterly Traffic Movement Reports have been prepared and are available on the website <b>(Closed)</b></p> <p>It was noted that the Quarterly Traffic Summary reports do not necessarily provide sufficient information to reflect the requirements of TMP Section 6.1 to monitor key parameters. A new Observation has been raised.</p> <p>A record of Incidents and Non-compliances have been uploaded to the website. <b>(Closed)</b> However, the Incidents and non-compliances table were not up to date.</p>	
	Sch 3 Cond 32						

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
	EPBC Cond 7	<p>any approved strategies, plans and programs</p> <ul style="list-style-type: none"> <li>– A record of all incidents and non-compliances</li> </ul> <p>a) make copies of the following information publicly available on its website:</p> <p>The Proponent must implement the approved Water Management Plan for the development.</p> <p>To minimise impacts on water resources, the approval holder must comply with conditions 30 - 32 of the NSW approval relating to water management.</p>	was in draft at the time of the audit (also refer to Observation regarding Annual Report)				
39.	Surface Water Mgmt Plan Surface Water Trigger Action	The Trigger Action Response Plan 2 – Stormwater Overtopping Event (TARP) requires that if controls are	NPWS were not notified of an overtopping event that occurred following significant rain at Marica on	<b>Agreed Actions:</b> i. All events resulting in an overtopping event to be reported to NPWS as per the	07/21/ NC 13	<b>July 2023 Update:</b>  – Notification to EPA, NPWS and SHL on 28/08/22 of overtopping event 30/07/22 (ongoing event)	<b>Closed</b>

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
	Response Plan (TARP)	overtopping (yes response) and water makes it to a receiving waterway (yes response), SHL, EPA and NPWS must be notified of the overtopping event.	(INC 0718 - 26/06/2021) or an overtopping event at the Main Yard (permanent Batch Plant Pad) with dirty water entering the Yarrangobilly River as required by the TARP (INC 575 – 23 March 2021 – reported to EPA)	<p>TARP going forward;</p> <p>ii. Notifications to be provided to Snowy Hydro prior to submission;</p> <p>iii. Communicate this requirement to all relevant Management and Staff</p> <p><b>SHL Proposed Actions</b></p> <p>iv. SHL propose to update TARP 2 to remove the requirement to notify NPWS of overtopping events that occur following rain events that exceed the approved design capacity of the basin. This would be subject to approval by DPIE / NPWS.</p>		<ul style="list-style-type: none"> <li>– Notification to EPA, NPWS, SHL 12/12/2022 – Overtopping event at Lobs Hole, Tantangara and Marica;</li> <li>– Notification to EPA, NPWS, SHL 25/02/23 (of overtopping event 30/01/2023 (delayed notification);</li> <li>– Notification to EPA, NPWS, SHL 27/03/2023 – overtopping event 24/03/2023 (Lobs Hole);</li> <li>– Notification to EPA, NPWS on 2/4/23 of overtopping event 24/03/23 - Marica</li> <li>– Notification to EPA, NPWS, SHL 18/04/2023 of overtopping event 16/04/23;</li> <li>– Notification to EPA, NPWS on 10/07/2023 of overtopping event on 03/06/2023 (Lobs Hole and Marica)</li> </ul>	



No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
				<b>Responsibility:</b> FGJV / Snowy Hydro  <b>Due Date (i – iii):</b> immediately, next time an overtopping event occurs, and ongoing  <b>Due Date (iv):</b> 1 October 2021, implementation - if approved by DPIE/NPWS – after approval received.			
40.	Transport Management Plan Sect 5.12	Traffic Incidents (within the site): <ul style="list-style-type: none"> <li>safety and environment related traffic incidents within the bounds of the project area will be managed in accordance with the EMS and the Health and Safety Management Plan and the associated incident and emergency</li> </ul>	Insufficient evidence could be provided to demonstrate that all traffic incidents that required notification were notified to the appropriate authorities. Relevant authorities include NPWS (within KNP), TfNSW and DPIE (dependent on location, type, severity etc).  Evidence was provided of a traffic	<b>Completed Actions:</b> <ul style="list-style-type: none"> <li>Develop a Traffic Incident Register;</li> <li>Meeting between NPWS, Transport NSW, FGJV and SHL was held on the 26/07/2021 to discuss incident reporting process and clarification on what is to be reported;</li> <li>Since this meeting, at least one incident had been reported to</li> </ul>	07/21/ NC 14	<b>Update July 2023:</b> A new Traffic Incident Register has been developed to include the required fields. A column was also added to reference whether an incident report was also raised. The register is significantly improved since the previous audit, and captures key information including. <ul style="list-style-type: none"> <li>Location of incident</li> <li>Date and time of initial notification;</li> <li>Risk rating for potential and actual consequence;</li> <li>Reported to (NPWS, TfNSW, Police, Ambulance, Fire);</li> <li>Breach of requirements?;</li> </ul>	<b>July 2023 - Closed</b>  Remained open Feb 2022  Raised July 2021

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		<p>reporting procedures;</p> <ul style="list-style-type: none"> <li>depending on the type and severity of the incident this may include notification to the Department in writing for incidents defined under the Approval, notification to the NPWS where required under the Deed of Agreement of Lease and notification to the EPA for pollution related incidents.</li> </ul> <p>Traffic Incidents (external to the project site): In the event of a traffic incident external to the project site, but within project roads as described in Table 3-1, relevant road authorities and emergency services will be notified.</p>	<p>incident register being maintained; however, the first entries were dated July 2021.</p> <p><i>It appears that there have been varying interpretations of the requirements to notify of traffic related incidents between the different parties (Proponent / Contractors and the Authorities). This may have resulted in some traffic related incidents not being appropriately notified.</i></p>	<p>NPWS using the hotline number;</p> <ul style="list-style-type: none"> <li>Daily transport meetings initiated in July 2021 - includes discussion on incidents in past 24-hour period.</li> </ul> <p><b>Agreed Actions:</b></p> <ul style="list-style-type: none"> <li>Formalise and implement the processes agreed with NPWS and TfNSW for reporting traffic related incidents once effectiveness has been established;</li> <li>Ensure all incidents are notified as determined by agreed process;</li> </ul> <p><b>Responsibility:</b> FGJV / SHL <b>Due Date:</b> 1 November 2021</p>		<ul style="list-style-type: none"> <li>Subcontractor involved;</li> <li>Cause environmental harm?</li> <li>Comments – description of what occurred.</li> </ul> <p><b>Update Feb 2022:</b> A Traffic Incident Register had been developed and maintained, however the information captured is sparse and does not provide confidence that all relevant traffic incidents have been notified.</p> <p>Some email notifications to NPWS were sighted:</p> <ul style="list-style-type: none"> <li>08/11/2021 - Link Road - roll of conveyor belting fell off truck</li> </ul>	

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		If a traffic incident were to occur external to project roads defined in Table 3-1, TfNSW and / or the relevant road authority will be notified.		<b>Agreed Actions:</b> <ul style="list-style-type: none"> <li>– Maintain Traffic Incident Register, ensuring all relevant details are logged, and communicated to SHL.</li> </ul> <b>Responsibility:</b> FGJV <b>Due Date:</b> - ongoing			
41.	Schedule 3, Cond 30 (p)	<b>30 (p):</b> store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards”	<b>Chemicals Management</b> A non-compliance was raised at Audit #1 regarding the inadequate / inappropriate storage of liquid substances. Whilst the specific issues raised in Audit #1 were mostly addressed and closed out, further issues were identified regarding storage of chemicals and hydrocarbon products and is re-raised at this audit.	<b>Agreed Actions:</b> <ol style="list-style-type: none"> <li>1. Immediately remove the acid from the bunded area in which the Sodium Hypochlorite is stored;</li> <li>2. Undertake a review of the compatibility of all chemicals stored in bunded storage areas, with particular attention to those that have bulk quantities of Class 8 chemicals (also</li> </ol>	07/21/ NC 4	<b>Update July 2023</b> The same issues were identified during the 2023 audit at various sites. The site visit in the 2022 audit found that acid was still stored in the same bunded area with the sodium hypochlorite at Lobs Hole (among other issues) Action remained open at the 2021 audit with storage compatibility still remaining as an issue.	Transferred to current 2023 audit findings.

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				<p>recommended in EMM Hazardous Chemicals Audit in March 2021)</p> <p>3. Review storage of all Class 2 flammable gas storage across the project and ensure only compatible items are stored together;</p> <p>4. Review all SDSs held on site and ensure they were issued less than 5 years ago as per regulations.</p> <p>5. Review the internal chemical handling and storage program audit and inspection program and make any necessary changes;</p> <p><b>Responsibility:</b> FGJV</p>			



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				<b>Due Date:</b> 21 September 2021			
42.	Sch 3 Cond 41 Table 5-1	The Proponent must carry out the road and intersection upgrades in Tables 5-1 and 5-2 in Appendix 5 in accordance with any specified timeframes to the satisfaction of the relevant roads authority.	NPWS is the relevant roads authority for the works listed in Table 5-1. Evidence could not be provided to demonstrate that all the roads and intersection upgrades listed in Table 5-1 had been carried out in accordance with specified timeframes to the satisfaction of the relevant roads authority. The following upgrades had been either completed or had been partially completed:  <ul style="list-style-type: none"> <li>– Link Road (spring 2020)</li> <li>– Mines Trail Road;</li> </ul>	<b>Agreed Actions:</b> <ul style="list-style-type: none"> <li>– SHL to continue to work with NPWS to determine an acceptable sign-off mechanism; (However SHL believes that mechanisms are in place to record where there is disagreement in the design)</li> <li>– Ensure all outstanding upgrades are appropriately undertaken to the satisfaction of the relevant roads authority (NPWS)</li> </ul> <b>Actions Taken (July 2023):</b> A Roads Working Group has been established to discuss		<b>Follow-up comments Audit #4:</b> Whilst this issue had not yet been fully resolved, a Roads Working Group has been established to discuss ongoing NPWS road related issues. This NC is not re-raised at Audit #4, however remains as an “open NC” from previous audits, and it appears that the current process will be implemented over a longer-term period, and may not be able to be “closed”. Progress will be followed up at each subsequent audit.  <b>Follow-up comments Audit #3:</b> A Show Cause letter from DPIE dated 3 November 2021, alleging a breach of section 4.2(1)(b) of the EP&A Act was issued to SHL on as a result of this non-compliance. The letter provided SHL with an opportunity to make representations as to why the Department should not take formal enforcement action by COB 19 November 2021.  SHL responded to the above in a letter dated 19 November 2021 with a	<b>Remains open (NOT re-raised at Audit #4)</b>

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			<ul style="list-style-type: none"> <li>– Lobs Hole Ravine Road North</li> <li>– Marica Trail and Marica Trail West</li> <li>– Tantangara Camp Road</li> </ul> <p>It was noted that there had been no mutually acceptable sign-off mechanism at the time of the audit.</p>	<p>ongoing NPWS road related issues</p> <p><b>Responsibility:</b> Snowy Hydro</p>		detailed response (442-page document comprising an 11-page letter with various annexures). The letter concluded that “SHL submits that the facts and circumstances of the matter as set out in detail in this response, indicate that the only appropriate action would be informal action to note and support the actions that SHL is already taking to implement the Agreed Actions and the commitments it has made going forward as detailed above”. Evidence was provided that consultation with NPWS has been conducted and is ongoing	
43.	Part B Annexure A EPBC Cond 33	<p><b>Annual compliance reporting</b></p> <p>The approval holder must prepare a compliance report for each 12-month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p>	An EPBC Annual Compliance Report had not been prepared or published on the website within the required timeframe of this condition.	<p><b>Agreed Actions:</b></p> <ul style="list-style-type: none"> <li>– Prepare and submit the EPBC Annual Compliance Report as required by this condition;</li> </ul> <p><b>Responsibility:</b> SHL</p>	NC 5	<p>EPBC Compliance Report August 2020 to August 2021 and EPBC Compliance Report August 2021 to August 2022 had been prepared and were on the website.</p> <p>The next Compliance Report for 2022 – 2023 was not yet triggered.</p>	Closed

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		a. publish each compliance report on the website within 60 business days following the relevant 12 month period.					
44.	EPL 21266  POEO Act Sect 66(6)	<p><u>Protection of the Environment Operations Act 1997 Section 66(6)</u> Publication of results of monitoring. The holder of a licence subject to a condition referred to in subsection (1) (a) must, within 14 days of obtaining monitoring data as referred to in that subsection.</p> <p><u>Subsection (1) (a)</u> (1) Monitoring The conditions of a licence may require -- (a) monitoring by the holder of the licence of the activity or work authorised, required or controlled by the</p>	<p>The water quality and volume monitoring data reports had not been uploaded to the project website within the required 14 day timeframe.</p> <p>At the time of the audit, the latest monitoring data on the Snowy Hydro website was for August 2021 and was significantly overdue.</p>	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>– Upload all outstanding EPL monitoring results to the website;</li> <li>– Ensure required summary data is uploaded within the required timeframes for the balance of the project.</li> <li>– Report as a non-compliance in the next EPL Annual Return.</li> </ul> <p><b>Responsibility:</b> SHL</p>	NC 6	EPL Monitoring reports had been uploaded to the website – current reports were to Feb 2023. Mar to May Report was under review following EPA comments to add further graphs and information.	Closed

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		<p>licence, including with respect to--</p> <p>(i) the operation or maintenance of premises or plant, and</p> <p>(ii) discharges from premises, and</p> <p>(iii) relevant ambient conditions prevailing on or outside premises, and</p> <p>(iv) anything required by the conditions of the licence</p> <p>EPA publication: <u>Requirements for publishing pollution monitoring data – Section 2:</u></p> <p>The specific requirements for providing monitoring results are set out in section 66(6) of the POEO Act. In summary, this provision requires that:</p> <ul style="list-style-type: none"> <li>– licensees who undertake monitoring as a result of a licence</li> </ul>					



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		<p>condition must publish or make available pollution monitoring data within 14 days of obtaining the data and/or receiving a specific request for a copy of the data</p> <ul style="list-style-type: none"> <li>– licensees who maintain a website must make the monitoring data related to pollution available in a prominent position on their website.</li> </ul>					
45.	<p>Sch 3 Cond 19</p> <p>EPBC Cond 8</p> <p>BMP App F 5.1.2.1</p> <p>Table 2-3 BMP</p>	<p>At minimum, a twice-annual weed control program will take place throughout the construction of the project. This will generally involve a spring and summer round of weed spraying, the timing of which will be adapted each season to maximise efficacy by targeting the most</p>	<p>The spring 2021 (due Nov 2021) weed spraying program had not been undertaken.</p> <p>It was noted during the site inspection that weed control is required at various locations across the project.</p>	<p><b>Actions Taken:</b></p> <ul style="list-style-type: none"> <li>– A Weed Management Program has been provided by Narla (following issues with the engagement of a different supplier), and this is in the process of being implemented</li> </ul>	NC 7	<p>Evidence was provided in a Weed Spraying Memorandum (not dated, however embedded maps were dated 7/06/2023) noting that weed spraying was conducted from 29 Dec 2022 to 23 Feb 2023 in Tantangara, Gooandra Trail, Marica, Rock Forest, Lobs Hole, Lobs Hole Ravine Road and Rock Forest.</p> <p>The Memorandum notes that the weed spraying works were scheduled in accordance with priority areas, species, and weather conditions, and targeted 6</p>	Closed

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		appropriate life stage of the target species.	It was also noted that a non-compliance was issued by Snowy Hydro to FGJV January 2022 in regards to weeds control and management.	<b>Agreed Actions:</b> <ul style="list-style-type: none"> <li>– Implement the weed management program;</li> <li>– Ensure that all future spraying programs are implemented in accordance with the requirements of the BMP.</li> </ul> <b>Responsibility:</b> FGJV		key weed species including Nodding thistle, St Johns Wort, Scotch Thistle, Sweet Briar, Blackberry and Ox-eye daisy.  It was noted that the spraying did not occur until 29 December 2022 (missing the spring season / November spraying), however heavy rain during Nov and Dec 2022 prevented spraying from occurring (would be ineffective and potentially cause water pollution)	
46.	Sch 3 Cond 24  EPBC Cond 12	Management Plans issues within required timeframes (various):  Within 12 months of the commencement of construction, the Proponent must prepare a Threatened Fish Management Plan for the development to the satisfaction of the	The following Management Plans had not been prepared or submitted to the relevant agencies (Director General of the NSW DPI, the NSW Planning Secretary or to the Commonwealth (DAWE) within the nominated time frames:  – Threatened Fish MP (Relevant	<b>Agreed Actions:</b> <ul style="list-style-type: none"> <li>– Submit the relevant plans to DPIE by April 2022</li> <li>– Submit relevant plans to DPI by April 2022</li> <li>– Submit relevant plans to DAWE by April 2022</li> </ul>	NC 8	These plans have still not submitted / approved.	Transferred to current 2023 audit findings.

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	Sch 3 Cond 54	Director-General of NSW DPI  EPBC – To minimise impacts to the aquatic environment, the approval holder must comply with Cond 20-25 of the NSW Approval	agencies: NSW DPI and Commonwealth Department of Agriculture, Water and the Environment - DAWE)				
	Sch 3 Cond 39	Within 12 months of the commencement of construction, the Proponent must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary.  Within 12 months of the commencement of construction, the Proponent must prepare a Recreation Management Plan for the development to the satisfaction of the Planning Secretary.	<ul style="list-style-type: none"> <li>– Visual Impact Management Plan (Relevant agency: NSW Planning Secretary - DPIE)</li> <li>– Recreation MP (Relevant agency: NSW Planning Secretary - DPIE)</li> </ul>				

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			<p>It is noted that an extension of time was requested by SHL to DPI and DPIE for submission of these Plans. A letter from DPIE dated 6/12/2021 noted that SHL has been liaising with the relevant agencies to progress these with a schedule to have them submitted by April 2022.</p> <p>DPIE assessed these non-compliances and determined that the breaches will be recorded in their system.</p> <p>It was noted that DPI endorsed the requested extension, noting that a delay of the submission of the Threatened Fish Management Plan would not increase</p>				



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			the risk to the aquatic environment.				
47.	EPBC Part B Annexure A Cond 31a.	The approval holder must: a) submit plans required by conditions 18, 22 and 24 of the NSW approval and conditions 18 and 22 of this approval for consultation purposes, electronically to the Department;	The Threatened Fish MP NSW Cond 24 had not been submitted within the 12 months from construction commencement timeframe as required. Whilst the NSW Department of Primary Industry (DPI) endorsed a request to extend the timeframe for submission, DPIE determined that the late submission of the Threatened Fish MP be recorded as a breach, and is therefore determined as non-compliant to this condition.	<b>Agreed Action</b> <ul style="list-style-type: none"> <li>Submit the Threatened Fish Management Plan to DPIE, DPI and DAWE by April 2022</li> </ul> <b>Responsibility: SHL</b>	NC 9	The Threatened Fish Management Plan has not yet been submitted / approved. Re-raised in current findings	Transferred to current 2023 audit findings.

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48.	Sch 2 Cond 8 Sch 2 Cond 9	<p><b>Surrender of Approval</b> Within 6 months of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must surrender the infrastructure approval (CSSI 9208) for the Exploratory Works in accordance with Clause 197 of the EP&amp;A Regulation.</p> <p>Prior to surrendering the infrastructure approval (CSSI 9208) for the Exploratory Works, the Proponent must update the approved management plans for the development to incorporate the approved management plans for the Exploratory Works to the satisfaction of the Planning Secretary.</p>	<p>At the time of the audit, the Exploratory Works Approval had not yet been surrendered.</p> <p>It was noted that a surrender request was made in August 2021, however correspondence between DPIE and NPWS indicate that the Exploratory Works approval cannot be surrendered until the Main Works Worker Recreation Management Plan has been approved. (refer to NC 5)</p> <p>At the time of the audit, the issue was still under consideration by DPIE and NPWS and had not been resolved.</p>	<p><b>Agreed Action</b></p> <p>Once the Main Works Recreation Management Plan has been approved a prerequisite for surrender), surrender the Exploratory Works Approval</p> <p><b>Responsibility:</b> SHL</p>	NC 10	Surrender of approval has still not occurred	Transferred to current 2023 audit findings

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49.	NHMP S 7.3	This Natural Hazards Management Plan (NHMP) will be provided for comment annually to Local Emergency Management Committees, NSWRFs, NSWSES and NPWS. Following natural hazard emergencies, where necessary lessons learnt will be incorporated into this plan.	The NHMP had not yet been provided in the 12 months since construction commencement for comment to Local Emergency Management Committees, NSWRFs, NSWSES and NPWS.	<b>Agreed Actions:</b> <ul style="list-style-type: none"> <li>– Provide the Natural Hazards Management Plan to the relevant agencies for comment;</li> <li>– Facilitate discussions and review to ensure appropriateness and currency of the Plan</li> <li>– Update the NHMP as necessary following receipt of comments from the agencies.</li> </ul> <b>Responsibility:</b> FGJV	NC 11	<b>Update July 2023:</b> Evidence was sighted of consultation with NPWS and the provision of the NHMP for review. NPWS sought and obtained feedback from the two Local Emergency Management Committees and Rural Fire Service Districts in relation to the revised Natural Hazard Management Plan. NPWS also reviewed the NHMP with regards to previous comments register and agency feedback. (Jan 2023). Comments register and NHMP with comments sighted.  Latest version of NHMP - Rev F Nov 2022 (not yet approved).	Closed
50.	Sch 3, Cond 52 (a) and (b)	Excluding the spoil generated by the development, the Proponent must: a) minimise the waste generated by the development; b) maximise the reuse and recycling of any waste;	a) Bottled water is provided extensively across the project, with minimal provision of potable water for drinking (or refilling own containers). This does not meet the requirement to	<b>Agreed Actions:</b> <ul style="list-style-type: none"> <li>– Provide potable water for drinking and positively encourage workers to refill their own containers;</li> </ul>	NC 12	Bottled water still extensively used – re-raised as observation as there has been significant improvement in diversion of waste from landfill	Closed, re-raised as OBS July 2023

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			<p>"minimise waste generated by the development". It is acknowledged that bottles are sent to recycling (return and earn), however this is not minimisation of waste generation.</p> <p>b) The FGJV Waste Tracking Register shows all waste from Lobs Hole (including recycling stream) goes to landfill). This does not meet b) - "maximise the reuse and recycling of any waste".</p>	<ul style="list-style-type: none"> <li>– FGJV could consider providing reusable vessels to workers (among other things);</li> <li>– For other waste streams (other than plastic bottles), provide segregation facilities and send to recycle facilities rather than landfill.</li> </ul>			
51.	EPBC Part A Cond 7	The approval holder must notify the Department in writing within 10 business days of making a biodiversity offset payment to the NSW National Parks and Wildlife Service. Each notification must state the date of	The latest biodiversity offset payment was paid on 22/10/2021 to the NSW government and was notified to them. However, evidence could not be provided to demonstrate that Snowy Hydro had	<p><b>Agreed Actions:</b></p> <ul style="list-style-type: none"> <li>– Ensure all future biodiversity payments are notified in writing to the designated contact to DAWE within the required timeframes and records retained.</li> </ul>	NC 13	Notification was provided to <a href="mailto:EPBCMonitoring@awe.gov.au">EPBCMonitoring@awe.gov.au</a> on 25 October 2022 along with the submission of the 2021-2022 Annual Compliance Report. Acknowledgement of receipt was provided on 26 October 2022. The notification was within the 10-day timeframe (payment made 22 October 2022)	<b>Closed</b>



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		payment and the amount paid.	also notified the (Commonwealth) Department within 10 business days of making a biodiversity offset payment.				
52.	EPL 20266 Cond R4.2 and R4.3	<p>The licensee must submit an Environmental Monitoring Report every six (6) months to the EPA, unless otherwise agreed in writing by the EPA.</p> <p>The Environmental Monitoring Report must be prepared by a suitably qualified and experienced person and include, but not be limited to:</p> <p>a) results of all water quality monitoring undertaken in the preceding six (6) month period;</p> <p>b) results of all-weather monitoring undertaken in the preceding six (6) month period;</p>	A 6-monthly Environmental Monitoring Report was not yet been prepared or submitted to the EPA.	<p><b>Agreed Actions</b></p> <ul style="list-style-type: none"> <li>– Prepare and submit the overdue 6 monthly report to the EPA in accordance with these conditions;</li> <li>– Ensure the 6 monthly reports are prepared on an ongoing basis;</li> <li>– Report this as a non-compliance in the annual return;</li> <li>– Publish the Environmental Monitoring Report on the website in accordance with Sect 66 (6) of the POEO Act.</li> </ul> <p><b>Responsibility:</b> FGJV</p>	NC 14	6 monthly Environmental Monitoring Reports are now prepared and are on the Project Website	<b>Closed</b>

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		c) assessment of historical trends in all water sampling data for each monitoring point inclusive of the current six (6) month period; d) identification of instances where the water quality objective triggers for each relevant pollutant were exceeded at receiving water locations and/or where the predicted discharge water quality was exceeded at sediment basin discharge points; e) include details of any actions taken by the Licensee in response to exceedances identified under point (d), including but not limited to: i. additional monitoring; ii. remedial actions and: iii. activation of trigger, action, response plans (TARPs);					

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		f) recommendations for future actions in relation to monitoring and/or management.					
53.	EPL 21266 Cond M3.2, M3.1	<p>M3.1 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area <b>must be done in accordance with the Approved Methods Publication</b> unless another method has been approved by the EPA in writing before any tests are conducted.</p> <p>M3.2 Condition M3.1 also applies to the monitoring of any points identified in Condition M2.2</p>	<p>The monitoring for the concentration of pollutants in monitoring points identified in condition M2.2 has not been conducted in accordance with the approved methods publication.</p> <p>Evidence of express provision to use in-house methods are not included in the current Environment Protection Licence.</p>	<p><b>Agreed Actions</b></p> <p>Either:</p> <ul style="list-style-type: none"> <li>– Ensure that the laboratory (Eurofins) uses the EPA approved publication for monitoring the concentration of pollutants <b>OR</b></li> <li>– Seek approval for the use of in-house methods.</li> </ul> <p><b>Responsibility:</b> FGJV</p>	NC 15	<p>Email dated 20 May 2022 from Dr Bob Symonds from Eurofins Environment Testing Australia and New Zealand stating" <i>I can confirm that we are ISO/IEC 17025: 2017 accredited by NATA in both our Girraween and Dandenong South facilities for the tests in the aforementioned document (NSW EPA 2022 <a href="#">Approved methods for the sampling and analysis of water pollutants in NSW</a>) and also for analyses conducted as part of our works with Future Generation Joint Venture</i>".</p> <p>This non-compliance is now closed.</p>	Closed
54.	Sch 3 Cond 19	a) An annual report will be prepared to report on the variety of biodiversity matters	At the time of the audit, the Annual Report (biodiversity) was being drafted by	<p><b>Agreed Actions:</b></p> <ul style="list-style-type: none"> <li>– Revise the Draft Annual Report to</li> </ul>	OBS 1	Annual Reports for Year 1 or Year 2 addressing the biodiversity matters listed in Section 6.5 of the Biodiversity	Escalated to NC and transferred to current

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	Biodiversity Management Plan S 6.5	<p>addressed in this plan. This report, which will be made available to NPWS, DAWE and BCD, will include the following matters:</p> <ul style="list-style-type: none"> <li>i. summary of weed and vertebrate pest control activities undertaken since last report (as detailed in Appendix F);</li> <li>ii. account of all clearing activities including tracking against clearing limits and threatened species habitat limits;</li> <li>iii. post-clearing ecology reports since last report (as detailed in Appendix C);</li> <li>iv. results of threatened species, groundwater-dependant ecosystem, weed and pest</li> </ul>	<p>consultants EMM and had not been finalised and made available to NPWS, DAWE or BCD.</p> <p>A draft report was provided to the auditor for review on 15 Feb 2022. The report covered the monitoring period of October 2020 (project commencement) to October 2021 (End of year 1 monitoring)</p> <p>A review of the draft report found that only item iv. had been addressed, and the following matters were not included in the report:</p> <p>Items i. ii, iii, v, vi, vii.</p> <p><b>Note 1:</b> No timeframe for the issue of the Annual Report is included in</p>	<p>include details on items i. ii, iii, v, vi, vii. This would involve input from FGJV;</p> <ul style="list-style-type: none"> <li>– Once finalised, make the Annual Report available to NPWS, DAWE and BCD;</li> <li>– Upload the Annual Report to the project website as required by Sch 4 Cond 8;</li> </ul> <p><b>Responsibility:</b> - SHL</p> <ul style="list-style-type: none"> <li>– Review the Biodiversity Management Plan (BMP) to ensure it includes relevant information for project phases;</li> <li>– Update the BMP with changes from the review above including providing a more specific timeframe for issue of the</li> </ul>		<p>Management Plan had not yet been completed / undertaken.</p> <p>The EMM Reports were issued under separate conditions / requirements and did not include the requirements under S 6.5 of the Biodiversity Management Plan. A separate report to address these requirements is being drafted by FGJV however has not been significantly progressed.</p> <p>Escalated to NC in current findings table.</p>	2023 audit findings.



No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
		v. monitoring (as detailed in Appendix B); account of fauna strike mitigation strategy management actions (as detailed in Appendix G); vi. account of any relevant incidents and non-compliances; and vii. efficacy of the implemented biodiversity management measures against the performance measures included in section 6.5.1 of this plan.	<i>the Biodiversity Management Plan (see recommendation)</i>  <b>Note 2:</b> <i>This finding has been issued as an OBS as the Annual Report was in draft at the time of the audit. If the Annual Report were to be issued in its current form, it would be non-compliant with this requirement.</i>	Annual Report. A three (3) month timeframe from the end of the monitoring period would be appropriate; – Update the BMP with the recommendations contained within the Annual Report.  <b>Responsibility:</b> FGJV			
55.	Sch 3 Cond 8  Spoil Management Plan Topsoil Strategy App B Pages 96, 97	<b>Topsoil and subsoil maintenance:</b> Topsoil will be stockpiled, signposted and separated from other materials, and tracked.	The site inspection at Lobs Hole identified that topsoils, subsoils and mulch material were mixed and not adequately separated. Signage was also inadequate, with only one sign	<b>Agreed Actions:</b> <ul style="list-style-type: none"> <li>- Install additional signage at topsoil, subsoil and mulch stockpiling areas;</li> <li>- Undertake toolboxes to reiterate the importance of as</li> </ul>	07/21/ OBS 1	2022.The site inspection across all sites noted an improvement in the separation and management of topsoils, subsoils and mulch.  July 2023: Inspection noted appropriate topsoil, and spoil separation.	<b>Closed</b>

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
			<p>was sighted in the vicinity – Mulch.</p> <p>An interview with FGJV site environmental staff noted that due to limited storage areas at Lobs Hole, it can be very challenging to adequately store the topsoils, subsoils and mulch separately.</p>	<p>much segregation of materials as possible.</p> <ul style="list-style-type: none"> <li>- Review Construction Method Statements to ensure separation requirements and methods are captured</li> <li>- Utilise mulch to protect topsoil.</li> <li>- Maximise segregation of materials as far as reasonable and feasible (where space and logistics allow).</li> </ul> <p><b>Responsibility:</b> FGJV <b>Due Date:</b> 1 October 2021</p>		<p>2022. Construction Method Statements (CMs) were provided as evidence (Bulk Earthworks dated 2020) and Stripping procedure date 2019) however there was no evidence these have been reviewed or updated since the last audit.</p> <p>2023: Work Packs – placement methods and staging documents (eg – GF01, Tantangara Spoil Emplacement and Marica Clearing and Grubbing) were sighted and reviewed. Include requirements for topsoil separation.</p>	
56.	Sch 3 Cond 13 (c)	Sch 3 Cond 13 (c): The Proponent must ensure that all plant and equipment used on site, or in connection with the development, is: (c) kept free of weeds, seeds and pathogens	The site inspection at the Tantangara site identified that whilst the construction of the permanent wheel wash had been completed as per the agreed actions to previous non-	<p><b>Agreed Actions:</b></p> <ul style="list-style-type: none"> <li>– Investigate the root causes of this failure including the potential consequences;</li> <li>– Undertake a risk assessment on</li> </ul>	OBS 2	Agreed actions not completed – Escalated to NC in current findings	Transferred to current 2023 audit findings

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
		when entering or leaving the site.	<p>compliance 07/21/NC2, on the day of the audit, it was not operating correctly due to the pump not working and the water reservoir was empty.</p> <p>It is unknown how long the facility had been non-operational or how many vehicles would have left site without having their wheels washed. There was no back-up system in place.</p> <p>Note: The previous NC 07/21/NC2 remains open, and this OBS should be addressed in conjunction with that on-going non-compliance.</p>	<p>the operation of the wheel washes;</p> <ul style="list-style-type: none"> <li>– Implement contingencies and fail-safe mechanisms to address the issue to prevent recurrence at this and other sites</li> </ul> <p><b>Responsibility:</b> FGJV</p>			

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
57.	Biodiversity Management Plan App F, 5.2.2	<p>An experienced and suitably qualified pest control contractor will be employed to manage feral predators including wild dogs, foxes and cats. This program will be prepared in conjunction with the NPWS activities occurring in the broader area.</p> <p>The frequency and timing of control activities will be determined by the pest control contractor through discussion with NPWS.</p>	<p>The Draft Annual Monitoring Report noted: <i>"The sighting of feral animals within proximity to known Smoky Mouse habitat or project infrastructure is a trigger for adaptive management"</i>.</p> <p><i>Feral animals were recorded within proximity to project roads and infrastructure within Lobs Hole, Marica, Tantangara Dam, Tantangara Road and Rock Forest. Therefore, Snowy Hydro/FGJV are required to control feral animals in accordance with the Weed, Pest and Pathogen Management Plan (FGJV, 2020).</i></p> <p><i>All areas within proximity to project</i></p>	<p><b>Agreed Actions:</b></p> <ul style="list-style-type: none"> <li>As per the adaptive management trigger, undertake a feral animal control program using an experience and qualified pest control contractor</li> </ul> <p><b>Responsibility:</b> SHL</p>	OBS 3	<p>The finalised Yr 1 and the Y2 biodiversity monitoring reports indicated that the sighting of feral animals triggered adaptive management for feral predators.</p> <p>Evidence was not provided that a feral control program has been implemented. Escalated to non-compliance</p>	Transferred to current 2023 audit findings



No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
			<p>infrastructure are required to have feral animal control undertaken. Priority areas for control include Marica and upper Lobs Hole within proximity to Smoky Mouse habitat.</p> <p>It was advised that to date, no targeted program for feral animal control has been executed outside of the camp areas.</p>				
58.	Schedule 3, Cond 30 (p)	<b>30 (p):</b> store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards”	Bunds and bunded pallets were not always covered allowing ingress of water, leading to the need to pump out potentially contaminated water. Specific example sighted – IBC of Stonewall on bunded pallet on trunk	<b>Agreed Actions:</b> <ul style="list-style-type: none"> <li>– Undertake an internal review to review the scale of the issue across the project</li> <li>– Communicate the requirement cover bunded pallets or store bunded pallets under cover to</li> </ul>	OBS 4	Re-raised as part of NC on chemicals management	Transferred to current 2023 audit findings

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
			services – see photo in report.	contractors / subcontractors; – Communicate this requirement to contractors / subcontractors.  <b>Responsibility:</b> FGJV			
59.	Schedule 3, Cond 30 (p)	<b>30 (p):</b> store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards”	New pump installed on access road near Marica Surge shaft was not bunded (oil contained in motor)	<b>Agreed Actions:</b> – Install bunding / secondary containment beneath the pump <b>Responsibility:</b> FGJV	OBS 5	This specific action was completed	<b>Closed</b>
60.	Sch 4 Cond 6 (a)	The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.	It is noted that the responsibility to notify incidents and non-conformances has been changed from an SHL responsibility to an FGJV responsibility (where incident or non-conformance is caused by FGJV). The project Management Plans do not currently reflect this.	<b>Agreed Actions:</b> – Review and update the relevant management plans to reflect the changed reporting / notification responsibilities.	OBS 6	The responsibility to report incidents and non-compliances has been re-directed to Snowy Hydro, and therefore, the management plans do not require updates on this issue.	<b>Closed</b>

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
61.	Sch 3 Cond 45(m)  Transport Mgmt Plan Section 7.4	m) keep the public informed of any road or infrastructure upgrades, disruptions to traffic, the closure of roads or other infrastructure, OSOM vehicle use, peak construction periods, and any emergencies.	Public information on the FGJV website (link from Snowy Hydro website) relating to traffic was considerably out of date at the time of commencement of the audit (referred to activities in September / October 2021).  Whilst it is recognised that other means of communication of information to the public have been implemented, the website is an important part of the communications.	<b>Completed Actions;</b> <ul style="list-style-type: none"> <li>Website updated with latest OSOM movements</li> </ul> <b>Agreed Actions:</b> <ul style="list-style-type: none"> <li>Update the FGJV Traffic website to include: <ul style="list-style-type: none"> <li>information about other ways of receiving information regarding traffic and include a “last updated” date.</li> <li>Include links on the website to other sources of information (e.g. – Live traffic)</li> </ul> </li> <li>Ensure the traffic website is kept up to date.</li> </ul> <b>Responsibly:</b> FGJV	OBS 7	An interview with the FGJV communications manager found that various effective mechanisms were in place to inform the public of road or infrastructure changes.	Closed

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
62.	Sch 3 Cond 45 (g)	The proponent must: (g) minimise the traffic impacts of the development on the public road network, including: minimising convoy lengths;	A site inspection conducted by NPWS and DPIE on 23 & 24 June 2021 identified some issues in relation to convoy length (up to 7 trucks observed in convoy) leaving Lobs Hole Ravine Road. Whilst it was stated that correspondence was issued by the Transport Department to address this issue, and that a new system has been implemented to stagger the exit of heavy vehicles from Lobs Holes since the inspection, evidence of communication of requirements or a change of process could not be provided.	<b>Agreed Actions:</b> <ul style="list-style-type: none"> <li>- Improve the internal FGJV event / incident reporting system to capture issues identified by agencies / regulators, and ensure the issues raised are adequately followed up and addressed;</li> <li>- Provide formal communications / instructions to the heavy vehicle (HV) companies to ensure HVs are appropriately scheduled to minimise convoy length.</li> <li>- Develop and install signage at the exit of each site noting the requirement to reduce convoys</li> </ul> <b>Responsibility:</b> FGJV	07/21/ OBS 2	<p>Signage was installed at Lobs Hole advising to limit convoy size (all HV's to keep at least 500m (increased from 250m) apart)</p> <p>Toolbox talks regarding requirements were conducted – 13/07/2022 sighted – require 500m between trucks.</p> <p>Traffic alert No 6 regarding convey lengths provided (11/8/22 – min distance 200m).</p> <p>Distribution list and communications evidence provided 28/11/2022 Transport Distribution List provided This Observation remains open in the SHL Aconex corrective action system.</p> <p>Adequate evidence was provided to demonstrate that processes are in place to prevent / minimise convoys. (instances have been noted, and actions taken to prevent further issues with specific suppliers).</p>	<b>Closed</b>



No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
				<b>Due Date:</b> 1 October 2021 and ongoing.			
63.	Sch 3 Cond 57	<p>Prior to the commencement of construction on the Rock Forest site, the Proponent must prepare a Construction Noise Management Plan for the development on site to the satisfaction of the Planning Secretary. This plan must:</p> <p>(c) include a program to monitor and publicly report on the effectiveness of these measures.</p>	<p>Whilst Table 2-1: <i>Conditions of approval relevant to construction noise management</i> of the CNMP references the requirement to publicly report on the effectiveness of the noise minimisation and notes it is addressed in Table 7-1, there is no reference to public reporting in Table 7-1 – Noise Monitoring Program.</p> <p><i>It is acknowledged that Section 7.5 of the CNMP identifies that reporting requirements and responsibilities are documented in Section 8.4 of the EMS.</i></p>	<p><b>Agreed Actions:</b></p> <ul style="list-style-type: none"> <li>Review and revise the Construction Noise Management Plan – Rock Forest (CNMP – RF) to clarify how public reporting on the effectiveness of measures will be addressed.</li> </ul> <p><b>Responsibility:</b> FGJV / SHL</p> <p><b>Due Date:</b> 1 October 2021</p>	07/21/ OBS 3	<p><b>July 2023 Update:</b> The Construction Noise Management Plan – Rock Forest was updated to include reference to public reporting 20/05/2022 (and further revised on 11/10/22 and 02/12/2022)</p> <p><b>Jan 2022 Update:</b> The Construction Noise Management Plan – Rock Forest had not been updated at the time of the audit.</p>	<b>Closed</b>

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
64.	Biodiversity Management Plan S 6.5  BMP App B (Biodiversity Monitoring Plan) S10	b) Where possible, threatened species, weed and pest monitoring results will informally be provided to NPWS, DAWE and BCD as they become available to assist with conservation activities being undertaken in the locality by those agencies (further detail included in Appendix B).	Whilst some reports (3) have been provided to BCD (listed below), other monitoring and quarterly reports referenced in the Draft Annual Report have not been provided: <ul style="list-style-type: none"> <li>– BMP Year 1 Quarter 3 Report dated 30 Sept 2021;</li> <li>– October 2021 Monitoring Report dated 20 Oct 2021; and</li> <li>– Fauna Strike Mitigation Report - Fauna Strike Monitoring Report dated 26 August 2021</li> </ul>	<b>Recommendation:</b> <ul style="list-style-type: none"> <li>– Snowy Hydro should forward any quarterly or other biodiversity monitoring reports to the relevant agencies on a regular basis, once received from the consultant and reviewed to keep agencies informed of key project issues.</li> </ul>	OFI 1	No evidence was provided that results were informally provided. Recommendation remains open.	Open
65.		Compliance tracking	Whilst FGJV have developed a comprehensive spreadsheet for tracking compliance against Conditions of	<b>Recommendation:</b> <ul style="list-style-type: none"> <li>– FGJV could consider adding the requirements of the Management</li> </ul>	OFI 2	Monthly compliance register provided to SHL includes CoA, EPLs, REMMs, and NPWS Lease requirements.	Closed

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
			Approval, it does not include the key requirements from the approved management plans	Plans to the compliance tracking spreadsheet to ensure compliance to the key requirements tracked.			
66.	Schedule 3, Cond 30 (p)	<b>30 (p):</b> store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards	Water ingress was noted during the site inspection at the Fuel Farm. Whilst the fuel farm is roofed, rain has entered the bund as the roof is not large enough to prevent ingress of heavy rain. re-extend roofing over fuel farm to prevent rain water entering the bund).	<b>Recommendation:</b> – FGJV should consider extending the roofing (or other solutions) to limit ingress of water	OFI 3	This was considered but it was determined that this was not required.	<b>Closed</b>
67.	Sch 3 Cond 7(f)  Sect 9.5 and Table 9.4 of SMP	include a program to monitor and publicly report on: – the management of spoil on site; – the implementation of each of the detailed plans,	The spoil specific reporting will be triggered shortly after this audit was conducted. TBM operation, and therefore spoil generation	<b>Recommendation:</b> – FGJV to prepare the spoil specific report as per the requirements of the Spoil Management Plan	OFI 4	Spoil report was completed but was not uploaded to the Project Website. Spoil report not on website has been included as NC under Sch 3 Cond 7	Transferred to current 2023 audit findings

No	Condition / requirement Reference	Requirement	Audit Finding	Agreed Actions / Recommendations <i>(Agreed due dates for each action are in Audit Action Plan issued separately)</i>	Finding no. & rating (NC, OBS/ OFI)	Follow-up comments	Status
		including the effectiveness of the proposed mitigation and contingency measures; and – progress against the detailed completion criteria and performance indicators of each permanent spoil emplacement area.	commenced around August 2021. The first report is therefore due to be undertaken in February 2022.  This is raised as an Opportunity for Improvement as a reminder that the reports are due soon.				



## 6.0 Appendix B – Agency Consultation Table

Agency Comments	How addressed at this audit
<b>Department of Planning and Environment (DPE)</b>	
Incident and non-compliances (how, who and when they are being reported in accordance with CoA) (Including truck driver roll over fatality)	Notification of incidents and non-compliance was reviewed in detail. Non-compliance raised at this audit.
Evidence of management plans being reviewed and if necessary revised and submitted to department for approval (as required after IEAs, incidents etc) as per schedule 4 condition 4	Addressed as part of this audit. FGJV Approvals Register provides evidence of internal review of various plans, however more reviews would be required following IEAs
All information is on the website and evidence of uploading in a timely manner; and	Part of standard scope – DPE focus added to main checklist Sch 4 Cond 12
Efficiency and effectiveness of closing out the actions from the previous IEA's	Part of scope – review latest version of Action Plans
<b>National Parks and Wildlife Service (NPWS) – main comments</b>	
Our highest priority items are: – non-compliances /observations /opportunities for improvement from previous audits	Follow-up on previous non-compliances, observations and opportunities was a major focus of this audit. Outcomes are documented in the current findings table and the audit follow-up table in the Appendix of this report.
– erosion and sediment (ERSED) control/management – particularly regarding road and surface water management	ERSED was addressed as part of the site inspection. Improvements, and actions taken to address EPA regulatory notices and PINs were reviewed in detail.
– road upgrades/maintenance – leading to ERSED and potential safety concerns eg public safety on shared public/project roads	Road upgrades and maintenance was addressed at this audit
– weed management – does not appear to be consistent with or as comprehensive as required by the Biodiversity Management Plan. NPWS has requested but not been provided with full details of control undertaken. Also, has wheel wash operation/ use/ effectiveness been reviewed, particularly in areas where ox-eye daisy is present?	Weed management was reviewed in detail, particularly in regard to addressing the previous non-compliance on wheel wash operation. The weeds control program was also reviewed (undertaken, spring program delayed due to inclement weather, however summer program completed.
– compliance with Environmental Management Plan (EMP) obligations e.g. Biodiversity monitoring requirements, ERSED and water monitoring in Surface Water MP (for Tantangara Road works, Marica and plateau works) and Natural Hazard (specific examples can be provided as required)	Compliance with Environmental Management Strategy assessed as part of this audit. Compliance with obligations in Management Plans included as part of the scope. Specific issues identified relating to Natural Hazard Management Plan reviewed and reported on.
– review of effectiveness of EMP obligations – in general, as well as post non-compliances /incidents. Is such review occurring? If so, agency visibility? E.g. has a review been undertaken of potential Booroolong Frog habitat impact in Wallace Creek post erosion and sediment control issues	Review of effectiveness generally assessed. Incident investigations reviewed – actions are assigned and internally closed out including water quality monitoring following a sediment / erosion / release related incident; however specific action such as review of Booroolong Frog habitat are not specifically undertaken.
– finalisation of outstanding management plans	Assessed as part of scope – SHL meeting regularly with DPE to address this issue (NCs raised)
– waste management across all sites needs to be improved – both domestic and industrial eg materials used in construction works (eg polypropylene geofabric and orange conduit)	Waste management assessed. Specific issues identified regarding plastic waste on Gooandra trail have been rectified. General overall improvement on waste management, however

Agency Comments	How addressed at this audit
are breaking down as waste in the environment	OBS raised on use of a plastic based stabilisation material in small areas.
<ul style="list-style-type: none"> <li>– immediate rehabilitation of sites once no longer required for construction purposes or temporary rehabilitation if site is required to be left inactive for a period of time eg communication and power trenching works adjacent to Snowy Mountains Highway</li> </ul>	Addressed as part of site inspection – remote sites and roadside areas were reviewed
<ul style="list-style-type: none"> <li>– clarity on the definition of incidents and non-compliances; and are reportable issues always reported? eg Gooandra Trail ERSED issues, non-operational wheel washes – should these be reported as non-compliances?</li> </ul>	Assessed and reported on. EMS with revised definition of incidents not yet approved. NC raised on visibility of notifications to agencies.
<ul style="list-style-type: none"> <li>– site inspections could be carried out at remote sites (eg water bores and geotechnical sites) if time permits – for maintenance, waste, weed management</li> </ul>	Site inspections included water bores and geotechnical sites – positive outcome from sites visited.
<p align="center"><b>National Parks and Wildlife Service (NPWS)</b> (Additional comments provided by Glenn Stroud (Jan 2023) after commencement of the audit).</p>	
<p><b>5.4. Emergency Contact Numbers</b> Appendix D of the Emergency Response Management Plan contains contact details for key Future Generation emergency response personnel. Note that Future Generation and emergency service contacts are subject to change. Table 5-1 below includes relevant emergency service contact details. Note that all contact to emergency services in an emergency should be made through 000.</p> <p><i>SV LEMC comment - No addendum or information for clarification has been provided in the plan or to the LEMC on the impact of the Elliott Way closure on their activities (Agencies aware for response but unknown how it impacts FGJV processes).</i> <i>NPWS - the plan and the Emergency Response MP need to included procedures to make sure everyone is aware of issues that may impact on access that need to be passed onto 000 operators.</i></p>	All comments relate to the Natural Hazards Management Plan. The comments provided in this multi-page document were reviewed as part of the assessment of compliance against the Natural Hazard Management Plan (individual issues not addressed here but are generally included in the report / assessment)
<p><b>7.3. Review</b> This NHMP will be provided for comment annually to Local Emergency Management Committees, NSWRFs, NSWSES and NPWS. Following natural hazard emergencies, where necessary lessons learnt will be incorporated into this plan.</p> <p><i>NPWS and other agencies identify that as the annual review of the plan has not been occurring and has been identified as a non compliance. More specific time e.g. July each year and a responsible person for managing the review needs to be included.</i> <i>The review needs to be built into the After Action Reviews of the site familiarisations and exercises</i></p>	

Agency Comments	How addressed at this audit
<p><i>conducted with all the agency stakeholders of the plan.</i></p>	
<p><b>Table 2-3: Main Works (CSSI 9687) management measures relevant to bush fire</b>  HAZ05 Primary and secondary access is maintained, upgraded and/or constructed to comply where possible with performance criteria and/or acceptable solution requirements of PBP 2019 and NSW RFS Fire Trail Standards (NSW RFS 2019). Consultation with the NSW RFS will be undertaken where compliance is constrained.</p> <p><i>Comment from RFS SV - Also the Lobbs Hole Ravine Rd Nth Trail was inspected by RFS and NPWS over 18 months ago with a view to ensure it complied with fire trail standards and was accessible by Cat1 Fire Tanker which at the time didn't with the required passing bays and corners and would be inspected again once standard had been met. We would like a report on its current status and progress.</i></p> <p><i>It was agreed that when up to standard a Cat 1 fire tanker would transverse the road and confirm compliance to ensure an emergency response can occur safely from the northern side</i></p> <p><i>NPWS comment - Noting the response that this is a compliance issue and the measure has not been meet nor reported as a non compliance. The revision needs to identify when and by whom this measure will be addressed. <b>Lobs Hole North works are still incomplete (RP 7.07.2023)</b></i></p>	<p>OBS raised at this audit</p>
<p><b>4.1. Project Location and Access</b>  Lobs Hole and Talbingo works Access to Lobs Hole will be via Ravine Road from the southern access point at the Link Road junction (see Figure 4-1). Secondary access via Lobs Hole Ravine Road North when road upgrades are complete.  Link Road – Lobs Hole Ravine</p> <p><i>Considering that the plan was approved in 21 August 2022 and this upgrade still haven't been completed. The plan needs to identify a time frame for completion and confirmation from NSW RFS that HAZ05 has been completed.</i></p>	
<p><b>4.2. Evacuation Arrangements</b>  All vehicle access routes traverse bushfire prone vegetation which can support higher intensity bushfires. Attempting to evacuate at the last moment through these areas during a bushfire may be extremely dangerous, with fatal consequences.  All evacuations must be managed in accordance with the instructions of the Person in Charge (PIC), Incident Controller (IC), fire warden (for offices and accommodation camps) or their delegate. Personnel may be directed to a works area Muster Point to await instructions or seek</p>	

Agency Comments	How addressed at this audit
<p>refuge and shelter at the nearest Refuge Assembly Area (Assembly areas detailed in Section 4.3)</p> <p>until a bushfire passes. A Consequence Management Guide (CMG) relating to evacuation will be in place prior to works mobilisation. This will include notification triggers to the local Emergency Operations Centre (EOC).</p> <p>CM</p> <p><i>Agree with the response in that the development of the CMG's is still outstanding and considering the original plan was approved in 21 August 2020 is a non-compliance that hasn't been reported. NSW RFS SM has identified that the CMG are currently being developed for Tantangara but there is no visibility on CMG relating to evacuation of any of the sites. The review of the plan needs to include identification of who on the project is responsible for this action and that a date be set for prioritisation and immediate finalisation of this important work.</i></p> <p><i>Gs will be discussed with the local EOC to ensure compatibility with EOC operations.</i></p>	
<p><b>4.3. Assembly Areas</b></p> <p><b>Marica Camp</b>  Assembly Area  35°47'10.4"S 148°26'39.1"E  This assembly area is located within the Marica Camp along the Marica trail approximately 5.5km west of the Snowy Mountain Highway.</p> <p><b>Tantangara Camp</b>  Assembly Area  35°48'18.2"S 148°39'13.1"E  This assembly area is located within the Tantangara Camp at the southern extent of the Tantangara Reservoir on Quarry Trail off Tantangara Road, approximately 15km north of the Snowy Mountain Highway.</p> <p>The Assembly Areas will include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> A minimum 20,000L dedicated fire water supply (rainwater roof collected, topped up by water cart) fitted with 65mm Storz bushfire couplings;</li> <li><input type="checkbox"/> A minimum of three 12m x 3m portable offices (or equivalent floor space) placed in a U-shape.</li> </ul> <p>The sizing of these assembly areas will be catered to suit the expected number of personnel at each location;</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Gravel central hardstand and gravel building perimeter track;</li> <li><input type="checkbox"/> Colorbond perimeter fence (minimum 1.8m high) may be required subject to individual assessment of assembly areas– should it be determined to be required the Colorbond perimeter fence is flush with the ground and maintained with no gaps between the fence bottom and the ground surface;</li> <li><input type="checkbox"/> A 20m buffer around the refuge buildings and a 10m buffer</li> </ul>	



Agency Comments	How addressed at this audit
<p><i>Need to confirm if the AA's "will" include these measures or do actually contain these items considering how long the project has been going.</i></p>	
<p><b>4.3.1. Staying and Defending at Assembly Areas</b>  Ideally, the bulk or all of the workforce would be evacuated well in advance of any known bushfire threat. The assembly areas will also function as a site of safer refuge for workers if it is determined too late to safely evacuate from site.  The decision to stay and defend at a site must not be taken without careful planning. A specific incident action plan and a back-up plan that carefully considers all the local risk factors associated with a bushfire in the vicinity of each Refuge Assembly Area must be prepared.</p> <p><i>The response indicate that this is still outstanding and considering the original plan was approved in 21 August 2020 is a non-compliance which hasn't been reported. The plan needs to be updated to include identification of who on the project is responsible for this action and that a date be set for finalisation of this important work.</i></p>	
<p><b>4.7. External Firefighting Resources</b>  The nearest fire resources are NPWS Blowering Works Depot, and the volunteer NSW RFS brigades at Adaminaby, and Talbingo all more than one-hour response time away, when available. NPWS also maintains firefighting units, which are based at Tumut and Jindabyne.  The NSW RFS or Tumbarumba Fire and Rescue are likely to be the first responders despatched to an incident. This will be dependent on the emergency response automated system which will deploy available or closest units. There are also fire stations in Cooma and Tumut, however both are more than two hours response time away.</p> <p><i>The comment was " check that systems are in place for effective notification to 000 e.g. location of incident and if any road are closed etc." The response indicated that this is a non compliance. Previous events have shown that relying on the automated dispatch can be problematic if access roads are cut off. (e.g Elliott Way) Therefore the plan needs to be updated to indicated that the project are working with operators of the 000 to ensure effective dispatch of emergency responders.</i></p>	
<p><b>BUSHFIRE PREVENTION AND MITIGATION</b>  <i>RFS SV comment that Section 5 Bushfire prevention and Mitigation requires some kind of KPI to ensure this work is being done in terms of vegetation management. IE inspect and maintain prior to fire season and record works undertaken.</i></p>	
<p><b>5.4. Fire Breaks and Trails</b></p>	

Agency Comments	How addressed at this audit
<p>Fire trails, trail signage, passing bays, turn-around points and fire breaks must be serviceable before the start of each fire season and during the season. The Future Generation PIC or delegate will identify any maintenance required within the project site to meet the NPWS fire trail requirements and the NSW RFS fire trail standard (NSW RFS 2019). Where maintenance by Future Generation is required within the project site, requirements and plans will be communicated to Snowy Hydro and NPWS. Fire trails adjoining the Main Works areas that are not accessed by the project will not be maintained by Future Generation.</p> <p>All major trails on and adjoining the Main Works areas will be clearly marked with key information. (e.g. dead end, no access, steep and narrow) and will be wholly contained within the approved disturbance area. These locations include:</p> <p><i>This still outstanding and considering the original plan was approved in 21 August 2020 is a non-compliance which has not been reported. The plan needs to be updated to include identification of who on the project is responsible for this action and that a date be set for finalisation of this important work.</i></p>	
<p><b>6.3. Liaison and Pre-Season Drills with the NPWS and Local NSW RFS</b></p> <p>The PIC or delegate will annually and prior to the bushfire season (which typically starts 1 October, unless brought forward by the NSW RFS Commissioner) invite the local NSW RFS Brigade and NPWS representatives onsite for site familiarisation, fire response and evacuation drill and liaison with personnel. This will include running through the procedures and operations detailed in this plan.</p> <p><i>Noting the response that acknowledges the non compliance with this measure which hasn't been reported. The review needs to clearly states when this measure will be conducted and who is responsible for conducting it.</i></p> <p><i>SV LEMC have also raised concerns that regular site familiarisation and exercises have not eventuated. The review needs to address these concerns.</i></p>	
Environment Protection Authority (EPA)	
– Spoil Management Plan	Part of scope
– sediment and erosion controls as focus areas under the review of the water management plan	Sediment and erosion controls was included as part of the site inspection
– Diffuse source pollution controls. We are really keen to see controls in place that cease the shedding of sediment off roads in the first	Assessed as part of site inspection. Improvements have been noted in regard to the issues raised by EPA in regulatory actions.

Agency Comments	How addressed at this audit
<p>instance, and in the second that pull sediment out of dirty water. These may include:</p> <ol style="list-style-type: none"> <li>1. sealing roads that have a high risk of sediment run off</li> <li>2. semi-sealing roads that have a high risk of sediment run off;</li> <li>3. slowing down dirty water</li> <li>4. pulling sediment out before it reaches sediment basins through regular check dams and rock lining</li> </ol>	<p>No significant issues identified during this audit (minor observations).</p>
<p>Some of the key waterway crossings that we have seen issues at are Dip Creek, Eucumbene River, Nungar Creek (although this crossing is now sealed. It's also worth noting that this was the creek crossing that was the subject of one of the PINS), Gang Gang Creek, Wallaces Creek and Yarrangobilly River.</p>	<p>Noted – sites were visited and assessed</p>
<p>We issued a <a href="#">Prevention Notice</a> last year which focussed on diffuse source pollution along Tantangara Road, Spoil Road and Quarry Road (all at the Tantangara worksite). We saw positive change along Spoil Road, but would like to see similar controls deployed project wide.</p> <p>As a result of the Notice, they installed a lot on small check dams and rock lined drains along Spoil Road at Tantangara to intermittently pull sediment out of the dirty water before it discharges to a basin or through vegetation, which has been quite successful</p>	<p>Noted – all sites listed were visited as part of the site inspection. Improved programs have been implemented to inspect, maintain and clean out sediment basins and sumps.</p>
<p>We also issued a <a href="#">Pollution Reduction Program</a> on the licence last year, and as a result of that Snowy Hydro/FGJV have committed to installing a range of additional controls to help them to manage diffuse source pollution. The PRP has been <a href="#">updated</a> to capture these actions</p>	<p>Noted. As above, there have been improvements in controls to manage diffuse water pollution.</p>
Transport for NSW (TfNSW)	
<p>1. <i>Have the requirements for a road dilapidation report been met:</i> CSSI approval 9687, in its approved documentation, requires a dilapidation report to be prepared for the main transport route that is being used during construction which includes the identification of measures to address any residual impacts not able to be avoided.</p> <p>This includes sections of state classified roads and mechanisms to restore any damage that may result due to its use by traffic and transport related to the project (refer to Section 5.4 in Appendix K Revised Traffic and Transport Assessment prepared by SCT Consulting, Revision 6.2 dated 25 February 2020 in the Main Works Preferred Infrastructure Report and Response to Submissions dated 28 February 2020).</p>	<p>This was added to the scope of the audit. It was confirmed that the dilapidation survey referred to in Appendix K was not completed or submitted. Raised as a finding.</p>

Agency Comments	How addressed at this audit
<p>The approved documentation outlines that <i>"The Road Dilapidation Report will be submitted to the relevant road authority for review prior to commencement of heavy vehicle movements."</i> Has this been done?, If yes, for what roads? What, if any, are the subsequent actions?</p> <p>TfNSW at this time has been unable to locate the above document including who it was submitted to at TfNSW to enable a review prior to the commencement of heavy vehicle movements associated with the Snowy 2.0 Main Works approval, and any comments that have been provided by TfNSW. TfNSW requests further details in relation to the above.</p> <p>It is important to note that TfNSW has observed a greater number of vehicle movements along the northern half of the Snowy Mountains Highway (north of Link Road) than were forecast in the Main Works Preferred Infrastructure Report and Response to Submissions dated 28 February 2020. Based on the information provided as part of the approval process the majority of the heavy vehicle movements were planned to come from the south and head north to the construction site. As a consequence of the above inaccuracy, sections of the Snowy Mountains Highway are experiencing road pavement issues that are directly associated with the increased vehicle movements with a reduced speed limit now having to be implemented from Tumut to Yarrangobilly Caves Road.</p>	
<p>2. <u><i>The development's compliance with applicable transport/road works conditions:</i></u> An assessment of the development's compliance with applicable transport/road works conditions in the issued approval that specifically relate to the state road network including connections to/from the state road network (e.g. as detailed by Schedule 2 Conditions 2 and 4, Schedule 3 Conditions 7, 8, 41, 43, 45, 46, 49 and 50, Schedule 4 Condition 12 and Appendix 5 Table 5.2 ). This includes details on how compliance or otherwise has been determined.</p>	<p>Cond 1 &amp; 4 of Sch 2 apply only generally. Cond 41-50 are part of the standard scope</p>
<p>3. <u><i>Review of the management of worker movements to and from sites and between sites:</i></u> Is the management of worker movements to and from sites and between sites being undertaken as detailed in approved documentation (e.g. Snowy 2.0 Main Works Traffic and</p>	<p>Assessed as part of the audit scope. Good evidence was provided that workers are transported to site using buses – travel in private vehicles is not permitted.</p>



Agency Comments	How addressed at this audit
Transport Assessment, dated 25 February 2020 prepared by SCT Consulting – refer to Section 4.1.3).	
<p>4. <u>Review of traffic volumes:</u> Is the approved development complying with the revised traffic volumes as detailed in the Preferred Infrastructure Report and Response to Submissions – Snowy 2.0 Main Works, dated February 2020 prepared by EMM (e.g. Section 3.2.5 and 4.4.6, etc) noting the comments in Point 1 above about a greater number of vehicle movements along the northern half of the Snowy Mountains Highway.</p>	<p>Traffic volumes are predicted – in section 4.1.2 of the TMP.</p> <p>It is noted that the Traffic volumes are predictions and are not specified as a condition of approval, however FGJV have committed to reporting on the volumes of traffic in future.</p> <p>Vehicle volumes using the Snowy Mountains Highway was requested from FGJV to confirm whether vehicle volumes along the northern part of the road are higher than predicted.</p> <p>Figures provided indicate that the actual volumes are well within the predicted volumes – addressed in report.</p>
<p>5. <u>Spoil management:</u> Is the spoil associated with the Main Works project being disposed of as per the requirements of the approval and not being taken off-site to other locations that would result in additional heavy vehicle movements on the classified road network.</p>	<p>Assessed. It was confirmed that wherever possible, spoil is not taken off-site. The only spoil taken off site is spoil that is contaminated with fibres and other material that prevent it from being reused on site or being place in the permanent spoil emplacement areas.</p>
<p>6. <u>Compliance management:</u> Timeframe for the implementation of any identified measures to address road related concerns that have not been complied with.</p>	<p>No non-compliance raised regarding traffic and transport. Timeframe for implementation generally would be included in the Action Plan for the IEA.</p>
<p>It would be appreciated if a copy of the completed audit can be forwarded to TfNSW for its information/records (i.e. development.south@transport.nsw.gov.au). If you have any questions, please give me a call on 0418 962 703.</p>	<p>The report will be issued to Snowy Hydro who will forward it to DPE and upload to the website as required under the conditions of approval. TfNSW can access the report online or directly from Snowy Hydro.</p>
Biodiversity Conservation Division (BCD)	
BCD review of SHL Reports against BMP & CoA Snowy 2.0 Main Works CSSI 9687:	
<p>BMO2 &amp; BMO3 management of vehicle speed limits on access roads.</p> <ul style="list-style-type: none"> <li>– Comment: Underpasses completed &amp; monitoring commenced in June 2022;</li> <li>– Recommendation: Increasing the speed limit on Ravine Road is not supported by BCD, particularly without evidence of predator/pest control implementation</li> <li>– Continued monitoring recommended by BCD</li> </ul>	<p>Addressed. The speed limit on Lobs Hole Ravine Road remains at 30km/hr. The comment was communicated to Snowy Hydro.</p>
<p>BM04 unexpected finds procedure implementation:</p> <ul style="list-style-type: none"> <li>– Comment: Reporting (internal) on unexpected finds is required by the BMP and CoA 17 -i.e., to minimise impacts on Biodiversity values are being followed. E.g., Pimelea bracteata? Are</li> </ul>	<p>Addressed.</p> <p>It was advised that there have been no unexpected finds of flora or fauna since the last audit.</p> <p>The EMM Year 1 and Year 2 reports were prepared to report on the Biodiversity Monitoring program documented in Appendix B</p>

Agency Comments	How addressed at this audit
<p>internal reports on unexpected finds available?</p> <ul style="list-style-type: none"> <li>– Recommendation: Annual BMP monitoring &amp; reporting (1st and 2 yr monitoring reports) does not address unexpected finds;</li> </ul>	<p>of the BMP, and therefore do not necessarily address all the information on biodiversity matters requested by BCD.</p> <p>Section 6.5 (Reporting of Incidents) of the Biodiversity Management Plan (BMP), requires an Annual Report to be prepared on a variety of Biodiversity matters (see details in Biodiversity section of “Overview of Environmental Performance”).</p> <p>Appendix F of the BMP also requires that details of the weed control actions, vertebrate pest control activities and the efficacy of other control measures are including in an annual report and integrated into the broader biodiversity management Plan required by Appendix B.</p> <p>As such, there is a gap in the data being reported on, - this is raised as a non-compliance.</p>
<p>BM05 minimise impacts to native vegetation and TS habitats “where feasible and reasonable”</p> <ul style="list-style-type: none"> <li>– Comment: There is no report on clearing native vegetation or TS habitat to know whether this condition has been monitored or met;</li> <li>– Recommendation: Annual report must include report on clearing extents. Reporting against clearing limits is required to evaluate this measure and assess compliance against CoA Sch 2 Condition 5 &amp; also Sch 3 Condition 13 &amp; 17 (d)</li> </ul>	<p>As above – Annual Reports on biodiversity matters not prepared (NC)</p>
<p>BM06 exclusion zones established around areas of retained vegetation (fenced using appropriate materials and signage)</p> <ul style="list-style-type: none"> <li>– Comment: This measure applies for the duration of construction. This may require compliance check;</li> <li>– Recommendation: BCD recommend checks to ensure continued compliance with this measure</li> </ul>	<p>The site inspection included a review of exclusion zones around areas of retained vegetation.</p> <p>It was found that the delineation (fences, rope) generally remained in place, however, brumbies continue to damage and destroy some fences and ropes. In some areas (such as parallel to roads, the ropes have been removed (following discussions with NPWS).</p>
<p>BM07 Pre-clearing survey to identify key habitat features and habitat suitable for release of any fauna encountered during clearing works;</p> <p>Recommendation: Annual reports should include results of pre clearing surveys.</p>	<p>Pre-clearing surveys are conducted for all areas to be cleared and include identification of key habitat features, salvage activities etc.</p> <p>As noted above, Annual Reports on biodiversity matters not prepared (NC).</p>
<p>BM08 delineation of clearing limits with continuous highly visible barrier such as safety flagging UV stabilised rope, or other durable robust material/ &amp; Environmental Protection Area signage along the exclusion fencing;</p> <p>Recommendation: BCD recommend checks to ensure continued compliance with this measure.</p>	<p>Site inspection included a review of delineation of clearing limits – no specific issues identified.</p>

Agency Comments	How addressed at this audit
<p>The Proponent must provide regular reporting on the environmental performance of the development on its website in accordance with the requirements in any approved strategies, plans or programs.</p> <ul style="list-style-type: none"> <li>– BM09 Pre-clearing &amp; clearing Procedure- 2 stage clearing for fauna habitat features;</li> <li>– Recommendation: Are there clearing reports available? Require clearing reports to evaluate this measure against CoA 17</li> </ul>	<p>As noted previously, Annual Reports on biodiversity matters not prepared (NC).</p>
<p>BM10 – no ground disturbance of mapped riparian avoidance areas except where approved design requires it such as bridge crossings;</p> <ul style="list-style-type: none"> <li>– Recommendation: Require clearing monitoring report (refer BM20) to evaluate this measure</li> </ul>	<p>As noted above, Annual Reports on biodiversity matters not prepared (NC).</p>
<p>BM11- Preclearing inspections in locations within 50m of watercourses and reservoirs will include thorough searches for frogs:</p> <ul style="list-style-type: none"> <li>– Comments: Not reported</li> <li>– Recommendations: As BM 10</li> </ul>	<p>Pre-clearing inspections have included searches for frogs. As an example, the Pre-clearing report for ECVT laydown pads in Lobs Hole included a targeted Booroolong Frog survey and the Tantangara Intake pre-clearing report included a fauna habitat search in caves, crevices and culverts (habitat for from, reptiles, small mammals and microbats.</p> <p>As noted above, Annual Reports on biodiversity matters not prepared (NC).</p>
<p>BM12 &amp; 13, BM17- 19 - Targeted pre-clearing surveys for threatened flora and fauna and fauna relocation;</p> <ul style="list-style-type: none"> <li>– Comments: There are no reports detailing the results of the pre-clearing and clearing survey procedures.</li> <li>– Recommendations: As BM10</li> </ul>	<p>Targeted pre-clearing surveys are undertaken. As noted above, Annual Reports on biodiversity matters not prepared (NC).</p>
<p>BM14 &amp; 15 – Habitat trees- &amp; HBT- pre-clearing inspection &amp; salvaging hollows: Comments: There are no reports detailing the results of the pre-clearing and clearing survey procedures and demonstrating compliance with BMP and CoA</p>	<p>As noted above, Annual Reports on biodiversity matters not prepared (NC).</p>
<p>BM16 Dangerous tree removal – all tree removal will be accounted for and tracked in the project wide clearing tracking BM20- monitoring the clearing limits</p> <ul style="list-style-type: none"> <li>– Comments: Tracking/monitoring and evaluation of clearing against approved limits (BDAR &amp; approval set limits and credits for the offset payments) on Plant community types is required</li> </ul>	<p>As noted above, Annual Reports on biodiversity matters not prepared (NC).</p> <p>Clearing limits are monitored. Evidence provided that the project is meeting the overall limits and limits for specific PCRs.</p> <p>As noted above, Annual Reports on biodiversity matters not prepared (NC).</p>
<p>BM21 GDE's groundwater monitoring /follow up actions if groundwater drawdown exceeds 80th percentile/limits;</p> <ul style="list-style-type: none"> <li>– Comments: Review of water monitoring results indicate no baseline groundwater monitoring has occurred since project commencement;</li> <li>– Recommendation: Monitoring and reporting against groundwater drawdown limits is</li> </ul>	<p>Groundwater levels are being monitored. As noted above, Annual Reports on biodiversity matters not prepared (NC).</p> <p>As noted above, Annual Reports on biodiversity matters not prepared (NC).</p>

Agency Comments	How addressed at this audit
required to evaluate this measure and compliance against CoA Sch 3 cond 18 (d) & Cond 15	
<p>BM22 Carry out threatened species weed, pest and pathogen monitoring as per BMP (Bio monitoring program)</p> <ul style="list-style-type: none"> <li>Comments: The Biodiversity Yr 2 Annual monitoring report 2021/2022 has been provided;</li> <li>Recommendations: Provide spatial data sets/mapped locations of weed monitoring locations and mapped areas of weed infestations as per the BMP requirements.</li> </ul>	<p>Spatial data sets are said to be mapped, however could not be viewed.</p> <p>As noted above, Annual Reports on biodiversity matters not prepared (other than EMM Year 1 and Year 2 reports) (NC).</p>
<p>BM32, BM34, REMM EC02 (RTS) A weed and pathogen monitoring program will be implemented with a weed control program to be implemented if weeds are identified along road verges;</p> <ul style="list-style-type: none"> <li>Comments: The Biodiversity Monitoring yr 2 annual report acknowledges Pests and weed &amp; pathogen monitoring has not been undertaken as per the BMP stated requirements (table 9.1 &amp; table 9.2). Although the monitoring has occurred, it indicates adaptive management measures are required;</li> <li>Recommendations: As per the commitments in the EIS &amp; BMP – Implementation of a weed control program is required. Monitoring is required to provide spatial data sets/mapped locations of weed infestations.</li> </ul>	<p>Sch 3 Cond 17 BMP Table 5.1 &amp; Appendix B, Main Works RTS</p> <p>A weed control program is in place and is generally being implemented. Refer to Audit Tables and summaries in the report.</p>
<p>BM32, 33 Appendix B BMP A predator control program will be implemented in conjunction with OEH and NPWS;</p> <ul style="list-style-type: none"> <li>Comments: The 21/22 yr 2 annual monitoring report (EMM April 2023) states adaptive management actions have been triggered and indicates pest control actions have not been undertaken by SHL;</li> <li>Recommendation: This commitment is particularly important where the project impacts key Threatened Species habitats identified in EIS including the accommodation areas and access tracks/Rds Lobs Hole Ravine, Tantangara and Marica.</li> </ul>	<p>A predator control program has not been implemented – refer to NC in findings table.</p>
<p>BM36 - A chemical Weed control program will be implemented as detailed in the Weed , Pest and Pathogen Management Plan (Appendix F);</p> <ul style="list-style-type: none"> <li>Comments: The 21/22 yr 2 annual monitoring report (EMM April 2023) states adaptive management actions have been triggered and indicates weed control actions have not been undertaken as per Appendix F;</li> <li>Recommendations: Weed control in and adjacent to impact areas and known Threatened flora locations was a commitment in the EIS and BMP. This requires action and reporting against BM36 and as per Sched 4 CoA 8 requirements</li> </ul>	<p>A chemical weed control program has been implemented in 2023 (was non-compliant in previous audit).</p> <p>As noted above, Annual Reports on biodiversity matters not prepared (NC).</p>



Agency Comments	How addressed at this audit
<p>BM38 &amp; 39 A Vertebrate Pest control program will be implemented for the duration of construction as detailed in the Weed , Pest and Pathogen Management Plan (Appendix F)</p> <ul style="list-style-type: none"> <li>Comments: The 21/22 yr 2 annual monitoring report (EMM April 2023) states adaptive management actions have been triggered and indicates pest control actions have not been undertaken by SHL;</li> <li>Recommendations: This BMP mitigation measure / commitment is particularly important where the project impacts key TS habitats identified in EIS including the accommodation areas and access tracks/rds Lobs Hole Ravine, Tantangara and Marica</li> </ul>	<p>Vertebrate Pest control program not implemented (see NC in Findings Table).</p>
<p><b>Department of Climate Change, Energy, the Environment and Water (DCCEEW) formerly Department of Agriculture, Water and the Environment (DAWE)</b></p>	
<p>The compliance team have asked if you could include incident reporting into your audit, as it appears this is an issue that they're currently looking at.</p>	<p>Incidents were assessed as part of this audit (see NC in Findings Table).</p>
<p><b>Snowy Monaro Regional Council (SMRC)</b></p>	
<p>No formal comments provided in writing Discussion with Garry Shakespeare – generally happy with the way traffic is going in Cooma, no additional comments to make.</p>	<p>Traffic management assessed generally as part of this audit.</p>
<p><b>DPI Fisheries</b></p>	
<p>No comments to date (03/07/23) 07/07/2023: I am only just back in the office today after being in the field all week and therefore unable to provide you with any input for this audit. I apologise for the lack of response and that you have had trouble contacting Fisheries to provide input, I will endeavour to review the material and provide some feed back for the next audit process.</p> <p><b>Comments 7/7/23:</b> I am only just back in the office today after being in the field all week and therefore unable to provide you with any input for this audit. I apologise for the lack of response and that you have had trouble contacting Fisheries to provide input, I will endeavour to review the material and provide some feed back for the next audit process. Regards Luke.</p>	<p>Fisheries issues assessed generally as part of this audit.</p>

## 7.0 Appendix C – Audit Attendance Register

NAME (print)	ORGANISATION	POSITION	ENTRY 10/07/23	EXIT 17/07/23
Chris Buscall	Snowy Hydro	Environment Manager	✓	✓
Ben Croome	Snowy Hydro	Environment Coordinator		✓
Rodd Brinkmann	Snowy Hydro	Snr Project Mgr Lobs Hole	✓	✓
Guy Boardman	Snowy Hydro	Snr Project Mgr Tantangara / Marica	✓	✓
Jordan Chenery	Snowy Hydro	Environmental Assurance Officer		✓
Fabrizio Lazzarin	FGJV	Deputy Project Director	✓	
Geoff Scott	FGJV	Project Operations Director	✓	✓
Ellen Porter	FGJV	Environment Manager	✓	✓
Nathan Jones	FGJV	Deputy Environment Mgr	✓	✓
Jess Adams	FGJV	Compliance Coordinator	✓	✓
Grant O'Rourke	FGJV	Deputy Project HSSE Mgr	✓	✓
<b>Other Participants – (interviews – Cooma Offices)</b>				
Luke Jenkins	Snowy Hydro	Environmental Coordinator		
Laura Hobbs	Snowy Hydro	Environmental Advisor		
Neve Sela	Snowy Hydro	Groundwater specialist		
Mick Courtney	FGJV	Transport Manager		
Ellen Rummery	FGJV	Transport Coordinator		
Marianne McCabe	FGJV	Community and Stakeholder Engagement Manager		
Hugh Jones	FGJV	Commercial / Waste Mgr		
Ruben Periera	FGJV	Project Maintenance Plant Engineer		
<b>Lobs Hole participants</b>				
Blake Gilfillan	FGJV	Superintendent – Lobs Hole		
Sangeetha Banakar	FGJV	Environment Advisor		
Fabrizio Lazzarin	FGJV	Deputy Project Director		
Drew Butters	FGJV	ERT Captain – Lobs Hole		
Jordan Chenery	Snowy Hydro	Environmental Assurance Officer		
<b>Marica participants</b>				
Brendan Hall	FGJV	Superintendent - Marica		
Brett Allen	FGJV	Supervisor		

NAME (print)	ORGANISATION	POSITION	ENTRY 10/07/23	EXIT 17/07/23
Lisa Walter	FGJV	Spoil Advisor (all sites)		
<b>Tantangara participants</b>				
Mitchell Coustley	FGJV (Construction)	General Superintendent		
Matthew Gardner	FGJV (Construction)	Superintendent		
Shawn Lu	FGJV	Environmental Advisor		

## 8.0 Appendix D – Independent Audit Declaration Forms

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**Project Name:** Snowy 2.0 Main Works

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**Consent Number:** CSSI 9687

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**Description of Project:** Development of the Snowy 2.0 and Transmission Project as described in Clause 9 of Schedule 5 of State Environmental Planning Policy (State and Regional Development 2011)

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**Project Address:** Various locations within Kosciusko National Park – Lobs Hole, Tantangara, Marica (as per Appendix 1 of the Main Works Approval of CSSI 9687)

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**Proponent:** Snowy Hydro Limited

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**Title of Audit Independent Environmental Audit:** –

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**Date:** August 2023

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

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

Notes:

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

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**Name of Auditor:** Julie Dickson

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**Signature:** 

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**Qualification:** Exemplar Global Master / Lead Environmental Auditor – Registration No 13573

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**Company:** Dickson Environmental Consulting and Audit Pty Ltd

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**Company Address:** P.O Box 69, Berowra 2081

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## 9.0 Appendix E – Planning Secretary Audit Team Agreement



Department of Planning and Environment

Mr Ben Croome  
Snowy Hydro Ltd  
Senior Environmental Advisor Snowy 2.0  
PO Box 332  
Cooma NSW 2630  
13/04/2023

Dear Mr Croome

**Snowy 2.0 - Main Works – (CSSI-9687)  
Independent Environmental Audit (#4) Team Request 2023**

I refer to your request (SSI-9687-PA-112) for the Secretary's approval of a suitably qualified person to undertake the fourth (#4) Independent Environmental Audit (Audit) and prepare the Audit report for the Snowy 2.0 - Main Works - (the project) in accordance with Schedule 4 Condition 9 of CSSI-9687 as modified (the consent).

The Department of Planning and Environment (the department) has reviewed the nomination and information you have provided and is satisfied that this expert is suitably qualified and experienced. Consequently, in accordance with Schedule 4 Condition 9 of the Consent and the Independent Audit Post Approval Requirements, the Secretary has agreed to Ms Julie Dickson from Dickson Environmental Consulting and Audit Pty Ltd to undertake the IEA and prepare the Audit report.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The department reserves the right to request an alternate auditor or audit team for future audits. Please note that this approval of the above audit team is conditional upon them maintaining certification as a lead or principal auditor with a relevant industry body.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact me on 0429400261 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly", written over a light blue rectangular background.

Katrina O'Reilly  
Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary

## 10.0 Appendix F – Audit Plan and Scope

### Audit Plan and Scope - Snowy Hydro 2.0 Audit # 4

<b>Project:</b>	Snowy Hydro 2.0		
<b>Audit Title:</b>	Independent Environmental Audit – Environmental Compliance #4		
<b>Auditor:</b>	Julie Dickson - DECA Pty Ltd		
<b>Date (s) of Audit:</b>	10 – 17 July 2023		
<b>Time:</b>	08.30 – 16.30 (approx.) daily		
<b>Location (s):</b>	<b>Cooma:</b> Snowy Hydro Office <b>Cooma:</b> Future Generation Joint Venture Office <b>Site visits to:</b> Lobs Hole, Tantangara, Marica, surge shaft, trunk services, road upgrades / maintenance, Rock Forest, remote sites (e.g. water bores, geotechnical sites)		
<b>Audit Objective:</b>	The objective of this Independent Environmental Audit is to assess the environmental performance of the development and whether it is complying with the requirements in this approval (including the requirements of any approved strategy, plan or program) and to recommend any appropriate measures to improve environment performance of the development and approved strategies, plans, programs.		
<b>Audit Scope:</b>	Development Consent CSSI 9687 – Compliance to all relevant conditions of consent, commitments made in the approved Management Plans, Environment Protection Licence (EPL) conditions incl. Pollution Reduction Program, and EPBC 2018-8322 Approval conditions. Scope will also include: Areas identified in Audit #3 as “areas to be assessed at next / future audits”, “follow-up on areas of non-compliance / observation / Opportunities for improvement” and areas identified as focus areas by agencies and authorities.		
<b>Audit Methodology</b>	The Audit will be undertaken in accordance with ISO 19011:2018 and will include document and record reviews, interviews, and site inspection.		
<b>Areas of focus (from pre-audit consultation)</b>	<b>DPE:</b> Incidents and non-compliance reporting, management plan review, revision and approvals, website document uploads, closing of actions from EIAs; <b>NPWS:</b> Pest and weed control/vehicle hygiene, incidents and non-compliance reporting, Management Plans revision and update, water management including diffuse water pollution, <b>EPA:</b> Diffuse water pollution, sealing / semi sealing roads with high sediment run-off potential, slowing down dirty water, removing of sediment through check dams/rock lining etc before it reaches the sediment basins. Areas where PINs raised, Prevention Notice requirements and Pollution Reduction Program progress; <b>BCD:</b> Reporting against BMP and CoA requirements including Management of speed limits on access roads, unexpected finds implementation, BM04 – BM22, BM 32-34, 36, 38 & 39, <b>TfNSW:</b> – Dilapidation Report required under App K of Revised Traffic and Transport Assessment 25 Feb 2020, worker movements to site, Traffic volumes as per PIR and response to submissions Feb 2020 and TMP, spoil management, compliance management; <b>DCCEEW (formerly DAWE):</b> Incident Reporting; No formal response from SMRC or DPI Fisheries		
<b>Audit Invitees (Required)</b>	<b>Name:</b>	<b>Organisation</b>	<b>Role</b>
	David Evans	Snowy Hydro	Project Director
	Chris Buscall	Snowy Hydro	Environment Manager
	Ben Croome	Snowy Hydro	Senior Environmental Advisor
	Rodd Brinkmann	Snowy Hydro	Snr Project Mgr Lobs Hole

	Guy Boardman	Snowy Hydro	Snr Project Mgr Tantangara / Marica
	Ellen Porter	FGJV	Environment Manager
	Nathan Jones	FGJV	Deputy Environment Manager
	Jess Adams	FGJV	Compliance Coordinator
	Steve Thorne	FGJV	Project HSSE Manager

## AUDIT PLAN - Day 1 (Mon 10 July 2023)

Indicative time	Agenda item / Areas for review	Proposed attendees
09.00 – 09.45	Opening meeting <ul style="list-style-type: none"> <li>• Introduction, confirmation of scope, criteria, locations planned to be visited, methodology, reporting, expectations (Auditor);</li> <li>• Introduction of SHL and FGJV management / teams and their role on the project;</li> <li>• Overview of project issues / progress / background / challenges (presentation by SHL and FGJV management);</li> <li>• Logistics, available personnel.</li> </ul>	<b>All – SHL &amp; FGJV</b> Relevant internal management including SHL Project Director and FGJV Senior Management Representative
09.45 – 12.00	Follow-up on previous Audit #3 findings – actions and status (SHL component):	SHL Chris Buscall, Ben Croome, others as required
12.00 – 12.30	Terms of approval – DPIE requirements, lapse of approval, surrender of approval, structural adequacy, protection of infrastructure (Sch 2 Cond 1-13)	Snowy Hydro Chris Buscall
12.30 – 13.15	Break	
13.15 – 14.30	<ul style="list-style-type: none"> <li>– Digital Strategy (Sch 3 Cond 1 – 3)</li> <li>– Rehabilitation Plan, Objectives (NSW Sch 3 C9 – 11, EPBC Cond 25);</li> <li>– Biodiversity - offset payment, additional offset (NSW Sch 3 Cond 12-16), biodiversity monitoring / reporting / predator control program</li> <li>– EPBC biodiversity related conditions (Cond 1 – 11), changes to NSW approval (Cond 26, 27), Admin (28-39)</li> </ul>	SHL
14.30 – 15.30	<ul style="list-style-type: none"> <li>– Sch 3 C17, Biodiversity MP requirements including:               <ul style="list-style-type: none"> <li>o GDE / groundwater monitoring / drawdown triggers as relevant to SHL;</li> <li>o Monitoring reporting - Annual report (6.5 of BMP)</li> <li>o Seed collection;</li> <li>o Weeds, pathogens, pests</li> <li>o Underpass / fauna strike / speed limits;</li> <li>o Biodiversity monitoring and reporting;</li> </ul> </li> <li>– Biodiversity Monitoring Plan reqts (App B - BMP)</li> </ul>	SHL Chris Buscall
16.30 – 16.45	<ul style="list-style-type: none"> <li>– End of Day 1 debrief audit progress and outcomes to date (if required).</li> </ul>	SHL - Chris Buscall, Ben Croome

## AUDIT PLAN Day 2 (Tues 11 July 2023)

Indicative time	Agenda item / Areas for review	Proposed attendees
08.30 – 09.30	<ul style="list-style-type: none"> <li>Threatened Fish Management Plan, (NSW Sch 3 Cond 20 – 27)</li> <li>Biosecurity Risk Management Plan, Aquatic ecology, biosecurity, (Inc EPBC Cond 12 – 16)</li> <li>Recreational Management Plan, Recreational Fishing Management Plan (NSW Sch3 Cond 37-40)</li> <li>Construction Noise Management Plan (Rock Forest) (Cond 57)</li> </ul>	<b>SHL</b> SHL – please populate this column
09.30 – 10.30	<ul style="list-style-type: none"> <li>Transport – road upgrades / sign-off (Sch 3 C41, 42(a), Long-term Road Strategy (Cond 50), Dilapidation survey ;</li> <li>Notification of dates, reporting on performance, compliance tracking, independent audit Sch 4 (Cond 6, 8, 10, 11)</li> <li>Heritage – archival recording, salvage (Sch 3 Cond 34), Aboriginal consultation</li> </ul>	SHL Charlie Litchfield / Julie Dibden. Mick Courtney
10.30 – 11.30	<ul style="list-style-type: none"> <li>Water supply, water pollution (NSW Sch 3 C29-32)</li> <li>Groundwater (incl. real-time) monitoring / drawdown (Cond 31) , implementation of Groundwater Monitoring Plan</li> <li>Reporting of incidents (including traffic) and notification (NSW Sch 4 Cond 6, EPBC C34, 35);</li> <li>Reporting of non-compliances (Sch 4 C7)</li> </ul>	SHL
11.30 – 12.15	<ul style="list-style-type: none"> <li>Environment Protection Licence (EPL): Administrative and reporting conditions, discharges, mixing zones, limit, monitoring conditions relevant to SHL, Annual returns, Monitoring Reports,</li> <li>Responding to Prevention Notices, Cleanup-up Notices, PINS, PRPs, Licence Variation requirements</li> <li>Uploading monitoring information to public website;</li> <li>Access to Information (Sch 4 Cond 12)</li> </ul>	SHL
12.15 – 12.30	End of SHL HO component (Day 2) – debrief if required	
12.30 – 13.15	<b>Break</b> <b>Move to FGJV Office</b>	
13.15 – 13.45	Overview of current FGJV activities, planned / actual updates to Management Plans, high level overview of issues / challenges / interactions with regulators, communications / reporting to SHL, subcontractor management, compliance tracking.	<b>FGJV</b> Ellen Porter, Jess Adams, others as required
13.45 – 16.30	<b>Previous audit findings / corrective action processes</b> <ul style="list-style-type: none"> <li>Follow-up on previous IEA Audit #3 findings – actions and status (FGJV component) including provision of evidence to support closure / ongoing status (Sch 4 Cond 11).</li> <li>Review of FGJV corrective action processes and responses to SHL site instructions, SHL and internal audit findings / regulator requests;</li> <li>Communications with Proponent (SHL)</li> </ul>	<b>FGJV</b> Ellen Porter, others as required
16.30 – 16.45	<b>Visual and waste impacts</b> <ul style="list-style-type: none"> <li>Visual Impact Management Plan (NSW Sch 3 Cond 53, 54)</li> <li>Waste management (Sch 3, Cond 52)</li> </ul>	
16.45 – 17.00	End of Day 2 and end of FGJV Day 1 component - debrief audit progress and outcomes to date (if required).	FGJV as required



## AUDIT PLAN – DAY 3 (Wed 12 July 2023)

Indicative time	Agenda item / Areas for review	Proposed attendees
08.30 – 10.15	<b>Environmental Management Strategy (Sch 4) implementation:</b> <ul style="list-style-type: none"> <li>Environmental inspections (incl. joint with SHL);</li> <li>Environmental Training and awareness, inductions, toolbox talks</li> <li>Complaints management;</li> <li>Incident reporting to SHL / Regulators (Sch 4 Cond 6)</li> <li>Reporting of non-compliances to SHL / Regulators (Sch 4 Cond 7)</li> <li>Monthly Environmental Reports to SHL;</li> <li>Reporting of adverse traffic interactions (to SHL &amp; Road authorities);</li> </ul> <b>Administrative Conditions - Schedule 2</b> <ul style="list-style-type: none"> <li>Demolition (Cond 10), Structural adequacy (Cond 11)</li> <li>Protection of Infrastructure (Cond 12);</li> <li>Plant and equipment maintenance (Cond 13)</li> </ul>	<b>FGJV</b> Ellen Porter, others as required Please populate this column
10.15 – 10.45	<b>Reporting</b> <ul style="list-style-type: none"> <li>Reporting on environmental performance (Sch 4 Cond 8)</li> <li>Monitoring and Reporting (various Plans) including:               <ul style="list-style-type: none"> <li>Spoil volumes (Spoil MP);</li> <li>biodiversity (BMP);</li> </ul> </li> <li>Quarterly Environmental water report (Water MP).</li> </ul>	FGJV Ellen Porter Others as required
10.45 – 11.30	<b>Environment Protection Licence (EPL) compliance</b> <ul style="list-style-type: none"> <li>Operating and general conditions, discharges, mixing zones, limit, monitoring and special conditions relevant to FGJV;</li> <li>Reporting EPL requirements to SHL, EPA, regulators,</li> <li>EPL monitoring – monthly results to SHL for upload to website and 6 monthly Environmental Monitoring Report</li> </ul>	FGJV Environment Team member
11.30 – 12.30	<b>Transport</b> <ul style="list-style-type: none"> <li>Transport and Traffic management, congestion, parking, website traffic updates, implementation of TMP, VMP (Cond 42 – 49);</li> <li>Quarterly vehicle movement summary report (TMP) including methodology for data collection;</li> </ul>	FGJV Mick Courtney, Ellen Rummery, others as required - Transport
12.30 – 13.15	Break	
13.15 – 14.15	<b>Surface and Groundwater</b> <ul style="list-style-type: none"> <li>Water, Surface water, Process and wastewater treatment plants, discharge points, ESCPs, reporting (Sch 3 C29 – 32);</li> <li>Groundwater take minimisation / pre and post grouting / Groundwater TARP, inflow monitoring, data gathering</li> <li>Biosecurity and fish management – minimise impact on threatened fish species and habitat, and fishing (S 3 Cond 20)</li> <li>EPBC - water resources (Cond 17-20)</li> </ul>	<b>FGJV</b> Ellen Porter, others as required
14.15 – 15.15	<b>Biodiversity / Flora and fauna</b> (Sch 3 Cond 17, 16, Biodiversity Management Plan including: <ul style="list-style-type: none"> <li>Tracking of limits on disturbance areas and native vegetation clearing (Sch 2 Cond 5);</li> <li>Clearing permits/registers,</li> <li>Fauna strike;</li> <li>Weeds, pathogens, pests (including Weed, Pest and Pathogen Management Plan requirements)</li> <li>Light spill;</li> <li>Bushfire risk;</li> <li>Unexpected finds;</li> <li>Salvage;</li> </ul>	

Indicative time	Agenda item / Areas for review	Proposed attendees
	<ul style="list-style-type: none"> <li>– Fauna relocation.</li> </ul>	
15.15 – 16.15	<b>Spoil, emergency, noise</b> <ul style="list-style-type: none"> <li>– Spoil Management (Sch 3 Cond 4 - 8) – tracking, classification, planning, topsoil and subsoil separation, characterisation &amp; assessment;</li> <li>– Emergency / Natural Hazards / bushfire management, annual review and consultation on NHMP;</li> <li>– Noise management (Rock Forest CNMP), general;</li> </ul>	
16.15 – 16.45	<b>Recreation</b> <ul style="list-style-type: none"> <li>– Recreation – control of recreational activities of workers in the accommodation camps, implement recreation management requirements (S3 Cond 38;</li> </ul>	
16.45 – 17.00	End of Day 3 debrief audit progress and outcomes to date (if required).	

## AUDIT PLAN – DAYS 4 ,5, 6 and 7

DAY 4 – Site Visit – Thursday 13 July 2023		
Indicative time	Agenda item / Areas for review	Proposed attendees
TBC	Travel to site	
All day (incl break)	<b>Visit to sites: Lobs Hole Ravine Road, Lobs Hole, NPWS and TfNSW roads and public parking areas</b> To include all areas of sites, interviews with relevant personnel, review of site-based documentation.	Environmental Coordinators: Others including <ul style="list-style-type: none"> <li>– Plant / Maintenance Supervisor</li> <li>– Ecologist</li> <li>– Operator (s)</li> <li>– Refueller</li> <li>– Site Supervisor</li> <li>– Random subcontractor(s)</li> </ul>
16.00 – 16.15	Site debrief. Return to accommodation	

DAY 5 – Site Visits – Friday 14 July 2023		
Indicative time	Agenda item / Areas for review	Proposed attendees
TBC	Travel to site	
All day (incl break)	<b>Visit to sites: Tantangara and Rock Forest</b> To include all areas of sites, interviews with relevant personnel, review of site-based documentation.	Environmental Coordinator: Others including: <ul style="list-style-type: none"> <li>– Plant / Maintenance Supervisor</li> <li>– Ecologist</li> <li>– Operator (s)</li> <li>– Refueller</li> <li>– Site Supervisor</li> <li>– Random subcontractor(s)</li> </ul>
16.00 – 16.15	Site debrief. Return to accommodation	

DAY 6 – Site Visits – Saturday 15 July 2023		
Indicative time	Agenda item / Areas for review	Proposed attendees
TBC	Travel to site	
All day (incl break)	<b>Visit to sites: Marica, Marica camp, surge shaft, trunk services</b> (various locations). To include all areas of sites, interviews with relevant personnel, review of site-based documentation.	Environmental Coordinator:  Others including: <ul style="list-style-type: none"> <li>– Plant / Maintenance Supervisor</li> <li>– Ecologist</li> <li>– Operator (s)</li> <li>– Refueller</li> <li>– Site Supervisor</li> <li>– Random subcontractor(s)</li> </ul>
16.00 – 16.15	Site debrief. Return to accommodation	

DAY 7 – Site Visits - Sunday 16 July 2023		
Indicative time	Agenda item / Areas for review	Proposed attendees
All day / TBC	<b>Visit to sites: various remote / small sites – e.g – water bores, geotechnical sites, communication towers, revisit other sites / locations as determined;</b> Flexible schedule for the day – to be planned Thursday pm or Friday am.	TBC
	Site debrief if required. Return to accommodation	

DAY 8 – Monday 17 July 2023		
Indicative time	Agenda item / Areas for review	Proposed attendees
AM	<b>Follow-up on audit trails, further review, and collection of evidence and interviews as required,</b> Flexible schedule for the day	TBC
PM	Preparation for closing meeting	Auditors
4.00pm	Closing meeting – presentation of overview of outcomes and summary of findings to date. Full interim findings to be issued approximately one week following completion of audit on site	All (Snowy Hydro and FGJV)

*Note:.. The scope is flexible to meet site circumstances and may be varied at the discretion of the Auditor.*



## **APPENDIX G – AUDIT TABLES**

**Note:** Criteria in each Table includes the Schedule and the requirements of related Management Plans

**TABLE A – SCHEDULE 2 – Administrative Conditions**

**TABLE B – SCHEDULE 3 – - General / Digital Strategy**

**TABLE C- SCHEDULE 3 – Spoil Management and Rehabilitation**

**TABLE D – SCHEDULE 3 & EPBC – Biodiversity, Biosecurity, Surface and Groundwater, Heritage**

**TABLE E- SCHEDULE 3 –Recreation, Transport/Traffic, Waste, Visual**

**TABLE F – SCHEDULE 3 – Noise, Air Quality, Emergency Management**

**TABLE G – SCHEDULE 4 – Environmental Management, Reporting and Auditing**

**TABLE H – Environment Protection Licence conditions**

## 11.0 Appendix G – Snowy 2.0 Independent Audit Tables

**TABLE A – SCHEDULE 2 – Administrative Conditions**

ID	S2 - CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
<b>SCHEDULE 2 - ADMINISTRATIVE CONDITIONS</b>					
1.	1	<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>  In meeting the conditions of this approval, the Proponent must implement all feasible and reasonable measures to prevent, and if prevention is not feasible or reasonable, minimise any material harm to the environment that may result from the construction, operation, decommissioning or rehabilitation of the development.	Overall audit outcome Site inspection	Feasible and reasonable measures were being implemented to minimise harm to the environment.	Compliant
2.	2	<b>TERMS OF APPROVAL</b>  The Proponent must carry out the development: generally, in accordance with the Exploratory Works and Main Works; and a) in accordance with the conditions of this approval. <i>Notes:</i> <ul style="list-style-type: none"> <li>• The key documents for the Exploratory Works and Main Works are identified in the definitions of this approval.</li> <li>• The general layout of the development is shown in Appendix 2.</li> </ul>		The development was being generally carried out in accordance with the conditions or approval, however non-compliances have been raised and non-compliances remain open from the previous audit.  Details of non-compliances and the associated required actions are documented within these audit tables and in the IEA report. Although a non-compliance was raised against this condition in previous audits, it was considered unnecessary to re-raise a non-compliance at this audit as no actions to address it are required.	Compliant
3.	3	<b>TERMS OF APPROVAL</b>  If there is any inconsistency between the above documents, the most recent document will prevail to the extent of the inconsistency. However, the conditions of this approval must prevail to the extent of any inconsistency.		Noted - no areas of inconsistency	Not triggered

ID	S2 - CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status																
		SCHEDULE 2 - ADMINISTRATIVE CONDITIONS																			
4.	4	<b>TERMS OF APPROVAL</b> The Proponent must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:  a) any strategies, plans or correspondence submitted in accordance with this approval; b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and c) the implementation of any actions or measures contained in these documents.	Letter from DPE to SHL: Snowy 2.0 - Main Works CSSI 9787 Environment Management Strategy dated 13 January 2023 - Regarding Direction to undertake a review of, and update the Environmental Management Strategy (EMS).  Letter from DCCEEW dated 04/08/2023 - DCCEEW - Potential Breach of EPBC Approval 2018/8322.  Response to letter - Potential Breach of EPBC Approval 2018/8322 from Snowy Hydro dated 19 May 2023 outlining the circumstances of the incidents, details of non-compliance/incident reports sent to DPE and actions being undertaken to prevent further incidents.  Warning Letter from DPE 18/08/2022 regarding 5 breaches associated with non-compliances raised in IEA #3.  Post Approval email dated 24 March 2023 acknowledging receipt of revised EMS Strategy - Sch 2 Cond 4 with attached Post Approval Form.	The letter from DPE to SHL dated 13 January 2023 directs Snowy Hydro, as project proponent to undertake a review of, and update the Environmental Management Strategy (EMS) in consultation with DPE, NPWS, EPA, TfNSW, NSW Fisheries and Water NSW. The review is to address issues including, but not limited to, expanding the definition of what is an emergency and clarification of incidents associated with the Project. The updated EMS is to be submitted to the Planning Secretary, via the Major Projects Portal, for approval by no later than 28 February 2023.  An extension of time was granted by DPE to submit the revised EMS until 24 March 2023. Evidence was provided that the EMS was submitted to DPE on 24 March 2023	Compliant																
5.	5	<b>LIMITS ON APPROVAL</b> <b>Restrictions on Disturbance Area and Native Vegetation Clearing</b> The Proponent must comply with the restrictions in Table 1 below:  <table><tr><td colspan="4">Table 1: Restrictions on Approval<sup>a</sup></td></tr><tr><td>Matters<sup>a</sup></td><td>Exploratory-Works<sup>a</sup></td><td>Main-Works<sup>a</sup></td><td>Total<sup>a</sup></td></tr><tr><td>Maximum Disturbance Area<sup>a</sup></td><td>126 ha<sup>a</sup></td><td>504 ha<sup>a</sup></td><td>630 ha<sup>a</sup></td></tr><tr><td>Maximum Native Vegetation Clearing<sup>a</sup></td><td>107 ha<sup>a</sup></td><td>425 ha<sup>a</sup></td><td>532 ha<sup>a</sup></td></tr></table> <i>Note: The areas in Table 1 relate to direct disturbance and clearing and do not include the indirect impacts of this disturbance and clearing. <sup>a</sup></i>	Table 1: Restrictions on Approval <sup>a</sup>				Matters <sup>a</sup>	Exploratory-Works <sup>a</sup>	Main-Works <sup>a</sup>	Total <sup>a</sup>	Maximum Disturbance Area <sup>a</sup>	126 ha <sup>a</sup>	504 ha <sup>a</sup>	630 ha <sup>a</sup>	Maximum Native Vegetation Clearing <sup>a</sup>	107 ha <sup>a</sup>	425 ha <sup>a</sup>	532 ha <sup>a</sup>	S2-FGJV-ENV-LST Master Tracker Clearing Register last updated 13/06/2023 WebGIS (live system) Clearing Limits Register (last data update 24/10/2021)	The Master tracker indicates that the total disturbance area was 84% of the projected Disturbance area of 531 ha (446 ha) and is therefore currently compliant to the first requirement.  The Master tracker shows that the native vegetation disturbance area was 90% of the predicted total disturbance area of 478 ha (430 ha) and is therefore compliant with the second requirement.	Compliant
Table 1: Restrictions on Approval <sup>a</sup>																					
Matters <sup>a</sup>	Exploratory-Works <sup>a</sup>	Main-Works <sup>a</sup>	Total <sup>a</sup>																		
Maximum Disturbance Area <sup>a</sup>	126 ha <sup>a</sup>	504 ha <sup>a</sup>	630 ha <sup>a</sup>																		
Maximum Native Vegetation Clearing <sup>a</sup>	107 ha <sup>a</sup>	425 ha <sup>a</sup>	532 ha <sup>a</sup>																		
6.	6	<b>STAGING</b> The Proponent may construct, operate, and decommission the development in stages. When staging occurs, the Proponent is only required to comply with the conditions of this approval that are relevant to the specific stage/s.		Noted - no compliance requirements	Compliant																

ID	S2 - CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>SCHEDULE 2 - ADMINISTRATIVE CONDITIONS</b>			
7.	7	<b>LAPSE OF APPROVAL</b> This approval will lapse if the Proponent does not physically commence the development within 5 years of the date on which it is granted.		Construction works commenced in October 2020 which is well within the 5-year timeframe.	Not triggered
8.	8	<b>SURRENDER OF APPROVAL</b>  Within 6 months of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must surrender the infrastructure approval (CSSI 9208) for the Exploratory Works in accordance with Clause 197 of the EP&A Regulation.	Letter from Snowy Hydro to DPIE dated 17/08/2021: RE: Surrender of Exploratory Works Approval CSSI 9208  Email: Snowy 2.0 Exploratory Works - Surrender of Approval from DPIE to Snowy Hydro dated 27/09/2022 - re: the approach to surrender of Exploratory Works Approval requires consultation with NPWS and approval of Workers Recreation Management Plan.  Email: Snowy 2.0 Exploratory Works - Surrender of Approval - Drafting of Notice for DPIE from Snowy Hydro to NPWS dated 12/01/2022 requesting a statement from NPWS consenting to the surrender.	As noted in the previous audit #3, a letter from FGJV to Snowy Hydro dated 16/05/2021: Surrender of Exploratory Works Approval (CSSI9208) outlining updated plans and those that may require discussion or clarification with DPIE.  At the time of the audit, the Exploratory Works Approval had not yet been surrendered.  It was noted in the previous audit that a surrender request was made in August 2021, however correspondence between DPIE and NPWS indicate that the Exploratory Works approval cannot be surrendered until the Main Works Worker Recreation Management Plan has been approved.  At the time of this and previous audits, the issue had not been progressed or resolved.	Non-compliant
9.	9	<b>SURRENDER OF APPROVAL</b> Prior to surrendering the infrastructure approval (CSSI 9208) for the Exploratory Works, the Proponent must update the approved management plans for the development to incorporate the approved management plans for the Exploratory Works to the satisfaction of the Planning Secretary.	See above	At the time of the audit, the Exploratory Works Approval had not yet been surrendered. It appears that the Exploratory Works approval cannot be surrendered until the Main Works Worker Recreation Management Plan has been approved.	Non-compliant
10.	10	<b>DEMOLITION</b> The Proponent must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Interviews; Site inspection	It was advised that there has been no demolition to date - it is believed that the intent of this condition would apply to the demolition of temporary structures once the majority of works are complete.	Not triggered



**TABLE B – SCHEDULE 3 – - General / Digital Strategy**

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS DIGITAL STRATEGY</b>						
	1		<p>The Proponent must:</p> <p>a) consolidate all the information presented in the documents prepared for the Exploratory Works and Main Works (see definitions) in a single, open-source database;</p> <p>b) supplement this information over time with the information that must be gathered and made public under the conditions of this approval;</p> <p>c) prepare a detailed archival record of all phases of the development; and</p> <p>d) make this information publicly available.</p>		As the Digital Strategy is not yet complete (see Cond 2 below), this condition has not been triggered)	Not triggered
	2		<p><b>Within 6 months of the commencement</b> of construction, the Proponent must prepare a Digital Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <p>a) be prepared in consultation with the NPWS;</p> <p>b) identify innovative ways to give effect to the requirements in condition 1 above; and</p>	<p>Letter from Snowy Hydro to the Director Compliance dated 21 July 2023 - Snowy Hydro 2.0 Main Works Management Plans (Infrastructure Approval No. SSI 9687)</p>	<p>At Audit #3, it was noted that the Digital Strategy was submitted by Snowy Hydro to DPIE on 4 June 2021 requesting endorsement of the Planning Secretary to submit this plan on a staged basis.</p> <p>On 15 Nov 2021, an extension was received from DPE until April 2022 for management plans including the Digital Strategy.</p> <p>Since the last audit, Snowy Hydro has been updating DPE regularly on the status of the Digital Strategy and other management plans on a regular basis.</p> <p>In the fortnightly update to DPE (5 July 2023) it was noted that "The draft plan is almost complete and will be provided to NPWS for review within the next week. SHL is organising a time to meet with NPWS to present this plan.</p> <p>Snowy Hydro has proposed a new submission date of 01 November 2023 in the fortnightly update 21/07/2023.</p> <p>The Digital Strategy is not yet developed "to the satisfaction of the Planning Secretary" and therefore continues to be non-compliant to this condition.</p> <p>There has been ongoing consultation with NPWS to develop the Digital Strategy to meet the requirements of NPWS</p>	Non-Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS DIGITAL STRATEGY</b>						
			c) include a program to develop a digital application for users of the Kosciuszko National Park to bring key information to life in an interactive way and enhance the enjoyment of the park.			
	3		The Proponent must implement the approved Digital Strategy for the development.			Not triggered

**TABLE C- SCHEDULE 3 – Spoil Management and Rehabilitation –**

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
1.	4		<b>SPOIL MANAGEMENT</b> <b>Spoil Management Requirements</b> The Proponent must:			
			a) minimise the spoil generated by the development;	Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022) updated to include Stage 4 construction activities at the Tantangara emplacement area and includes reference to the updated Leachate Detection Procedure and Contingency Plan.  Lobs Hole Spoil Drawings (GF01) Ravine Bay Spoil Disposal area drawing Tantangara Spoil Disposal Area - Final Landform drawing	Section 6.2.1 of the Spoil Management Plan (SPM) indicates that the amount of spoil generated will be reduced through design optimisation. Where possible both temporary and permanent infrastructure has been designed to minimise excavation.  Section 6.2.2 - Beneficial reuse indicates that FGJV will maximise the reuse of non-reactive spoil on site in permanent infrastructure.	Compliant
			b) test and classify the relevant physical and chemical characteristics of the spoil;	Interview with Lisa Walter - Spoil Advisor - FGJV - project wide.  Quarterly Spoil Monitoring Report July 2023 Rev A	The Quarterly Spoil Reports prepared to satisfy the requirements of the EPL include results of all spoil characterisation that has occurred in the quarter.  The methodology for sampling was discussed during the interview with the Spoil Advisor, noting that core samples are taken in advance and tested in the internal lab to provide fast results, and also sent to external labs for verification.	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
2.			<p>c) manage, use or dispose of the spoil in accordance with its classification;</p>	<p>Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022) - Appendix A - Spoil Characterisation Program dated 08/06/2022 is included in the Plan.</p> <p>Interview with Lisa Walter - Spoil Advisor - FGJV - project wide.</p> <p>Internal Tunnel Spoil Management Audit conducted 7 &amp; 8 March 2023 and submitted to DPE as evidence of internal audit undertaken on 30 May 2023.</p> <p>Waste Classification Assessment for Surplus Soil and Concrete (CS006) by Tetra Tech Coffey - Tantangara 16 May 2023 - classified as General Solid Waste (non-putrescible) - contained concrete, plastic and steel. Some contaminants of concern were identified.</p> <p>Chain of Custody C006 14/04/2023 Tantangara - Lab - Eurofins</p> <p>Eurofins Soil Testing Certificate of Analysis 24/04/2023</p>	<p>Only non-reactive spoil is placed within the emplacement areas. PAF material is treated at the final placement area and re-tested post-treatment to validate that the material has been effectively neutralised and no longer poses risk of leaching low pH seepage or cause an oxidation reactor conditions.</p> <p>PAF is thoroughly blended with Acid neutralising capacity (ANC) material to create a neutral spoil mass.</p> <p>Any spoil that has been contaminated with grout, fibres or other wastes are classified in a Waste Classification Assessment and removed from site - the recommendation from the 16 May 2023 assessment was for waste to be transported by an appropriately licenced transported and tracked using the EPA's online tracking system.</p>	Compliant
			<p>d) develop and implement suitable procedures for handling, storing and disposing of any:</p> <ul style="list-style-type: none"> <li>potentially acid forming material;</li> <li>asbestiform mineral fibres;</li> <li>contaminated material;</li> </ul>	<p>Main Works Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022) including appendices</p> <ul style="list-style-type: none"> <li>* Appendix D: Naturally Occurring Asbestos Management Plan;</li> <li>* Appendix E Acid and Metalliferous Drainage Management Plan;</li> <li>* Appendix A - Characterisation Program</li> </ul> <p>Lobs Hole Operational Material Characterisation and Handling Procedure Report Rev 02 Aug 2021</p> <p>Tantangara Operational Material Characterisation and Handling Procedure Report Rev C Jan 2023</p> <p>Inspection and Test Plan (ITP) Handling and Characterisation Spoil Management Rev E Sept 2022;</p>	<p>Detailed procedures have been developed as appendices to the Spoil Management Plan and site-specific Material Characterisation and Handling Procedures.</p> <p>In addition ITPs have been developed</p>	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
3.			e) only place non-reactive spoil, which has a low geochemical risk and is suitable for reuse, in the western emplacement area;	<p>Spoil handling, testing and placement records:</p> <p>*ECVT Spoil Tracking table showing date, ring number, final location and cubic meters per location;</p> <p>*MAT Portal Spoil Tracking table showing date, ring number, final location and cubic meters per location;</p> <p>Spoil Placement Permits</p>	Only non-reactive spoil is currently placed in the western emplacement areas (Main Yard - Lobs Hole)	Compliant
			f) maximise the reuse of non-reactive spoil on site and in other parts of the Kosciuszko National Park;	Spoil Reuse Procedure S2-FGJV-ENV-PRO-0056 dated 30 May 2023.	<p>The Spoil Reuse procedure has been prepared to address this requirement, and provides the sampling and criteria required to determine whether spoil is chemically suitable for reuse across the project</p> <p>It was noted that some of the spoil generated at Marica / Surge shaft will now to be used to cover part of the above ground component of the surge shaft itself, rather than being transported to Rock Forest.</p> <p>Non-reactive spoil has also been used for unsealed road sheeting on site.</p>	Compliant
			g) maximise the use of the permanent spoil emplacement areas;	<p>Spoil Report for August 2021 - Jan 2022 submitted 25/01/2023 (JA03/02/2023)</p> <p>Quarterly Spoil Report Jan - March 2023 dated April 2023)</p> <p>Site Inspection Interviews.</p>	Tunnel spoil is being transported to the current permanent spoil emplacement areas - primarily GF01 at Lobs Hole and the Tantangara PSE.	Compliant
			h) minimise the spoil left at Lobs Hole and Marica for incorporation into the final landform;		As tunnelling is not yet complete, the use of spoil in the incorporation into the final landform has not yet been triggered.	Not triggered



ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
4.			i) minimise the water quality impacts of the temporary and permanent emplacement areas;	Progressive Erosion and Sediment Control Plans (PESCPs)  Leachate Detection Procedure (S2-FGJV-ENV-PRO-0057).	A Leachate Detection Procedure (LDP) has been developed to manage potential leachate seepage from the PSE. The LDP was prepared in consultation with EPA (and NPWS) who have since confirmed they are satisfied with the procedure for GF01 and Tantangara.  Monitoring via surface water and ground water sampling has been implemented to continually assess if leachate is occurring from the spoil emplacement. The data and information gathered during monitoring will feed into management processes that seeks to minimise the Project's impact on surface and groundwater.	Compliant
			j) not place any spoil from the tunnel boring machines in the active storages or below the full supply level of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary; and	Site inspection Interviews.	No spoil has been placed in the Talbingo Reservoir or the Tantangara Reservoir to date.	Compliant
			k) not place any spoil from dredging, channel excavation or underwater blasting in the eastern and western emplacement areas, or in the active storages or below the full supply level of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary.		No dredging, or underwater blasting has been undertaken to date.	Not triggered
5.	5		<b>Permanent Spoil Emplacement Areas</b> Apart from the spoil that is provided to the NPWS for use in other parts of the Kosciuszko National Park, sent off-site, used to construct temporary or permanent infrastructure for the development or used to rehabilitate the site, the Proponent must ensure that all the spoil generated by the development is disposed of in the following emplacement areas: a) Ravine Bay; b) GFO 1; c) Lobs Hole; d) Tantangara; or e) Rock Forest.  <i>Note: The location of these emplacement areas is shown in the figures in Appendix 2.</i>	Main Works Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022)  SMP includes: Appendix F - Lobs Hole Main Yard Emplacement Area; (21 July 2020) Appendix G - GF01 Emplacement Area (20 Aug 2022) ); Appendix H - Ravine Bay Emplacement Area (not yet developed or approved); Appendix I - Tantangara Emplacement Area (7 Sept 2022); Appendix J - Rock Forest Emplacement Area (not yet developed or approved)	Based on observations during the audit site inspections, generated spoil is disposed only in permanent emplacement areas. Site visits were made to the Lobs Hole (GF01, Lick Hole Gully), and Tantangara spoil emplacement areas (see photos in report)	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
6.	6		<p><b>Design Objectives for Permanent Spoil Emplacement Areas</b></p> <p>The Proponent must ensure the permanent spoil emplacement areas comply with the design objectives in Table 2.</p> <p><i>Table 2: Design Objectives for Permanent Spoil Emplacement Areas</i></p> <p><b>Aspect / Objective:</b></p> <p><u>Landforms</u></p> <ul style="list-style-type: none"> <li>• As natural as possible, including minimising the use of linear or engineered structures</li> <li>• Sympathetic with the landforms in the surrounding area, particularly from a visual, water management and ecological perspective</li> <li>• Suitable drainage density</li> <li>• Safe, long-term stable and non-polluting</li> <li>• Where feasible, gradients along the water line of the reservoirs that could be exposed under normal conditions (i.e., above the minimum operating level) must be suitable for safe recreational use and consistent with the approved Recreation Management Plan</li> <li>• Provide suitable access for vehicles and/or all-terrain vehicles for rehabilitation, weed control and firefighting to allow for spraying from vehicles (at around 200 metres measured on the slope, or as approved by the NPWS)</li> </ul> <p><u>Water management</u></p> <ul style="list-style-type: none"> <li>• Integrate the drainage of the emplacement area with the surrounding drainage network, including any upstream flows and residual run-on water</li> <li>• Minimise downstream water flows and velocities with any changes to be quantified and addressed through suitable design</li> <li>• Minimise valley infill</li> <li>• Create natural drainage lines that are long-term sustainable having regard to the selection of suitable underlying materials, including rock sizing and grading</li> </ul>	<p>Detailed Plans have been prepared and are included in the appendices of the SMP.</p> <p>Appendix F - Lobs Hole Main Yard Emplacement Area; (21 July 2020)</p> <p>Appendix G - GF01 Emplacement Area (20 Aug 2022) );</p> <p>Appendix I - Tantangara Emplacement Area (7 Sept 2022);</p>	<p>Detailed plans for permanent spoil emplacement (PSE) have been prepared. Since the last audit, the GF01 and Tantangara spoil plans have been prepared and approved (Appendices to SMP)</p> <p>These plans have taken into consideration the Design Objectives indicated in the Approval.</p>	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
7.			<ul style="list-style-type: none"> <li>Minimise the use of large rocks in drainage lines</li> <li>Minimise the concentration of water on landforms unless this is consistent with accepted drainage density and geomorphic design practices</li> <li>Minimise the generation and dispersion of sediment in the Talbingo Reservoir, Tantangara Reservoir or other waterways</li> </ul> <p><u>Erosional stability</u></p> <ul style="list-style-type: none"> <li>Minimise steep slopes, particularly slopes that will be difficult to access and maintain (such as slopes over 18o or 1V:3H)</li> <li>The final surface of the landform must be long-term sustainable with sufficient topsoil (or some other suitable growth medium) to maintain a soil water profile and sustain vegetation</li> <li>Maximise the revegetation of the final surface</li> <li>Ensure areas subject to wave action are suitably protected or the slopes are flattened to limit wave action</li> </ul> <p><u>Land Use</u></p> <ul style="list-style-type: none"> <li>Native vegetation and habitat must comply with the approved Rehabilitation Management Plan</li> <li>Recreational facilities and use must comply with the approved Recreation Management Plan</li> </ul> <p><u>Constructability</u></p> <ul style="list-style-type: none"> <li>The emplacement area must be constructible having regard to the: <ul style="list-style-type: none"> <li>availability of suitable material, including topsoil</li> <li>erosion and sediment control;</li> <li>access;</li> <li>initial shaping of natural ground;</li> <li>progressive rehabilitation;</li> <li>shapes and benching; and</li> <li>safety around water</li> </ul> </li> </ul>			

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
8.	7		<b>Spoil Management Plan</b> Prior to the commencement of construction, the Proponent must prepare a Spoil Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	Main Works Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022)	A Spoil Management Plan (SMP) has been prepared and approved by the Planning Secretary. Various appendices are included in the Plan, prepared and approved at different times than the main report.	Compliant
			a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, EPA, Water Group, NRAR, NSW DPI and TfNSW;	SMP Section 1.7. Consultation	The original SMP was prepared by Derek Low, who has over 13 years' experience in infrastructure and remediation. Evidence of the consultation process has been included in the Plan.	Compliant
			b) provide an overarching framework for the management of all spoil generated on site - including the testing, classification, handling, temporary storage and disposal of spoil – that complies with the spoil management requirements in condition 4 above	Main Works Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022) - Section 6 - Spoil Management Strategy, and - Appendix E - Acid and Metalliferous Drainage (ADM) Management Plan	An overarching framework for the management of all spoil generated on site - including the testing, classification, handling, temporary storage and disposal of spoil, has been defined in Section 6 of the SMP.	Compliant
			c) include a detailed plan for managing the temporary spoil stockpiles of the development, which includes suitable triggers for remedial measures (if necessary) and describes the contingency measures that would be implemented to address any water quality risks	SMP: - Section 6.5 Stockpile management; - Section 9 - Compliance Management; - Appendix C - Stockpiling Procedure	A detailed plan for managing temporary spoil stockpiles has been included in App C - Stockpiling Procedure of the SMP.  Section 6.5 Stockpile management describes stockpile design applying erosion and sediment control principles and the use of erosion and sediment control plans (ESCP).  Section 9 - Compliance Management, defines monitoring and inspection activities related to temporary stockpiles in general, as well as trigger action response plans (TARPs) for temporary stockpiles.	Compliant
9.			d) include a detailed plan for managing all the reactive or contaminated spoil generated on site, including the contingency measures that would be implemented if the volumes of this spoil are greater than expected and unsuitable for land disposal;	Main Works Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022) - Section 6 - Spoil Management Strategy, and - Appendix E - Acid and Metalliferous Drainage (ADM) Management Plan	A detailed plan for managing all the reactive or contaminated spoil has been defined in the Spoil Management Plan (SMP), Appendix E - Acid and Metalliferous Drainage (ADM) Management Plan. Additional contingency measures Section 6 - Spoil Management Strategy of the SPM.	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
10			<p>e) detailed plans for each of the permanent spoil emplacement areas that have been prepared using both analogue and erosional-based methods, these plans must:</p> <ul style="list-style-type: none"> <li>describe how the development of each emplacement area would be co-ordinated with the rehabilitation of the site in accordance with the approved Rehabilitation Management Plan;</li> <li>describe the measures that would be implemented to comply with the spoil management requirements in condition 4 above and the design objectives in Table 2;</li> <li>include a topsoil strategy, outlining the measures that would be implemented to ensure the surface of the emplacement area will be suitable to sustain the target PCTs in the long term, having regard to the approved strategy in the Rehabilitation Management Plan;</li> <li>identify the key risks for the successful completion of each emplacement area and the contingency measures that would be implemented to address these risks; and</li> <li>include detailed completion criteria and performance indicators for each emplacement area, including criteria for triggering remedial action (if necessary);</li> </ul>	<p>Detailed permanent spoil emplacement areas (PSE) - approved, include:</p> <p>Appendix F - Lobs Hole Main Yard Emplacement Area; (21 July 2020);</p> <p>Appendix G - GF01 Emplacement Area (20 Aug 2022);</p> <p>Appendix I - Tantangara Emplacement Area (7 Sept 2022).</p>	<p>Detailed plans for permanent spoil emplacement (PSE) areas have been prepared and are included in the appendices of the SMP.</p> <p>Detailed Plans have been prepared and are included in the appendices of the SMP.</p> <p>App F - Lobs Hole Main Yard indicates in the introduction that whilst the Lobs Hole Main Yard is within a designated permanent spoil emplacement area, it is the primary base for construction for the western portion of the project.</p> <p>In GF01 and Tantangara Detailed Plan, rehabilitation is addressed in Section 4.2 and notes that the permanent structure will be consistent with the Rehabilitation Management Plan.</p> <p>A Topsoil strategy is included in the GF01 and Tantangara Detailed Plans (Section 4.1)</p> <p>Key Risks for successful completion is included in Section 4.2 of the GF01 and Tantangara Plans</p> <p>Completion criteria is included in Section 4.3 of the GF01 and Tantangara Plans</p>	Compliant
			<p>f) include a program to monitor and publicly report on:</p> <ul style="list-style-type: none"> <li>the management of spoil on site;</li> <li>the implementation of each of the detailed plans, including the effectiveness of the proposed mitigation and contingency measures; and</li> <li>progress against the detailed completion criteria and performance indicators of each permanent spoil emplacement area.</li> </ul> <p><i>Note: The Proponent may stage the preparation of the Spoil Management Plan, including the preparation of detailed plans for each permanent spoil emplacement area. However, the detailed plans must be approved prior to any construction occurring in the relevant emplacement area</i></p>	<p>Main Works Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022)</p> <p>Spoil Report for August 2021 - Jan 2022 submitted 25/01/2023 (JA03/02/2023)</p> <p>Quarterly Spoil Report Jan - March 2023 dated April 2023)</p>	<p>A program to monitor is included in Section 9.5 and Table 9-4 of the SMP. This section notes that reporting is presented in Table 9-4 and will be completed and made publicly available in accordance with schedule 3 condition 7 (f) and EPL 21266.</p> <p>Table 9-4 notes that 6 monthly reporting will be undertaken for the duration of construction of: Volume of spoil excavated from tunnelling,; Volume placed at each emplacement area with a brief summary of progress towards design objectives listed in Table 7-1; Volume disposed of off-site, reused elsewhere in KNP, volume of AMD treated and volume of NOA excavated and placed in encapsulation (if any) .</p>	Compliant



ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
11	8		The Proponent must implement the approved Spoil Management Plan for the development	Main Works Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022)	Spoil specific reports have not been provided on the Project website as required by Table 9-4 of the Spoil Management Plan: Refer to section below - Spoil Management Plan implementation.	Non-compliant
12			<b>SPOIL MANAGEMENT PLAN - Topsoil Strategy Implementation</b>			
13		Sect 9.5 and Table 9.4 of SMP	<p>Spoil specific reporting is presented in Table 9-4 and will be completed and made publicly available in accordance with schedule 3 condition 7 (f). The following will be reported 6 monthly for the duration of construction</p> <p>Table 9.4: Volume of spoil excavated from tunnelling; Volume placed at each emplacement area:  <ul style="list-style-type: none"> <li>• Ravine Bay</li> <li>• GFO</li> <li>• Lobs Hole</li> <li>• Tantangara</li> <li>• Rock Forest.</li> </ul> and a brief summary of progress towards final design objectives listed in Table 7-1 of this Plan.  Volume disposed of off-site (if any).  Volume reused elsewhere in KNP (if any).  Volume of AMD material treated (if any).  Volume of NOA excavated and placed in encapsulation (if any).</p>	<p>Quarterly Spoil Monitoring Report July 2023 Rev A. (Prepared to satisfy the reporting requirements of the Environmental Protection Licence 21266 (5 October 2022).</p> <p>Spoil Report August 2021 - January 2022 S2-FGJV-ENV-REP-0069 Rev A Jan 2023.</p> <p>Aconex Transmittal from FGJV to Snowy Hydro dated 25 Jan 2023 - Contractors Environmental Compliance Reporting - S2-FGJV-ENV-REP-0069_A SPOIL REPORT AUGUST 2021 - JANUARY 2022.</p>	<p>6 monthly spoil specific reports have not been provided on the Project website as required by Table 9-4 of the Spoil Management Plan:</p> <p>* Finalise 6-monthly Summary Spoil reports to meet the requirements of Table 9-4 of the Spoil Management Plan based on the information provided in the Quarterly Spoil Management Reports.</p> <p>* The 6 monthly Spoil Reports are to cover the period from the commencement of tunnel</p>	Non-compliant
14		App B; Pages 96 - 97	<b>Topsoil and subsoil maintenance:</b> – Topsoil will be stockpiled, signposted and separated from other materials, and tracked;	Site inspection	Topsoil stockpiles were observed to be stockpiled and separated from other materials, however the stockpile area above Marica was not signposted (see photos in report)	Compliant OBS
			– Subsoil should be removed and stockpiled separately from topsoil;	Site inspection	Topsoil stockpiles were observed to be stockpiled and separated from other materials	Compliant
			– Stripped topsoil will be stockpiled separately from woody material and subsoil stockpiles;	Site inspection	Woody materials were observed to be stockpiled separately	Compliant
			– Topsoil stockpile heights will not exceed 2.5 m, to minimise the risk of compaction and to maintain the viability of the soil seed bank;		Stockpiles observed appeared to be around 2.5m	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
15			– Topsoil stockpiles will be placed away from water discharge zones and flow paths; topsoil should not be stockpiled against fences or vegetation and should be retained separately from mulch (apart from a surface layer);		Stockpiles observed were located appropriately	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
16			– Topsoils to be maintained for an extended period of time should have the surface left in a rough state and monitored for weed management;		Topsoil has been covered with various materials including jute mesh, hydromulch and geofabric	Compliant
			– Topsoil stockpiles to be covered with weed-free mulch, jute mesh, geofabric or similar to assist with reducing temperature extremes and reducing weeds and helps to maintain its integrity for future use.		Topsoil has been covered with various materials including jute mesh, hydromulch and geofabric	Compliant
			– Inspections for dispersion and erosion of subsoil stockpiles will be undertaken, particularly on moderately dispersive soils. Suitable measures will be applied to reduce erosion potential as required.		Weekly Environmental Site Inspections throughout the project were reviewed. Checklist includes questions on stockpiles management.	Compliant
17		BMP; App F 5.1.2	(From Biodiversity Plan App F – weeds management)		Weekly Environmental Site Inspections throughout the project were reviewed. Checklist includes questions on stockpiles management.	Compliant
			– Topsoil, mulch and spoil stockpiles will be inspected for evidence of weeds on a regular basis as a part of routine environmental site inspections.			
			<b>SPOIL MANAGEMENT PLAN</b>			
18			<p>Spoil Transport</p> <p>Spoil will be transported from its source to its destination via truck using both the internal construction road network and the external road network</p> <p>Spoil will be transported from Marica to Rock Forest via the public road network.</p> <p>TfNSW question: Is the spoil associated with the Main Works project being disposed of as per the requirements of the approval and not being taken off-site to other locations that would result in additional heavy vehicle movements on the classified road network?</p>	<p>Site inspection</p> <p>Interviews with Transport personnel</p>	<p>The site inspection found that spoil is not being transported from sites to other sites, rather it is being placed in the designated spoil emplacement areas at each site.</p> <p>To date, spoil has not been required to be transported from Marica to Rock Forest as it is being temporarily stockpiled for use around the Marica surge shaft at the moment.</p> <p>Some spoil that is not suitable for re-use on site has been required to be removed from sites (contaminated soils) and taken to waste facilities that can legally accept it.</p>	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
19		SMP 6.1	<p><b>6. SPOIL MANAGEMENT STRATEGY</b></p> <p><b>6.1 Overview (page 66)</b></p> <p>Spoil that cannot be re-used in permanent infrastructure will be directed to the approved emplacement areas at Talbingo (Ravine Bay, GF01 and Lobs Hole), Tantangara Reservoir and outside KNP at Rock Forest as a priority:</p> <ul style="list-style-type: none"> <li>Reactive material would be placed in the aforementioned emplacement areas with prior treatment and / or appropriate engineering controls to manage leaching and reaction both in the short term and long term.</li> <li>NOA material would be placed within designated encapsulation cells above the FSL of the Tantangara Reservoir emplacement area.</li> <li>TBM spoil must not be placed in the active storages or below the FSL of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary.</li> <li>Spoil from dredging, channel excavation or underwater blasting must not be placed in the Exploratory Works eastern and western emplacement areas, or in the active storages or below the FSL of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary.</li> <li>Unsuitable material will be disposed of offsite to facilities lawfully permitted to receive it.</li> </ul>	Receipts for off-site disposal	<p>Based on observations during the audit site inspections, generated spoil is disposed only in permanent emplacement areas at Lobs Hole - GF01 and Tantangara.</p> <p>Potentially Acid Forming (PAF) material is tested and blended with Non-Acid forming material (NAF) to neutralise where the requirement is indicated, and once re-tested, is place within the PSEs.</p> <p>NOA material had not yet been encountered at the time of this audit.</p> <p>No TBM spoil has been place in any of the active storages.</p> <p>Spoil from dredging, channel excavation or underwater blasting has not yet been triggered.</p> <p>Small volumes of unsuitable material have been generated - evidence provided of appropriate offsite disposal</p>	Compliant
20			<p><b>Leachate Detection Procedure</b></p> <p>To manage potential leachate seepage from the Permanent Spoil Emplacements (PSEs), specific Leachate Detection Procedures will be implemented and followed for each of the spoil emplacement areas. Monitoring will be carried out at applicable surface water and ground water point which will continually assess if leachate is occurring from the spoil emplacement.</p>	<p>Leachate Detection Procedure - S2-FGJV-ENV-PRO-0058 Marica Rev C March 2023</p> <p>Leachate Detection Procedure - S2-FGJV-ENV-PRO-0059 Lobs Hole Main Yard Rev D March 2023.</p> <p>Leachate Detection Procedure - S2-FGJV-ENV-PRO-0061 Rock Forest Rev C March 2023</p>	<p>Leachate basins have been installed at Lobs Hole GF01, Main yard and Marica.</p> <p>Implementation not fully assessed, however confirmed Procedures are in place (March 2023).</p> <p>Monitoring results are reported as part of monthly EPL water quality monitoring.</p>	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
21			The data and information gathered during monitoring will feed into management processes that seeks to minimise the Project's impact on surface and groundwater. Potential seepage and runoff will be collected in a leachate basin downstream of the treatment emplacement area. Collected water will be tested for potential contamination which will be guided by the EPL.		Monitoring results are reported as part of monthly EPL water quality monitoring.  Leachate basins in place	Compliant
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
22			Water will be irrigated to the spoil emplacement area (to promote evaporation) or, where the water quality is not suitable for reuse, treated in the process water treatment plant. Should the water treatment plant have insufficient capacity to treat the water, the water will be classified and will be disposed on offsite at a facility licensed to accept the classification of water.	Site inspection Interviews	Water is being irrigated to the emplacement area.	Compliant
23			<p><b>Waste Management (Spoil)</b> In the unlikely event spoil is not able to be reused or placed on the project it will need to be disposed of off-site as a waste.</p> <p><b>Acid and Metalliferous Drainage (AMD)</b> Future Generation will use designated treatment areas for PAF material to be treated separately from the non-PAF material;</p> <p>Potentially Acid Forming (PAF) material would be blended with ANC material, or lime, until neutralised</p> <p>Where there is sufficient material, PAF material will be encapsulated within Non-acid forming material (NAF) material in emplacement areas to minimise interaction with air and water. If there is insufficient material, treated PAF material will be used.</p> <p>Neutralised PAF material can, once validated, be safely disposed of like any other spoil</p>	<p>Waste Classification Assessment for Surplus Soil and Concrete (CS006) by Tetra Tech Coffey - Tantarara 16 May 2023 - classified as General Solid Waste (non-putrescible) - contained concrete, plastic and steel. Some contaminants of concern were identified.</p> <p>Interview with Lisa Walter - Spoil Advisor - FGJV - project wide.</p>	<p>Any spoil that has been contaminated with grout, fibres or other wastes are classified in a Waste Classification Assessment and removed from site - the recommendation from the 16 May 2023 assessment was for waste to be transported by an appropriately licenced transported and tracked using the EPA's online tracking system. PAF areas were segregated from other materials and signposted</p> <p>PAF is thoroughly blended with Acid neutralising capacity (ANC) material to create a neutral spoil mass.</p>	Compliant



ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
24			<p><b>Tunnel Drainage</b> All tunnel drainage, including tunnel drainage within excavations in Possible, Likely and Confirmed AMD hazard areas are to be directed to the process water treatment plant whereby it will undergo treatment prior to reuse in process.</p> <p>The water will be reused in the tunnelling process following treatment. Any discharge to the environment will only occur where the water is treated so as to comply with the criteria in EPL 21266.</p>	<p>Site inspection Interviews</p>	Tunnel drainage is directed to the process water treatment plant.	

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
25		SMP 8; Table 8-1	<b>8. ENVIRONMENTAL MANAGEMENT MEASURES</b>			
			<b>Table 8-1: Spoil management measures (page 82-87)</b>			
			<b>General</b>			
26		SM01	SM01 Training will be provided to all project personnel, including relevant sub-contractors on spoil management practices and the requirements from this plan through inductions, toolboxes, and targeted training.	<p>Site Induction material Environmental Awareness Training material (PowerPoint presentation) Meeting minutes - Marica Spoil Management 14/02/23 Meeting minutes - Tantangara 30/06/23 - Spoil advisor and Construction personnel</p> <p>Internal Spoil Audit Report - undertaken 7 &amp; 8 March 2023, submitted to DPE 30 May 2023. Spoil Audit - Internal audit action sheet with due dates for action.</p>	The Internal spoil audit identified that there were no documented records of pre-start training and spoil was not included in the project induction at the time of the audit. This was raised as an Observation. A draft of the spoil section was provided as evidence - closed in Aconex, still awaiting final records. Not raised as new finding in this audit - actions taken to address and being managed internally.	Compliant
27		SMP 8; Table 8-1	<b>8. ENVIRONMENTAL MANAGEMENT MEASURES</b> <b>Table 8-1: Spoil management measures (page 82-87)</b> <b>Characterisation</b>			
28		SM03	The spoil characterisation program in Appendix A will be implemented. The program will enable adequate assessment of contaminated materials, NOA, acid metalliferous drainage (AMD)/neutral metalliferous drainage (NMD)/saline drainage (SD) material and reduce the risk of material being misclassified as 'benign' and being managed inappropriately.	<p>Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022) - Appendix A - Spoil Characterisation Program dated 08/06/2022 is included in the Plan.</p> <p>Interview with Lisa Walter - Spoil Advisor - FGJV - project wide.</p> <p>Internal Tunnel Spoil Management Audit conducted 7 &amp; 8 March 2023 and submitted to DPE as evidence of internal audit undertaken on 30 May 2023.</p> <p>ECVT and Talbingo Sample Registers indicating classification of spoil (NAF/PAF) showing ring numbers, TR number, Eurofins/ALS report number and classification (NAF) - Jan to March 2023.</p> <p>Site inspection Interview with Spoil Advisor</p>	The site inspection, interview with the Spoil Advisor, review of the Internal Spoil Audit Report and sample registers provided evidence of compliance with this requirement.	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
29		SM05	Material which has been assessed as not suitable for reuse on land or for subaqueous disposal or cannot be reused will be classified in accordance with the Waste Classification Guidelines (NSW EPA 2014).	<p>Waste Classification Assessment for Spoil (CS016) Impacted by Fuel &amp; Hydraulic Oil Spills at the Talbingo Adit, Lobs Hole 8/3/23. Tetra Tech Coffey;</p> <p>Waste Classification Assessment for Spoil (CS017) Impacted by Fuel &amp; Hydraulic Oil Spills at the Main Office, Lobs Hole 8/3/23. Tetra Tech Coffey;.</p> <p>Waste Classification Assessment for Spoil (CS018) Impacted by Fuel &amp; Hydraulic Oil Spills at Main Yard, Pad 50 6/4/23 - Coffey;</p> <p>Waste Classification Assessment for Surplus Soil and Concrete (CS006) by Tetra Tech Coffey - Tantangara 16 May 2023 - classified as General Solid Waste (non-putrescible) - contained concrete, plastic and steel. Some contaminants of concern were identified.</p>	External specialists (Coffey) are engaged to assess soils / spoil unsuitable for reuse on site. Where unsuitable, the reports recommend disposal to a facility licenced to receive that class of waste (General Solid Waste - non-putrescible).	Compliant
30		SMP 8; Table 8-1	<b>8. ENVIRONMENTAL MANAGEMENT MEASURES</b> <b>Table 8-1: Spoil management measures (page 82-87)</b> <b>Spoil handling and management</b>			
31			TBM spoil must not be placed in the active storages or below the full supply level of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary	Site Inspection Interviews with site and environmental staff - FGJV.	It was advised that no TBM spoil has been placed in the active storage areas to date.	Not triggered
32			Spoil from dredging, channel excavation or underwater blasting must not be placed in the eastern and western emplacement areas, or in the active storages or below the full supply level of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary.	Site Inspection Interviews with site and environmental staff - FGJV.	It was advised that no spoil from dredging, channel excavation or underwater blasting has been placed in the active storage areas to date.	Not triggered
33			An unexpected finds procedure is included in the Contaminated Land Management Plan (S2-FGJV-ENV-PLN-0049). Workers will be trained to identify potential contamination that may be encountered during construction.	Environmental Awareness Training PowerPoint slide deck (last updated 22/02/2023).	The Environmental Awareness Training slide deck includes a contaminated soil slide which requires workers to notify the supervisor, stockpile any contaminated material separately and not mix with other material. The slide includes photos of typical situations where contamination may be encountered	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
34			The Naturally Occurring Asbestos Management Plan (Appendix D of this Plan) will be implemented to ensure appropriate management of Naturally Occurring Asbestos encountered during works.	Snowy Hydro Spoil Management Plan - Appendix A - Spoil Characterisation Program (June 2022).  Naturally Occurring Asbestos Management Plan (March 2022) S2-FGJV-ENV-PLN-0019 - Appendix D of the Spoil Management Plan	Based on the Geotechnical Baseline Report and information provided by Snowy Hydro, NOA is likely to be found in the 7.5 km section of the headrace tunnel after the Tantangara zone.  The Tantangara tunnelling had not advanced far at the time of the audit, and NOA had not yet been encountered.	Not triggered
35			The Waste Management Plan (S2-FGJV-ENV-PLN-0048) will be implemented to ensure appropriate classification, use and disposal of waste from the project.	Snowy 2.0 Main Works Waste Management Plan Rev D April 2023 (draft revision) - previous version C- 23/07/2020.	See waste section of the audit tables	Compliant
36			A hold point process will be established and implemented requiring approval by the Future Generation Environment Manager or Construction Manager prior to the placement of material generated from dredging, channel excavation or underwater blasting. This hold point process will note that this material cannot be placed in the Exploratory Works eastern and western emplacement areas without the approval of the Planning Secretary.	Inspection and Test Plan (ITP) Handling and Characterisation Spoil Management Rev E Sept 2022	ITP includes hold points for various points in the characterisation and process	Compliant
37			The monitoring in Section 9 of this Plan will be implemented to identify and track the performance of: • the management of spoil on site; • the implementation of each of the detailed plans, including the effectiveness of the proposed mitigation and contingency measures; and • progress against the detailed completion criteria and performance indicators of each permanent spoil emplacement area.	Quarterly Spoil Monitoring Report - January to March 2023 S2-FGJV-ENV-REP-0076 Rev A April 2023	The quarterly report provides an overview of the spoil monitoring during the nominated reporting period in accordance with EPL 21266 (5 October 2022) condition R4.4 and includes the requirement identified in Table 8-1.	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
38			<b>Monitoring: Tunnel Excavated Spoil</b> * Daily workplace inspections (visual only - no records) * TBM probing during tunnelling as per App A: * Lab testing of spoil sampled and tested as described in App A	Lobs Hole Operational Material Characterisation and Handling Procedure Report Rev 02 Aug 2021  Tantangara Operational Material Characterisation and Handling Procedure Report Rev C Jan 2023  Inspection and Test Plan (ITP) Handling and Characterisation Spoil Management Rev E Sept 2022  Spoil material at ECVT Portal (Ring 591- Ring 595) request ECVT Acid and metalliferous drainage (AMD) testing 8/7/22	The Reports have been prepared to provide direction on material sampling, geochemical characterisation, classification, handling, and disposal for the Lobs Hole emplacement areas known as Main Yard, GF-01 and Ravine Bay.	Compliant
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
39			<b>Monitoring: Emplacement Areas</b> * Weekly inspection of stockpile areas (refer Section 9.1.2) (recorded in inspection report)	Weekly Environmental Inspection Checklist - includes section "Excavated Material, Waste & Contamination"	Inspection checklist includes the following questions: * Is spoil being suitably tested (as required) and placed in correct locations? * Are the emplacement stockpiles being appropriately managed in accordance with the EMMP? * Is identified contamination including Acid Sulphate Soils, Naturally Occurring Asbestos being managed accordingly? * Is waste required for off-site disposal being appropriately tested, stockpiled and tracked to a suitable licenced facility? * Is general waste being segregated and bins well maintained including secure fauna-proof lids?	Compliant



ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
40			<b>Spoil Reporting</b> Volume of spoil excavated from tunnelling - required 6 monthly for the duration of construction - to be made publicly available in accordance with schedule 3 condition 7 (f) and EPL 21266. To include volume placed at each emplacement area, off site (if any), reused in KNP (if any), AMD material (if any) and NOA (if any)	Quarterly Spoil Monitoring Report - January to March 2023 S2-FGJV-ENV-REP-0076 Rev A April 2023	<p>Detailed Quarterly Spoil Monitoring Reports are prepared to satisfy the reporting requirements of the Environmental Protection Licence 21266 (5 October 2022), Condition R4.5.</p> <p>Six (6) monthly Spoil specific reports have not been provided on the Project website as required by Table 9-4 of the Spoil Management Plan. Refer to non-compliance for details.</p> <p>The quarterly reports provide detailed information relating to the location, quantities and characteristics of the spoil generated and emplaced, which may not be appropriate for provision on a public website.</p>	Non-compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
41	Schedule 3 condition 4; Schedule 3 condition 47;	SM20	SM20 The Acid and Metalliferous Drainage Management Plan (Appendix E of this Plan) will be implemented to ensure appropriate management of AMD material encountered during works.	<p>Spoil Placement Permit - ECVT GF01 25/01/2023 - signed by Spoil Advisor and Construction Supervisor - includes Laboratory Test Reports.</p> <p>Internal Spoil Audit Report - undertaken 7 &amp; 8 March 2023, submitted to DPE 30 May 2023.</p> <p>Spoil Audit - Internal audit action sheet with due dates for action.</p> <p>Spoil Management Plan (SMP) Rev P dated 06/09/2022 (approved 13/09/2022) - Appendix A - Spoil Characterisation Program dated 08/06/2022 is included in the Plan.</p> <p>Interview with Lisa Walter - Spoil Advisor - FGJV - project wide.</p> <p>Internal Tunnel Spoil Management Audit conducted 7 &amp; 8 March 2023 and submitted to DPE as evidence of internal audit undertaken on 30 May 2023.</p> <p>ECVT and Talbingo Sample Registers indicating classification of spoil (NAF/PAF) showing ring numbers, TR number, Eurofins/ALS report number and classification (NAF) - Jan to March 2023.</p> <p>Site inspection Interview with Spoil Advisor</p>	<p>The site inspection, interview with the Spoil Advisor, review of the Internal Spoil Audit Report and sample registers provided evidence of compliance with this requirement.</p> <p>The internal spoil audit report noted that the AMDMP was implemented however some improvements could be undertaken - the finding has been closed out.</p>	Compliant
42	Schedule 3 condition 7;	SM23	SM23 The Stockpile Procedure (Appendix C of this Plan) will be developed to ensure temporary stockpiling is appropriately managed and that any adverse impacts are controlled and rectified.		Addressed under SMP; App C; Pages 100 - 101.	Compliant
43	Schedule 3 condition 4	SM24	SM24 The Surface Water Management Plan (S2-FGJV-ENV-PLN-0011) will be implemented to ensure impacts on surface waters as a result of spoil handling and placement are minimised.		Addressed under Surface Water.	Compliant
44	Schedule 3 condition 4	SM25	SM25 Site-based Erosion and Sediment Control Plans (ESCPs) will be prepared by a suitably qualified erosion and sediment control specialist.		Addressed under Condition 4 (g) and (i)	Compliant
45		SM26	SM26 A non-naturally occurring Asbestos Management Plan (S2-FGJV-HAS-PLN-0010) has been developed and will be implemented to manage Asbestos Containing Materials ACM (ACM), or		Non-naturally occurring asbestos was addressed at previous audits early in the construction phase. Not encountered during this audit period.	Not triggered

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
			areas are suspected of containing ACM (such as historical buildings). The AMP addresses unexpected finds of ACM. Specifically, protocols will be stipulated for separation, monitoring, validation, and clearance of asbestos.			
46		SM27	SM27 An Occupational Hygienist (Hygienist) will be on-site for the duration of the excavation works where ACM has been identified from pre-construction or where unexpected finds of ACM are encountered.	Occupational Health and Hygiene Management Plan Rev C Sept 2021.	As above	Not triggered
47	Schedule 3 condition; 4(k) and DPIE comments.	SM30	SM30 A hold point process will be established and implemented requiring approval by the Future Generation Environment Manager or Construction Manager prior to the placement of material generated from dredging, channel excavation or underwater blasting. This hold point process will note that this material cannot be placed in the Exploratory Works eastern and western emplacement areas without the approval of the Planning Secretary.		Dredging, channel excavation or underwater blasting has not yet occurred.	Not triggered
48		SMP, App A; 3.1.2	<b>3.1.2. Pre-excavation assessment</b> In-situ Geochemical sampling/testing during pre-excavation will be undertaken to provide an initial classification obtained from: <ul style="list-style-type: none"> <li>selected shallow in situ bore holes and / or test pits at relevant portal, camp and construction pad cutting areas (i.e.: surface works) for PAF/AMD, NMD, SD and NOA determinations as soon as possible and prior to excavation; and</li> <li>selected blasting drilling holes and TBM excavated materials for the tunnel.</li> </ul>	Inspection and Test Plan (ITP) Handling and Characterisation Spoil Management Rev E Sept 2022. Interview with Spoil Advisor Site Inspection Laboratory results	The methodology for sampling was discussed during the interview with the Spoil Advisor, noting that core samples are taken in advance and tested in the internal lab to provide fast results, and also sent to external labs for verification.	Compliant

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
49		SMP, App A; 3.1.3	<b>3.1.3. Post-excavation assessment</b> Post-excavation sampling of D&B and TBM material will be required to enable ongoing correlation with spoil scanning and sampling and to test materials before and following treatment (if required). Post-excavation sampling must be undertaken in accordance with Australian Standard 1141 <i>Methods for sampling and testing aggregates</i> (or equivalent). The Standard will be applied based on the Inspection and Test Plan quality document and will be relevant depending on each sample's particle sizing. Composite samples shall be obtained from stockpiles at locations and at frequencies that enables confidence in the material classification. Sub-samples (those that make up the composite samples) are to be collected uniformly throughout the stockpile to account for potential variability in soil characteristics. Samples should also be collected at various depths in the stockpile (not just the surface). Where possible it is recommended that a systematic grid sampling pattern. An example of a sample pattern for stockpiles is presented in Figure 3-1.	Inspection and Test Plan (ITP) Handling and Characterisation Spoil Management Rev E Sept 2022. Interview with Spoil Advisor Site Inspection Laboratory results	Evidence was provided that post excavation sampling is undertaken, and where the material is assessed as PAF, is blended with NAF and retested once blended. Sampling and testing are undertaken by external labs.	Compliant
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
50			<b>3.1.4. Underwater excavation and dredging</b> It is anticipated that post excavation assessment for material excavated from underwater (or dredged) will generally follow the same process as that applied for excavated material from bulk earthworks (refer Section 3.1.3 above).		There has been no underwater excavation or dredging to date.	Not triggered
51		SMP, App A; 3.1.4	Internal Audit conducted on the Spoil Management Plan. Review contents of report and comment on outcomes and actions taken to address any non-conformances		An Internal audit spoil management was conducted by SHL on FGJV in March 2023. The Audit Action Plan indicates that several of the findings remain open in either overdue, incomplete, ongoing and WIP status	Compliant OBS
	Part A		<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
			<u>Amenity and landscape</u>			

ID	S3 – CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SPOIL MANAGEMENT</b>			
52	24		To minimise impacts to the environment in Kosciuszko National Park, the approval holder must comply with conditions 4-11 of the NSW approval relating to spoil management and site rehabilitation.		No non-compliances were raised against the NSW Conditions 4 - 11, and therefore is compliant to this condition	Compliant





ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status								
			SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - REHABILITATION											
54.			b) rehabilitate the Rock Forest site to comply with the rehabilitation objectives in Table 5;  <table><caption>Table 5 Rehabilitation Objectives – Rock Forest Site</caption><thead><tr><th>Feature</th><th>Objective</th></tr></thead><tbody><tr><td>Land use</td><td><ul style="list-style-type: none"><li>Return the site to its previous use in consultation with the landowner</li></ul></td></tr><tr><td>Land</td><td><ul style="list-style-type: none"><li>Safe, stable and non-polluting</li><li>Ensure the creation of all new landforms complies with the design criteria in Table 2</li><li>Minimise surface disturbance on site during construction</li><li>Progressively rehabilitate the site as soon as possible following disturbance</li><li>Employ interim rehabilitation strategies to areas that can't be permanently rehabilitated yet to minimise dust generation, erosion, uncontrolled discharges of sediment, and the spread of weeds</li></ul></td></tr><tr><td>Infrastructure</td><td><ul style="list-style-type: none"><li>Decommission and remove development-related infrastructure, unless the Planning Secretary agrees otherwise</li></ul></td></tr></tbody></table>	Feature	Objective	Land use	<ul style="list-style-type: none"><li>Return the site to its previous use in consultation with the landowner</li></ul>	Land	<ul style="list-style-type: none"><li>Safe, stable and non-polluting</li><li>Ensure the creation of all new landforms complies with the design criteria in Table 2</li><li>Minimise surface disturbance on site during construction</li><li>Progressively rehabilitate the site as soon as possible following disturbance</li><li>Employ interim rehabilitation strategies to areas that can't be permanently rehabilitated yet to minimise dust generation, erosion, uncontrolled discharges of sediment, and the spread of weeds</li></ul>	Infrastructure	<ul style="list-style-type: none"><li>Decommission and remove development-related infrastructure, unless the Planning Secretary agrees otherwise</li></ul>	Site visit - Rock Forest	This condition is not triggered. At the time of the audit, Rock Forest had not yet commenced receiving spoil	Not triggered
			Feature	Objective										
			Land use	<ul style="list-style-type: none"><li>Return the site to its previous use in consultation with the landowner</li></ul>										
			Land	<ul style="list-style-type: none"><li>Safe, stable and non-polluting</li><li>Ensure the creation of all new landforms complies with the design criteria in Table 2</li><li>Minimise surface disturbance on site during construction</li><li>Progressively rehabilitate the site as soon as possible following disturbance</li><li>Employ interim rehabilitation strategies to areas that can't be permanently rehabilitated yet to minimise dust generation, erosion, uncontrolled discharges of sediment, and the spread of weeds</li></ul>										
			Infrastructure	<ul style="list-style-type: none"><li>Decommission and remove development-related infrastructure, unless the Planning Secretary agrees otherwise</li></ul>										
c) complete the initial rehabilitation of the site - including the removal of all temporary infrastructure, creation of landforms, narrowing of roads - within 3 years of completing construction;		This condition is not triggered and will not be triggered until three years after completion of construction.	Not triggered											
d) complete the ecological rehabilitation of the site, apart from the areas used for operations, within 20 years of completing construction;		This condition is not triggered and will not be triggered until three years after completion of construction.	Not triggered											
e) complete the final rehabilitation of the site, including the removal of all remaining infrastructure, within 3 years of decommissioning the development; and		This condition is not triggered and will not be triggered until three years after completion of construction.	Not triggered											
f) complete the ecological rehabilitation of the areas used for operations within 20 years of decommissioning the development.		This condition is not triggered and will not be triggered until three years after completion of construction.	Not triggered											

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - REHABILITATION</b>			
55.	10		<p><b>Rehabilitation Management Plan</b></p> <p>Within 18 months of the commencement of construction, the Proponent must prepare a Rehabilitation Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p>	<p>Rehabilitation Management Plan (Draft - Rev 2) 23 November 2022 (Date on front page).</p> <p>Rehabilitation Management Plan (Draft - Rev 3) 28 April 2023</p> <p>Letter - Snowy Hydro to DPE 5 July 2023 - Management Plan Submission (weekly update)</p> <p>Letter - Snowy Hydro to DPE 21 July 2023 - Main Works Management Plans (update on management plans)</p> <p>Table 1-1 provides a summary of where the sub-conditions of this Condition are address (not all of them are correct - see purple text)</p> <p>Email from Ben Croome (SHL) to Nicole Shotter Rod Peel, Gabriel Wilks, Ian Oliver, Josh Dorrough and Angela Jenkins (NPWS and BCD) dated 10 July 2023 - Main Works Rehabilitation Plan - Third Round Consultation.</p>	<p>At the time of the audit, the Rehabilitation Management Plan had not yet been “developed to the satisfaction of the Planning Secretary”.</p> <p>The Rehabilitation Plan (Rev 2) had been drafted and submitted (Rev 2) to NPWS for review (April). A further draft dated July 2023 (Rev 3) has been prepared and was still under consultation with NPWS. Snowy Hydro indicated it will only be submitted to DPE for approval once NPWS have determined it is to their satisfaction.</p> <p>The RMP has been prepared to provide the overarching rehabilitation strategy and methodologies to be implemented across the entire Main Works project. As per Schedule 4 Condition 3 of CSSI-9687, this RMP will be prepared and updated on a staged basis to include rehabilitation requirements as the project progresses and additional areas become available for rehabilitation.</p> <p>Regular updates have been provided to DPE on the progress of various overdue management plans including the Rehabilitation Management Plan. The letter to DPE on 24 July 2023 noted "Progress was made on the staging strategy for this plan. SHL met with NPWS on 3 July to discuss staging rationale and this was supported in principle by the Department at the fortnightly update on 4 July 2023". SHL is well progressed with Stage 1 of the plan and will be presenting this plan to NPWS on 12 July 2023.</p> <p>Engaging Dendra to undertake drone surveys in Nov 2023 -to map PCTs, native characteristics species and also weed mapping, erosion - ground truthing to verify - will be using AI for characteristic species.</p> <p>SHL were currently in discussions on techniques and number of monitoring sites.</p>	Non-compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - REHABILITATION</b>			
56.			a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, BCD, EPA, NSW DPI and TfNSW;	Rehabilitation Management Plan (Draft - Rev 3) 28 April 2023	<p>Snowy Hydro engaged the services of SLR to prepare the framework and initial draft (Nathan Archer, Rod Masters), and the services of Liz McPhee from Alpine Flora have been engaged to work with Ben Croome (Snowy Hydro) to further develop and finalise the Plan.</p> <p>Consultation is addressed in Sections 1.5 and 1.7 of the RMP - Key team members and technical specialists included four (4) in-house SHL specialists, and four (4) external specialists including:  Rod Masters (SLR Consulting) - growth media, landform, rehabilitation specialist;  Elizabeth McPhee (Alpine Flora) - Sub-alpine ecology, seed collection / propagation, rehabilitation;  Dennis Garside (GSS) - Specialist - Seed collection / propagation, rehabilitation; and  Chris Waygood (Golder) - Specialist – Landform.</p> <p>The Draft RMP indicated that ongoing consultation has been undertaken with NPWS (summarised in Table 1-4) between 8/9/2021 and Feb 2023. Draft Report Ver 2 submitted 24/11/2022.</p> <p>The RMP (Draft V3) notes that a copy of the RMP will be provided to BCD, EPA, NSW DPI NSW and TfNSW along with DPE for review and comment.</p>	Compliant
			b) be consistent with the Spoil Management Plan, Recreation Management Plan, Long-Term Road Strategy and Visual Mitigation Management Plan;	Section 1.6 of the Rehabilitation Management Plan (Draft - Rev 3) 28 April 2023	Section 1.6 of the Draft RMP notes that the Plan has been developed to be consistent with other management plans being developed separately for the project including, but not limited to the Spoil Management Plan, Recreation Management Plan, Long-Term Road Strategy and Visual Mitigation Management Plan	Compliant
			c) include a conceptual plan for the rehabilitation of the whole site;	Section 5 and 6 of the Rehabilitation Management Plan (Draft - Rev 3) 28 April 2023	Includes conceptual plan for whole site	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - REHABILITATION</b>			
			d) include the detailed program for the rehabilitation of roads in the Kosciuszko National Park in accordance with the approved Long-Term Road Strategy;	Section 6.2 of the Rehabilitation Management Plan (Draft - Rev 3) 28 April 2023	It is noted that the Long-Term Road Strategy (LTRS) is currently being prepared. On completion of the LTRS, this RMP will be reviewed and revised where required.	Compliant
57.			e) include a topsoil balance for the site, which includes a strategy for: <ul style="list-style-type: none"> <li>• maximising the reuse of topsoil on site (provided it is suitable for reuse);</li> <li>• using other suitable growth media; and</li> <li>• importing additional topsoil to the site (if necessary);</li> </ul>	Table 1-1 - Requirements for the RMP indicates that Section 6.2.1 addresses topsoil balance in 6.2.1	Topsoil balance is mentioned in Table 1-1 and Table 10-2 (Trigger Action Response Plan).  Table 1-1 references that topsoil balance is addressed in Section 6.2.1, however this does not exist in the current draft Plan	Compliant Opportunity
			f) include a native seed collection and propagation program in accordance with Florabank (www.florabank.org.au ) and/or NPWS guidelines for the site, which includes a strategy for: <ul style="list-style-type: none"> <li>• maximising the collection and use of native seed resources from the site prior to disturbance;</li> <li>• collecting seed from the surrounding area, including other parts of the Kosciuszko National Park (with the approval of the NPWS); and</li> <li>• prioritising the use of local sources of seed for the ecological rehabilitation of the site;</li> </ul>	Section 6.2.1 of the Draft RMP  Appendix G - Snowy 2.0 Rehabilitation Species List	Seed collection not addressed in detail - however Exploratory Works RMP includes App A - Seed Collection Proposal	Compliant Opportunity
			g) include detailed plans for the rehabilitation of the disturbance area at each of the following sites, describing the measures that would be implemented to comply with the rehabilitation objectives in Table 3 or 5: <ul style="list-style-type: none"> <li>• Talbingo Reservoir;</li> <li>• Lobs Hole;</li> <li>• Marica;</li> <li>• Plateau;</li> </ul>	Section 1.1.2 of the Draft RMP)  Site specific RMPs in Appendices K to P (to be included as they are progressively developed). Plans will be developed in order of priority and availability of long-term land use confirmation.	(no section 1.1.2, but overarching strategy and separate plans to be prepared for each area addressed in 1.1 - Background) Section 5 (section 5 relates to final landform and Rehabilitation Plan - doesn't appear to be specifically related to detailed plans	Compliant Opportunity



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - REHABILITATION</b>			
			<ul style="list-style-type: none"> <li>Tantangara Reservoir; and</li> <li>Rock Forest;</li> </ul>			
			h) include a detailed ecological rehabilitation management plan for the development that:	Section 5 of the Draft RMP	Section 5 relates to final landform and Rehabilitation Plan - doesn't appear to be specifically related to overarching plans)	Compliant Opportunity
			<ul style="list-style-type: none"> <li>provides an overarching description of the proposed ecological rehabilitation works, identifying the:</li> </ul>	Section 6.2.5 of the Draft RMP	The draft RMP provides the overarching description and framework for rehabilitation.	Compliant
			<ul style="list-style-type: none"> <li>plant community types to be established; and</li> </ul>	Additional detail will be included as required in the Site Specific RMPs (Appendices K to P).		
58.			<ul style="list-style-type: none"> <li>area of land to be established for each plant community type;</li> <li>provides maps showing the proposed location of each plant community type;</li> <li>describes the detailed measures that would be implemented to comply with the ecological rehabilitation objectives in Table 4;</li> </ul>	Appendix J PCT Target Species List		
			i) identify the key risks to the successful completion of the rehabilitation and describe the contingency measures that would be implemented to address these risks;	Section 3 - Rehabilitation Risk Assessment Section 10 - Intervention and Adaptive Management	Addressed in Draft Plan	Compliant
			j) include detailed completion criteria and performance indicators for the rehabilitation of the development (having regard) to the criteria and indicators in Table 4, including criteria for triggering remedial action (if necessary); and	Section 4 - Rehabilitation Objectives and Rehabilitation Completion Criteria and Table 4-1	Addressed in Draft Plan	Compliant
			k) include a program to monitor and publicly report on:	Section 8 - Rehabilitation Monitoring Program	Addressed in Draft Plan	Compliant
			<ul style="list-style-type: none"> <li>the rehabilitation of the site;</li> <li>the implementation of the each of the detailed plans, including the effectiveness of the proposed mitigation and contingency measures; and</li> <li>progress against the detailed completion criteria and performance indicators.</li> </ul>			

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - REHABILITATION</b>			
59.	11		The Proponent must implement the approved Rehabilitation Management Plan for the development.		The Rehabilitation Plan had not yet been approved and is not yet triggered for implementation.	Not triggered
<b>REHABILITATION MANAGEMENT PLAN (Exploratory works)</b>						
60.		5.2.5	<b>Early rehabilitation trials</b> The few areas that can be rehabilitated (during/following exploratory works) will be restored as small-scale trials before further rehabilitation works which will be detailed in the Main Works RMP. The areas where these trials may be undertaken include: <ul style="list-style-type: none"> <li>• Redundant sections of Lobs Hole Ravine Road;</li> <li>• Decommissioned drills sites and access paths; and</li> <li>• Selected areas on the Exploratory Camp and Minetrail Road batter slopes (where no further disturbance is anticipated).</li> </ul>		Trials have been carried out in small areas, and legacy sites not part of the current construction activities. - also see below - "remote sites"  Areas near the Copper mine laydown (just out of Marica) and Powerline Hill (not in project site) - near Ravine Road entrance area - plan to keep doing it this summer.  Liz McPhee provides advice to the project on appropriate rehabilitation techniques	Compliant
61.			<b>NPWS Concern</b> Immediate rehabilitation of sites once no longer required for construction purposes or temporary rehabilitation if site is required to be left inactive for a period of time e.g. communication and power trenching works adjacent to Snowy Mountains Highway	Site visits to various "remote areas"	"Remote areas" including bore hole sites and pullover bays, roadside verges, a trail, and a communication site were visited as part of the audit (see photos in report). The sites visited were left in good condition, with rehabilitation works completed in the form of native seeding, planting, stabilising, topsoiling thatching and placing of logs to prevent access to vehicles.	Compliant
62.	<b>Part A</b>		<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
-	-	-	<b><u>Rehabilitation</u></b>	-	-	-
63.	25		The Rehabilitation Management Plan required by condition 10 of the NSW approval must include provisions to make monitoring data (excluding sensitive ecological data) available as part of the monitoring, evaluation and reporting program required by condition 10k of the NSW approval.	Rehabilitation Management Plan (Draft - Rev 3) 28 April 2023	The Rehabilitation Management Plan was in draft at the time of the audit (overdue) (see previous findings). The Draft Plan included a Rehabilitation monitoring section and acknowledged this condition. As the RMP is not finalised and approved at the time of the audit, it is considered that this condition is not formally triggered.	Not triggered

**TABLE D – SCHEDULE 3 & EPBC – Biodiversity, Biosecurity, Surface and Groundwater, Heritage**

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>						
64.	12		<b>FLORA AND FAUNA</b> <b>Biodiversity Offset Payments</b> The Proponent must make the following payments to the NPWS to offset the residual biodiversity impacts of the Main Works: a) \$14.76 million prior to the commencement of construction;			Not triggered
			b) \$14.76 million within 1 year of the commencement of construction;	Tax Invoice from DPIE dated 29/09/2021 for \$14.76m plus GST - total \$16.236m  Payment receipt from Snowy Hydro - Biodiversity offset 2nd payment Sept 2021 - payment date 22/10/2021 - approval status - paid	Part B was assessed as compliant and IEA 2 and as therefore not triggered at this audit	Not triggered
			c) \$14.76 million within 2 years of the commencement of construction; and	Tax Invoice from DPE dated 28/09/2022 for \$14.76m plus GST - total 16.236m  Remittance Advice dated 14/01/2022 \$116.236m	Remittance advice sighted	Compliant
			d) \$14.76 million within 3 years of the commencement of construction.			Not triggered
			<ul style="list-style-type: none"> <li><i>This payment represents 80% of the Proponent's liability to offset the residual biodiversity impacts of the Main Works. These funds will augment the \$8,492,909 already paid to the NPWS to offset the residual biodiversity impacts of the Exploratory Works.</i></li> </ul>			
			<ul style="list-style-type: none"> <li><i>The NPWS will use these funds and any interest generated by these funds to enhance the biodiversity values of the Kosciuszko National Park. However, in the limited circumstances where it is not possible to address all of the residual biodiversity impacts of the development within the Kosciuszko National Park, the NPWS may use some of these funds to ensure suitable conservation actions are carried out outside the park.</i></li> </ul>			

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY						
			<ul style="list-style-type: none"> <li>To ensure accountability, the NPWS will:</li> </ul>			

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
65.			<p>~ develop and implement a detailed program for the allocation of these funds to specific projects, focusing on the ecosystems and species affected by the development; and</p> <p>~ monitor, evaluate and publicly report on the progress of the implementation of the detailed program and the effectiveness of the specific projects;</p> <ul style="list-style-type: none"> <li>The NPWS will develop and implement a specific program in consultation with DAWE to carry out conservation actions to address the residual biodiversity impacts of the development on the following Commonwealth-listed species and communities:</li> </ul> <p>~ Alpine Sphagnum Bogs and Associated Fens;</p> <p>~ Broad-toothed Rat;</p> <p>~ Smoky Mouse;</p> <p>~ Alpine Tree Frog; and</p> <p>~ Alpine She-oak Skink.</p>			
66.	13		<p><b>Additional Biodiversity Offset Payment</b></p> <p>Within 3 years of the commencement of construction, the Proponent must submit a report via the Major Projects Portal that:</p> <p>a) identifies the final disturbance area of the Main Works;</p>	Not triggered		Not triggered
67.			b) calculates the difference between the maximum disturbance area and the final disturbance area of the Main Works; and			
68.			c) calculates the value of the outstanding biodiversity offset payment on a proportionate basis.			
69.	14		Within 6 months of the Planning Secretary setting the value of the outstanding biodiversity offset payment, the Proponent must pay the funds to the NPWS.			Not triggered



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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
			<p>Notes:</p> <ul style="list-style-type: none"> <li>These conditions relate to the remaining 20% of the Proponent's liability to offset the residual biodiversity impacts of the development.</li> </ul>			
70.			<ul style="list-style-type: none"> <li>They are intended to create an incentive for the Proponent to reduce the biodiversity impacts of the development by reducing the final disturbance area of the development during the final design of the project.</li> <li>For instance, if the final disturbance area of the Main Works is only 87% of the maximum disturbance area of the Main Works then the Proponent will only have to pay 35% of the outstanding liability of \$14.76 million.</li> <li>These funds will be added to the funds paid under condition 12 and managed in accordance with the notes under that condition.</li> </ul>			
71.	15		<p><b>Potential Additional Offsets – Alpine Sphagnum Bogs and Associated Fens</b></p> <p>The Proponent must ensure that the development does not cause any exceedances of the following performance measures in the Alpine Sphagnum Bogs and Associated Fens above the Gooandra Volcanics and Kellys Plains Volcanics (see the figures in Appendix 2):</p> <p>a) negligible change to the shallow groundwater regime supporting the bogs and associated fens when compared to a suitable control site; and</p> <p>b) negligible change in the ecosystem functionality of the bogs and associated fens.</p>			Not triggered

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
72	16		<p>If the Planning Secretary determines that the development has caused exceedances of the performance measures in condition 15 above, the Proponent must pay additional funds to the NPWS within 3 months of the determination to offset the groundwater-related impacts of the development on these Alpine Sphagnum Bogs and Associated Fens. The Planning Secretary will determine the amount of funds the Proponent must pay following consultation with the NPWS, DAWE and the Proponent; and having regard to:</p> <p>a) the significance of the impacts on the bogs and associated fens;</p> <p>b) the relevant values from the Biodiversity Offsets Payment Calculator; and</p> <p>c) the likely cost of carrying out the conservation actions required to offset these impacts on the bogs and associated fens.</p>			Not triggered
			<i>Note: These funds will be added to the funds paid under condition 12 and managed in accordance with the notes under that condition.</i>			
73	17		<p><b>Biodiversity Management Requirements</b></p> <p>17. The Proponent must:</p> <p>a) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance area;</p>	<p>WebGIS was sighted live</p> <p>Boundary well established</p>	The review of the WebGIS images did not identify any areas of disturbance outside the boundary.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
			b) minimise the clearing of native vegetation and habitat within the disturbance area;	<p>Master Tracker Clearing Register WebGIS</p> <p>Pre-clearing Report - ECVT Laydown Pads - Narla Environmental 19/03/2023 Final v 1.0</p> <p>Pre-clearing Survey Report - Tantangara Intake Stage 2 Sept 2022 - Narla Environmental Final 1.0</p> <p>Pre-clearing Survey Report - Tantangara Moxy Haul Road Sept 2022 - Narla Environmental Final 1.0</p> <p>Pre-clearing Survey Report -GF01 Sept 2022 - Narla Environmental Final 1.0</p> <p>Post-clearing report - Gooandra Trunk Services - Narla Environmental 30 Sept 2022 Final v1.0</p> <p>Clearing (Land Disturbance) Permit for clearing site : Ravine Road Culvert CH 450 (100m2) dated 09/06/2023 accepted FGJV, approved SHL 16/06/23</p> <p>Clearing (Land Disturbance) Permit for clearing site : Culvert clearing Ch 990 1200m2 dated 27/07/22, accepted FGJV, approved SHL 29/07/22. Post clearance section completed 9/11/22, reference to Post Clearing report by Narla.</p> <p>Clearing (Land Disturbance) Permit for clearing site: Marica USS Office Laydown carpark 6,200m2 19/08/2022. accepted FGJV, approved SHL 27/10/22. Post clearance section completed 01/02/2023, reference to Post Clearing report by Narla.</p> <p>SHL check clearing limits - no issues raised.</p> <p>Tracking Register confirms no clearing outside the disturbance area</p>	The review of clearing permits, the Master Tracker Clearing Register and the WebGIS indicated that clearing is within the maximum allowable clearing limits, and that overall, clearing is minimised as far as possible.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
74.			c) minimise the trimming of trees required for safety purposes along the approved road network within the Kosciuszko National Park and adjoining the disturbance area;	Clearing (Land Disturbance) Permits - as above	There is a section in the Clearing Permits relating to "unsound trees that are identified for removal for safety reasons, however none sighted showed this as the reason for clearing	Compliant
			d) minimise the impacts of the development on threatened flora and fauna species or ecological communities within the disturbance area and its surrounds, including the: <ul style="list-style-type: none"> <li>Alpine Sphagnum Bogs and Associated Fens;</li> <li>Alpine She-oak Skink; (EPBC - max 80.83 ha)</li> <li>Alpine Tree Frog; (EPBC - max 22.87 ha)</li> <li>Booroolong Frog;</li> <li>Broad-toothed Rat; (EPBC - max 61.47 ha)</li> <li>Caladenia montana;</li> <li>Clover Glycine;</li> <li>Eastern Pygmy-possum; (EPBC - max 197.95 ha)</li> <li>Gang-gang Cockatoo;</li> <li>Hoary Sunray;</li> <li>Kiandra Leek Orchid;</li> <li>Leafy Anchor Plant;</li> <li>Mauve Burr-daisy;</li> <li>Max Mueller's Burr-daisy;</li> <li>Raleigh Sedge;</li> <li>Slender Greenhood;</li> <li>Smoky Mouse; (EPBC - max 84.29 ha)</li> <li>Spotted tailed Quoll;</li> <li>Southern Myotis;</li> <li>Thelymitra alpicola;</li> </ul>	Clearing Master Tracker Register to June 2023 Clearing (Land Disturbance Permits)	Clearing Master Tracker Register - updated whenever any clearing occurs. The Clearing Master Tracker tracks the cleared area for each species habitat  Post clearing reports are sent to from the construction team, (a survey file - KML file, which is uploaded to the Web GIS by Coffey, which provides ongoing monitoring of habitat cleared. Pre-clearing permits include the predicted area to be cleared. Post clearing reports include actual area cleared.	Compliant

			<ul style="list-style-type: none"> <li>White-bellied Sea-eagle;</li> </ul>			
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ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
75.			<p>e) minimise potential fauna strike in sensitive habitat areas on the road network within the site, including reducing speed limits between sunset and sunrise and constructing suitable underpasses;</p>	<p>Biodiversity Monitoring Program: Year 2 Annual Monitoring Report 2021/2022 dated April 2023.</p> <p>Memorandum: Snowy 2.0 Main Works Fauna Strike Mitigation - Annual Mortality Monitoring Report 2021-2022 by EMM dated 28 July 2022.</p> <p>Ravine Road Fauna Underpass Installation and As-built report - Final dated 28/07/2022 by Jordan Chenery (Snowy Hydro).</p> <p>Review of Lobs Hole Road fauna underpass remote camera monitoring for the period of 17 March 2023 to 15 April 2023. dated 24 July 2023 (on project website)</p> <p>Review of Lobs Hole Road fauna underpass remote camera monitoring for the period of 11 Aug 2022 to 12 Dec 2022. dated 17 Feb 2023 (on project website)</p> <p>Review of Lobs Hole Road fauna underpass remote camera monitoring for the period of 25 April 2022 to 22 Sept 2022. dated 21 Nov 2022 (on project website)</p> <p>FGJV Fauna Encounter Register - records to May 2023</p> <p>Site Inspection Interviews - confirmed IVMS in place</p> <p>Signage - Smoky Mouse crossing -Ravine Road.</p> <p>Small mammal underpasses (6) complete (were mostly completed at previous audit)</p> <p>30 km/hr speed limits on Lobs Hole Ravine Road (see photos).</p> <p>Incident Notification Forms - strikes of swamp wallabies (2) Mar 23 and May 23, wallaby (May 23), wood duck May 23,</p>	<p>The Annual Mortality Monitoring Report 2021-2022 provides a summary on the mortality monitoring, including the initial results of scavenger trials conducted in November 2020 and ongoing monthly monitoring to December 2021.</p> <p>The Annual Mortality Monitoring report concluded that the use of the detection dogs in the fauna strike monitoring has proven to be effective, with extremely high efficacy rates and that the mortality monitoring program has not recorded any fauna strike of threatened species, with overall recorded fauna strike numbers considered low given the number of vehicle movements each night. The report also noted that as 13 months of monitoring has resulted in no fauna strike of threatened species, monitoring has ceased along Ravine Road.</p> <p>The Ravine Road underpass installation and as-built report provided evidence of completion of the 6 underpasses with details of the as-built design and noted that cameras had been installed and mortality monitoring had commenced. The report also notes that "images collected from the fauna cameras will be utilised in a quarterly monitoring report, developed in consultation with a suitably qualified ecologist."</p> <p>Quarterly monitoring reports are on the project website in the form of the Review of Lobs Hole Road fauna underpass remote camera monitoring reports.</p> <p>The Fauna underpass remote camera monitoring for Mar to April 2023 note: "With a reasonable level of confidence, no presences of Smoky Mouse or Broad-toothed Rat were recorded using the underpasses during Aug 22 - Dec 22 and 17 March 2023 - 15 April 2023 reporting period.. However, it was noted that an Eastern Pygmy-Possum was detected once at Underpass 3 West. The FGJV Fauna Encounter Register - shows around 45 native fauna strikes since Jan 2022 and does not identify any strikes of Smoky Mouse.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
76.			f) undertake pre-clearance surveys;	<p>Pre-clearing Report - ECVT Laydown Pads - Narla Environmental 19/03/2023 Final v 1.0</p> <p>Pre-clearing Survey Report - Tantangara Intake Stage 2 Sept 2022 - Narla Environmental Final 1.0</p> <p>Pre-clearing Survey Report - Tantangara Moxy Haul Road Sept 2022 - Narla Environmental Final 1.0</p> <p>Pre-clearing Survey Report -GF01 Sept 2022 - Narla Environmental Final 1.0</p> <p>Post-clearing report - Gooandra Trunk Services - Narla Environmental 30 Sept 2022 Final v1.0</p> <p>Clearing (Land Disturbance) Permit for clearing site : Ravine Road Culvert CH 450 (100m2) dated 09/06/2023 accepted FGJV, approved SHL 16/06/23</p> <p>Clearing (Land Disturbance) Permit for clearing site : Culvert clearing Ch 990 1200m2 dated 27/07/22, accepted FGJV, approved SHL 29/07/22. Post clearance section completed 9/11/22, reference to Post Clearing report by Narla.</p> <p>Clearing (Land Disturbance) Permit for clearing site: Marica USS Office Laydown carpark 6,200m2 19/08/2022. accepted FGJV, approved SHL 27/10/22. Post clearance section completed 01/02/2023, reference to Post Clearing report by Narla.</p>	Evidence was provided that pre-clearance surveys are undertaken across the project.	Compliant
			g) maximise the salvage of resources within the disturbance area for reuse in the restoration of vegetation and habitat on site, including native vegetative material, hollows logs, ground timber, and topsoil containing vegetative matter and native seed bank;	<p>Bulk clearing is complete.</p> <p>Topsoil and mulch and hollow bearing trees stockpiled until needed for re-use.</p>	Where possible, resources appear to be salvaged for later reuse. Timber stockpiles and trees moved to the edge of clearing areas was observed.	Compliant

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77.			h) collect seeds for use in the ecological rehabilitation of the site;	Interview Email chain commencing 25 Jan 2023 from Natural Capital to Snowy Hydro regarding routes to be taken for seed collecting in KNP, email forwarded to NPWS 25 Jan 23, response from NPWS on 30 Jan 23 regarding access issues and further information on private properties.	It was advised that the Rehabilitation Management Plan will have an appendix which specifies the seeds that have been collected. The draft Plan includes information about the seed collection program.  Greening Australia has been contracted prior to the previous audit to source, process and store seed required for the Snowy Hydro 2.0 restoration work and continued to be engaged.  Correspondence with NPWS - need to give a week's notice of the areas in which the seed collectors want to collect.  Greening Australia and Native Seeds continue to be engaged to collect seeds.	Compliant
			i) minimise the spread of weeds, pathogens and feral pests on site, and import or export of these matters to or from the site, including the Phytophthora, Chytrid Fungus, African Lovegrass and Ox-eye Daisy;	Follow up of previous audit findings: Findings were raised at IEA#1, 2 & 3 regarding adequacy of processes to ensure plant, equipment and vehicles are free of weeds, seeds and pathogens when leaving site.  Site Inspection	Various actions had been agreed and documented in the Action Plan. Whilst some actions are now closed, other agreed actions still remain open. Closed actions include installation of wheel washes at all areas (most now permanent), toolbox talks delivered and Wheel Wash Operating and Management Procedure prepared and distributed for consultation with relevant departments (not yet formally issued at time of the audit).  The current wheel wash procedure states that "Where vehicles are unable to pass through the automated wheel wash, the completed hygiene certificates will be provided to security staff at the gate. Security staff will note in the Entry Checklist if hygiene certificates have been provided and that these are completed.  The procedure also notes responsibilities of the Environment Team include reviewing compliance by checking Security staff are ensuring hygiene certificates are completed.  Insufficient evidence was provided to demonstrate Entry Checklists are completed prior to entry to sites as per the procedure, or that the	Non-compliant

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					Environmental Team review the completed certificates.  Other key actions not yet adequately completed from the previous audit recommendations include: •Investigate the root causes of this failure including the potential consequences.	
78.					•Undertake a risk assessment on the operation of the wheel washes; •Review of the effectiveness of the current weed, seed and pathogen protocols and facilities once the other corrective actions have been undertaken (by and ecologist with input by SHL).	
79.			j) minimise the generation and dispersion of sediment to watercourses, particularly Yarrangobilly River and Wallace Creek;	ERSED control plan, inspections, - Lobs Hole - discuss at site	Whilst specific issues relating to sediment generation and dispersion were not identified during this audit, various regulatory actions were initiated by EPA for diffuse water pollution over the audit period (also raised as non-compliant under s 120 of the POEO Act 1997)	Non-compliant
80.			k) minimise the light spill from night works, including using directional and LED lighting; and	Emails 06/03/23 and 13/03/203 - Project Lighting from Environmental Advisor.  Photos provided which were taken showing lighting angles	Email dated 06/03/2023 from Environmental Advisor - Project lighting noting that several flood lights have been installed and areas outside the construction zone are being impacted. - Provides guidance on minimising light pollution and provides light pollution guidelines for wildlife and a reminder of the conditions of approval. Email 13/03/23 - following up on Project Lighting to adjust lights and fix issues	Compliant
81.			l) minimise bushfire risk.	Site inspection Interview with ERT Captain - Lobs Hole	At the time of the audit, it was winter, and the sites were very wet or covered in snow, so there was low fire danger.  However, the site inspection noted that fire trailers were deployed to the sites visited.	Compliant
82.	18		<b>Biodiversity Management Plan</b>  Prior to carrying out any construction, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: a) be prepared by a suitably qualified and experienced biodiversity expert/s in consultation with the NPWS, BCD and DAWE;	Snowy 2.0 Main Works Biodiversity Management Plan Rev I 12/10/2020, approved 15/10/2020.	The Biodiversity Management Plan was reviewed for adequacy at the first IEA and had not been revised or updated since then. It was previously assessed as compliant.	Compliant

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
			b) describe the detailed measures that would be implemented to comply with the biodiversity mitigation requirements in condition 17 above; c) include a strategy to address the requirements in condition 17(e), including: <ul style="list-style-type: none"> <li>a detailed risk assessment to identify the locations where underpasses would be built during the upgrade of the road network; and</li> </ul>			



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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
83.			<ul style="list-style-type: none"> <li>a trigger, action and response plan for reducing speed limits on the road network on site to minimise fauna strike;</li> </ul> <p>d) include a program to monitor, evaluate and publicly report on:</p> <ul style="list-style-type: none"> <li>the effectiveness of these measures; and</li> <li>compliance against the performance measures in condition 15 above, including:</li> </ul> <p>~ establishing a suitable control site;</p> <p>~ baseline monitoring of the condition of the relevant Alpine Sphagnum Bogs and Associated Fens;</p> <p>~ detailed criteria for determining the impact of the development on the performance measures; and</p> <p>~ a program to monitor the impacts of the development against the detailed criteria.</p>			
84.	19		Proponent must implement the approved Biodiversity Management Plan for the development	Site inspection Follow up on previous audit findings - see Cond 17 (i)	<p>The project has not met the requirement to adequately manage the processes for ensuring plant and equipment is free of weeds, seeds and pathogens as per Condition 17(i) and therefore is not compliant to this condition.</p> <p>Annual Reports addressing the biodiversity matters listed in Section 6.5 of the Biodiversity Management Plan (BMP) and in Appendix F of the BMP had not been completed / undertaken.</p>	Non-compliant

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
			<b>BIODIVERSITY MANAGEMENT PLAN</b>			
85.		BMP 5.3	<p>Monitoring of groundwater levels will be carried out in accordance with the Groundwater Monitoring Program (Water Management Plan).</p> <p>If the shallow groundwater regime in GDE patches shows a drawdown in exceedance of the 80th percentile (<i>May to October - as per Figure 5-2</i>) and this drawdown is subsequently found to be attributable to the project, then a non-negligible impact to the shallow groundwater system will be confirmed.</p>	<p>Master Groundwater Monitoring Database (SHL) updated to October 2021;</p> <p>Snowy 2.0 Groundwater Telemetry Installation and As-built reportV2 dated 31/05/2023.</p> <p>ECVT/PSC Preliminary Depressurisation Event Memo - Preliminary Assessment</p>	<p>Real time monitoring is now being undertaken through a network of bores with telemetry. There are 135 boreholes in the network, and currently have 105 that now have telemetry to allow remote monitoring in real time. Telemetry reporting levels every 6 hours (standpipes - shallow). The balance is a still be done - access issues - will be done over summer.</p> <p>32 Vibrating wire piezometers (deeper 500 - 800m) have also been installed</p> <p>A dashboard system is being developed and currently showing results, however, at the time of the audit, need to go into it manually to determine if there is any drawdown. Snowy Hydro are engaging EMM to develop a more user friendly dashboard with alarms and trigger levels, and also taking rainfall into account.</p> <p>SHL has essentially taken over the groundwater level monitoring function except for the tunnel inflow and outflow groundwater monitoring and groundwater quality monitoring.</p> <p>The preliminary assessment into a depressurisation event into the “reduction of the groundwater levels in a number of groundwater monitoring points” during the excavation of the ECVT in 2022 cited a noticeable change in trend from mid-year 2022 and a sharp decrease in levels from the end of 2022 requires further investigations.</p>	Compliant OBS

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86.		BMP 5.3	<p>Where there is a confirmed change to the shallow groundwater regime (as determined by the Groundwater Monitoring Program), an adverse impact to ecosystem function is assumed to follow.</p> <p>At the time of registering a confirmed impact to groundwater levels in GDE patches, the Project will notify agency stakeholders and will investigate with experts if ameliorative steps are available to recover the groundwater levels in the GDE patches.</p>	ECVT/PSC Preliminary Depressurisation Event Memo - Preliminary Assessment	As noted above, a preliminary assessment into a depressurisation event cited a noticeable change in trend from mid-year 2022 and a sharp decrease in levels from the end of 2022 and requires further investigations.	Compliant OBS

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
87.	Section 6.5 BMP	6.5 BMP	<b>Reporting and Incidents - Annual Report on biodiversity matters</b>	<p>Snowy 2.0 Main Works Biodiversity Monitoring Program: Year 1 Annual Monitoring Report (2020 / 2021)</p> <p>Snowy 2.0 Main Works Biodiversity Monitoring Program: Year 2 Annual Monitoring Report (2021 / 2022) 26 April 2023 - EMM</p> <p>Annual Biodiversity Report October 2020 - October 2021 (Draft - WIP) Jan 2023. Table of contents and structure developed, some chapters populated.</p>	<p>Annual Reports addressing the biodiversity matters listed in Section 6.5 of the Biodiversity Management Plan (BMP) and in Appendix F of the BMP had not been completed / undertaken.</p> <p>Whilst the EMM Year 1 and Year 2 reports were prepared to report on the Biodiversity Monitoring program documented in Appendix B of the BMP, they did not address all the information on biodiversity matters required by the BMP.</p> <p>Section 6.5 (Reporting of Incidents) of the Biodiversity Management Plan (BMP), requires an Annual Report to be prepared and made available to SHL, NPWS, DAWE (now DCCEE) and BCD on a variety of Biodiversity matters including (but not limited to) weed and pest control activities, clearing activities, post clearing ecology reports, results of threatened species, GDE, weed and pest monitoring, fauna strike mitigation and efficacy of management measures.</p> <p>Section 6.1 Appendix F of the BMP also requires that details of the weed control actions, vertebrate pest control activities and the efficacy of other control measures are included in an annual report (and made available to the agencies listed above) and integrated into the broader biodiversity management Plan required by Appendix B.</p> <p>As the biodiversity matters listed in Section 6.5 and Appendix F had not been integrated into the Annual Reports by EMM, FGJV had started to prepare a separate Year 1 draft report to include these matters, however it was noted as incomplete at the previous audit (raised as an Observation). The Year 1 and Year 2 reports had not yet been prepared.</p>	Non-compliant
88.			a) An annual report will be prepared to report on the variety of biodiversity matters addressed in this plan. This report, which will be made available to NPWS, DAWE and BCD, will include the following matters:			
89.			i. summary of weed and vertebrate pest control activities undertaken since last report (as detailed in Appendix F);			
90.			ii. account of all clearing activities including tracking against clearing limits and threatened species habitat limits;			
91.			iii. post-clearing ecology reports since last report (as detailed in Appendix C);			
92.			iv. results of threatened species, groundwater-dependant ecosystem, weed and pest monitoring (as detailed in Appendix B);			
93.			v. account of fauna strike mitigation strategy management actions (as detailed in Appendix G);			
94.			vi. account of any relevant incidents and non-compliances; and			

95.		<p>vii .efficacy of the implemented biodiversity management measures against the performance measures included in section 6.5.1 as detailed in <b>Table 6-2</b> of this plan: <b><i>Performance Measures for assessing efficacy of implemented management controls</i></b> - see below.</p>	
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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
96.			b) Where possible, threatened species, weed and pest monitoring results will informally be provided to NPWS, DAWE and BCD as they become available to assist with conservation activities being undertaken in the locality by those agencies (further detail included in Appendix B).		<p>Evidence was not provided that threatened species, weed and pest monitoring results were made informally to NPWS, DCCEE or BCD. This was raised as an opportunity at the previous audit and remains open in the follow-up audit table in the main report.</p> <p>It is recommended that monitoring results are provided informally to the agencies listed</p>	Compliant Opportunity
97.		6.5 BMP	A public version of this report will be made available in accordance with schedule 3, condition 18(d) of the infrastructure approval (SSI 9687) and condition 9(b) of the commonwealth approval.	<p>Snowy 2.0 Main Works Biodiversity Monitoring Program: Year 1 Annual Monitoring Report (2020 / 2021)</p> <p>Snowy 2.0 Main Works Biodiversity Monitoring Program: Year 2 Annual Monitoring Report (2021 / 2022) 26 April 2023 - EMM</p>	The Year 1 and Year 2 Annual Monitoring Reports were available on the project website.	Compliant

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98.		Appendix B Table 9-1	<b>Weed presence/absence monitoring, Weed mapping</b> *Surveys will be undertaken at select locations adjacent to the main project access roads, around key infrastructure areas ( <b>within a 50 m buffer of the disturbance area - nominated sample locations:</b> - Lobs Hole Ravine Road, Marica Trail, Tantangara Road, key construction compounds) and threatened flora monitoring locations, and will record: o location using a GPS or mapping enabled tablet. Groups of individuals will be marked out with a waypoint and large infestations will be mapped out as a polygon; o weed species identified as a priority for control as per weed species of concern in ANNEXURE A; o an estimate of the cover number of individuals, the estimated size of infestation (e.g. m2 for large infestations) and estimated cover (e.g.: Trace<1%; Light 1-10%, Medium 11-50%, Dense >50%); * Comments on any other features (flowering or fruiting); Groups of individuals will be marked out with a waypoint and large infestations will be mapped out as a polygon; • Mapping will be updated each monitoring period to show new weed occurrences or changes in patch size.	Snowy 2.0 Main Works: Biodiversity Monitoring Program: Year 2 Annual Monitoring Report (2021/2022) (on Project Website)	Weed presence / absence monitoring was undertaken and reported on in the Year 2  It was advised that Dendra Systems has been engaged to address the issues relating to weed management identified in the Year 2 report commencing November 2023.	Compliant

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99.			Weed monitoring will occur yearly (early Summer) and at a time that targets growth of weeds identified as a priority for control during construction.	<p>Weed spraying program - Rev 01 (Narla Environmental March 2022)</p> <p>Toolijooa monthly report - Feb 2022 showing spraying completed at Lobs Hole, Marica and Tantangara.</p> <p>Toolijooa monthly report - April 2022 showing spraying at Tantangara;</p> <p>Toolijooa monthly report - Aug 2022 showing spraying at Trunk Services and Rock Forest.</p>	Weed control activities were undertaken in December 2022 to February 2023. Refer to separate section - Appendix B for further detail	Compliant
100.			Weed records and associated <b>spatial data to be kept in a GIS and accompanying spreadsheet</b> to determine any changes in the presence of weeds between monitoring periods and to inform management activities.		It was advised that weed records are kept in a GIS - the Zip file was provided to the auditor, however it was not openable. On the evidence available this requirement is determined as compliant.	Compliant
101.		Appendix B Table 9-12	<b>Presence/absence of Phytophthora monitoring</b> Undertake soil sampling in order to monitor pathogens within proximity to project roads and key project infrastructure, to inform the location and extent of controls.	Snowy 2.0 Main Works: Biodiversity Monitoring Program: Year 2 Annual Monitoring Report (2021/2022) (on Project Website)	Phytophthora was detected at the bottom end of Lobs Hole near the MAT in the baseline year - The Year 2 Annual Report noted that all samples in Year 2 (Q1 sampled only) were negative for Phytophthora and therefore no additional testing or adaptive management is required.	Compliant
102.			<p>Routine sampling sites should include:</p> <ul style="list-style-type: none"> <li>• areas where material/vehicles have been brought onto the project site; and</li> <li>• surrounding all vehicle washdown stations.</li> </ul> <p>The same procedure can be used for sampling at sites of investigation including potential dieback sites.</p>			
103.			<p>Frequency will comprise one monitoring event per year during construction.</p> <p>Monitoring data (laboratory results) for each monitoring location to be kept in a spreadsheet with additional results added after each monitoring program.</p>			

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104.	App B - BMP	Appendix B; Sect 10	<p><b>Biodiversity Monitoring Program - Appendix B to Biodiversity MP</b> Biodiversity monitoring reporting</p> <p>An 'annual report' will be prepared yearly and provided to Snowy Hydro, DPIE and DAWE. The annual report will summarise all monitoring undertaken within the year and the results of the monitoring, including whether any of the adaptive management triggers outlined above have been exceeded. If so, recommendations for adaptive management will be made outlining how these should be actioned. The annual report is also an opportunity to summarise findings to feed into the annual review of the monitoring program. Monitoring data will be provided as an appendix to the annual report.</p> <p>Where adaptive management other than feral animal control or weed control has been triggered this will be reported to DPIE and DAWE (for MNES), with liaison around adaptive management proposed.</p>	<p>Snowy 2.0 Main Works: Biodiversity Monitoring Program: Year 1 Annual Monitoring Report (2020/2021) - 16 March 2022 (on Project Website)</p> <p>Snowy 2.0 Main Works: Biodiversity Monitoring Program: Year 2 Annual Monitoring Report (2021/2022) (on Project Website)</p>	<p>Annual Report was provided to Snowy Hydro Year 1 monitoring periods included:</p> <ul style="list-style-type: none"> <li>* Q1 (Baseline) 21 Oct - 20 Jan 2021;</li> <li>* Q2 Construction 21 Jan to 20 April 2021;</li> <li>* Q3 Construction 21 April to 20 July 2021;</li> <li>* Q4 Construction 21 July to 20 Oct 2021.</li> </ul> <p>Year 2 monitoring periods (construction) included:</p> <ul style="list-style-type: none"> <li>* Q1 21 Oct 2021 to 28 Feb 2022;</li> <li>* Q2 1 Mar to 31 May 2022;</li> <li>* Q3 1 June to 31 Aug 2022;</li> <li>* Q4: 1 Sept to 31 Oct 2022</li> </ul> <p><b>Adaptive management triggered</b> in the Year 2 report included:</p> <p><b>*Small mammal occupancy monitoring</b> - As the Smoky Mouse and Eastern Pygmy Possum have had absences of greater than one year at camera locations, adaptive management has been triggered.</p> <p><b>* Small mammal habitat characteristic monitoring:</b> As degradation in vegetation structure has been observed at occupied small mammal sites (SM19 for Smoky Mouse and Eastern Pygmy Possum and SM16 and SM20 for Eastern Pygmy Possum) with an increasing weed structure, adaptive management has been triggered.</p> <p>* Feral animal occupancy and abundance monitoring: Pest control in accordance with the Weed, Pest and Pathogen Management Plan (FGJV 2020).</p> <p>Adaptive management actions include:</p> <ul style="list-style-type: none"> <li>• initial investigation to document potential causation between decline and project related impacts (e.g. if initial investigation determines that habitat is unlikely to be suitable for Smoky Mouse, then the historic record would be deemed transient)</li> </ul>	Non-compliant

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105.		Table 5-1; BM04	<p>In the event that threatened species, active breeding habitat of threatened species or endangered ecological communities are unexpectedly identified during construction, the Unexpected Threatened Species Finds Procedure included in Appendix D will be followed.</p> <p>BCD Comments BM04 unexpected finds procedure implementation:</p> <p>Comment: Reporting (internal) on unexpected finds is required by the BMP and CoA 17 -i.e., to minimise impacts on Biodiversity values are being followed. E.g., Pimelea bracteata? Are internal reports on unexpected finds available?</p>	<p>Interviews - Snowy Hydro and FGJV Environment team</p> <p>Pre-clearing surveys - Narla - see previous records.</p>	<p>It was advised that there have been no unexpected finds since last audit.</p> <p>Pre-clearing surveys are conducted, and no unexpected finds were reported in the samples reviewed.</p> <p>Sightings of fauna are recorded in the Fauna (none were unexpected finds)</p>	Compliant
106.		Table 5-1; BM06	<p>Exclusion zones will be established around areas of retained vegetation prior to clearing that particular area. Where required, these areas will be fenced using appropriate fencing materials and designated and signed as no-go zones or environmentally sensitive area.</p>	Site Inspection	<p>The site inspection found that exclusion zones were in place for retained vegetation. There have been exceptions in the Marica / Tantangara area as the fencing has been damaged heavily by feral horses / brumbies. Whilst berms and stabilised areas are generally repaired following brumby damage, the reinstatement of fencing / ropes does not appear to be feasible.</p>	Compliant
107.		Table 5-1; BM08	<p>Clearing limits/disturbance footprint will be delineated using highly visible, durable, continuous barrier such as safety flagging, UV stabilised rope, or other similarly robust and durable material.</p> <p>Delineation will be installed consistently where possible to reduce the risk of error or misinterpretation of boundaries. Where a continuous rope is impractical due to terrain and vegetation density, highly visible flagging will be placed on vegetation to maintain line of sight of the clearing boundary.</p> <p>"Environmental Protection Area" signs (or similar wording) will be placed in prominent positions along the exclusion fencing.</p>	Site Inspection	<p>Clearing limits / disturbance area were generally well delineated with UV stabilised rope, flagging and fencing around Environmental Protection Areas (with signage - see photos) except as above (brumbies damage roped areas particularly in the Tantangara area.</p>	Compliant

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108.		Table 5-1; BM12	Fauna detected during pre-clearing surveys shall be relocated into areas of retained vegetation in accordance with the Preclearing and Clearing Procedure (Appendix C) and Fauna Handling and Rescue Procedure (Appendix E).	See Cond 17 for records of pre-clearing and post-clearing records.	The pre-clearing surveys include a section showing locations of areas where fauna can be relocated should fauna be encountered and a requirement for the ecologist to relocate any encountered fauna.  Post clearing report sighted did not require fauna relocation	Compliant
109.		Table 5-1; BM14	Habitat trees within areas to be cleared will be marked during the pre-clearing inspection by the Ecologist. GPS coordinates for all habitat trees identified will be recorded during the pre-clearing survey.  Comments by BCD BM14 & 15 – Habitat trees- & HBT- pre-clearing inspection & salvaging hollows: Comments: There are no reports detailing the results of the pre-clearing and clearing survey procedures and demonstrating compliance with BMP and CoA	See Cond 17 for records of pre-clearing and post-clearing records.	Pre-clearing reports identified the GPS coordinates or habitat trees recorded within the survey area and notes that the habitat trees were identified and demarcated in accordance with the approved methodology	Compliant
110.		Table 5-1; BM15	Where a HBT is felled, the tree hollows will be salvaged, and the salvaged sections reused as hollow replacements for the rehabilitation of the site.	Site inspections	Various examples of HBT trees moved outside the clearing boundary and retained were sighted during the site visit at various locations	Compliant



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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
111.		Table 5-2 BM16	<p>Where dangerous trees, which are located adjacent to the disturbance area (but within the construction envelope), present a safety hazard that requires intervention, they will be managed/removed such that the impact to native vegetation is minimised. Where safe to do so, corrective pruning is preferable to tree removal and should be performed in accordance with Australian standard AS 4373-2007 Pruning of Amenity Trees.</p> <p>All clearing impacts associated with dangerous tree removal/management will be accounted for in the project wide clearing tracking.</p>	<p>Clearing (Land Disturbance) Permit for clearing site: Ravine Road Culvert CH 450 (100m2) dated 09/06/2023 accepted FGJV, approved SHL 16/06/23</p> <p>Clearing (Land Disturbance) Permit for clearing site: Culvert clearing Ch 990 1200m2 dated 27/07/22, accepted FGJV, approved SHL 29/07/22. Post clearance section completed 9/11/22, reference to Post Clearing report by Narla.</p> <p>Clearing (Land Disturbance) Permit for clearing site: Marica USS Office Laydown carpark 6,200m2 19/08/2022. accepted FGJV, approved SHL 27/10/22. Post clearance section completed 01/02/2023, reference to Post Clearing report by Narla.</p>	There is a section in the Clearing Permits relating to "unsound trees that are identified for removal for safety reasons, however none sighted showed this as the reason for clearing	Compliant

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112.		Table 5-1; BM17	<p>HBTs marked for removal will be checked by the Ecologist prior to felling/ disturbance and any animals found will be relocated to adjacent habitat. Ecologists should capture and/or remove fauna that have the potential to be disturbed as a result of clearing activities.</p> <p>To prevent injury and mortality of fauna, an ecologist will be present at the time of felling HBTs. Further details are provided in the Fauna Handling and Rescue Procedure included in Appendix E.</p>	<p>See Cond 17 for records of pre-clearing and post-clearing records.</p> <p>Interview with ecologist</p>	Permits and procedures require that an ecologist is present during clearing.	Compliant
113.		Table 5-1; BM20	<p>The clearing of native vegetation will be monitored so that impacts to mapped plant community types and threatened species habitats do not exceed those defined in the assessment reports and project approvals. Further detail included in section 5.2.2.</p> <p>BCD Comments: Tracking/monitoring and evaluation of clearing against approved limits (BDAR &amp; approval set limits and credits for the offset payments) on Plant community types is required</p>	<p>Master Tracker Clearing Register</p> <p>WebGIS</p>	PCTs and threatened species habitats are monitored as part of the Master Tracker clearing register and are also tracked on the WebGIS. At the time of the audit, there were no exceedances of clearing limits overall or for defined PCTs.	Compliant
<b>BIODIVERSITY MONITORING PLAN (Appendix B - BMP)</b>						
114.		BMP App B Tble 4.2	<p><b>Threatened Flora Monitoring</b> (Clover Glycine and Kiandra Leek-Orchid)</p> <p>* 8 impact and 6 control monitoring sites (Tantangara area - see site inspection checklist)</p> <p>* To be conducted bi-annually between Dec &amp; January (dependent on flowering)</p>	<p>Snowy 2.0 Main Works: Biodiversity Monitoring Program: Year 2 Annual Monitoring Report (2021/2022)</p>	The Year 1 and 2 Annual Monitoring Report (2021/2022) included threatened flora monitoring	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
115.		BMP App B Tble 5.2	<b>Small terrestrial mammal presence / absence monitoring</b> (Smoky Mouse, Eastern Pygmy-possum, Broad toothed rat) * Remote camera monitoring sites established (21 impact sites) (Lobs Hole Ravine Road and construction areas, Marica trail, Tantangara Road and construction areas) and 18 control sites outside construction envelope. Min 30-day deployment of cameras *Faecal search (broad tooth rat only) - one per event * 4 monitoring events per year (one per season) * Data to be kept in a spreadsheet to determine presence /absence between monitoring periods *Trends to be analysed by suitably qualified person to detect changes in absence/presence.		The Year 1 and 2 Annual Monitoring Report (2021/2022) included small terrestrial mammal presence / absence	Compliant

ID	S3 - CoA No	Plan / Section	Description		Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
116.		BMP App B Tble 5.3	<b>Small Terrestrial Mammal habitat characteristic monitoring</b> (Smoky Mouse, Eastern Pygmy-possum, Broad toothed rat): * Pair of transects to be placed at sites as per the presence / absence monitoring * Estimate of habitat characteristics at each 1 m interval, weed cover (sum over 50m transect) * One monitoring event per year (spring) * Transect data to be kept in a spreadsheet to determine any changes in % cover		The Year 1 and 2 Annual Monitoring Report (2021/2022) included small mammal habitat characteristic monitoring	Compliant
117.		BMP App 2 Tble 6-1	<b>Frog occupancy monitoring (presence/absence) (Booralong Frog and Alpine Tree Frog)</b> * Stream transects along section of waterways providing breeding habitat. * The collected data will be tracked on a spreadsheet to determine trends in occupancy <b>Booralong Frog (Talbingo area)</b> * 4 impact monitoring transects on Yarrangobilly River and 1 at Wallaces Creek * 2 control transects along Yarrangobilly River, upstream from disturbance footprint * Surveys to be at night during breeding season (Nov to Mid-Dec) twice per year for frog abundance <b>Alpine Tree Frog (Tantangara, various)</b> * 4 impact transects located on Kellys Plain Creek, Tantangara Ck, Nungar Ck, Tantangara reservoir between MOL & FSL * 4 proposed control transects on Eucumbene R, Murrumbidgee R, Nungar Ck & Tantangara Ck * Surveys to be at night during breeding season (Dec to Jan) twice per year for frog abundance.		The Year 1 and 2 Annual Monitoring Report (2021/2022) included Booralong and Alpine Tree Frog occupancy presence / absence monitoring	Compliant
118.		BMP App 2 Tble 6-2	<b>Habitat characteristic monitoring - Booralong Frog</b> * Aerial imagery will be collected using unmanned aerial vehicles (UAVs or drones) Data to be processed using software and classified into: cobble banks, bedrock banks, riparian vegetation, water and imported into GIS database. * Monitoring annually during breeding season (Nov - Mid Dec) * Location - Survey sites will replace Booroolong Frog occupancy monitoring		The Year 1 and 2 Annual Monitoring Report (2021/2022) included Booralong Frog habitat characteristics monitoring	Compliant

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
119.		BMP App 2 Tble 7-1	<b>Alpine She-oak Skink Presence/absence monitoring</b> Tile grid locations at key locations: * 5 impact sites including Tantangara Rd (2 sites) and Tantangara construction area (3 sites) * 4 control sites located outside disturbance area and construction envelope * Surveys to be undertaken between October and March - each tile grid checked once a month (6 times) * Data to be tracked on a spreadsheet to determine trends in occupancy, and analysed by suitably qualified person		The Year 1 and 2 Annual Monitoring Report (2021/2022) included Alpine She-oak Skink occupancy monitoring	Compliant
120.		BMP App 2 Tble 8-1	<b>Feral Animal occupancy monitoring</b> <b>Remote camera monitoring</b> * Cameras to be placed at locations adjacent to project infrastructure area (camps, admin buildings) and roads, left in place for 30 days * 18 monitoring locations - Tantangara roads and infrastructure area (JD counted from map in Fig 8.2) * 24 monitoring locations - Lobs hole Ravine Road and infrastructure areas - counted as above) * Coordinates to be recorded at each camera location to allow return to same locations Location - within Smoky mouse habitat * Frequency - 4 monitoring events per year for duration of construction (event defined as 30 days of camera deployment of all camera traps) * Data (date time location, species, individuals present) to be kept in a spreadsheet to determine presence/absence *Trends to be analysed by suitably qualified person (occupancy to be compared with number of animals caught during control)		The Year 1 and 2 Annual Monitoring Report (2021/2022) included feral animal occupancy monitoring	Compliant

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
121.		BMP App 2 Tble 8-2	<b>Feral Animal abundance monitoring</b> Spotlight transects through key constriction areas * Establish transect paths along key project roads (how many transects required? - not stated) * Sum of counts at each location to be divided by the length of transect to get simple index of abundance (animals/km) * Frequency - four monitoring events per year for the duration of construction (spotlight monitoring event defined as one night of spotlighting at each nominated transect site) *	Snowy 2.0 Main Works: Biodiversity Monitoring Program: Year 2 Annual Monitoring Report (2021/2022) (on Project Website)	The Year 1 and 2 Annual Monitoring Report included the outcomes of feral animal abundance monitoring	Compliant



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
122.		2.4; Table 2-3; (ECO2)	<b>Spread of weeds</b> A weed and pathogen monitoring program will be implemented, with a weed control program to be implemented if weeds are identified along road verges. This may include wash-down stations to be constructed at a suitable location, with wash down for weeds as well as pathogen <i>Phytophthora cinnamomi</i> .	Weed spraying program - Rev 01 (Narla Environmental March 2022)  Toolijooa monthly report - Feb 2022 showing spraying completed at Lobs Hole, Marica and Tantangara.  Toolijooa monthly report - April 2022 showing spraying at Tantangara;  Toolijooa monthly report - Aug 2022 showing spraying at Trunk Services and Rock Forest.	The weed control program was implemented in 2022/2023.  The Year 2 Biodiversity Monitoring Report noted that all samples taken in Year 2 were negative for <i>Phytophthora</i> . As such, no additional testing or adaptive management is required.	Compliant
123.		App F; 5.1; Table 5-1; BM34	<b>Weed, Pest and Pathogen Management Plan</b> Future Generation will implement the following measures to prevent the introduction or spread of weeds/pathogens on site:	Weeds Management and Washdown Wheel Wash failure (no date) - Investigation into failure, risk assessment and mitigation measures.  Responses from Audit #3 Action Plan: Four (4) actions are noted as incomplete.	The undated Weeds Management and Washdown wheel wash failure document includes section "Root cause of failure". At Tantangara, the root cause was determined as the pump not working and the water reservoir being empty. At Lobs Hole Ravine Gatehouse, the root cause was determined as the unavailability of a scheduled vac truck - the vac truck was required to pump and clean out the wheel wash.  The cause analysis only addresses the immediate causes, not the root causes. Further "why" questions should have been asked, such as why the pump was not working (maintenance schedule adequate?) why the water reservoir was empty (insufficient checking / inspection program?), why the vac truck was not available (resources, scheduling etc?)	Non-compliant

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
			<ul style="list-style-type: none"> <li>Mobile washdown stations will be established in weed and pathogen restricted areas as they are identified.</li> </ul>		<p>Semi- Permanent wash down facilities were operating at Lobs Hole (LV only), Tantangara, Marica and Gooandra trail (closed for winter), however there was a temporary failure of the wheel wash to operate at Marica (vehicle ahead washed down, but failed to operate 5 mins later, and it appears vehicles entering the site a short time later were also washed down).</p> <p>Whilst washdown facilities have been significantly improved since the last audit, further work needs to be undertaken to ensure the reliability of the wheel wash facilities.</p>	

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
124.			<ul style="list-style-type: none"> <li>Hygiene inspections of plant and equipment being transported to site and across zones (inc. Hygiene Declaration Form – Annexure A App F Biodiversity MP available in vehicles?;</li> <li>Washdown stations at access points to site; and</li> <li>Restricted access to areas of known weed/pathogen infestation.</li> </ul> <p>Future Generation will establish a checkpoint to carry out visual inspections of plant and equipment. Checkpoints will be located at or prior to the main access points to site.</p>		The Action Plan from Audit #3 (also raised at Audits 1 & 2) included an agreed action - "Develop operating and management procedures for the wheel washes. "This was incomplete at the time of the audit.	Non-compliant
125.		App F; 5.1.1.3	<p><b>Weeds, Pest and Pathogen Management Plan</b></p> <p>Weed dominated areas will be demarked by the project ecologist during pre-clearing surveys.</p> <p>Weed or pathogen infested areas or sites of weed topsoil stockpiles will be demarked as restricted areas to limit the tracking of plant materials throughout the site.</p>	Various pre-clearing reports - see Condition 17 for details	Pre-clearing surveys identified weed dominated areas	Compliant
126.		App F; 5.1.2.1 BM36	<p><b>Chemical weed control</b></p> <p>A weed control contractor will be employed to implement chemical weed control across the project site as the primary means of eradicating or mitigating against the spread of weeds. The weed control contractor will be suitably qualified in the sustainable management of the specific weed species occurring on the project site.</p>	<p>Weed spraying program - Rev 01 (Narla Environmental March 2022) (draft 1.0 - 19/10/2021; draft 1.1 16/11/2021)</p> <p>Project Memorandum from FGJV Environment Team to SHL Environment Team - Weed Spraying 2022 / 2023 (no date - however maps embedded in document are dated 07/06/2023)</p>	Since the last audit, FGJV have engaged two contractors to control weeds - Toolojoa undertake ad hoc spraying, and Ripper Rural have been engaged to implement the Narla Weed Spraying program. (see below)	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
127.		App F; 5.1.2.1	<p><b>Chemical weed control</b></p> <p>At minimum, a twice-annual weed control program will take place throughout the construction of the project. This will generally involve a spring and summer round of weed spraying, the timing of which will be adapted each season to maximise efficacy by targeting the most appropriate life stage of the target species.</p>	<p>Weed Spraying Plan - Rev01 March 2022 by Narla Environmental</p> <p>Toolijooa monthly report - Feb 2022 showing spraying completed at Lobs Hole, Marica and Tantangara.</p> <p>Toolijooa monthly report - April 2022 showing spraying at Tantangara;</p> <p>Toolijooa monthly report - Aug 2022 showing spraying at Trunk Services and Rock Forest.</p> <p>Project Memorandum from FGJV Environment Team to SHL Environment Team - Weed Spraying 2022 / 2023 (no date - however maps embedded in document are dated 07/06/2023)</p>	<p>The previous audit identified that the spring program had not been delivered in late 2021 / Early 2022 and was determined as non-compliant. The 2022/23 spring / summer program has been undertaken in accordance with the Weed Spraying Program prepared by Narla Environmental., however spraying did not commence until 29 December 2023. The delay was primarily due to inclement weather - as noted by the FGJV Environment Manager "we experienced 169.2-199.2 mm of rain in November 2022 across the sites (Lobs Hole and Tantangara respectively), and in December 2022 there was 99.0-117.6 mm of rain (Lobs Hole and Tantangara respectively). This impacted the commencement of the weed spraying program weed spraying cannot be undertaken in wet weather as there is the potential for run off"</p> <p>The Weed Spraying Memorandum 22 / 23 includes a list of weed species that are to be the priority for mapping, monitoring and control in accordance with Appendix F of the BMP (FGJV 2020) and the Regional Pest Management Strategy 2012-2017: Southern Ranges Region (OEI 2012). The list included:</p>	Compliant
			<p>Prior to spring, the weed contractor will prepare a customised weed spraying program which will consider items such as:</p> <ul style="list-style-type: none"> <li>Specific weeds present including areas for priority control;</li> <li>Seasonal and climatic factors for that year;</li> <li>Weed monitoring results;</li> <li>location of existing or emerging weed infestation within and adjacent to the disturbance area;</li> <li>necessity for follow-up spraying;</li> <li>Opportunity to manage the surrounding 50m buffer of the disturbance area;</li> <li>Previous spraying activities on the site</li> </ul>		<ul style="list-style-type: none"> <li>Achillea millefolium (Milfoil/Yarrow);</li> <li>• Barbarea verna (Winter Cress);</li> <li>• <b>Carduus nutans (Nodding Thistle);</b></li> <li>• Cytisus scoparius (Scotch Broom);</li> <li>• Echium vulgare (Vipers Bugloss);</li> <li>• Eragrostis curvula (African Love Grass);</li> <li>• <b>Hypericum perforatum (St John's Wort);</b></li> <li>• Juncus effusus (Large Rush);</li> <li>• Lupinus polyphyllus (Russel Lupins);</li> <li>• Marrubium vulgare (Horsehound);</li> <li>• Nasella trichotoma (Serrated Tussock);</li> <li>• <b>Onopordum acanthium (Scotch Thistle);</b></li> <li>• <b>Rosa rubiginosa (Sweet Briar);</b></li> <li>• <b>Rubus fruticosus sp. agg. (Blackberry);</b></li> <li>• Ulex nutans (Gorse);</li> <li>• Xanthium spp. (Bathurst Burr); and</li> <li>• <b>Leucanthemum vulgare (Ox-eye Daisy).</b></li> </ul>	

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
128.			<p>Coloured dye will be used in weed spraying units to allow the sprayers and Future Generation to identify which areas have been sprayed.</p> <p>The weed-spraying program will be developed through liaison with NPWS and their weed management program being undertaken in the surrounding area for that season.</p> <p>NPWS have concerns that weed management or not as comprehensive as required by the BMP - they have requested full details of control undertaken, however this was not provided (NPWS scope input June 2023)</p>		<p>The Memorandum notes that the weed spraying works were scheduled in accordance with priority areas, species, and weather conditions. Species targeted in the spring / summer 2022 / 2023 program are highlighted above in <b><i>bold italics</i></b>. Spraying included a mix of herbi dye and Grazon herbicide.</p> <p>Table 1-1 of the Memorandum identifies the locations and dates of the weed spraying works, which in summary, commenced 29/12/2022 to 23/02/2023 and included Tantangara, Gooandra Trail, Marica, Rock Forest, Lobs Hole, Lobs Hole Ravine Road and Rock Forest. Maps showing locations of spraying are also provided.</p>	
129.		App F; 5.2	<p><b>Feral predator and herbivore control</b></p> <p>food waste will be stored appropriately in inaccessible bins and disposed offsite; no waste will be left outside in open areas accessible to animals;</p> <ul style="list-style-type: none"> <li>– a monitoring program will be implemented using remote cameras and spotlight surveys to monitor for pest animal presence (refer to Appendix B of BMP);</li> <li>– opportunistic sightings in high-risk areas, such as areas of habitation (e.g. the camp and tunnel portal) for pest animal activity will be documented. Targeted follow-up control actions will be implemented.</li> </ul>	Site inspection	<p>The site inspection found that bins containing food waste were appropriately covered with lids. No specific instances of food waste being accessible to animals were identified</p> <p>Remote cameras are deployed at various locations around sites</p> <p>A mouse baiting program has been developed by FGJV, and a Procedure – Short-term field mouse baiting procedure (Rev c) September 2022 has been developed in consultation with NPWS. It has been issued to cover the period 19/09/2022 – 19/09/2023. Appendix A of the procedure provides NPWS authorisation to undertake the program under certain conditions and over the designated time frame</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIODIVERSITY</b>			
130.		App F; 5.2.2 BM32 BM33	<p><b>Predator control program</b></p> <p>A routine pest predator control program will be implemented throughout construction of the project.</p> <p>An experienced and suitably qualified pest control contractor will be employed to manage feral predators including wild dogs, foxes and cats. This program will be prepared in conjunction with the NPWS activities occurring in the broader area.</p> <p>The frequency and timing of control activities will be determined by the pest control contractor through discussion with NPWS.</p> <p>BCD Comments: The 21/22 yr. 2 annual monitoring report (EMM April 2023) states adaptive management actions have been triggered and indicates pest control actions have not been undertaken by SHL.</p> <p>Recommendation- This commitment is particularly important where the project impacts key Threatened Species habitats identified in EIS including the accommodation areas and access tracks/Rds Lobs Hole Ravine, Tantangara and Marica</p>	<p>Snowy 2.0 Main Works: Biodiversity Monitoring Program: Year 1 Annual Monitoring Report (2020/2021) - 16 March 2022 (on Project Website)</p> <p>Snowy 2.0 Main Works: Biodiversity Monitoring Program: Year 2 Annual Monitoring Report (2021/2022) (on Project Website)</p>	<p>Evidence of a pest predator control program or the engagement of a suitable pest control contractor could not be provided. It was noted that discussions have occurred between NPWS and Snowy Hydro in regard to the use of a "felixer" to control predators, however no evidence was provided of these. A felixer uses rangefinder sensors to distinguish target cats and foxes from nontarget wildlife and humans etc and spray targets with a measured dose of toxic gel.</p> <p>The Year 1 and Year 2 Annual Monitoring Report noted: "The sighting of feral animals within proximity to known Smoky Mouse habitat or project infrastructure is a trigger for adaptive management. Adaptive management actions have been triggered as a result of the monitoring: Feral animal occupancy and abundance monitoring. Therefore, Snowy Hydro/FGJV are required to control feral animals in accordance with the Weed, Pest and Pathogen Management Plan (FGJV, 2020).</p> <p>This issue was raised at the previous audit as an Observation and has now been escalated to non-compliance</p>	Non-compliant
131.		App F; 5.2.3	<p><b>Incidental predator trapping</b></p> <p>In addition to the routine pest predator control program, cage trapping will be carried out to capture feral predators which are incidentally observed frequenting areas of human habitation such as camps and construction compounds.</p>	<p>Fauna Handling record sheet - record of black rat caught (escaped)</p> <p>Fauna Encounter Register (trapping tab and trap location tab)</p>	<p>It was advised that a few cats have been caught, however minimal evidence was provided that cage trapping has been implemented over the past audit period. Since January 2022 only mice and 2 black rats have been recorded as trapped. The latest date that a trap has been recorded as deployed was in April 2021.</p>	Non-compliant



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>Part A</b>	<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
132.	1		The approval holder must undertake the action as described in the NSW approval.		Snowy Hydro have generally undertaken the project in compliance with the NSW approval in relation to controlled actions. Non-compliances have been raised against a number of NSW conditions. Where the issue is related to an EPBC condition, this is noted in the findings.	Compliant
133.	2		The approval holder must not clear outside of the construction envelope as identified at Appendix A.		As per the NSW approval, the clearing has been conducted within the construction envelope	Compliant
134.	3		The disturbance area must not exceed 504 hectares (ha).		As per the NSW approval, the clearing has not exceeded 504 hectares	Compliant
135.	4		The approval holder must submit the report required by condition 13 of the NSW approval to the Department on the same day as submission to the NSW Government. The report submitted to the Department must include shapefiles of the 'final disturbance area' and the final clearance areas for the entities listed in condition 5		Condition 13 of the NSW Approval relates to the Additional Biodiversity Offset payment, which is not yet triggered.	Not triggered
			<b>Terrestrial biodiversity</b>			
136.	5		5. Within the construction envelope, the approval holder must not clear more than:	Clearing Master Tracker to June 2023	The Clearing Limits Register provided indicated the following totals cleared to date:	Compliant
			a. 425 ha of native vegetation;		The total areas cleared (and percentage allowable) for each of the following species were within the limits 320 ha (75%)	
			b. 84.29 ha of habitat for the Smoky Mouse;		61 ha (73%)	
			c. 22.87 ha of habitat for the Alpine Tree Frog;		16 ha (69%)	
			d. 61.47 ha of habitat for the Broad-toothed Rat;		44 ha (72%)	
			e. 80.83 ha of habitat for the Alpine She-oak Skink;		64 ha (80%)	
			f. 197.95 ha of habitat for the Eastern Pygmy-possum;		177 ha (90%)	
			g. 81.86 ha of habitat for the Latham's Snipe; and		2 ha (35%)	
			h. 1.03 ha of the Alpine Bogs and Fens.		0.62 ha (60%)	

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		<b>Part A</b>	<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
137.	6		To compensate for direct impacts on protected matters, including the entities listed in condition 5, the approval holder must comply with conditions 12 -16 of the NSW approval relating to biodiversity offset payments.		Conditions 12 - 16 of the NSW Approval had not been triggered at this audit.	Not triggered
138.	7		The approval holder must notify the Department in writing within 10 business days of making a biodiversity offset payment to the NSW National Parks and Wildlife Service. Each notification must state the date of payment and the amount paid.	Email to EPBC Monitoring@awe.gov.au dated 26 October 2022 - submission of Annual Compliance Report.  Remittance Advice 28/09/2-22 \$16,236,000.00 Tax Invoice for amount above - Main Works Biodiversity Offset.	Notification was provided to EPBCMonitoring@awe.gov.au on 25 October 2022 along with the submission of the 2021-2022 Annual Compliance Report. Acknowledgement of receipt was provided on 26 October 2022. The notification was within the 10-day timeframe (payment made 22 October 2022). This condition was noted as non-compliant at the previous audit, however was addressed for the next period.	Compliant
139.	8		To minimise impacts on protected matters, the approval holder must comply with conditions 17 -19 of the NSW approval relating to biodiversity management.		Non-compliances were raised in relation to Condition 19 of the NSW Approval (weeds management)	Non-compliant
140.	9		9. The Biodiversity Management Plan required under condition 18 of the NSW approval must: a. be consistent with relevant statutory documents; and		The BMP was consistent with statutory documents. (Assessed as compliant at previous audits)	Compliant
141.			b. include provisions to make biodiversity monitoring data (excluding sensitive ecological data) available as part of the monitoring, evaluation and reporting program required by condition 18d of the NSW approval.		The BMP includes provisions to make biodiversity monitoring data available - requires the preparation of quarterly and Annual Monitoring Reports. Refer to Non-compliance under the NSW Conditions	Compliant
142.	10		The approval holder must implement the Biodiversity Management Plan approved by the NSW Planning Secretary until the end date of this approval, unless otherwise agreed by the Minister in writing.		Non-compliances were raised in relation to the implementation of the Biodiversity Management Plan.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>Part A</b>	<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
143.	11		Prior to the commencement of the action, the approval holder must provide the Department with shapefiles of all records of threatened species and communities recording during surveys undertaken for the assessment of the action.	Snowy 2.0 Main Works: Annual EPBC Compliance Report Rev A 121/10/2022 - Reporting period 25 August 2021 to 24 August 2022;	Assessed as compliant at the previous audit.  The Annual EPBC Compliance Report noted "Shapefiles containing all records of threatened species and communities recorded during surveys undertaken as a part of the biodiversity assessment for Snowy 2.0 were provided to the Department on 25 August 2020".	Compliant
			<b><u>Refer to respective tables for:</u></b> <b><u>Aquatic ecology and biosecurity (refer to Biosecurity and Fish tab); Water resources (Refer to Surface Water); Heritage; Amenity and landscape (see spoil management (C24) and Rehabilitation (C25))</u></b>			
			<b><u>Changes to the NSW approval</u></b>			
144.	26		The approval holder must notify the Department in writing of any proposed change to the NSW approval conditions referred to in these conditions within 10 business days of formally proposing a change or becoming aware of any proposed change.	No changes to conditions	At the time of the audit there had been no changes to the NSW approval conditions. A modification to the approval for horizontal directional drilling of a section of trunk services was underway, however had not yet been approved.	Not triggered
145.	27		The approval holder must notify the Department in writing of any change to the NSW approval conditions referred to in these conditions, within 10 business days of a change to conditions being finalised.	No changes to conditions	As above	Not triggered
	<b>Part B</b>		<b>EPBC Condition - Annexure A - Standard Administrative Conditions</b>			
146.	28		<b>Notification of date of commencement of the action</b>  The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.		Assessed as compliant at previous audits - not reassessed	Compliant
147.	29		<b>Compliance records</b> The approval holder must maintain accurate and complete compliance records.		Compliance records have been maintained.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>Part A</b>	<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
148.	30		<p>If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.</p> <p><i>Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.</i></p>	<p>Letter from DCCEEW: Potential Breach of conditions attached to the EPBC Act approval for EPBC 2018/8322</p> <p>Letter from Snowy Hydro to Environmental Audit Section - Environment Compliance Brance DCCEEW: Re Potential Breach of conditions attached to the EPBC Act approval for EPBC 2018/8322 dated 19 May 2023.</p>	A request in writing regarding an incident (relating to EPA PIN) was made 4 May 2023 - SHL responded on 19th May (10 business days) with details of the potential breach providing background, requested information, ongoing actions and measures being undertaken by Snowy Hydro and statements regarding Snowy Hydro's commitment to the environment and continuous improvement.	Compliant
149.	31		<p><b>Preparation and publication of plans</b> The approval holder must:</p> <p>a. submit plans required by conditions 18, 22 and 24 of the NSW approval and conditions 18 and 22 of this approval for consultation purposes, electronically to the Department;</p> <p>b. publish each plan approved by the NSW Planning Secretary or Director-General of NSW Department of Primary Industries on the website within 20 business days of the date the plan is approved, unless otherwise agreed to in writing by the Minister;</p> <p>c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and</p> <p>d. keep plans published on the website until the end date of this approval, unless otherwise agreed to in writing by the Minister.</p>	<p>NSW Cond 18 = Biodiversity MP NSW Cond 22 = Biosecurity Risk MP NSW Cond 24 = Threatened Fish MP EPBC Cond 18 = Water MP EPBC Cond 22 = Heritage MP</p>	<p>The Biosecurity Risk Management Plan and the Threatened Fish Management Plan were not submitted in the required timeframes and are non-compliant to NSW Conditions 22 and 24, and therefore, not compliant with this condition. (refer to NSW Conditions for details)</p> <p>The Biodiversity Management Plan, Water Management Plan and Heritage Management Plans were previously assessed as compliant.</p>	Non-compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>Part A</b>	<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
150.	32		The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plan.	Weeds zip file (unopenable by the auditor)  Interview with SHL  Snowy 2.0 Main Works: Annual EPBC Compliance Report Rev A 121/10/2022 - Reporting period 25 August 2021 to 24 August 2022;	It was advised that monitoring data by EMM under the Biodiversity Monitoring Program is uploaded to GIS and spatial and metadata files. A zip file on weeds was provided to the auditor, however it was not openable. On the evidence available this requirement is determined as compliant.  The Annual EPBC Compliance Report notes that "All data for the Biodiversity Management Plan was prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and provided to the Department on 25 August 2020".	Compliant
151.	33		The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:	Snowy 2.0 Main Works: Annual EPBC Compliance Report Rev A 19/08/2022 - Reporting period 25 August 2020 to 24 August 2021;  Snowy 2.0 Main Works: Annual EPBC Compliance Report Rev A 121/10/2022 - Reporting period 25 August 2021 to 24 August 2022;	The previous audit identified that the EPBC Annual Compliance Reports had not been prepared or published on the website within the required timeframe of this condition.  The Annual Compliance Reports have now been prepared and submitted to the Department (25 October 2022).	Compliant
			a. publish each compliance report on the website within 60 business days following the relevant 12-month period;	Email string from Snowy Hydro 25 Oct 2022 and response from EPBCMonitoring@awe.gov.au dated 26 Oct 2022 - RE: Snowy 2.0 EPBC 2018_8322 - Annual Compliance report 2021/22 [SEC=OFFICIAL] - Acknowledging receipt of the submission of the Annual Compliance Report.	The correspondence from Snowy Hydro included that the 2021-2022 Compliance Report was uploaded to the SHL website on 24 October 2022 and that a public version and full version were provided to the Department	Compliant
			b. notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication;	As above	As above	Compliant
			c. keep all compliance reports publicly available on the website until this approval expires, unless otherwise agreed to in writing by the Minister;	Project website <a href="https://www.snowyhydro.com.au/snowy-20/documents/">https://www.snowyhydro.com.au/snowy-20/documents/</a>	All current reports are on the project website	Compliant
			d. exclude or redact sensitive ecological data from compliance reports published on the website; and		Public version has redacted data	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		Part A	<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
			e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication. <i>Note: Compliance reports may be published on the Department's website.</i>		Full version provided to the Department as above	Compliant
152.	34		<b>Reporting incidents and non-compliances</b> The approval holder must notify the Department in writing of any incident as soon as practicable after becoming aware of the incident and no later than two business days. The notification must specify:	Interview: SHL believes that there have been no incidents that are relevant to matters of national environmental significance (MNES).  Fauna Encounter Register Event and Environmental Incident Register Incident and Incident Investigation Reports	The Environmental Management Strategy (EMS) (original and unapproved revised version) is not clear on what incidents would trigger a notification to DAWE / DCCEEW.  The EMS states that DAWE/ DCCEEW is to be notified in writing of any (auditor emphasis) incident as soon as practicable, however does not clarify whether this would only be for matters pertaining only to protected matters / Matters of National Environmental Significance (MNES).	Compliant OBS
			a. a short description of the incident; and			
			b. the location (including co-ordinates), date, and time of the incident. In the event the exact information cannot be provided, provide the best information available.			
153.	35		The approval holder must provide to the Department in writing the details of any incident or noncompliance with the conditions or commitments made in plans within 10 business days after becoming aware of the incident or non-compliance, specifying:		IEA #3 report identifies any non-compliances, and these are publicly available on the Snowy Hydro website.	Compliant
			a. any condition that is or may be in breach;			
			b. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;			
			c. the potential impacts of the incident or non-compliance on protected matters; and			
			d. the method and timing of any remedial action that will be undertaken by the approval holder.			



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		Part A	<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
154.	36		<b>Independent audit</b> The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested by the Minister.		This Independent Environmental Audit was triggered by the NSW approval and was undertaken in accordance with Schedule 4 Condition 9 and was not requested by the Minister.  Pre-audit consultation correspondence indicated that the Department was happy for the EPBC conditions to be audited as part of the NSW Conditions of Consent, without triggering a separate EPBC audit that needs to be compliant with EPBC Condition 37.	Not triggered
155.	37		For each independent audit, the approval holder must: a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.		As noted in Condition 36, this IEA was conducted in accordance with the NSW Conditions of Consent with the inclusion of EPBC conditions.	Not triggered
156.	38		The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.		Refer to comments in EPBC Conditions 37 and 38 above	Not triggered
157.	39		<b>Completion of the action</b> Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.		The Action has not yet been completed and is therefore not triggered.	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Previous Evidence Assessed	Previous Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIOSECURITY</b>			
158.	20		<b>Biosecurity and Fish Management Requirements</b>  The Proponent must: <ul style="list-style-type: none"> <li>a) minimise the biosecurity risks associated the development, including the movement and/or spread of weeds, fish and pathogens;</li> <li>b) minimise the impact of the development on threatened fish species and their habitat, particularly the Macquarie Perch, Stocky Galaxias and Murray Crayfish; and</li> <li>c) minimise the impact of the development on recreational fishing in Tantangara Reservoir and Lake Eucumbene.</li> </ul>		This Condition will not be triggered until the operational phase of the Project.	Not triggered
159.	21		<b>Fish Screens and Barrier</b> Prior to the commencement of commissioning, the Proponent must install: <ul style="list-style-type: none"> <li>a) a fish barrier on Tantangara Creek to prevent so far as is reasonably practicable Climbing Galaxias reaching the existing population of Stocky Galaxias in the upper reaches of the creek; and</li> <li>b) fish screens at the southern end of the Tantangara Reservoir to prevent so far as is reasonably practicable the movement of pest fish (in all its forms: eggs, larvae, juveniles and adults) and spread of disease to the mid-Murrumbidgee River and Lake Eucumbene.</li> </ul>		This condition is not triggered - it will be triggered prior to the commencement of commissioning.	Not triggered
160.	22		<b>Biosecurity Risk Management Plan</b> Within 2 years of the commencement of construction, the Proponent must prepare a Biosecurity Risk Management Plan for the development to the satisfaction of the Director-General of NSW DPI. This plan must: <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person in consultation with DPIE, NPWS and DAWE;</li> <li>b) include a detailed biosecurity risk management framework for minimising the ongoing biosecurity risks of the development required in condition 20(a) above, including:</li> </ul>	Letter from Snowy Hydro to DPE - Management Plan submission dated 5 July 2023	The Biosecurity Risk Management Plan was submitted to the agencies later than the due date (October 2022) and had not yet been developed "to the satisfaction of the DG of NSW DPI".  At the time of these findings, Snowy Hydro were awaiting further feedback from DPI and other agencies, and approval of a peer reviewer from DCCEEW. A revised submission date proposed by Snowy Hydro is 1 December 2023	Non-compliant

ID	S3 - CoA No	Plan / Section	Description	Previous Evidence Assessed	Previous Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIOSECURITY</b>			
161.			<ul style="list-style-type: none"> <li>developing systems to prevent spills from the Tantangara Reservoir so far as is reasonably practicable; and</li> <li>pest fish and disease surveillance and eradication/management measures to protect the Macquarie Perch and Stocky Galaxias in the Mid to Upper Murrumbidgee catchment and the salmonid fishery in Lake Eucumbene;</li> <li>c) include detailed plans for the installation and use of the fish screens and barriers required in condition 21 above, including: <ul style="list-style-type: none"> <li>minimising the environmental impacts associated with installing the screens;</li> <li>testing the effectiveness of the screens before they are used; and</li> <li>maintaining and improving the effectiveness of the screens and barriers over time;</li> </ul> </li> <li>d) include a program to monitor, evaluate and publicly report on these plans, including: <ul style="list-style-type: none"> <li>carrying out monitoring using epidemiologically designed surveys; and</li> <li>conducting fish, disease and eDNA surveys.</li> </ul> </li> </ul>			
162.	23		The Proponent must implement the approved Biosecurity Risk Management Plan for the development.		Implementation has not yet commenced	Not triggered
163.	24		<b>Threatened Fish Management Plan</b> Within 12 months of the commencement of construction, the Proponent must prepare a Threatened Fish Management Plan for the development to the satisfaction of the Director-General of NSW DPI.	Letter from Snowy Hydro to DPE - Management Plan submission dated 5 July 2023	The Threatened Fish Management Plan was overdue for submission and has not yet been “developed to the satisfaction of the Director-General of NSW DPI”. The fortnightly update from SHL to DPE on 21/7/2023 noted “Additional stakeholder consultation requested by DPI to expert advisory bodies (NSW Fisheries Scientific Committee (FSC))”.. The Peer review required under Condition 14 of the EPBC approval of the project has been uploaded to the Snowy Hydro website”, however may need to be repeated if feedback from DPE or the FSC requires a revision of the Plan. Snowy Hydro has proposed a new submission date of 01 November 2023 in the fortnightly update.	Non-compliant
164.	24 (a)		This plan must:			
			a) be prepared by a suitably qualified and experienced person in consultation with DPIE and DAWE;			
165.	24 (b)		b) include the establishment and use of an expert advisory committee to provide advice to the proponent on the implementation of the plan;			
166.	24 (c)		c) describe the detailed measures that would be implemented to comply with condition 20(b) above;			
167.	24 (d)		d) include a detailed captive breeding program for the Macquarie Perch and Stocky Galaxias involving the spending of \$5 million over 5 years from the commencement of the program that provides for:			

ID	S3 - CoA No EPBC CoA	Plan / Section	Description	Previous Evidence Assessed	Previous Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIOSECURITY</b>			
168.			<ul style="list-style-type: none"> <li>population monitoring, surveillance and research on the Macquarie Perch and Stocky Galaxias in the Mid to Upper Murrumbidgee catchment;</li> <li>habitat surveys to identify suitable receiving sites for stocking insurance populations of Stocky Galaxias and Macquarie Perch;</li> <li>captive breeding, stocking and monitoring of Macquarie Perch and Stocky Galaxias with the aim of achieving self-sustaining populations of these species;</li> <li>habitat enhancement for the Macquarie Perch in the mid-Murrumbidgee catchment in accordance with the National Recovery Plan to increase the existing population's resilience to the potential biosecurity risks from the development</li> </ul>			
169.	24 (e)		e) include a review after 5 years of the commencement of the captive breeding program in (d) above and detail the trigger, action and response plan for the extension of the program;			
170.	24 (f)		f) include a program to minimise the impacts of the development on the Murray Crayfish in Talbingo Reservoir, including: <ul style="list-style-type: none"> <li>population monitoring and surveillance for Murray Crayfish;</li> <li>relocating any Murray Crayfish from the disturbance area of the development prior to disturbing the relevant area; and</li> <li>habitat enhancement for the Murray Crayfish habitat in the vicinity of the disturbance area at the Talbingo Reservoir, including the use of woody debris salvaged during construction; and</li> </ul>			
171.	24 (g)		g) include a program to monitor and publicly report on the progress of each program/plan and the effectiveness of these measures.			
172.	25		The Proponent must implement the approved Threatened Fish Management Plan for the development.		The implementation of the Threatened Fish Management Plan is not triggered. As noted by the DG of DPI, in the previous audit report, the project is still in the early phase of construction and will not be completed for some years.	Not triggered

ID	S3 - CoA No EPBC No	Plan / Section	Description	Previous Evidence Assessed	Previous Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIOSECURITY</b>			
173.	26		<b>Recreational Fishing Management Plan</b>  Within 12 months of the commencement of construction, the Proponent must prepare a Recreational Fishing Management Plan for the development to the satisfaction of the Director-General of NSW DPI.		The Recreation Management Plan was overdue for submission and is not yet developed "to the satisfaction of the Planning Secretary". The Recreation Management Plan was due for submission October 2021.	Non-compliant
174.	26 (a)		This plan must: a) be prepared by a suitably qualified and experienced person in consultation with DPIE, NPWS and relevant recreational fishing groups;		The fortnightly update to DPE on 5/07/2023 noted that "Some progress was made on the staging strategy for this plan. SHL met with NPWS on 3 July to discuss staging rationale with feedback and agreement that the preference for both groups was to stage by level of design if possible.	
175.	26 (b)		b) describe the detailed measures that would be implemented to comply with condition 20(c) above, including: • a program involving the spending of \$5 million over 5 years from the commencement of the program to develop the capability to restock, and to restock, the Tantangara Reservoir and Lake Eucumbene with salmonid fish; • a program to monitor the impacts of the development on recreational fishing in Tantangara Reservoir and Lake Eucumbene; • a review after 5 years of the commencement of the restocking program and detail the trigger, action, and response plan for the continuation of the restocking of Tantangara Reservoir and/or Lake Eucumbene salmonid fish;		The fortnightly update on 21/07/2023 noted that the plan requires ongoing consultation with NPWS to satisfy their requirements. NPWS would like to see final landforms and visualizations of the areas and views, before then can commit to a design.  Snowy Hydro has proposed a new submission date of 01 October 2023 for Stage 1 in the fortnightly update 21/07/2023.	
176.	26 (c)		c) include a program to monitor and publicly report on the effectiveness of these measures.			
177.	27		The Proponent must implement the approved Recreational Fishing Management Plan for the development.		The implementation of the Recreation Fishing Plan is not triggered.	Not triggered
	<b>Part A</b>		<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
	<b>EPBC Cond</b>		<b>Aquatic ecology and biosecurity</b>			
178.	12		To minimise impacts to the aquatic environment, the approval holder must comply with conditions 20-25 of the NSW approval relating to biosecurity and fish management.	Letters from Snowy Hydro to DPE - Management Plan submission dated 5 July 2023 and 21 July 2023 regarding status of various overdue Management Plans.	A non-compliance was raised against Condition 22 of the NSW Approval - preparation of a Biosecurity Risk Management Plan within 2 years of commencement of construction and Condition 24 - preparation of a Threatened Fish Management Plan within 12 months of commencement of construction. The approval holder is therefore non-compliant to this condition.	Non-compliant

ID	EPBC CoA	Plan / Section	Description	Previous Evidence Assessed	Previous Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS BIOSECURITY</b>			
179.	13		<p>To minimise potential impacts of pest fish movement on protected matters, the approval holder must, in addition to conditions 22c and 24d of the NSW approval:</p> <p>a. investigate reasonable measures, including the installation of secondary fish barriers, to protect tributaries identified as priority receiving sites for the establishment of stocking insurance populations of the Macquarie Perch and Stocky Galaxias;</p> <p>b. include the findings of the investigation in the Biosecurity Risk Management Plan required by condition 22 of the NSW approval, and the Threatened Fish Management Plan required by condition 24 of the NSW approval; and</p> <p>c. before undertaking any stocking of insurance populations required by condition 24d of the NSW approval, implement those measures determined under condition 13a to protect tributaries identified as priority receiving sites for the establishment of stocking insurance populations of the Macquarie Perch and Stocky Galaxias.</p>		As the Biosecurity Risk Management Plan and the Threatened Fish Management Plans have not been approved, the project is also non-compliant with this condition.	Non-compliant
180.	14		<p>The Biosecurity Risk Management Plan required by condition 22 of the NSW approval, and the Threatened Fish Management Plan required by condition 24 of the NSW approval, must be peer reviewed by an independent, suitably qualified expert/s approved by the Department.</p> <p>a. The peer review must be made publicly available on the approval holder's website within 10 business days of finalisation; and</p> <p>b. The peer review must be undertaken prior to approval of the Biosecurity Risk Management Plan and Threatened Fish Management Plan by the Director-General of the NSW Department of Primary Industries.</p>		As the Biosecurity Risk Management Plan and the Threatened Fish Management Plans have not been approved, the project is also non-compliant with this condition.	Non-compliant
181.	15		The Biosecurity Risk Management Plan and the Threatened Fish Management Plan must include provisions to make monitoring data (excluding sensitive ecological data) available as part of the monitoring, evaluation and reporting programs required by condition 22d and 24g of the NSW approval.		As the Biosecurity Risk Management Plan and the Threatened Fish Management Plans have not been approved, the project is also non-compliant with this condition.	Non-compliant
182.	16		The approval holder must implement the Biosecurity Risk Management Plan and Threatened Fish Management Plan approved by the Director-General of the NSW Department of Primary Industries until the end date of this approval, unless otherwise agreed by the Minister in writing.			Not triggered



ID	S3 - CoA No/ EPBC CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER</b>						
183.	29		<b>Water Pollution</b> Unless an environment protection licence authorises otherwise, the Proponent must comply with Section 120 of the POEO Act. <i>Note: Section 120 of the POEO Act makes it an offence to pollute any waters.</i>	Various incident reports:  16/06/2022 - Sediment plume to Yarangobilly River - Reported to EPA, Show Cause letter from EPA issued, response from SHL provided to EPA, Official Caution Notice issued by EPA, Penalty Infringement Notice issued to FGJV;  27/09/2022 - Release of Sediment laden waters from Tantangara Road into Nungar Creek: Notified to EPA, Show Cause Letter from EPA issued, response by SHL, Pollution Prevention Notice issued by EPA 19/12/22, EPA letter recommending that SHL used the ERSED approach along Spoil Road as benchmark for standard across the premises, Show Cause letter from EPA 18/04/23, Penalty Infringement Notice issued by EPA 29/03/2023.  30/01/2023: Diluted leachate water mixed with sediment laden water leak from spoil emplacement area at Lobs Hole on 30/01/2023 (Cond O1.1). An Official Caution letter (3505349) was issued by EPA to SHL on 23/05/2023;  23/03/2023 Sediment laden water discharged to Gooandra Creek (23/03/23). An Official Caution (3505611) was issued by EPA to SHL 06/06/2023.	A number of water pollution incidents have occurred in the audit period (Jan 2022 to July 2023) that have primarily involved the discharge of sediment laden water into the waterways. The incidents were reported to the EPA, and various regulatory notices were issued. Summary of incidents shown in the evidence assessed column.  As some of the incidents have resulted in regulatory action, it is determined that the project is non-compliant to this condition.	Non-compliant

ID	S3 - CoA No/	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER</b>			
184.	30 (a)		<b>Water Management Requirements</b>  The Proponent must: a) maximise the recycling and reuse of water on site;	Site inspection Interviews CWT Plans productivity and consumption reports Watercart load sheets (various) Water tracking take Logs (various) spreadsheets showing usage / purpose - Marica, Tantangara and Lobs Hole - mostly for dust suppression.	Water recycling activities observed during the site inspection included: - Dust suppression on unsealed roads; - Wheel washing stations; - Water storage on sediment basins prior to re-use (e.g. for wheel wash stations; for water carts refilling).	Compliant
185.	30 (b)		b) maximise the diversion of clean water runoff around the disturbance areas;	Main Yard ESCP Rev G 5/4/2023 ESCP - Main Camp Rev F Tantangara Spoil Road ESCP Rev E; Talbingo Intake ESCP Rev D GF01 PESCP Rev B Upstream Surge Shaft PESCP 01/09/2021 Explosives Main Yard ESCP Rev C Quarry Trail Road AR03 ESCP Rev I TS01 Marica Horizontal Directional Drilling PESCP Rev C Marica Road PESCP Rev I	The site inspection noted that there was a vehicular track above the GF01 spoil emplacement area that served as a diversion channel, however had not yet been adequately stabilised as per the PESCP for GF01. Shortly after the site visit, (and after a joint agency inspection), works had commenced to stabilise the "clean water drain". The clean water drain was shown on the PESCP for GF01 - Lobs Hole.  The condition and effectiveness of clean water diversions and sediment and erosion controls are included in weekly environmental inspections.  Progressive Erosion and Sediment Control Plans (PESCPs) / ESCPs have been prepared by SEEC and are implemented by FGJV.	Compliant
186.	30 (c)		c) minimise the flow rates and velocities of any clean water runoff diversions to adjoining watercourses;	See above	Clean water diversions have been installed and progressively planned for	Compliant
187.	30 (d)		d) minimise the flooding impacts of the development;	SWMP – Section 5.2 Flooding; SWMP Table 5-3 SW18, SW19, SW20 and SW21; Natural Hazard Management Plan (S2-FGJV-ENV-PLN- 0090); S2-CIV-RO-GEN-MEM-S001[B] Nungar Creek Flood Study, issued 11/12/20.	Measures to minimise flooding impacts have been included in the SWMP. Additionally, the Natural Hazard Management Plan (S2-FGJV-ENV-PLN- 0090); includes information on risks of floods and emergency preparedness and response measures in case of floods. A flood study was conducted for the Nungar Creek to determine whether a bridge or culvert crossing is required at that location.	Compliant

ID	S3 - CoA No/	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER</b>			
188.	30 (e)		d) minimise groundwater take from the Gooandra Volcanics and Kellys Plain Volcanics using pre and post grouting of the tunnel, to minimise the loss of stream flows in the waterways above these geological formations, including Gooandra Creek and the headwaters of the Eucumbene River;			
189.	30 (f)		f) minimise erosion and the generation and dispersion of sediment using suitable controls in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> guidance series;	<p>Email from EPA to SHL 1 Sept 2022 - Diffuse source pollution observations;</p> <p>Email from EPA to SHL 29 Sept 2022 - Tantangara - Sediment and erosion controls;</p> <p>Prevention Notice Number 3503960 issued on 21 October 2022 relating to sediment and erosion controls at Tantangara;</p> <p>Letter from EPA- Prevention Notice 3503960 dated 15/12/2022 (inadequate information provided - require SHL to address action in App A by 18 Jan 2023.</p> <p>Show Cause letter from EPA to SHL dated 18/04/2023 - Failure to comply with Prevention Notice number 3503960</p> <p>Response to EPA Show Cause Letter by SHL re: alleged discharge of sediment laden water into Nungar Creek REG-3525 dated 19/12/2022;</p> <p>Letter from EPA to SHL - Penalty Notice Advice - Discharge Of Sediment Laden Water from the Premises into Nungar Creek – 27 September 2022;</p> <p>Penalty Infringement Notices (PIN) EPA issued a \$15k Penalty Notice in sum of with respect to the matter on 29/03/23</p> <p>Letter from EPA to SHL - Spoil Road Erosion and Sediment Controls noting improvement in controls and enhanced controls go beyond the "Blue Book" commensurate with level of protection required in a high conservation value area.</p> <p>Diffuse Water Pollution fortnightly update</p>	<p>In the audit period, there have been several regulatory actions by the EPA in regard to inadequate sediment and erosion controls and diffuse source water pollution. Regulatory actions have included the issue of clean-up notices, prevention notice, Penalty Infringement Notice, and requirement for the implementation of a Pollution Reduction Program. Failure to adequately respond to a Prevention Notice resulted in</p> <p>The Diffuse Water Pollution Management Action Update Report is provided to satisfy the EPL 21266 Condition U1.3: By 17 July 2023, the licensee must provide a written report to the EPA's Manager Regulatory Operations – Regional South detailing the completion of the works outlined in Condition U1.2.</p> <p>A site inspection was conducted at all sites as part of this IEA. Whilst some minor erosion and sediment issues were identified across the project at that time, it appears that the actions taken to address the EPA notices and requirements have been successful. SHL and FGJV will need to continue to work with the EPA to ensure all issues are resolved in the longer term.</p> <p>Although the controls were generally satisfactory at the time of the audit, a non-compliance was raised against this condition as part of the non-compliance regarding breach of Section 120 of the POEO Act due to unsatisfactory performance during the audit period.</p>	Non-compliant

ID	S3 - CoA No/	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER</b>			
				30/06/2023;  Diffuse Water Pollution Management Action Update Report Rev A 12/07/2023 - FGJV;		
190.	30 (g)		g) design all instream works, particularly the inlet and outlet works, to minimise scour and erosion;	Site inspection (see photos in report)	Since the last audit, significant works have been undertaken at Dip Creek and Eucumbere River crossings to minimise scour and erosion	Complaint
191.	30 (h)		h) unless permitted by this approval, avoid carrying out of any development within 40 metres of any watercourse;	Surface Water Management Plan - Table 5-2: Works on waterfront land - notes that disturbance may occur on any land within the project disturbance area that is within 40 m of a watercourse or reservoir; WebGIS image of distance between work and waterbody (e.g. 40m buffer Lobs Hole - Yarrangabilly River = 41.8 meters).		Complaint
192.	30 (i)		i) carry out all instream works or development within 40 metres of any watercourse generally in accordance with the requirements in the <i>Guidelines for Controlled Activities on Waterfront Land</i> ;	SWMP - Section 5.7, Table 5-3 SW51, SW52;	Some instream works have occurred involving water crossings (e.g. at Marica: Eucumbene River and Dip Creek). Construction methodologies were sighted at the previous audit for Eucumbene and Dip Creek waterway crossings. Since then there have been upgrades to the crossings (Eucumbene River crossing was in progress at the time of the audit - gabion baskets used to stabilise the banks.)	Complaint
193.	30 (j)		j) treat all wastewater and surplus process water prior to discharging it at the approved discharge points at the Talbingo Reservoir or Tantangara Reservoir;	Talbingo Discharge ITPs - May 2023 (various) showing water quality objectives insitu results and pass/fail status.	Reverse Osmosis water treatment plant has been commissioned to further treat treated wastewater prior to discharge at the Talbingo Reservoir.  All water discharge to reservoirs is required to be tested and validated prior to discharge to the reservoirs. water quality records sighted showed discharges met water quality objectives	Compliant

ID	S3 - CoA No/	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER</b>			
194.	30 (k)		k) reduce the number of diffuser points for low velocity discharges to the Talbingo Reservoir or Tantangara Reservoir;	Report - EPL Verification Monitoring (Draft P01.01 6 April 2023)	<p>The collated monitoring report by Royal HaskoningDHV was prepared for the Mixing Zone Verification Programme of the MAT Portal PWTP, Main Camp STP and Exploratory Camp STP, which are located at Lobs Hole and discharge to Talbingo Reservoir (via a RO plant at Talbingo WTP).</p> <p>The report was prepared to address EPA's special conditions and describes the outcomes of field sampling, analysis and interpretation of laboratory results obtained between August 2021 and December 2022.</p> <p>Whilst the report does not have definitive conclusions, the mixing zone verification studies have been conducted suggesting that the number of diffuser points has been taken into consideration.</p>	Compliant
195.	30 (l)		l) not discharge any surplus process water to the stormwater basins on site;		<p>It was noted that some incidents related to the accidental discharge of process water into stormwater basins have occurred. (see incident section)</p> <p>However it appears that there has been no deliberate discharge of excess / surplus process water from the process water treatment plant to the basins.</p> <p>On this basis, it has been determined that the proponent / Contractor is compliant to this condition.</p>	Compliant
196.	30 (m)		m) minimise the surface water quality impacts of the development, including: <ul style="list-style-type: none"> <li>the development carried out in the vicinity of waterways, particularly the Talbingo Reservoir, Tantangara Reservoir and Yarrangobilly River;</li> <li>all instream works, including dredging, channel excavations, underwater blasting, barge infrastructure, fish barriers and screens, culverts and bridges, and service crossings;</li> <li>the temporary and permanent spoil emplacement areas;</li> </ul>	Site inspection	<p>See response under 30 (b) - Inspections of Erosion and Sediment Controls.</p> <p>As noted previously, EPA notices have been issued in regard to diffuse water pollution and sediment and erosion controls (Non-compliance raised, but not against this condition)</p>	Compliant

ID	S3 - CoA No/	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER</b>			
			<ul style="list-style-type: none"> <li>development at the Marica, Plateau and Rock Forest sites;</li> <li>road works;</li> <li>the operation of the power station and associated infrastructure, including the operation of the inlets and outlets to minimise sediment disturbance risks and the dewatering of the tailrace tunnel;</li> </ul>			
197.	30 (n)		n) minimise the risk of spills or leaks on site, and clean up any spills or leaks as quickly as possible;	Site inspection	See Condition 30 (p) in regard to chemicals management (non-compliant) - not raised as NC under part of the condition.	Compliant
198.	30 (o)		o) minimise the groundwater quality impacts of the development, particularly through the design of the temporary and permanent spoil emplacement areas and all water storages on site;	S2-FGJV-ENV-PLN_Appendix I - Tantangara Emplacement Area Excerpt A, B.  Spoil Management Plan  Leachate Detection Procedures - various sites (see Spoil Management section)	Emplacement areas have been designed to minimise groundwater quality impacts.  Leachate Detection Procedures include provisions to minimise groundwater impacts from the storage of spoil	Compliant



ID	S3 - CoA No/ o	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER</b>			
199.	30 (p)		p) store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards.	Chemical and Hazardous Substance Work Instruction Chemical and Hazardous Substance Plan Site Inspection	<p>Whilst various actions have been undertaken to address inadequate / inappropriate / incompatible chemicals management since the last audit, the site inspection again identified issues at various sites including:</p> <p>General:</p> <p>Bunds and bunded pallets were not always covered allowing ingress of water, leading to the need to pump out potentially contaminated water;</p> <p>Lobs Hole</p> <p>Water Treatment Plant – Sodium Hydroxide, Hypochlorite, sulphuric acid, hydrochloric acid all stored within same bund – incompatible chemicals – need full segregation (it was believed that they just needed to be 5m apart)</p> <p>Sewage Treatment Plant STP – Citric acid in bund (half and IBC) in bund with Sodium Hydroxide</p> <p>Minor storage cabinet – Class 3 (flammable liquids) and Class 2 (flammable gases) stored in same cabinet (not compatible for storage).</p> <p>Tantangara:</p> <p>Some spill kit materials not suitable for the material in the area (e.g. – organic absorbent in Sewage TP for hazardous chemicals (can be reactive). Need to supply Hazchem type. Spill kits should be labelled with the correct type.</p> <p>The “bunded” area containing Sodium Hydroxide IBCs was only bunded on 3 sides – open on one side (said to slope inwards).</p> <p>Marica:</p> <p>No spill kits located in the surge shaft area;</p> <p>Unbunded 200 litre drums of oil stored in unbunded workshop;</p> <p>Oil drums (200 litre) (recently delivered to site) not stored in a bunded area.</p>	Non-compliant

ID	S3 - CoA No/	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER</b>			
200.	31		<b>Water Management Plan</b> Prior to the commencement of construction, the Proponent must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	Water Management Plan (Rev I) Nov 2022 (not yet approved) - issued for external agency review. Plan is revised to address annual audit findings and update and reviewed for currency and to update prior to in-reservoir placement of spoil.	The originally approved version (Rev G) was determined as compliant at previous audits. The Water Management Plan meets the requirements of this condition.	Compliant
201.	31 (a)		a) be prepared by a suitably qualified and experienced person in consultation with the EPA, NPWS, the Water Group, NRAR and NSW DPI;			
202.	31 (b)		b) include a Site Water Balance for the development with a program to review and update this water balance each calendar year;		The implementation of this condition was not assessed at this audit due to time constraints.	
203.	31 (c)		c) include a Surface Water Management Plan, containing detailed plans for the Talbingo Reservoir, Lobs Hole, Marica, Plateau, Tantangara Reservoir, and Rock Forest sites, with: <ul style="list-style-type: none"> <li>detailed baseline data on surface water flows and quality in the watercourses that could be affected by the development, and a program to augment this baseline data over time;</li> <li>detailed criteria for determining the surface water impacts of the development (flows, quality and flooding), including criteria for triggering remedial action (if necessary);</li> <li>a description of the measures that would be implemented to minimise the surface water impacts of the development and comply with the relevant water management requirements in conditions 4, 6 and 30 above, including specific plans covering: <ul style="list-style-type: none"> <li>the temporary or permanent emplacement of spoil;</li> <li>dredging, channel extraction and underwater blasting in the Talbingo Reservoir and Tantangara Reservoir;</li> <li>operation of the discharge points;</li> <li>the design of the inlets and outlets; and</li> <li>dewatering of the tailrace tunnel during operations;</li> </ul> </li> </ul>		A Surface water Management Plan was prepared as an appendix to the Water Management Plan	

ID	S3 - CoA No/	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER</b>			
			<ul style="list-style-type: none"> <li>identify the key risks to the successful implementation of these measures, and describe the contingency measures that would be implemented to address these risks;</li> <li>a program to monitor and publicly report on the surface water impacts of the development;</li> </ul>			
204.	31 (d)		<p>d) include a Groundwater Management Plan with:</p> <ul style="list-style-type: none"> <li>detailed baseline data of groundwater levels, yield and quality on the aquifers that could be affected by the development, and a program to augment this baseline data over time;</li> <li>a program to validate and calibrate the groundwater model for the development as new information is collected;</li> <li>detailed criteria for determining the groundwater impacts of the development, including criteria for triggering remedial action (if necessary);</li> <li>a description of the measures that would be implemented to comply with the water management requirements in condition 30 above;</li> <li>a program to monitor and publicly report on: <ul style="list-style-type: none"> <li>~ groundwater inflows to the tunnel;</li> <li>~ water take from the groundwater bores and connected water sources;</li> <li>~ the impacts of the development on: <ul style="list-style-type: none"> <li>o regional and local (including alluvial) aquifers;</li> <li>o base flow to surface water sources.</li> </ul> </li> </ul> </li> </ul> <p><i>Note: The Proponent may stage the preparation of the Water Management Plan, including the preparation of each of the detailed plans required under the Surface Water Management Plan. However, the detailed plans must be approved prior to any construction occurring on the relevant site.</i></p>		A Groundwater Management Plan was prepared as an appendix to the Water Management Plan.	
205.	32		The Proponent must implement the approved Water Management Plan for the development.	Environmental Water Reports - on the website	<p>The previous audit identified that Environmental Water Reports had not been prepared and publicly reported on the project website.</p> <p>The finding was followed up and the Quarterly Environmental Water Reports have now been</p>	Compliant

ID	S3 - CoA No/	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE WATER			
					prepared and are uploaded to the website. See previous finding status table for details	

ID	EPBC CoA No Part A	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
206.						
207.			<b><u>Water resources</u></b>			
208.	18		To minimise impacts on water resources, the approval holder must comply with conditions 30 - 32 of the NSW approval relating to water management.		As CoA 30 (p) is non-compliant and 30 (p) remains open, this condition is deemed non-compliant.	Non-compliant
209.	19		The Water Management Plan must include provisions to make monitoring data (excluding sensitive ecological data) available as part of the monitoring, evaluation and reporting programs required by condition 31c and 31d of the NSW approval.		The Water Management Plan includes provisions to make monitoring data available as part of the monitoring, evaluation and reporting programs required by condition 31c and 31d. Section 6.3 Monitoring; Table 6-1: Water Management Plan Monitoring Overview (for SWMP and GWMP); 6.6. Reporting; Table 6-2: Reporting requirements relevant to water.	Compliant
210.	20		The approval holder must implement the Water Management Plan approved by the NSW Planning Secretary until the end date of this approval, unless otherwise agreed by the Minister in writing.			Non-compliant
<b>WATER MANAGEMENT PLAN</b>						
211.		1.7 Table 1-3	<b>Staging Activities that require update to the WMP</b> This WMP will be updated in the third year of construction to determine the need for surface water flow monitoring sites and if necessary, suitable locations to monitor potential streamflow impacts (based on additional groundwater monitoring data / revised drawdown predictions).	Water Management Plan (Rev I) Nov 2022 (not yet approved) - issued for external agency review. Plan is revised to address annual audit findings and update and reviewed for currency and to update prior to in-reservoir placement of spoil.	This requirement is not yet triggered, however the WMP has been reviewed and revised and submitted for agency comments	Compliant
212.		6.6	<b>Reporting requirements:</b> Future Generation will report to Snowy Hydro and other agencies as detailed in Table 6-2 on water management aspects related to the Project – Weekly inspection (internal)	Weekly inspection (internal) Incidents relating to water  EPL monitoring reports (Lic 21266) - see EPL table	Evidence of weekly inspection (internal), incident reports relating to water were verified during this audit (refer to corresponding sections in this report).	Compliant

ID	EPBC CoA No Part A	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>EPBC Condition - Annexure A - Conditions specific to the action</b>			
			<ul style="list-style-type: none"> <li>– Incidents relating to water</li> <li>– EPL monitoring reports (Lic 21266) (frequency?)</li> <li>– Water Access Licence report (annual)</li> </ul> Environmental Water Report (every 3 months) – publicly available	Environmental Water Reports - publicly available on the website: * EPL 21266 Environmental Monitoring Reports Dec - Feb 2022 * EPL 21266 Environmental Monitoring Reports Mar - May 22 * EPL 21266 Environmental Monitoring Reports Jun-Aug 22 * EPL 21266 Environmental Monitoring Reports Sept - Nov 22 * EPL 21266 Environmental Monitoring Reports Dec 22 - Feb 23		



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUND WATER</b>			
213.	28		<b>WATER</b> <b>Water Supply</b> The Proponent must ensure it has sufficient water for each stage of the development; and if necessary, adjust the scale of development on site to match its available water supply. <i>Note: Under the Water Management Act 2000, the Proponent must obtain the necessary water licences for the development.</i>		Water licences continue to be in place (verbal - not verified this audit)	Compliant
214.	30 (e)		e) minimise groundwater take from the Gooandra Volcanics and Kellys Plain Volcanics using pre and post grouting of the tunnel, to minimise the loss of stream flows in the waterways above these geological formations, including Gooandra Creek and the headwaters of the Eucumbene River;	Interviews Site visit	It was advised that a probe is drilled at least 24m ahead of the cutter head to determine inflow rates, which is compared with trigger levels. Pre-grouting and post-grouting would be undertaken where triggers are exceeded.	Compliant
215.	31 (d)		d) include a Groundwater Management Plan with: <ul style="list-style-type: none"> <li>detailed baseline data of groundwater levels, yield and quality on the aquifers that could be affected by the development, and a program to augment this baseline data over time;</li> <li>a program to validate and calibrate the groundwater model for the development as new information is collected;</li> <li>detailed criteria for determining the groundwater impacts of the development, including criteria for triggering remedial action (if necessary);</li> <li>a description of the measures that would be implemented to comply with the water management requirements in condition 30 above;</li> <li>a program to monitor and publicly report on: <ul style="list-style-type: none"> <li>~ groundwater inflows to the tunnel;</li> <li>~ water take from the groundwater bores and connected water sources;</li> </ul> </li> <li>~ the impacts of the development on: <ul style="list-style-type: none"> <li>o regional and local (including alluvial) aquifers;</li> <li>o base flow to surface water sources.</li> </ul> </li> </ul>	Groundwater Management Plan (GMP) Rev G 15/10/2020	Groundwater Management Plan address these criteria (previously assessed). There are plans to revise and update the GMP following an upgrade to the monitoring program. The program to monitor and publicly report on groundwater matters is through the quarterly Environmental Water Report. (previously non-compliant) see - Surface water tables.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUND WATER</b>			
			<i>Note: The Proponent may stage the preparation of the Water Management Plan, including the preparation of each of the detailed plans required under the Surface Water Management Plan. However, the detailed plans must be approved prior to any construction occurring on the relevant site.</i>			
			<b>GROUNDWATER MANAGEMENT PLAN</b>			
216.		<b>5</b>	<b>Groundwater Management Measures</b>			
		<b>5.1</b>	<b>Tunnel boring machine method:</b>			
		5.1.1	<b>Excavation sequencing:</b> The construction program has been planned such that the Gooandra Volcanics region will be excavated late in the construction program so that the excavation would remain open for the shortest period of time. Gooandra volcanics had a higher hydraulic conductivity than other geological units in the project area.			Compliant
		5.1.2	<b>Forward Investigations</b> Surveys will be conducted ahead of each TBM to identify potentially critical areas with poor rock conditions or high fracturing intensity. Each TBM will be equipped with devices to perform the following surveys: • geophysical seismic reflection surveys; • geoelectrical surveys; and • systematic probe core retrieval ahead of the advancing tunnel face.			Compliant
		5.1.3	<b>Segmental Lining</b> Each TBM will be equipped to install the segmental lining for the tunnel using the universal ring method. The ring will be 2m wide, composed of nine pre-cast concrete segments which form each ring (eight segments, one 'large size' key-segment) and which have no bolts along the longitudinal joints. One drainage relief hole will be provided in each segment to guarantee a 'drainage effect' and water pressure re-equilibrium.	Site visit Interviews	Tunnel segments continue to be fabricated at the Cooma segment factory, and the TBMs are equipped to install these in the tunnel (see photos in report)	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUND WATER</b>			
		5.1.4	<b>Pre-grouting</b> Pre-grouting will be conducted to reduce the hydraulic conductivity of the rock mass (minimise groundwater inflow) and improve the stability of the excavation face. This is undertaken ahead of the excavation face and will generally be carried out by:• drilling and testing a probe hole;• drilling and installing a crown of groutable pipes;• injecting grout through the pipes; and• drilling a verification probe hole.Probe holes are drilled up to 40 m in front of the working face. Water flow through the initial holes is measured and a decision is made on the need to grout.Verification of the grout effectiveness is made by comparing inflow rates in the original probe hole to those in verification holes.	Interview - SHL and FGJVSite inspection / site interviews	In areas of high expected inflow, the tunnel alignment is to be drilled at least 24m ahead of the cutter head to determine inflow rates, which is compared with trigger levels. Pre-grouting and post-grouting would be undertaken based on water inflows, and rock type and are informed by design. Primary grouting is undertaken as standard practice as the tunnel advances.	Compliant
217.		5.1.5	<b>Post-grouting</b> Post-grouting may also be used to further consolidate the surrounding rock and/or prevent water ingress if required. Tunnel water inflow will be measured using in-line monitoring of flow along the constructed tunnel and will inform the decision on the need to grout.		Post-grouting would be undertaken based on water inflows, and rock type and are informed by design. Insufficient evidence provided to fully assess compliance	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUND WATER</b>			
218.		5.1.6	<p><b>Inflow monitoring</b> Groundwater inflow into the tunnels will be monitored during construction and compared to model predictions. Tunnel water inflow will be measured in the tunnel via in-line flow meters. Tunnel inflow monitoring, water treatment plant (WTP) discharges and Project water inputs re-cycled back into the tunnel will all be monitored and used to determine a simple water balance to estimate local groundwater extracted during construction. Monitoring will be undertaken at the indicated locations shown in Figure 5-1.</p>	<p>ECVT/PSC Depressurisation Event Memo - Preliminary Assessment. Email from SHL - response to clarification request from the auditor 4/09/2023 - update on data available from inflow and outflow monitoring. Interview with groundwater specialist at Snowy Hydro. Email from EMM - Sean Cassidy 30 August 2023 - sensor 1 trigger exceedance. Email from EMM to Snowy Hydro 14 August 2023 - BH 8106 TIR outcome. Totaliser calculator (FGJV spreadsheet)</p>	<p>Flow meters have been installed at the tunnels to measure inflow and outflow data to calculate a simple water balance, however the process was delayed. Data has been available since September 2022. Currently, a Totalizer Calculator spreadsheet is updated with meter readings at all tunnels by the FGJV dewatering team once a shift (every 12-hours). Flow meters have been installed recently directly on the cutterheads of the TBM to provide more accurate inflow/outflow data. Water balance calculations at each extraction point are done monthly by SHL and reported to NRAR annually. SHL advised that the data supplied in the Totalizer Calculator spreadsheet is sufficient for water balance calculations to ensure the water intake is within the licensed allocation.</p>	Compliant
<b>GROUNDWATER MONITORING PROGRAM</b>						
219.		Annex A GMP 1.6 Table 1-1	<p><b>Groundwater monitoring</b></p> <ul style="list-style-type: none"> <li>* Groundwater level monitoring (direct read data loggers) - 6 hourly</li> <li>* Groundwater quality - water quality lab samples from the suite - Quarterly or as required by EPL or TARPs</li> <li>* Groundwater extraction licence compliance (volume) - as required by the extraction licence</li> </ul>	Water monitoring - boreholes - realtime (online)	<p>Since the last audit, groundwater telemetry has been installed / progressed to provide better real-time groundwater monitoring data. As noted in a Groundwater Telemetry Installation and as-built report, "as underground construction progresses, this will allow rapid assessment of groundwater data to inform critical construction decisions relating to groundwater inflows and drawdown".</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUND WATER</b>			
220.		Annex A GMP 2.5	<b>Groundwater levels</b> Monitoring frequency will be continuously reviewed and data compared to model predictions, and frequency of data collection will be adapted to ensure potential significant trigger events are detected early (i.e. particularly when Tunnelling commences in high risk areas).No drawdown is predicted for the first few years of the project (see Section 4.2.4 of GMP) hence existing data loggers will be downloaded manually quarterly until telemetry is in place. Monitoring data collection frequency will also be reviewed during the annual review of the groundwater model, in consultation with NRAR and DPIE Water.	Realtime groundwater monitoring outcomes (online)	Since the last audit, groundwater telemetry has been installed / progressed to provide better real-time groundwater monitoring data. As noted in a Groundwater Telemetry Installation and as-built report, “as underground construction progresses, this will allow rapid assessment of groundwater data to inform critical construction decisions relating to groundwater inflows and drawdown”.	Compliant
221.		Annex A GMP 2.5	Groundwater level changes will be compared to predicted level changes from the numerical modelling as presented in Appendix B.	Master Groundwater Monitoring Database	Snowy Hydro and consultants review the groundwater data. EMM will be updating the model - well underway, should be a dashboard out in the next few months	Compliant
222.		Annex A GMP 2.5.1	Shallow groundwater levels in standpipes located at known GDEs will be compared to the 80th percentile between the months of May and October. If drawdown is identified beyond trigger levels in areas of these GDEs during this period, actions outlined in the Groundwater level Trigger Action Response Plan (TARP) will be initiated.	Groundwater Telemetry Installation and As-built report V2 31/05/2023  Hydrograph of water level at BH2102 - values at date sinkhole was discovered (15/12/2022) - compared to levels between July 2022 and June 2023 (no discernible changes in levels).	See investigation above No triggers to date	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUND WATER</b>			
223.		Annex A GMP 2.6	<b>Groundwater Quality (quarterly) monitoring</b> If a Level 1 water level trigger occurs, a round of water quality sampling is initiated at the triggered bore (unless the trigger occurs at a VWP site where water quality cannot be sampled) and immediate surrounding bores. Water quality analysis will indicate whether any change from baseline conditions has occurred. Sampling will be undertaken quarterly and if no change is detected after one year the bore reverts to a Level 1 condition (i.e. no further sampling).		As noted above, there have been no Level 1 triggers	Not triggered
ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUND WATER</b>			
224.		Annex A GMP 2.6	A review after the first 12 months of construction of the monitoring program will be completed to determine the efficiency of the monitoring program and any required changes.		This was addressed at the previous audit and determined as compliant	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUND WATER</b>			
225.		Annex A GMP 2.8	<p><b>Tunnel Inflow</b> Groundwater inflow into the tunnels will be monitored during construction and compared to model groundwater ingress predictions and water access licencing.</p> <p>The groundwater model will be updated as required based on the results of monitoring, and proposed management measures to minimise potential groundwater impacts adjusted accordingly.</p>	Totaliser calculator (FGJV spreadsheet)	The Totalizer Calculator spreadsheet is updated with meter readings at all tunnels by the FGJV dewatering team once a shift (every 12-hours).	Compliant
226.		Annex A GMP 2.8.1	<p><b>Groundwater extraction</b> Groundwater extraction will be monitored throughout the year throughout the year to ensure groundwater extraction is within permitted volumes of take from respective water sources and reported on an annual basis in accordance with licence requirements</p>		Groundwater take continues to be measured by FGJV and the data is provided to SHL on a monthly basis through an RFI process. A monthly water reading is provided for each of the six (6) extraction points	Compliant



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - GROUND WATER</b>			
227.		Annexure B Ground water TARP 1	<b>Groundwater TARP 1 - Groundwater Level</b> * Trigger level 2 reached (early warning - trending towards exceedance) - conduct preliminary review of activities * Trigger level 3a reached (exceedance of threshold trigger level) - report results of trigger investigation to SHL, report results in Annual Review * Trigger level 3b reached (exceedance identified as related to construction activities) - notify DPIE and NPWS within 7 days of trigger investigation report, provide trigger exceedance report within 30 days of notification, identify mitigations etc in consultation with DPIE * Trigger level 4 reached - water level drawdown impacts on a receptor (GDE) - initiate investigation into reasons for impact, take actions recommended by investigation. REFER TO TARP FOR FURTHER DETAILS (below)	ECVT/PSC Depressurisation Event Memo - Preliminary Assessment.  Email from SHL - response to clarification request from the auditor 4/09/2023 - update on data available from inflow and outflow monitoring.  Interview with groundwater specialist at Snowy Hydro  Email from EMM - Sean Cassidy 30 August 2023 - sensor 1 trigger exceedance  Email from EMM to Snowy Hydro 14 August 2023 - BH 8106 TIR outcome	<p>At the time of the audit, tunnelling has been undertaken at the Lobs Hole Main Access Tunnel (MAT) at Lobs Hole and the ECVT (Lobs Hole). It was generally expected that the Lobs Hole area is not in an area that presents a significant risk of groundwater drawdown in a GDE area. However, a recent preliminary assessment into the "reduction of the groundwater levels in a number of groundwater monitoring points" during the excavation of the ECVT in 2022 found that there was "a noticeable change in trend from mid-year 2022" and a "sharp decrease in levels was then observed from the end of the year 2022".</p> <p>The draft preliminary assessment– ECVT/PSC Depressurisation Event Memo (14 July 2023) notes that the mandatory probe holes in advance of the TBMs did not encounter inflows in excess of the triggers for the area and provides some preliminary suggestions as to the cause. It also notes that category 2 (facultative – opportunistic) and category 3 (entirely dependent / obligate) groundwater dependent ecosystems (GDE) are potentially located within the zone of influence of the measured drawdown.</p> <p>Subsequent reviews of the groundwater level data by EMM Consulting in mid-August 2023 noted "model validation works which are currently underway will validate groundwater drawdown response to groundwater inflow. The updated model will incorporate all relevant, additional monitoring and output corresponding performance criteria". In summary, EMM noted that there is no need for further action at this stage, however do note the importance of establishing the shallow monitoring network in PCT 637 and that proposed sites will be captured in the GMP revision and installed as soon as possible.</p> <p>At the time of the finalisation of this report, (30 August 23) it was determined by EMM that</p>	Compliant

					there has been no trigger for TARP 1 or to notify relevant agencies at this stage.	
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**TABLE E- SCHEDULE 3 –Recreation, Transport/Traffic, Waste, Visual**

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - RECREATION</b>			
228	37		<p><b>RECREATION Offset</b></p> <p>Prior to the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must pay the NPWS \$1,995,000 to offset the recreational impacts of the Main Works on the Kosciuszko National Park.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>• These funds will augment the \$4,962,777 already paid to the NPWS to offset the conservation and recreational impacts of the Exploratory Works on the Kosciuszko National Park.</li> <li>• The NPWS will use these funds and any interest generated by these funds to enhance the recreational facilities in the Kosciuszko National Park, particularly in the areas surrounding the Talbingo Reservoir, Lobs Hole and Tantangara Reservoir sites.</li> <li>• To ensure accountability, the NPWS will: <ul style="list-style-type: none"> <li>~ develop a detailed program for the allocation of these funds to specific projects; and</li> <li>~ monitor, evaluate and publicly report on the implementation of the detailed program and the effectiveness of the specific projects.</li> </ul> </li> </ul>		This condition was deemed compliant at Audit #1 - invoice sighted - 8/10/2020 - one off requirement. Not triggered at this audit	Not triggered
229	38 (a)		<p><b>Recreation Management Requirements</b></p> <p>The Proponent must:</p> <p>a) keep Tantangara Road open to the public once it has been upgraded for the development, and have suitable procedures in place to ensure it is safe for unrestricted use and to respond promptly to any temporary public safety risks;</p>	Site Inspection Interviews	Tantangara Road has been kept open to the public following the upgrade of the road	Compliant
230	38 (b)		<p>b) minimise the impacts of the development on users of the Kosciuszko National Park both within and in the vicinity of the construction envelope;</p>	<p>Exclusion zones on the reservoirs - e.g. blasting works at Talbingo intake.</p> <p>Environmental awareness toolbox talks / training</p>	Exclusion zones on the reservoirs - e.g. blasting works at Talbingo intake	Compliant
231	38 (c)		<p>c) minimise any disruption to the use of the Talbingo Boat Ramp;</p>	<p>Not in the project area - no anticipated disruption.</p> <p>There is boat ramp in the Lobs Hole area, however this area is not open to the public - signage with exclusion zone (verbal)</p>	<p>There is boat ramp in the Lobs Hole area, however this area is not open to the public - signage with exclusion zone (verbal).</p> <p>The boat ramp referred to does not appear to be within the project area, therefore there is no anticipated disruption to users.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - RECREATION</b>			
232	38 (d)		d) minimise the dust and noise impacts of the development on the Wares Yards campground;	Site Inspection Interviews	No construction activities in the vicinity of this campground. Some clearing of trees in line of site along Tantangara Road (Snowy) about a year ago - appears unlikely that there would have been significant dust or noise impacts.	Compliant
233	38 (e)		e) control the recreational activities of the workers staying in the accommodation camp to minimise the impacts of the development outside the approved disturbance area;	Interviews Site inspection	Lobs Hole and Tantangara have gym, walking track, wet mess hall, dining hall, and Marica has same but no walking track. This is to allow enough activities in the camp that don't need to go outside. Not allowed to leave camp unless have a valid reason. Gym classes held etc., trivia nights Induction material may include instructions not to go outside the project boundary.	Compliant
234	38 (f)		f) progressively reopen those areas of the Kosciuszko National Park that are closed to the public during construction as soon as possible following the completion of construction;		No new areas re-opened since last audit	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - RECREATION</b>			
235	38 (g)		g) keep the community informed about the temporary closure of areas or any recreational facilities within the Kosciuszko National Park.	Interview with FGJV Community Manager	Information regarding public access to recreational areas has been communicated on SHL's website and via road signage (refer to inspection photos). TMP, App E - Transport Communication Strategy, Table 2-3: Indicative communication activities, includes a range of communication methods to keep the public informed about transport impacts of the development, including road closures and reduced access to recreational activities. However no further evidence was gathered, for example in relation to communication with tourism providers or recreational sporting bodies. Some evidence sighted included road signage of restricted areas, and alternative routes. Although no direct information was gathered, for example in relation to communication with SHL and NPWS providing advance notification of changes to park facilities, the SHL's and FGJV's website did provide up-to-date information on public access to recreational areas in the KNP (open and closed) and the NPWS's website on KNP on also included up-to-date information on public access and road conditions. Therefore, it is considered that as a whole, the community has been kept informed of road closure status. Therefore, this condition is deemed compliant.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - RECREATION</b>			
236.	39		<b>Recreation Management Plan</b> Within 12 months of the commencement of construction, the Proponent must prepare a Recreation Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:		The Recreation Management Plan was overdue for submission and is not yet developed "to the satisfaction of the Planning Secretary". The Recreation Management Plan was due for submission October 2021.  The fortnightly update to DPE on 5/07/2023 noted that "Some progress was made on the staging strategy for this plan. SHL met with NPWS on 3 July to discuss staging rationale with feedback and agreement that the preference for both groups was to stage by level of design if possible.  The fortnightly update on 21/07/2023 noted that the plan requires ongoing consultation with NPWS to satisfy their requirements. NPWS would like to see final landforms and visualizations of the areas and views, before then can commit to a design.  Snowy Hydro has proposed a new submission date of 01 October 2023 for Stage 1 in the fortnightly update 21/07/2023.	Non-compliant
	39 (a)		a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, NSW DPI and TfNSW;			
	39 (b)		b) include a conceptual recreation strategy for the site, identifying the recreational facilities that would be provided during the rehabilitation of the site;			
	39 (c)		c) describe how the implementation of this strategy would be co-ordinated with the implementation of the Rehabilitation Management Plan;			
	39 (d)		d) include detailed plans for the provision of recreational facilities at, and future recreational use of, the following sites: <ul style="list-style-type: none"> <li>• Talbingo Reservoir;</li> <li>• Lobs Hole;</li> <li>• Tantangara Reservoir;</li> </ul>			
	39 (e)		e) describe the measures that would be implemented to comply with the recreation mitigation requirements in condition 38 above; and			
	39 (f)		f) monitor and publicly report on the implementation of these plans and measures.			
237.	40		The Proponent must implement the approved Recreation Management Plan for the development.		The Recreation Management Plan has not yet been approved yet and has not been triggered.	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status																																
			SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT																																			
238.	41		<p><b>TRANSPORT</b></p> <p><b>Road Upgrades</b></p> <p>The Proponent must carry out the road and intersection upgrades in Tables 5-1 and 5-2 in Appendix 5 in accordance with any specified timeframes to the satisfaction of the relevant roads authority.</p> <p><i>Table 5-2: Intersection Upgrades</i></p> <table><tr><th>Intersection</th><th>When</th><th>Design</th><th>Sign-off</th></tr><tr><td>SMH/Bombala Street</td><td>Prior to the delivery of tunnel boring machines, transformers or concrete segments using OSOM vehicles</td><td>Works to kerbs, signage, internal roundabout pavement, trimming overhanging vegetation, installation of temporary traffic signal and traffic sensors</td><td>TNSW</td></tr><tr><td>SMH/Vale Street</td><td>Prior to the delivery of tunnel boring machines, transformers or concrete segments using OSOM vehicles</td><td>Works to kerbs, signage, internal roundabout pavement, trimming overhanging vegetation</td><td>TNSW</td></tr><tr><td>SMH/Rock Forest</td><td>Prior to construction on the Rock Forest site</td><td>Basic Right Turn (BAR) treatment / Auxiliary Left Turn (AUL) treatment and pavement widening</td><td>TNSW</td></tr><tr><td>SMH /Marica Trail</td><td>During construction</td><td>BAR / AUL, road widening, and embankment works</td><td>TNSW</td></tr><tr><td>SMH/Tantangara Road</td><td>Prior to construction on the Tantangara site</td><td>Right-turn lane on SMH and vehicle activated sign</td><td>TNSW</td></tr><tr><td>SMH/Link Road</td><td>During construction</td><td>Minor pavement marking changes and vehicle activated sign</td><td>TNSW</td></tr><tr><td>Link Road/Lobs Hole Ravine Road – South</td><td>During construction</td><td>Sealing of intersection and vehicle activated signage</td><td>TNSW</td></tr></table>	Intersection	When	Design	Sign-off	SMH/Bombala Street	Prior to the delivery of tunnel boring machines, transformers or concrete segments using OSOM vehicles	Works to kerbs, signage, internal roundabout pavement, trimming overhanging vegetation, installation of temporary traffic signal and traffic sensors	TNSW	SMH/Vale Street	Prior to the delivery of tunnel boring machines, transformers or concrete segments using OSOM vehicles	Works to kerbs, signage, internal roundabout pavement, trimming overhanging vegetation	TNSW	SMH/Rock Forest	Prior to construction on the Rock Forest site	Basic Right Turn (BAR) treatment / Auxiliary Left Turn (AUL) treatment and pavement widening	TNSW	SMH /Marica Trail	During construction	BAR / AUL, road widening, and embankment works	TNSW	SMH/Tantangara Road	Prior to construction on the Tantangara site	Right-turn lane on SMH and vehicle activated sign	TNSW	SMH/Link Road	During construction	Minor pavement marking changes and vehicle activated sign	TNSW	Link Road/Lobs Hole Ravine Road – South	During construction	Sealing of intersection and vehicle activated signage	TNSW		<p>Follow-up comments Audit #4: Whilst this issue had not yet been fully resolved, a Roads Working Group has been established to discuss ongoing NPWS road related issues.</p> <p>This NC is not re-raised at Audit #4, however remains as an “open NC” from previous audits, and it appears that the current process will be implemented over a longer-term period and may not be able to be “closed”. Progress will be followed up at each subsequent audit.</p> <p>Follow-up comments Audit #3: A Show Cause letter from DPIE dated 3 November 2021, alleging a breach of section 4.2(1)(b) of the EP&amp;A Act was issued to SHL on as a result of this non-compliance. The letter provided SHL with an opportunity to make representations as to why the Department should not take formal enforcement action by COB 19 November 2021.</p> <p>SHL responded to the above in a letter dated 19 November 2021 with a detailed response (442-page document comprising an 11-page letter with various annexures). The letter concluded that “SHL submits that the facts and circumstances of the matter as set out in detail in this response, indicate that the only appropriate action would be informal action to note and support the actions that SHL is already taking to implement the Agreed Actions and the commitments it has made going forward as detailed above”.</p> <p>Evidence was provided that consultation with NPWS has been conducted and is ongoing.</p> <p>Note: This Non-compliance has been addressed to the degree it that it can be at this stage, It is not formally closed, however it has not been raised for action at this audit.</p>	Non-compliant
Intersection	When	Design	Sign-off																																			
SMH/Bombala Street	Prior to the delivery of tunnel boring machines, transformers or concrete segments using OSOM vehicles	Works to kerbs, signage, internal roundabout pavement, trimming overhanging vegetation, installation of temporary traffic signal and traffic sensors	TNSW																																			
SMH/Vale Street	Prior to the delivery of tunnel boring machines, transformers or concrete segments using OSOM vehicles	Works to kerbs, signage, internal roundabout pavement, trimming overhanging vegetation	TNSW																																			
SMH/Rock Forest	Prior to construction on the Rock Forest site	Basic Right Turn (BAR) treatment / Auxiliary Left Turn (AUL) treatment and pavement widening	TNSW																																			
SMH /Marica Trail	During construction	BAR / AUL, road widening, and embankment works	TNSW																																			
SMH/Tantangara Road	Prior to construction on the Tantangara site	Right-turn lane on SMH and vehicle activated sign	TNSW																																			
SMH/Link Road	During construction	Minor pavement marking changes and vehicle activated sign	TNSW																																			
Link Road/Lobs Hole Ravine Road – South	During construction	Sealing of intersection and vehicle activated signage	TNSW																																			



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
239.	42 (a)		<p><b>Maintenance – Link Road and Tantangara Road</b></p> <p>The Proponent must:</p> <p>a) prepare a dilapidation survey of Link Road between the Snowy Mountains Highway and Goat Ridge Road and Tantangara Road in accordance with the relevant Austroads standards and guidelines:</p> <ul style="list-style-type: none"> <li>• prior to the commencement of construction and/or the decommissioning of the development; and</li> <li>• within 2 months of the completion of construction and/or the decommissioning of the development;</li> </ul>	<p>Evidence assessed at the last audit:</p> <p>Snowy 2.0 Road Condition Survey – Issue A S2-6160-REP-000004-A dated 29 April 2019 (This Survey includes Link road between the Snowy Mountains Highway and Goat Ridge Road,</p> <p>Transport of Various Loads along Link Road, Kosciuszko National Park Assessments of Culverts for FGJV dated 14 July 2020 by Tasman Associates.</p> <p>Email dated 01/03/2021 from SHL Principal Engineer Roads Infrastructure – reasons for the Dilapidation survey not being undertaken for Tantangara Road</p>	<p>It was noted at the previous audit that a dilapidation survey was conducted for Link Road.</p> <p>There was also an email providing justification for a Dilapidation Survey not to be undertaken for Tantangara Rd.</p> <p>During pre-audit consultation, TfNSW noted that a Dilapidation Report was also required as part of Appendix K Revised Traffic and Transport Assessment in the Main Works Preferred Infrastructure Report and Response to Submissions. Refer to separate audit question and Observation.</p>	Compliant
240.	42 (b)		<p>b) rehabilitate and/or make good any development-related damage to Link Road between the Snowy Mountains Highway and Goat Ridge Road and Tantangara Road:</p> <ul style="list-style-type: none"> <li>• identified during the construction and/or decommissioning works if it could endanger road safety, as soon as possible after it is identified but within 7 days at the latest, unless the NPWS agrees otherwise; and</li> <li>• identified in any dilapidation survey completed after the construction and/or decommissioning works within 2 months of the completion of the survey, to the satisfaction of the NPWS.</li> </ul> <p>If there is a dispute about the scope of any remedial works or the implementation of these works, then either party may refer the matter to the Planning Secretary for resolution.</p>	<p>Photo of repairs</p> <p>Site inspection</p>	<p>It was discussed that there was only one recorded damage to a guard rail. Photos were sighted to indicate repairs were underway</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
241.	43		<p><b>Vehicle Restrictions</b></p> <p>All heavy vehicles associated with the development must travel to and from the site via the:</p> <ul style="list-style-type: none"> <li>a) Snowy Mountains Highway, Miles Franklin Drive and Spillway Road;</li> <li>b) Snowy Mountains Highway, Link Road and Lobs Hole Ravine Road;</li> <li>c) Snowy Mountains Highway, Coppermine Trail and Wallaces Creek Trail;</li> <li>d) Snowy Mountains Highway, Marica Trail;</li> <li>e) Snowy Mountains Highway, Tantangara Road and Quarry Trail; or</li> <li>f) Elliott Way and Link Road (but only following the written approval of the Planning Secretary).</li> </ul> <p><i>Note: The Proponent must obtain permits under the Heavy Vehicle National Law (NSW) for the use of any OSOM vehicles on the public road network.</i></p>	Site inspection Interviews	Site inspections and interviews indicated that heavy vehicles travel to the site via the Snowy Mountains Highway. It was confirmed that Elliott Way is not being used by heavy vehicles	Compliant
242.	44 (a)		<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>a) restrict vehicle speeds on the road network within the site to 30 km/h between sunset and sunrise, unless the Planning Secretary agrees otherwise;</li> </ul>	Site Induction material	Speed limit during the night is 30k/h. It is communicated via site inductions (e.g. 30 km/hr speed limit on site roads - 10 km/hr entering active zones).	Compliant
	44 (b)		<ul style="list-style-type: none"> <li>b) restrict the use of Lobs Hole Ravine Road – North to: <ul style="list-style-type: none"> <li>• access to and from the site during emergencies;</li> <li>• light vehicles at all other times with: <ul style="list-style-type: none"> <li>~ a maximum of 120 vehicle movements allowed a day (60 each way); and</li> <li>~ an annual average maximum of 60 vehicle movements allowed a day (30 each way); and</li> </ul> </li> </ul> </li> </ul>	<p>Email from FGJV Environmental Manager providing figures from camera on random dates.</p> <p>Site inspection.</p>	<p>Figures provided by FGJV based on a camera that is activated by vehicle movement on Lobs Hole Ravine Road confirmed that the volumes are well within the limited. The maximum on one day (based on records provided) was 11 vehicles per day.</p> <p>The site visit found that there is a gate in place across the Lobs Hole Ravine Road North road to restrict the movement of vehicles through a work site and on Lobs Hole Ravine Road.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
	44 (c)		c) restrict vessel speeds on Tantangara Reservoir and Talbingo Reservoir to current TfNSW speed limits.	<p>S2-FGJV-LOG-PLN-0008[G]- Main Works-Transport Management Plan 03/08/2020</p> <p>S2-FGJV-LOG-PLN-0008[I]- Main Works-Transport Management Plan 09/01/2023 - Updated to address audit findings, SHL comments, for issue to external agencies.</p>	Not verified this audit, however included in the Management Plan	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
243.	45 (a)		<b>Transport Management Requirements</b> The Proponent must: a) minimise the impacts of the road and intersection upgrades of the development;		Intersection upgrades were completed prior to the Audit #1. It was confirmed with TfNSW at Audit #2 that the intersection works were undertaken by TfNSW with minimal impacts on the road and intersections	Compliant
	45 (b)		b) maintain all roads and water-related infrastructure on site in a safe and serviceable condition;	Site inspection  TMP Reporting - HV deliveries to sites - Tumut origin	Pre-audit consultation comments from indicated that TfNSW has observed a greater number of vehicle movements along the northern half of the Snowy Mountains Highway (north of Link Road) than predicted. TfNSW believe that sections of the Snowy Mountains Highway are experiencing road pavement issues that are directly associated with the increased vehicle movements.  Traffic figures for the northern half of the Snowy Mountains Highway were provided by FGJV (deliveries) and these figures do not show higher volumes than predicted. The majority of vehicles access sites from Cooma, however some delivery vehicles do access sites from the Tumut side, and these figures were provided.  The site inspection did not identify any specific examples of unsafe conditions.	Compliant
	45 (c)		c) allow NPWS officers to access the site at all times, including during the upgrade of Tantangara Road;	Interviews	There was no evidence to suggest that NPWS officers were not provided with access as required. NPWS attend site regularly for joint agency meetings.	Compliant
	45 (d)		d) provide sufficient parking on site for all vehicles and ensure vehicles associated with the development do not park on the public road network;	Site inspection	During the site inspection, various sites were reviewed, including the entrance to Three Mile Dam (gate locked) a  Parking is provided on all project sites and buses transport workers to/from site, minimizing the need for parking of light vehicles.	Compliant
	45 (e)		e) ensure heavy vehicles entering and leaving the site have loads covered or contained and enter and leave the site in a forward direction;	Site Inspection Drivers Code of Conduct	These requirements are included in the Site Rules and the Drivers Code of Conduct.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
244.	45 (f)		f) minimise dust and/or sediment being tracked onto Link Road and the public road network;	Site inspection	Dust and mud tracking from the project area onto public sealed roads has been managed via ESCPs for project sites, installation of wheel wash stations (sighted at Tantangara and Lobs Hole Ravine Rd) and covering of heavy vehicles loads (observed during site inspection).  No specific issues were identified during the site inspection regarding sediment being tracked onto public roads	Compliant
	45 (g)		g) minimise the traffic impacts of the development on the public road network, including: <ul style="list-style-type: none"> <li>scheduling heavy vehicle movements to avoid peak periods;</li> <li>minimising convoy lengths;</li> <li>reducing the speeds of development-related traffic at key intersections along the Snowy Mountains Highway, including the Rock Forest, Tantangara Road, Link Road, Coppermine Trail, Marica Road, Lobs Hole Ravine Road – North and Miles Franklin Drive intersections;</li> </ul>	<p>Site inspection - see photos of signage at site</p> <p>Email from FGJV Traffic and Transport Manager to TfNSW dated 6 June 2023 "Segment Trucks, Upcoming Long Weekend operations" regarding official opening of snow season - Mount Selwyn, and plan to stand down segment truck operation plus response from TfNSW.</p> <p>Email from FGJV Traffic and Transport Manager to TfNSW dated 20 Dec 2022 - FGJV HV movements Xmas break.</p> <p>Site Inspection - signage requiring 500m between heavy vehicles leaving lobs hole (increased from 250m at previous audit)</p> <p>FGJV Delivery Locations and Instructions</p> <p>Ravine Road Convoy Scheduled 14/09/2022;</p> <p>Email communication - Heavy Vehicle Delivery Instructions for FGJV Project Sites - Michels Trenchless - 27/04/23</p> <p>Email: Construction Water Processing Plants - Clarifier Delivery - details for drivers 07/07/2023</p>	<p>The FGJV Delivery Locations and Instructions document provides details of routes to various sites from various locations, reiterating need to book vehicles to allow efficient delivery.</p> <p>Since the last audit, the minimum distance between heavy vehicles has been increased from 250m to 500m to minimise convoy lengths and provided other motorists, the opportunity to safely overtake heavy vehicles.</p> <p>A compliant was received regarding convoying in May 2023 near Adaminaby. IVMS records were reviewed and reminders provided to drivers as a corrective action to address the issue.</p> <p>Sufficient evidence was provided to determine compliance to this condition.</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
245.	45 (h)		h) minimise the traffic safety risks of the development in snow and ice conditions;	<p>Snow and Ice Traffic Management Plan Rev C dated 10/07/2020.</p> <p>Note: Area of focus for TfNSW - Trucks and interactions with motorists new Mount Selwyn, reporting of incidents, reacting to near misses.</p> <p>Traffic and Transport Updates (via WhatsApp) various including 5, 9, 10, 26 June, 18 July 2023</p> <p>Daily Transport DLAH meeting minutes - various including 25 May 23, 20 June 23, 6, 28 July - providing weather forecast, tasks.</p> <p>Email from FGJV Traffic and Transport Manager to TfNSW dated 6 June 2023 "Segment Trucks, Upcoming Long Weekend operations" regarding official opening of snow season - Mount Selwyn, and plan to stand down segment truck operation plus response from TfNSW.</p> <p>Email from FGJV Traffic and Transport Manager to TfNSW dated 20 Dec 2022 – "FGJV HV movements Xmas break."</p> <p>FGJV OSOM Audit 30/05/23</p> <p>"Winterisation plan" detailing what FGJV have communicated to date, information regarding plans for / by TfNSW, SHL NPWS Selwyn (undated)</p> <p>Winterisation Update and Safety on our Roads Meeting - attendance records sheet 12/05/2023.</p>	Evidence was provided to confirm compliance to this condition	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
246.	45 (i)		i) respond rapidly to any heavy vehicle accidents on the designated heavy vehicle routes for the development and secure access to a suitable heavy vehicle recovery vehicle;	Traffic Incident Log Email from FGJV to Nicholas.Hayes@environment.nsw.gov.au regarding response to broken down truck - truck and trailer towed away; Email regarding hazard on the road - skateboarder on the road 30/10/2022;  WhatsApp message T&T group Semi recovery timelines (no date)  Interview	Interviews and evidence sighted provided general confirmation of compliance to this condition	Compliant
	45 (j)		j) minimise the traffic noise impacts of the development, particularly in Cooma and Adaminaby, including: <ul style="list-style-type: none"> <li>limiting the use of truck engine braking on the Snowy Mountains Highway;</li> <li>notifying the local community about development-related traffic impacts;</li> </ul>	Site inspection Provisions are in the code of conduct Complaints Register	It was not possible to confirm that trucks limit engine braking directly, however there have been no noise complaints received regarding noise in Cooma or Adaminaby.  The notification of local community about development related traffic impacts are addressed in a separate condition	Compliant
	45 (k)		k) minimise the development-related traffic safety impacts of the development for the public: <ul style="list-style-type: none"> <li>using the Talbingo Reservoir and Tantangara Reservoir and any water-related infrastructure, such as the Talbingo Boat Ramp;</li> <li>using Tantangara Road, particularly during the construction of the development;</li> </ul>	Transport Management Plan, Table 5-1: NAV01 - Exclusion Zones; Maritime Traffic Control Plan (MTCP) S2-FGJV-LOG-PLN-0013 for Talbingo Reservoir	AV01 'Exclusion Zones' have been established around marine construction works as declared by NSW Maritime to ensure the safety of vessel traffic and to establish safe working zone/s. Maritime Traffic Control Plan (MTCP) for Talbingo Reservoir includes the established Maritime Exclusion Zones (MEZ)	Compliant
	45 (l)		l) ensure any vessel or structure occupying waters must display appropriate shapes and lights in accordance with the <i>Marine Safety (Domestic Commercial Vessel) National Law Act 2012</i> ;			Not triggered



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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
247.	45 (m)		m) keep the public informed of any road or infrastructure upgrades, disruptions to traffic, the closure of roads or other infrastructure, OSOM vehicle use, peak construction periods, and any emergencies.	<p>Email to all stakeholders from the Community team 01/09/2022 - All Snowy 2.0 TBM Cargo delivered &amp; thanks to motorists.</p> <p>Email to all stakeholders from the Community team 16/01/2023 Snowy 2.0 Traffic advice - large load TONIGHT (16/17 Jan);</p> <p>Email to all stakeholders from the Community team - Traffic Alert - re Snowy Mountains Trout Festival - Oct 2022 and Construction Noise Blast - Tantangara - 30 Oct 2022.</p> <p>Email to all stakeholders from the Community team Traffic Alert - Changed traffic conditions on the Snowy Mountains Highway 31/08/2022; FGJV website: <a href="https://www.futuregenerationjv.com.au/traffic">https://www.futuregenerationjv.com.au/traffic</a></p>	An interview with the FGJV communications manager found that various effective mechanisms were in place to inform the public of road or infrastructure changes.	Compliant
248.	46		<b>Transport Management Plan</b> Prior to the commencement of construction, the Proponent must prepare a Transport Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	<p>S2-FGJV-LOG-PLN-0008[G]-Main Works-Transport Management Plan 03/08/2020</p> <p>S2-FGJV-LOG-PLN-0008[I]-Main Works-Transport Management Plan 09/01/2023 - Updated to address audit findings, SHL comments, for issue to external agencies.</p>	The Transport Management Plan was assessed at the previous audit as compliant. The TMP has since been revised to take audit findings into account and has been issued to external agencies for review. Version I is not yet approved.	Compliant
	46 (a)		a) be prepared in consultation with the TfNSW, NPWS, Snowy Monaro Regional Council, Snowy Valleys Council and NSW Police;			
	46 (b)		b) include the establishment of a working group – which includes representatives from TfNSW, NPWS, NSW Police, Destination NSW, Snowy Monaro Regional Council and Snowy Valleys Council – to ensure effective communication and co-ordination between stakeholders on transport-related matters during the construction of the project;			
	46 (c)		c) describe the measures that would be implemented to comply with the transport management requirements in condition 45 above;			
	46 (d)		d) include a detailed: <ul style="list-style-type: none"> <li>• Heavy Vehicle Salvage Plan;</li> <li>• Driver's Code of Conduct;</li> <li>• Marine Transport Management Plan;</li> <li>• Snow &amp; Ice Traffic Management Plan;</li> </ul>			

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
249.			<ul style="list-style-type: none"> <li>Communication Strategy to keep the public informed about the transport impacts of the development; and</li> </ul>			
	46 (e)		e) include a program to: <ul style="list-style-type: none"> <li>record and track vehicle movements; and</li> <li>monitor and publicly report on the effectiveness of these measures.</li> </ul>	Quarterly Vehicle Movement Reports (on Project website): Jan to Mar 2022; April to June 2022 July to Sept 2022 Oct to Dec 2022 Jan to Mar 2023 April to June 2023	This condition was previously non-compliant. In response to a previous non-compliance, Quarterly Vehicle Movement Summary Reports have now been developed and uploaded to the project website.  Whilst the reports provide weekly light and heavy vehicle movements on Ravine Road, Tantangara, Marica and Polo Flat roads, the reports do not include Snowy Mountains Highway movements, insights on the effectiveness of measures, or reflect all requirements of TMP Table 6-1.  Areas not currently reported on include: Vehicle movements on Snowy Mountains Highway); Delivery traffic movements; Vehicle use of Lobs Hole Ravine Road North;  Agreed Actions:  Revise the format of the Quarterly Vehicle Movement Summary Reports to include:  Commentary on the effectiveness of measures to achieve satisfactory traffic, transport and access outcomes during construction; Vehicle movements on Snowy Mountains Highway); Delivery traffic movements; Vehicle use of Lobs Hole Ravine Road North;	Compliant Observation
250.	49		The Proponent must implement the approved Transport Management Plan for the development.		See above - improvements to the Quarterly Vehicle Movement Reports required.	Compliant Observation

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
251.	50		<p><b>Long-Term Road Strategy – Kosciuszko National Park</b></p> <p>Within 2 years of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Long-Term Road Strategy for the development to the satisfaction of the Planning Secretary. This strategy must be:</p> <ul style="list-style-type: none"> <li>a) be prepared in consultation with the NPWS and TfNSW;</li> <li>b) identify the road network within the Kosciuszko National Park required for the development during operations, including the detailed specifications for this road network;</li> <li>c) identify which roads within the Kosciuszko National Park can be narrowed or closed following construction and then rehabilitated;</li> <li>d) include a detailed program for the rehabilitation of these roads, which can be incorporated into the Rehabilitation Management Plan for the development; and</li> <li>e) identify future road maintenance and funding responsibilities for the long-term road network following construction.</li> </ul>		<p>Long Term Road Strategy was overdue for submission and had not yet been “developed to the satisfaction of the Planning Secretary”. The Plan was due in October 2022.</p> <p>The fortnightly update to DPE on 5/07/2023 noted “Progress was made on the staging strategy for this plan. SHL met with NPWS on 3 July 2023 to discuss staging rationale and this was supported in principle by the Department at the fortnightly update on 4 July 2023.</p> <p>SHL is organising a time to meet with NPWS to progress discussions on inclusions and exclusions to Stage 1 of this strategy”. There did not appear to be any formal consultation with TfNSW at the time of the audit.</p> <p>The 21/07/2023 fortnightly updated to DPE noted Agreement on funding allocation of future road maintenance is the time-consuming part of this process and this was originally planned for Stage 2 of this strategy. It is now evident that this plan needs to be staged geographically and meet conditions of approval for all stages which means Stage 1 will take longer than anticipated to achieve.</p> <p>Snowy Hydro has proposed a new submission date of 01 November 2023 for Stage 1 in the fortnightly update.</p> <p>Agreed Actions</p> <p>Continue to consult with NPWS and submit for final review as soon as possible, and in line with dates committed to in fortnightly meetings with DPE (1 Nov 2023);</p> <p>Consult with TfNSW on the development of the Long Term Road Strategy</p>	Non-compliant
252.	51		The Proponent must implement the approved Long-Term Road Strategy for the development.		Not triggered	Not triggered

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
	Plan ref		<b>TRANSPORT MANAGEMENT PLAN</b>			
253.	4.2.5		<p>With the exception of the Rock Forest site (Figure 4-1), all spoil emplacement areas will be located within the project site and accessible by project roads.</p> <p>Spoil generated from the Marica zone that cannot be reused during construction in permanent infrastructure will be temporarily stockpiled within the construction footprint then loaded on to trucks and transported to Rock Forest (which is outside KNP) via the Snowy Mountains Highway. It is anticipated that approximately 0.4 million m3 will be transported and emplaced at the Rock Forest site (with a capacity of 0.7 million m3).</p> <p>Assuming the use of Truck and Dog for spoil haulage, this volume represents 26,000 truck movements. Over a period of approximately 650 days this equates to approximately 40 heavy vehicle movements daily, which for the peak-hour equates to 4 heavy vehicles.</p>	<p>S2-FGJV-LOG-PLN-0008[G]-Main Works-Transport Management Plan 03/08/2020</p> <p>S2-FGJV-LOG-PLN-0008[I]-Main Works-Transport Management Plan 09/01/2023 - Updated to address audit findings, SHL comments, for issue to external agencies.</p>	At the time of the audit, spoil from the Marica zone was being temporarily stockpile for future use around the surge shaft. To date, no spoil has been transported from Marica to Rock Forest, or been transferred to any other site.	Compliant

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254.	4.2.1 Table 4-2		<p>Predicted Traffic Volumes - KNP Are actual traffic volumes compliant with the predicted traffic volumes per Table 4-2 below:</p> <p>Table 4-2: Predicted daily traffic volumes by road section – KNP</p> <table><tr><th rowspan="2">Road</th><th rowspan="2">Location</th><th colspan="2">Baseline traffic (Non-winter)</th><th colspan="2">Main Works only</th><th colspan="2">Main Works + Polo Flat</th></tr><tr><th>Light vehicles</th><th>Heavy vehicles</th><th>Light vehicles</th><th>Heavy vehicles</th><th>Light vehicles</th><th>Heavy vehicles</th></tr><tr><td>Link Road</td><td>Between Kings Cross Road and Snowy Mountains Highway</td><td>316</td><td>44</td><td>150</td><td>224</td><td>150</td><td>402</td></tr><tr><td>Link Road</td><td>Between Kings Cross Road and Ravine Road</td><td>206</td><td>22</td><td>48</td><td>44</td><td>48</td><td>44</td></tr><tr><td>Snowy Mountains Highway</td><td>North of Link Road (Garden Gully Creek)</td><td>436</td><td>79</td><td>42</td><td>146</td><td>42</td><td>148</td></tr><tr><td>Snowy Mountains Highway</td><td>North of Yarragobilly Caves Intersection</td><td>385</td><td>70</td><td>24</td><td>64</td><td>24</td><td>64</td></tr></table>	Road	Location	Baseline traffic (Non-winter)		Main Works only		Main Works + Polo Flat		Light vehicles	Heavy vehicles	Light vehicles	Heavy vehicles	Light vehicles	Heavy vehicles	Link Road	Between Kings Cross Road and Snowy Mountains Highway	316	44	150	224	150	402	Link Road	Between Kings Cross Road and Ravine Road	206	22	48	44	48	44	Snowy Mountains Highway	North of Link Road (Garden Gully Creek)	436	79	42	146	42	148	Snowy Mountains Highway	North of Yarragobilly Caves Intersection	385	70	24	64	24	64	TMP Reporting - HV deliveries to sites - Tumut origin	<p>The figures provided by FGJV Transport Department confirmed that delivery vehicles travelling from Tumut (this could constitute the majority of project vehicles from the north) were well within the predicted volume (see Section 4.1.10 of this report for details).</p> <p>Predicted daily traffic volumes in Table 4.2 of the TMP for heavy vehicles on the Snowy Mountains Highway north of Link Road (Garden Gully Creek) and North of Yarragobilly Caves Intersection of the Transport Management Plan for the Main Works are 146 and 64 respectively.</p> <p>* The maximum daily truck movements recorded on a single day (included trips from Tumut to Lobs Hole, Tantangara and Marica) to date in 2023 was 33 (recorded on 4/5/23). There was no day in which the predicted volumes were exceeded.</p> <p>* The highest recorded HV volumes for a full month was in April 2023 with 403 truck movements in total</p>	Compliant
Road	Location	Baseline traffic (Non-winter)				Main Works only		Main Works + Polo Flat																																												
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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
255.	App K	Section 5.5	<p><b>Dilapidation Report</b> Prior to construction commencing, an independent and qualified expert will survey and prepare a Road Dilapidation Report for the main roads used during construction. Prior to operations commencing, a Road Dilapidation Report should be prepared for the main transport route. The report would assess the current condition of the road surfaces the construction vehicles would traverse, including the external road network, and describe mechanisms to restore any damage that may result due to its use by traffic and transport related to the project.</p> <p>The Road Dilapidation Report will be submitted to the relevant road authority for review prior to the commencement of heavy vehicle movements.</p> <p>Above requirement is from Appendix K of the Traffic and Transport Assessment prepared by SCT Consulting, Revision 6.2 dated 25 February 2020 in the Main Works Preferred Infrastructure Report and Response to Submissions dated 28 February 2020)</p>	<p>Snowy 2.0 Road Condition Survey Issue A S2-6160-REP-000004-A dated 29 April 2019 by SMEC.</p> <p>Snowy Mountains Highway Risk Workshop Report dated 22/02/2023 by Safe System Solutions.</p> <p>FGJV Road Condition Report Lobs Hole to Rock Forest and Return dated 23/03/2023 by David Calvert</p>	<p>This requirement from Appendix K was flagged as a pre-audit consultation concern by Transport for NSW. The evidence provided by Snowy Hydro and FGJV was reviewed and assessed at this audit.</p> <p>The Road Condition Survey provided an overview of pavement video surveys and site inspections of existing roads that would be used as construction access to the Snowy 2.0 project. The roads inspected were: Miles Franklin Drive, Link Road, Goats Ridge Road and Kings Cross Road. This report was produced to respond to the Administrative Conditions of the Infrastructure Approval Notices (7 Feb 2019) Clause 42 concerning road maintenance. The Road Condition Survey Report appears to be an internal document only - no evidence was provided to indicate that the Report was submitted to relevant road authorities prior to commencement of heavy vehicle movements.</p> <p>Risk Workshop was organised by TfNSW and attended by Snowy Hydro and other key stakeholders. The workshop brought together stakeholders from a variety of organisations to identify and assess risk, develop counter measures /actions and prioritise those actions.</p> <p>The FGJV Road Condition inspection Report included sections Rock Forest to Tantangara turn-off, Tantangara Turnoff to Link Road, Link Road to Ravine Road, Link Road to Marica Turnoff and Ravine Road.</p> <p>Given that the scope of Independent Environmental Audits <i>are required to include</i>: all conditions of consent; all post approval and compliance documents prepared to satisfy the conditions of consent; and all environmental licences and approvals, it is concluded that this requirement in not non-compliant with the conditions of consent.</p> <p>However, it is identified that the project Assessment documents have not necessarily been complied with. An Observation is therefore raised.</p> <p><b>Recommendation:</b> Provide the Road Condition Survey to relevant stakeholders including Transport for NSW</p>	Compliant OBS

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
256.		5; Table 5-1; TRA02	Affected communities, visitors and emergency services will be notified in advance of any disruptions to traffic and restriction of access to areas of KNP impacted by project activities. Updates will be provided across a number of platforms so as to inform all demographics and provide ample warning of upcoming or changes in access restrictions.	<p>Email to all stakeholders from the Community team 01/09/2022 - All Snowy 2.0 TBM Cargo delivered &amp; thanks to motorists.</p> <p>Email to all stakeholders from the Community team 16/01/2023 Snowy 2.0 Traffic advice - large load TONIGHT (16/17 Jan);</p> <p>Email to all stakeholders from the Community team - Traffic Alert - re Snowy Mountains Trout Festival - Oct 2022 and Construction Noise Blast - Tantangara - 30 Oct 2022.</p> <p>Transport distribution list (contractors / drivers)</p> <p>Email to all stakeholders from the Community team Traffic Alert - Changed traffic conditions on the Snowy Mountains Highway 31/08/2022;</p> <p>Site inspection</p> <p>Interview with Community Manager</p> <p>FGJV website:  <a href="https://www.futuregenerationjv.com.au/traffic">https://www.futuregenerationjv.com.au/traffic</a> </p>	<p>Information is provided to the community through the Community Team via email and website updates. Variable Message Signs (VMS) are placed at various locations to inform motorists and community of traffic related issues.</p> <p>The Observation raised at the last audit was satisfactorily closed.</p>	Compliant
257.		Sect 5.6.1	<b>Vehicle Movement Plans and Heavy Vehicle Haulage Routes:</b>	Vehicle Movement Plan - Gooandra - Overview dated 28/06/2023 - showing turn-around locations, speed UHF call up etc.	Vehicle Movement Plans (VMPs) have been developed for both external and internal roads. VMPs include approved heavy haulage routes	Compliant



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258.			<p>Vehicle Movement Plans (VMPs) will be developed for both external and internal roads. VMPs will be used to communicate approved heavy haulage routes and include travel directions, permitted intersection turning movements, speeds, approved parking, lay-up areas (including Polo Flat, Rock Forest, the Link Road turn around and project sites), areas off-limits to parking (e.g. Link Road NPWS pay station), types / size of trucks to be used and any traffic control required.</p> <p>VMPs are to be presented diagrammatically to allow for clear communication with the workforce. VMPs will be progressively developed during construction and updated as conditions change. Where necessary VMPs will be communicated to the relevant road authority.</p>	VMPs in evidence - Directions to site"- presentation, refresher - provided as evidence.		Compliant
259.		Sect 5.6.1	<p>Heavy vehicle parking, idling and queuing on public roads will be minimised where practicable particularly within the regional towns of Tumut, Talbingo, Adaminaby and Cooma. The impact of heavy vehicles from convoys and congestion through local townships during peak traffic periods are to be mitigated through the following initiatives:</p> <ul style="list-style-type: none"> <li>– deliveries will be scheduled and staggered to prevent vehicles queuing on the Link Road;</li> <li>– deliveries will be scheduled to occur such that heavy vehicle travel during snow season (June long weekend – October long weekend) weekends and public holidays is avoided where practicable;</li> <li>– deliveries will be scheduled to occur such that heavy vehicle travel during peak periods through Cooma and Tumut, defined as between 8:00am and 9:30am and between 4:00pm and 5:30pm, will be avoided where practicable;</li> <li>– particular care will be given to avoid the need for heavy vehicle travel through school zones such as that adjacent the Snowy Hydro office in Cooma during school zone operating hours;</li> <li>– the DCC (Drivers Code of Conduct) requires drivers to pull over when safe to do so should excessive queuing occur on single lane roads.</li> </ul>	<p>Site inspection</p> <p>Complaints Register</p> <p>Email from FGJV Traffic and Transport Manager to TfNSW dated 6 June 2023 "Segment Trucks, Upcoming Long Weekend operations" regarding official opening of snow season - Mount Selwyn, and plan to stand down segment truck operation plus response from TfNSW.</p> <p>Drivers Code of Conduct</p>	<p>Booking system has been ongoing since the last audit to ensure the vehicles are scheduled appropriately; Various email communications were sighted to indicate alternative transport arrangements during the ski season (particularly opening weekend at Selwyn.</p> <p>During the site inspection, heavy vehicle parking, idling and queuing on public roads was not observed.</p>	Compliant
260.		Sect 5.6.1	Heavy vehicles will aim to travel staggered from one another when in transit in order to minimise delays to non-construction vehicle movements. This will be managed by:	Daily Transport DLAH meeting minutes - various including 25 May 23, 20 June 23, 6, 28 July - providing weather forecast, tasks.	Delivery Look Aheads (DLAH) have been used to plan HV movements and deliveries on site. DLAH for tomorrow, 2-day DLAH and 7-day DLAH	Compliant

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			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
			<ul style="list-style-type: none"> <li>– scheduling of vehicle movements using: <ul style="list-style-type: none"> <li>○ 6 month and 2 week look aheads at TTLG meetings;</li> </ul> </li> <li>• next day and next week look aheads for deliveries;</li> </ul>		are communicated on a daily basis via the Daily Transport Planning meeting. TMP Reporting - HV deliveries to site was reviewed.	
261.			<ul style="list-style-type: none"> <li>○ staggering of the departure of segment trucks from Polo Flat by site personnel;</li> <li>– adherence to heavy vehicle traffic movements leaving the Polo Flat Segment Factory (as specified in Infrastructure Approval (SSI-10034), see below):</li> <li>○ ensure that the development does not generate more than: <ul style="list-style-type: none"> <li>▪ 175 heavy vehicle movements during the day and evening;</li> <li>▪ 45 heavy vehicle movements transporting finished segments from the site during the night on the public road network;</li> </ul> </li> <li>○ monitor and record these heavy vehicle traffic movements at the Polo Flat Segment Factory gate.</li> <li>– drivers will communicate via radio and aim to maintain distance between each heavy vehicle; and</li> <li>– any OSOM escort vehicles will be used to coordinate staggered movements.</li> </ul>			
262.		Sect 5.6.3	<p><b>Heavy Haulage routes:</b></p> <p>Heavy vehicle haulage routes will be communicated to haulage contractors during the procurement stage and requirements of the DCC, route use and compliance included in their contracts.</p>	<p>FGJV Delivery Locations and Instructions</p> <p>Ravine Road Convoy Scheduled 14/09/2022;</p> <p>Email communication - Heavy Vehicle Delivery Instructions for FGJV Project Sites - Michels Trenchless - 27/04/23</p> <p>Email: Construction Water Processing Plants - Clarifier Delivery - details for drivers 07/07/2023</p>	Heavy Haulage routes are communicated via email to heavy haulage contractors	Compliant
			<b>Over-size and Over-mass (OSOM) vehicles</b>	Interviews		Compliant

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263.		Sect 5.6.4	<p>In advance of OSOM deliveries, Future Generation (or sub-contractor) will apply for an OSOM permit through the National Heavy Vehicle Regulator (NHVR) Portal. (specific permit to be obtained in advance of travel for vehicles exceeding 2.5m in width and/or 19m in length).</p> <p>A TMP is required for any of the following OSOM movements:</p> <ul style="list-style-type: none"> <li>– all OSOM movements that are classified as 'High Risk' due to their dimensions and/or weights;</li> <li>– all OSOM movements that travel on a 'High Risk' route; and</li> <li>– all OSOM movements that involve the transport of a 'Critical/Sensitive' load.</li> </ul>	<p>Permits for any vehicle wider than 2.5, 19m long - permits - Permits are rejected if not in order.</p> <p>FGJV OSOM Audit 30/05/23</p>	<p>For "Over Size Over Mass" (OSOM) vehicles, Traffic &amp; Transport (T&amp;T) has developed its own OSOM permits and a new booking system: OSOM HV Bookings Record.</p> <p>Field audits are undertaken to check compliance.</p>	

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264.		Sect 5.11	<p>Project personnel will not be permitted to drive personal vehicles to the project site. In order to reduce traffic volumes, travel times and improve safety outcomes, personnel will travel via either project approved light vehicles or bus.</p> <p>Personnel will be transported from designated local towns and airports to the accommodation camps by project-supplied buses.</p> <p>TfNSW comment: Is the management of worker movements to and from sites and between sites being undertaken as detailed in approved documentation (e.g. Snowy 2.0 Main Works Traffic and Transport Assessment, dated 25 February 2020 prepared by SCT Consulting – refer to Section 4.1.3). (This is Appendix K)</p> <p>From Appendix K Personnel working on the project will generally not be permitted to drive to the camps, in order to reduce the volume of traffic on the roads, reduce travel time and improve safety outcomes for the workforce.</p> <p>When on site, buses will collect workers and transport them between accommodation camps and various worksites before and after shifts. Bus pick-up and drop-off points will be marked at accommodation camps and at worksites, along with safe pedestrian routes. Sufficient buses will be allocated to each camp to ferry the workforce back and forth at the start and end of each shift. Exceptions will apply for superintendents and engineers or for personnel who require flexibility of movement as a result of the nature of their role.</p>	Site inspection - review of car parks, bus stops, notice boards (detailing timetables)	<p>Good evidence was provided that workers are transported to site using buses – travel in private vehicles is not permitted.</p> <p>Site inspections, interviews, review of bus timetables, provision of bus stops and lack of private vehicles on sites confirmed that the project is in compliance with this requirement.</p>	Compliant
265.		Sect 5.12	<p><b>Traffic Incidents (within the site):</b></p> <ul style="list-style-type: none"> <li>– safety and environment related traffic incidents within the bounds of the project area will be managed in accordance with the EMS and the Health and Safety Management Plan and the associated incident and emergency reporting procedures;</li> <li>– depending on the type and severity of the incident this may include notification to the Department in writing for incidents defined under the Approval, notification to the NPWS where required under the Deed of Agreement of Lease and notification to the EPA for pollution related incidents.</li> </ul>		<p>A new Traffic Incident Register has been developed to include the required fields. A column was also added to reference whether an incident report was also raised. The register is significantly improved since the previous audit and captures key information including.</p> <ul style="list-style-type: none"> <li>* Location of incident</li> <li>* Date and time of initial notification;</li> <li>* Risk rating for potential and actual consequence;</li> <li>* Reported to (NPWS, TfNSW, Police, Ambulance, Fire);</li> </ul>	Compliant

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			Snowy Hydro would notify the Department in writing immediately after they become aware of the incident on site.		<ul style="list-style-type: none"> <li>* Breach of requirements?;</li> <li>* Subcontractor involved;</li> <li>* Cause environmental harm?</li> <li>* Comments – description of what occurred.</li> </ul>	

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
266.		Sect 5.12	<p><b>Traffic Incidents (external to the project site)</b></p> <p>In the event of a traffic incident external to the project site, but within project roads as described in Table 3-1, relevant road authorities and emergency services will be notified.</p> <p>If a traffic incident were to occur external to project roads defined in Table 3-1, TfNSW and / or the relevant road authority will be notified.</p> <p>For incidents involving the salvage and / or recovery of project heavy vehicles refer to the Heavy Vehicle Salvage Plan provided in Appendix B.</p>	<p>Traffic Incident Log with columns for "Reported to Stakeholders (NPWS, TfNSW, Police, Ambulance, Fire", time and date of notification etc.</p> <p>Interview with Traffic and Transport Manager (FGJV)</p>	The Traffic Incident Log and interview with the Traffic and Transport Manager provided evidence of notification to the appropriate authorities in the event of an external traffic incident	Compliant
267.		Sect 6.1; Table 6-1	<p><b>Monitoring and Reporting:</b></p> <p>Monitoring will be undertaken to confirm the satisfactory traffic, transport and access outcomes are achieved during construction. Key parameters / frequency:</p> <ul style="list-style-type: none"> <li>– Congestion impacts; road conditions, safety and traffic signage (inspections);</li> <li>– Movement of project vehicles on key roads utilised by the project; delivery traffic movements (Quarterly report);</li> <li>– Vehicle use of Lobs Hole Ravine Road – North (max 120 movement / day – 60 each way) and annual average maximum of 60 movements / day (Quarterly Report).</li> </ul>	<p>Quarterly Vehicle Movement Summary Reports April - June 2023, Jan - March 2022 (as samples).</p> <p>Site Inspection - visit to Leed work area on Lobs Hole Ravine Road North (road is locked with cameras, which record the number of vehicles using the road.</p> <p>Email from FGJV Environmental Manager providing numbers of vehicles using Lobs Hole Ravine Road North on random dates (max recorded 11 per day)</p>	<p>This condition was previously non-compliant. In response to a previous non-compliance, Quarterly Vehicle Movement Summary Reports have now been developed and uploaded to the project website.</p> <p>Whilst the reports provide weekly light and heavy vehicle movements on Ravine Road, Tantangara, Marica and Polo Flat roads, the reports do not include Snowy Mountains Highway movements, insights on the effectiveness of measures, or reflect all requirements of TMP Table 6-1.</p> <p>Areas not currently reported on include: Vehicle movements on Snowy Mountains Highway); Delivery traffic movements; Vehicle use of Lobs Hole Ravine Road North;</p> <p>Agreed Actions:</p> <p>Revise the format of the Quarterly Vehicle Movement Summary Reports to include:</p> <p>Commentary on the effectiveness of measures to achieve satisfactory traffic, transport and access outcomes during construction; Vehicle movements on Snowy Mountains Highway); Delivery traffic movements; Vehicle use of Lobs Hole Ravine Road North;</p>	Compliant Observation

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS - TRANSPORT</b>			
268.		App D; Sect. 4	<p><b>Snow and Ice Traffic Management Plan (Appendix D)</b></p> <p>Traffic Control Plans (TCPs) and Transport Management Plans (required under Oversize overmass (OSOM) permits) will contain, where necessary details of adverse climatic conditions and measures for safe transit in adverse conditions. Management measures will include:</p> <ul style="list-style-type: none"> <li>– speed reductions;</li> <li>– best practice vehicle maintenance (tyres, lighting etc.);</li> <li>– adherence to legal requirements for snow chains;</li> <li>– use of fog lights during periods of low visibility;</li> <li>– cessation of works; and</li> <li>– grading and de-icing (by others) for snow removal; and</li> <li>– advising suppliers of potential adverse weather and likely site shutdowns</li> </ul> <p>Relevant management measures will be included in the Drivers' Code of Conduct. Future Generation will ensure there is appropriate training for such conditions and that the potential for adverse weather is communicated in driver inductions and relevant procurement processes.</p>	<p>Snow and Ice Traffic Management Plan Rev C dated 10/07/2020.</p> <p>Note: Area of focus for TfNSW - Trucks and interactions with motorists new Mount Selwyn, reporting of incidents, reacting to near misses.</p> <p>Traffic and Transport Updates (via WhatsApp) various including 5, 9, 10, 26 June, 18 July 2023</p> <p>Daily Transport DLAH meeting minutes - various including 25 May 23, 20 June 23, 6, 28 July - providing weather forecast, tasks.</p> <p>Email from FGJV Traffic and Transport Manager to TfNSW dated 6 June 2023 "Segment Trucks, Upcoming Long Weekend operations" regarding official opening of snow season - Mount Selwyn, and plan to stand down segment truck operation plus response from TfNSW.</p> <p>Email from FGJV Traffic and Transport Manager to TfNSW dated 20 Dec 2022 - FGJV HV movements Xmas break.</p> <p>FGJV OSOM Audit 30/05/23</p> <p>Winterisation plan detailing what FGJV have communicated to date, information regarding plans for / by TfNSW, SHL NPWS Selwyn (undated).</p> <p>Winterisation Update and Safety on our Roads Meeting - attendance records sheet 12/05/2023.</p>	<p>The Snow and Ice Traffic Management is an appendix to the Transport Management Plan.</p> <p>Reviewed various measures to minimize traffic safety risks in snow and ice conditions, - see evidence assessed column. Appropriate processes appear to be in place to manage snow and ice.</p>	Compliant



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – WASTE VISUAL</b>			
269.	52		<b>WASTE</b>	Snowy 2.0 Main Works Waste Management Plan Rev D April 2023 (draft revision) - previous version C- 23/07/2020.	In recent months, FGJV has appointed a person dedicated to waste management (Hugh Jones) to oversee and improve the waste management services across the project. Waste was generally managed in the past by the waste contractors.  The waste coordinator visits the site to meet with personnel, check waste requirements and organises provision of further bins and facilities as required. There appears to be improved oversight and management of waste on site.	Compliant OBS
			Excluding the spoil generated by the development, the Proponent must:	Letter from FGJV - Waste Management and Disposal Services Project Wide: Project Delivery KPI's dated 18 August 2023.	Letter regarding dated 18 August - formalising discussions to ensure waste is removed in a timely manner to comply with EPA directives and provides KPIs for waste pick up requirements including numbers of pickups, labelling, daily ticketing report requirements and maximum time frames for response to requests - Hugh Jones.	
			a) minimise the waste generated by the development;	May 2023 Waste Report - all sites.	Whilst the separation and recycling of water bottles has improved since the last audit, bottled water continues to be provided extensively across the project, with minimal provision of potable water for drinking (or refilling own containers). Disposable cutlery is also provided at sites (not reusable) - made from timber. The following actions have been agreed to be undertaken: * Provide potable water for drinking and positively encourage workers to refill their own containers; * FGJV could consider providing reusable vessels and reusable cutlery to workers (among other things);	
			b) maximise the reuse and recycling of any waste;	May 2023 Waste Report - all sites.	Plastic bottles are now collected in Return and Earn bins. Disposable cutlery is used at sites, which is biodegradable, however still enters the general waste stream.	

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – WASTE VISUAL</b>			
270.			c) classify all waste generated on site in accordance with the <i>Waste Classification Guidelines</i> (NSW EPA 2014), or its latest version;	May 2023 Waste Report - all sites. JJ Richards Monthly waste report.  Waste Classification Assessment for Surplus Soil and Concrete (CS005), Tantangara 15/05/2023 (Coffey) - 1800m3 stockpile - classified as General Solid Waste - non putrescible (to be removed from site to a licenced facility)	c. Waste is classified within the Waste Reports (complies).	
			d) store and handle all waste generated on site in accordance with its classification; and	Site inspection	Generally waste was stored appropriately. However one site was identified during the site inspection where actions were required to clean up an area in the vicinity of an over-full bin (raised as an Observation). Evidence was provided that this has been addressed.	
			e) ensure all waste is disposed of off-site at facilities that are lawfully permitted to accept such waste.	EPA Waste docket 10/04/2023 - for paint residue (F100) - taken to Environmental Treatment Solutions - Blayney.	Waste is disposed of at facilities able to accept the classified waste.	
271.			<b>Comment from NPWS</b> waste management across all sites needs to be improved – both domestic and industrial e.g. materials used in construction works (e.g. polypropylene geofabric and orange conduit) are breaking down as waste in the environment	Site inspection	Evidence was provided that the specific waste referred to by NPWS was picked up and disposed of (photo).  The site inspection did not identify significant issues with waste materials except as noted above and in Observation.	Compliant OBS
272.	53 (a)		<b>VISUAL</b> <b>Visual Impact Management Requirements</b> The Proponent must: a) minimise the visual impacts of the long-term temporary and permanent infrastructure of the development on the Kosciuszko National Park, including: <ul style="list-style-type: none"> <li>• having regard to the NPWS Park Facilities Manual;</li> <li>• complying with the requirements in approved management plan under the conditions of this approval;</li> </ul>		Long term temporary and permanent infrastructure had not generally been triggered at this audit.  However as noted at the previous audit, the concrete used for stabilisation of the batters on Lobs Hole Ravine Road, particularly near the boulder streams were coloured with a dark oxide. (see photos - Lobs Hole Ravine Road)	Not triggered  Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – WASTE VISUAL</b>			
273.			<ul style="list-style-type: none"> <li>• using suitable planting and screening;</li> <li>• ensuring the visual appearance of the infrastructure blends into the surrounding landscape as much as possible, including: <ul style="list-style-type: none"> <li>~ using appropriate colours and non-reflective paints on permanent buildings to reduce glare;</li> <li>~ incorporating textures on large surfaces and using dark aggregates and oxides for exposed concrete surfaces;</li> <li>~ using locally sourced stone to clad buildings or portals, such the Lobs Hole substation building façade;</li> </ul> </li> <li>• incorporating textured surfaces along the shoreline of the Ravine Bay and Talbingo spoil emplacement areas;</li> <li>• installing landscaping and/or suitable screening as soon as practicable along the Snowy Mountains Highway boundary of the Rock Forest site to screen the development on site from road users and nearby residences;</li> </ul>			
274.	53 (b)		b) minimising the visual impacts of the development on the Rock Forest site on nearby residences during construction;	Site inspection	Rock Forest had not yet received any spoil and there were no visually intrusive structures at the time of the audit.	Not triggered
275.	53 (c)		c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes;	Site inspection	Advertising signs and logos were not observed during the site inspections	Not triggered
276.	53 (d)		d) minimise the lighting impacts of the development, including ensuring that all external lighting associated with the development: <ul style="list-style-type: none"> <li>• is consistent with the good lighting design principles in the Dark Sky Planning Guideline, (DPE 2016), or its latest version; and</li> </ul>	Emails 06/03/23 and 13/03/203 - Project Lighting from Environmental Advisor.  Photos provided which were taken showing lighting angles	Email dated 06/03/2023 from Environmental Advisor - Project lighting noting that several flood lights have been installed and areas outside the construction zone are being impacted. - Provides guidance on minimising light pollution and provides light pollution guidelines for wildlife and a reminder of the	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS – WASTE VISUAL</b>			
			<ul style="list-style-type: none"> <li>complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.</li> </ul>		conditions of approval. Email 13/03/23 - following up on Project Lighting to adjust lights and fix issues	
277.	54		<b>Visual Impact Management Plan</b> Within 12 months of the commencement of construction, the Proponent must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	Visual Impact Management Plan March 2023 Rev G	Whilst the Visual Impact Management Plan has been submitted to DPE and consultation has occurred with NPWS (initially submitted for review 23/12/2021), it is not yet developed "to the satisfaction of the Planning Secretary". The Plan was due October 2021.  It is noted that the VIMP was submitted to DPE on 13 July 2023 by FGJV for approval following consultation with agencies and the incorporation of comments by NPWS and DPE.	Non-compliant
278.	54 (a)		a) be prepared in consultation with the NPWS;			
279.	54 (b)		b) describe the measures that would be implemented to comply with condition 53 above; and			
280.	54 (c)		c) include detailed plans for minimising the visual impacts of the following permanent infrastructure: <ul style="list-style-type: none"> <li>Lobs Hole substation;</li> <li>cable yard;</li> <li>water intakes and associated infrastructure at the Talbingo Reservoir and Tantangara Reservoir;</li> <li>Middle Bay barge ramp;</li> <li>headrace surge shaft and ventilation shaft; and</li> <li>fish screens and barrier.</li> </ul>			
281.	55		The Proponent must implement the approved Visual Impact Management Plan for the development.			Not triggered

**TABLE F – SCHEDULE 3 – Noise, Air Quality, Emergency Management**

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS NOISE</b>			
282.	56		<b>NOISE</b> <b>Minimise Noise</b> The Proponent must minimise the noise generated by the construction, operation, and decommissioning of the development.		At the time of the audit, minimal activities were being conducted at the Rock Forest site.  The site was also being used for materials laydown, storage of tunnel segments and was set up to allow trucks to park up due to inclement weather for winter conditions.	Compliant
283.	57		<b>Construction Noise Management Plan – Rock Forest</b> Prior to the commencement of construction on the Rock Forest site, the Proponent must prepare a Construction Noise Management Plan for the development on site to the satisfaction of the Planning Secretary. This plan must:	Construction Noise Management Plan (CNMP) – Rock Forest S2-FGJV-ENV-PLM-0089 Rev I dated 02/12/2022 (approved by DPE 28/03/2023). - revised to include updated noise assessment, public reporting and additional information requested by DPE.  Rock Forest Sensitive Receptors Map (updated 15/09/2021) showing 3 unattended monitoring sites (site hive) within the Rock Forest construction area.  Summary of the Construction Noise Management Plan (not dated)	The CNMP has been updated following additional noise assessments undertaken in January 2022. The CNMP has been prepared by Remi Larmandieu, suitably qualified and experienced noise consultants from RWDI.  The Proponent has developed a noise monitoring program at Rock Forest, to measure noise impacts to nearby property landowners.  There are four devices deployed within the Rock Forest lease area, and one device deployed adjacent to a nearby sensitive receiver	Compliant
284.	57 (a)		a) be prepared by a suitably qualified and experienced person in consultation with the landowners of the nearby properties;			
285.	57 (b)		b) describe the measures that would be implemented to minimise the construction noise impacts of the development on the Rock Forest site, including: <ul style="list-style-type: none"> <li>minimising the use of the site during the evening and night-time periods</li> </ul>			

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS NOISE</b>			
286.			<ul style="list-style-type: none"> <li>implementing the best practice noise mitigation measures outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version; and,</li> <li>potentially, the use of voluntary noise mitigation agreements with landowners to allow higher construction noise levels or longer construction hours;</li> </ul>			
287.	57 (c)		c) include a program to monitor and publicly report on the effectiveness of these measures.		The revised CNMP was updated to include the program to monitor and publicly report on the effectiveness of measures (previously raised as Observation)	Compliant
288.	58		The Proponent must implement the approved Construction Noise Management Plan for the Rock Forest site.		See below: Noise Management Plan - Rock Forest section	Compliant
289.	59		<b>AIR</b> The Proponent must: <ul style="list-style-type: none"> <li>a) minimise the dust, odour, fume, and blast emissions of the development; and</li> </ul>		The site inspections (all sites) did not identify and specific issues relating to dust, odour, fumes or blast emissions. Water trucks are used to minimise dust emissions on haul roads and pads.	Compliant
290.	59 (b)		b) minimise the surface disturbance of the site.		Overall, the disturbance of the surface was satisfactory - at the time of the audit, dust from the disturbance of the surface was not an issue.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS NOISE</b>			
			<b>NOISE MANAGEMENT PLAN – ROCK FOREST</b>			
291.		NMP 6.1	<p>Management measures will be implemented to avoid, minimise or manage noise impacts to sensitive receivers:</p> <ul style="list-style-type: none"> <li>– the provision of contact details on a site board at the front of the site and the maintenance of a complaints register;</li> <li>– community and neighbour notifications;</li> <li>– turning off plant that is not in use;</li> <li>– avoid dropping materials from a height, dropping or dragging road plates;</li> <li>– avoiding the use of radios or stereos outdoors where neighbours can be affected;</li> <li>– keeping drivers informed of designated vehicle routes, parking locations, acceptable delivery hours or other relevant practices (for example, minimising the use of engine brakes, and no extended periods of engine idling); and</li> <li>– periodic checks on nearby residences and other sensitive land users for noise issues so that mitigation measures can be quickly applied.</li> </ul>	<p>Site inspection</p> <p>Complaints Register</p>	<p>Active measures to avoid, minimise and manage noise impacts to sensitive receivers were generally in place at the Rock Forest site. The main use at the time of the audit was for segment storage and laydown areas.</p> <p>Since the implementation of the noise monitoring program, no official public complaints have been lodged with the proponent.</p> <p>* Drains / culverts had been constructed and stabilised.  * A basin had been recently re-sized to accommodate a pad extension;  * The pad had been stabilised with DGB/crushed rock  * Topsoil stockpiles stored / stabilised;  * Clearing of future stockpile area not yet commenced</p>	Compliant
292.		Table 6-1; NV02	Noise management measures from this plan will be included in site environmental documents including for example Work Packs and/or Site Environmental Plans (SEPs).	Site inspection	No works were being undertaken at Rock Forest at the time of the audit except storage of segments, therefore work packs and Site Environmental Plans were not required.	Not triggered
293.		Table 6-1; NV04	Where feasible and reasonable noisy equipment and/or construction processes will be substituted by alternative low noise emitting equipment and/or construction process.	Site Inspection	No noisy equipment was on site	Not triggered
294.		Table 6-1; NV05	Plant and machinery based at Rock Forest will be fitted with non-tonal reversing alarms (this does not include site light vehicles). Where possible this will include site heavy vehicles.	Site Inspection	No plant or machinery were working on the site at the time of the audit.	Not triggered
295.		Table 6-1; NV07	The Rock Forest site will be designed and configured so that the internal road network limits reversing of plant and heavy vehicles.	Site Inspection	The site was designed such that vehicles do not need to reverse.	Compliant
296.		Table 6-1; NV08	<p>Site setup (Phase 1) of the Rock Forest site will be undertaken during standard daytime construction hours:</p> <ul style="list-style-type: none"> <li>– 7:00am to 6:00pm Monday to Saturday; and</li> <li>– 8:00am to 6:00pm Sundays and NSW Public Holidays.</li> </ul>	Site Inspection	Phase 1 was completed prior to this audit (addressed at previous IEA)	Not triggered



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS NOISE</b>			
297.		Table 6-1; NV10	<p>Where possible, Phase 2 works will be undertaken in standard day-time hours. During evening and nighttime, high noise works will be minimised including but not limited to:</p> <ul style="list-style-type: none"> <li>– land forming and shaping of spoil placed;</li> <li>– loading and unloading of deliveries; and</li> <li>– dropping materials from a height.</li> </ul>	<p>Snowy 2.0 Main Works - Construction Noise Management Plan - Rock Forest S2-FGJV-ENV-PLN-0089 December 2022 - revised to include updated noise assessment, public reporting and additional information requested by DPE</p> <p>Site Inspection</p> <p>Rock Forest Sensitive Receptors Map (updated 15/09/2021) showing 3 unattended monitoring sites (site hive) within the Rock Forest construction area.</p> <p>Summary of the Construction Noise Management Plan (not dated)</p>	Phase 2 had not commenced - no spoil had yet been received at the Rock Forest site	Not triggered
298.		Table 6-1; NV11; App B	<p>Sensitive receivers will be notified of construction activities that are likely to affect their noise amenity. Information provided will include:</p> <ul style="list-style-type: none"> <li>– the types of activities to be undertaken;</li> <li>– the timing of activities including expected start and finish;</li> <li>– the location of activities; and</li> <li>– details of the community information line and how to make an enquiry and / or complaint</li> </ul>	Site Inspection	Phase 1 was addressed at previous audit Phase 2 - no current construction activities	Not triggered

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS NOISE</b>			
299.		Table 6-1; NV14; Sect 7.1; Table 7-1	<p><b>Attended noise monitoring</b></p> <p>At the Rock Forest site attended noise monitoring will be carried out during the initial stages of construction to inform site management.</p> <p>Attended monitoring will also be undertaken in response to complaints.</p> <p>All acoustic instrumentation used for monitoring under this plan will have current NATA or manufacturer calibration certificates.</p> <p>The Future Generation's Environmental Site Representative or a suitably trained person will undertake the attended noise monitoring.</p>	<p>Unattended Noise Monitoring results:</p> <p>Graphs -LAeq 1, 1 hour averages March to 17 July 2023 (Site hive) showing potentially weather affected periods and out of hours time periods.</p> <p>The site hive monitoring device HEX-000236 was calibrated on 12 January 2023 and is due for recalibration 12 January 2025.</p>	<p>Attended noise monitoring had been conducted during phase 1 and was reported on in IEA#2 as compliant.</p> <p>Phase 1 is complete, and no construction activities were underway during IEA#4.</p> <p>However, unattended monitoring has been conducted at 3 locations during the operation of the site as a laydown and segment storage area</p>	Compliant
300.		7.2	<p><b>Noise complaints</b></p> <p>If noise complaints are received during construction, a review of noise management measures will be undertaken to determine if additional noise management controls are required.</p> <p>When a noise complaint is received, the complaint will be managed in accordance with the complaints process in the EMS.</p> <p>All reasonable efforts will be made by Future Generation to resolve an issue with the complainant. In the event a complaint is unable to be resolved, Future Generation will raise the issue with Snowy Hydro or delegate to review and facilitate an outcome</p>		A review of the Complaints Register did not identify any noise complaints related to Rock Forest	Compliant
301.		App B	<p><b>Out of Hours Works Procedure (Phase 1 and Phase 3 works)</b></p> <ul style="list-style-type: none"> <li>Phase 1 and Phase 3 construction works associated with the project will only be undertaken during the approved hours, except if works have been approved otherwise through this OOHW procedure or agreed in writing by the Planning Secretary.</li> <li>The Future Generation Environment Team will assess whether the OOHW are likely to be audible to sensitive receivers. If inaudible, works may proceed without regulator approval.</li> <li>Where OOHW will be audible to sensitive receivers, a construction noise assessment will be undertaken where the proposed works will be assessed against predicted construction noise levels assessed in the EIS (if consistent activities and machinery).</li> </ul>		<p>Phase 1 was complete and Phase 3 had not commenced at the time of the audit, and therefore, no out of hours works procedure was required to be implemented.</p> <p>Since the last audit, consultation has been held with residents regarding the CNMP (July 2022) where some minor concerns were raised regarding noise and water management pertaining to spoil emplacement (as documented in the CNMP).</p>	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS NOISE</b>			
			<ul style="list-style-type: none"> <li>Where the proposed works are not currently covered by an existing EIS noise assessment, the noise impacts will require further assessment;</li> </ul>			
			<ul style="list-style-type: none"> <li>Where assessment finds that excessive noise from OOHV is predicted to occur, further consultation will be undertaken and negotiated agreements may be used with affected landholders.</li> </ul>			
302.		App B; Table B-3	<b>Additional mitigation measures for OOHV</b> <ul style="list-style-type: none"> <li>Notifications will be provided via email, mail and door knock at least 5 working days prior to start of the works</li> <li>Clearly outline the reason the work is to be undertaken outside standard construction hours;</li> <li>include a diagram that clearly identifies the location of the proposed works in relation to nearby cross streets and local landmarks</li> <li>include details of relevant time restrictions that apply to the proposed works;</li> <li>clearly outline, in plain English, the location, nature, scope and duration of the proposed works;</li> <li>detail the expected noise impact of the works on noise sensitive receivers;</li> <li>clearly state how complaints may be made and additional information obtained; and</li> <li>include the number of the telephone complaints line, an afterhours contact phone number specific to the works, and the project website address.</li> </ul>			Not triggered
303.		App C	<b>Updated Noise assessment</b>  Future Generation JV has proposed to move the location of the access road to Snowy Mountains Highway approximately 800m to the south-east in order to reduce noise impacts to R6 residential receivers	Snowy 2.0 Main Works - Construction Noise Management Plan - Rock Forest S2-FGJV-ENV-PLN-0089 December 2022 - revised to include updated noise assessment,	An updated noise assessment has been conducted and is embedded in the revised CNMP	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS EMERGENCY</b>			
	60		<b>EMERGENCY MANAGEMENT</b> <b>Bushfire Requirements</b> The Proponent must:			
304.	60 (a)		a) include suitable asset protection measures into the final design of the development in accordance with the <i>Planning for Bushfire Protection</i> (RFS 2018) guidelines, or its latest version;	NHMP Section 5.1 Maintenance of Asset Protection Zones and Vegetation Management; NHMP, Appendix A - Bushfire Management Plan	Final design of the development will not be completed for a number of years.	Not triggered
305.	60 (b)		b) ensure all buildings developed on site comply with the relevant requirements of the BAL-29 construction standards of <i>Australian Standard AS 3959-2018: Construction of buildings in bushfire prone areas</i> or the NASH Standard (1.7.14 updated) in <i>National Standard Steel Framed Construction in Bushfire Areas – 2014</i> ; and	Building Code of Australia Compliance Assessment Report GIS Building - Snowy Hydro - Surface Buildings 02/03/2023  Building Code of Australia Compliance Assessment Report Headrace Surge Tank Building - Snowy Hydro - Surface Buildings 24/02/23.  Building Code of Australia Compliance Assessment Report Lower Intake Building - Snowy Hydro - Surface Buildings 02/03/2023  Building Code of Australia Compliance Assessment Report Main Access Tunnel (MAT) Building - Snowy Hydro - Surface Buildings 27/02/2023  Building Code of Australia Compliance Assessment Report Upper Intake Building - Snowy Hydro - Surface Buildings 24/02/23.	Compliance Assessment Reports for permanent buildings have been prepared with the purpose to identify non-compliance matters contained in the proposed design of the building against the current Deemed-to-Satisfy (DTS) Provisions of the BCA and to provide compliance recommendations to overcome the DTS non-compliances.  A review of the various assessment reports found they do not include specific references to BAL 29 or AS 3959-2018.	Compliant OBS
306.	60 (c)		c) ensure any fire trails or asset protection zones associated with the development are wholly contained within the approved disturbance area.	Site inspection Interviews	It was advised that the Project has not created new fire trails since the last audit.  At Audit #2, the Basis of Design Report was reviewed. It identified the requirement to ensure the APZs are wholly contained within the approved disturbance area. It noted that where the site is near an EIS boundary, the APZ is to the EIS boundary.	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS EMERGENCY</b>			
					GIS maps were sighted electronically during that audit.	
307.	61		<b>Emergency Management Plan (renamed Natural Hazard Management Plan)</b>  Prior to the commencement of construction, the Proponent must prepare an Emergency Management Plan for the development to the satisfaction of the NPWS. This plan must:	Natural Hazard Management Plan (NHMP) (S2-FGJV-ENV-PLN-0090-C, issue approved 04/08/20); Section 1.4  Natural Hazards Management Plan Rev F Nov 2022 (revised and updated with input from NPWS - not yet approved)	The original Natural Hazard Management Plan (NHMP), which corresponds to the Emergency Management Plan in this condition, was submitted to NPWS on 04/08/20 and approved on 21/08/20. This final version (issue C 21/08/20) incorporated the Bushfire Management Plan, which was also approved on the same communication.  The NHMP has been reviewed and revised in Nov 2022 (yet to be approved).  The adequacy of the original NHMP was assessed at previous audits as compliant.	Compliant
308.	61 (a)		a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the NPWS;			
309.	61 (b)		b) be consistent with the <i>Kosciuszko National Park Fire Management Strategy 2008-2013</i> (NPWS 2008), or its latest version;			
310.	61 (c)		c) include evacuation protocols for the site;			
311.	61 (d)		d) describe the measures that would be implemented to: <ul style="list-style-type: none"> <li>• minimise the risk of bushfires on site;</li> <li>• protect the assets on site from bushfires;</li> <li>• respond to any bushfires on or in the vicinity of the site;</li> <li>• minimise flood risks on site, including flooding response procedures;</li> <li>• minimise the risk of landslips on site, including landslide response procedures; and</li> </ul>			

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS EMERGENCY</b>			
			<ul style="list-style-type: none"><li>evacuate the site in an emergency; and</li></ul>		The site specific Emergency Plans have been recently revised and updated for each of the sites and the NHMP has been revised and updated with input from NPWS and other emergency agencies (see below)	Compliant
312.	61 (e)		e) monitor and review the effectiveness of these measures.			
313.	62		(MOD 1) Sept 2021 In the event that changes to emergency access and egress routes are proposed, the Proponent is to review the proposed changes and the Emergency Management Plan in consultation with RFS, NSW State Emergency Service and NPWS, and update the Emergency Management Plan to the satisfaction of NPWS prior to implementation of the changes.	Natural Hazards Management Plan Rev F Nov 2022.  NHMP_BMP Comments Register.  'Lobs Hole Emergency Response Management Plan (ERP) S2-FGJV-HSA-PLN-0019 Rev E Dec 2022  Marica Emergency Response Management Plan S2-FGJV-HSA-PLN-0037 Rev E Dec 2022  Tantangara Emergency Response Management Plan S2-FGJV-HSA-PLN-0036 Rev E March 2022		
<b>NATURAL HAZARDS MANAGEMENT PLAN</b>						
314.		4.2	A Consequence Management Guide (CMG) relating to evacuation will be in place prior to works mobilisation. This will include notification triggers to the local Emergency Operations Centre (EOC).	Lobs Hole Consequence Management Guide (no date - highlighted areas for clarification)  Marica Consequence Management Guide V2 (no date, appears complete);  Tantangara Snowy Monaro Local Emergency Management Committee Consequence Management Guide V3 (no date) - highlighted areas for clarification).	At the time of the audit, CMGs had been prepared for Lobs Hole, Marica and Tantangara sites and were provided for RFS review. The documents contained highlighted text (incomplete / questions for clarification).	Compliant OBS

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS EMERGENCY</b>			
315		4.3.1	The decision to stay and defend at a site must not be taken without careful planning. A specific incident action plan and a back-up plan that carefully considers all the local risk factors associated with a bushfire in the vicinity of each Refuge Assembly Area must be prepared.	Lobs Hole Emergency Response Management Plan (ERP) S2-FGJV-HSA-PLN-0019 Rev E Dec 2022  Marica Emergency Response Management Plan S2-FGJV-HSA-PLN-0037 Rev E Dec 2022  Tantangara Emergency Response Management Plan S2-FGJV-HSA-PLN-0036 Rev E March 2022	The Bushfire section of the Emergency Response Plans include 2 scenario descriptions for Bush and/or wildfire with outlines on emergency response, action required, responsibilities, and a comments section outlining actions for personnel.  It was noted that the Bushfire section of the Marica ERP refers to Lobs Hole in Section 3.4 and 3.5.2 (however generally refers to Marica elsewhere).  It was also identified that the Tantangara ERP does not include a section on Bushfire.	
316		5.4	All major trails on and adjoining the Main Works areas will be clearly marked with key information (e.g. dead end, no access, steep and narrow) and will be wholly contained within the approved disturbance area. These locations include (see NHMP)	Example Photos (2) of example temporary signage - "No Entry - Steep and Narrow - No go zone" and "R7 CH 17 - No Entry"	Examples were provided of signposting major trails.	
317		6.3	The PIC or delegate will annually and prior to the bushfire season (which typically starts 1 October, unless brought forward by the NSW RFS Commissioner) invite the local NSW RFS Brigade and NPWS representatives onsite for site familiarisation, fire response and evacuation drill and liaison with personnel. This will include running through the procedures and operations detailed in this plan.	Photos (2) of RFS visit - Lobs Hole - 20 May 2023  Attendance Register for the Lobs Hole RFS site visit showing 51 participants from 18 local brigades.  Major Incident Exercise Report and Action Form - evacuation exercise drill from Tantangara Fill 3 Main Office precinct 05/04/2023.  Major Incident Exercise Report and Action Form - evacuation exercise drill from Gooandra JCE 25/07/2022	An RFS (Riverina) site visit - ECVT briefing was held at Lobs Hole in May 2023  It was advised that FGJV are setting up Emergency Evacuation scenarios at present which were scheduled for 22 August at Tantangara, 23 August at Lobs Hole (TBC - Marica). They will be a full site evacuation conducted and it will be run weekly until it runs smoothly.	
318		5.3	Site inspections will occur following adverse conditions (e.g. including bushfire, heavy rain, flood) to check for natural hazards.	During/Post Rainfall Inspection Checklist (e.g. Tantangara 13/06/2023, 22/06/23 + photos)	During / Post Rainfall Inspections have been conducted after heavy rain. There have been no bushfire threats since the last audit due to wet conditions.	Compliant



ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS EMERGENCY</b>			
319		7.2	<b>Monitoring and Inspection</b> The PIC should undertake the following monitoring activities on a monthly basis: <ul style="list-style-type: none"> <li>confirm that the preparedness processes (as per Section 5) are being followed, including site inspections following adverse conditions (e.g. including bushfire, heavy rain, flood) to check for natural hazards;</li> <li>ensure the relevant personnel have received appropriate training (as per section 6.1); and</li> <li>implement corrective actions where necessary to maintain compliance with this plan.</li> </ul> Weekly environmental inspections of the project will occur in accordance with Section 8 of the EMS.	Weekly inspections: Lobs Hole - 04/03/23, 03/03/23, 21/04/23; 12/5/23, 9/6/23 (sample of many) Marica: 15/01/23, 10/2/23, 24/3/23, 28/4/23, 10/5/23, 15/6/23; Tantangara 30/12/22, 18/11/22	Monthly Monitoring Activities include During/Post Rainfall Inspection as required. Weekly Environmental Site Inspections have been conducted.	Compliant
320		7.3	This NHMP will be provided for comment annually to Local Emergency Management Committees, NSWRFs, NSWSES and NPWS. Following natural hazard emergencies, where necessary lessons learnt will be incorporated into this plan.	Natural Hazards Management Plan S2-FGJV-ENV-PLN-0090 Nov 2022 Rev F  Email from NPWS dated 16/01/2023 Comments - Revised Natural Hazard Management Plan (inclusive of Bushfire Management Plan).  Email from NPWS dated 03/02/2023 Comments - Revised Natural Hazard Management Plan (further comments)  NHMP_BMP Comments Register.	A non-compliance with this requirement was raised at the previous audit. It was followed up and closed by Snowy Hydro in Nov 2022  Email from NPWS Jan 2023 notes that feedback was sought and obtained from two local Emergency Management Committees and Rural Fire Service Districts in relation to the revised Natural Hazard Management Plan. NPWS has also reviewed the NHMP with regards to previous comments register and agency feedback.. Comments were embedded in the attached comments register.  The email from NPWS provides and updated NHMP with agency comments and suggesting Integration with the PIRMP.  Comments in the NHMP Table include requirements for the updates to the Plan, and other related to compliance to the Plan. Responses acknowledge the comments regarding compliance to the Plans. .	Compliant

ID	S3 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS EMERGENCY</b>			
321.		App A; 5.1	<p><b>Maintenance of Asset Protection Zones and Vegetation Management</b></p> <p>From the commencement of the works and for every bushfire season throughout the project duration, the PIC or delegate must maintain the following asset protection zones (APZ):</p> <ul style="list-style-type: none"> <li>– A 20m radius APZ from the external wall and/or part of the Refuge Assembly Area buildings (once constructed) and occupied accommodation buildings;</li> <li>– A 10m APZ around: <ul style="list-style-type: none"> <li>o The external side of each Refuge Assembly Area perimeter Colorbond fence;</li> <li>o All diesel generators;</li> <li>o Non-accommodation buildings;</li> <li>o All other site infrastructure;</li> </ul> </li> <li>– A 25m radius APZ around any buildings in the vicinity of high voltage transmission lines. Buildings at these areas are to be located &gt; 25m from the nearest transmission line due to potential electrical hazards (see section 6).</li> </ul> <p>The siting of liquid fuel and explosive storage areas will maximise the distance from bushfire prone vegetation and will not be located within a 20m radius of retained vegetation or within the nominated asset protection zones for other infrastructure as detailed above.</p>	<p>Site Inspection</p> <p>Interview with ERT captain at Lobs Hole</p>	<p>At the time of the audit, it was winter, there had been a considerable period of heavy rain and snow, and the bushfire risk was low.</p> <p>The site inspection found that generally APZs were maintained around the accommodation camps, generators and site buildings. Interviews with ERT member at Lobs Hole also provided information supporting that APZs were maintained (but low risk at time of the audit)</p>	Compliant

**TABLE G – SCHEDULE 4 – Environmental Management, Reporting and Auditing**

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
322.	1		<b>Environmental Management Strategy</b> Prior to the commencement of the development of the Main Works, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary.  This strategy must:	Environmental Management Strategy (Rev I, 11/08/2020)  Environmental Management Strategy Rev J 20/02/2023 - updated to include emergency works and surrender of Exploratory Works Approval - submitted to DPE.	The originally approved version of the EMS was assessed as compliant at previous audits.	Compliant
323.	1 (a)		a) provide the strategic framework for the environmental management of the development;			
324.	1 (b)		b) identify the statutory approvals that apply to the development;			
325.	1 (c)		c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; and			
326.	1 (d)		d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>– keep the local community and relevant agencies informed about the progress of the development;</li> <li>– receive, handle, respond to, and record complaints;</li> <li>– resolve any disputes that may arise during the development;</li> <li>– respond to incidents and/or non-compliances; and</li> <li>– respond to any emergency.</li> </ul>			
327.	2		The Proponent must implement the approved Environmental Management Strategy.		Elements of the EMS were sampled during this audit to verify compliance with this condition. These elements are listed below:	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
			<b>ENVIRONMENTAL MANAGEMENT STRATEGY</b>			
328.		8.5	<p><b>Non-conformance, Corrective and Preventative Action</b></p> <p>Where a non-conformance has been identified, a correction action /preventative action will be developed and implemented to minimise the potential for recurrence. In the event of a non-conformance the following will occur:</p> <ul style="list-style-type: none"> <li>• the nature of the event will be investigated;</li> <li>• advice may be sought from a specialist;</li> <li>• monitoring may be undertaken;</li> <li>• the effectiveness or need for new/additional controls will be reviewed;</li> <li>• an appropriate preventative and corrective action will be implemented;</li> <li>• environmental documentation will be reviewed and revised; and</li> <li>• the activities may be stopped, if necessary, by the Future Generation Environmental Manager in consultation with the Project Director and Project HSE Manager.</li> </ul> <p>Corrective actions may be generated from a number of sources, including but not limited to incidents, audits, inspections and management reviews. Corrective actions will be systematically managed to ensure issues raised are recorded and closed out in a timely manner.</p> <p>Corrective/preventative actions will be entered into Future Generation's quality system database and include details of the issue raised, the action required, and timing and responsibilities. The close out details shall include the date closed and the name of the person verifying completion of the required action.</p> <p>DPE comment: Incident and non-compliances (how, who and when they are being reported in accordance with CoA)</p>	<p>FGJV Event and Incident Register IEA Action Plan - populated by SHL detailing corrective actions taken since the last audit.</p> <p>INC 2396 - Dilute leachate leaving PSE area Investigation from incident 30/01/2023. Report included sequence of events, actions required to address the issue (Part C), corrective actions including finish pond / shotcrete basin, divert underfill drains, comprehensive lab results, install standpipe, define long-term treatment plan for leachate at WTP, define criteria for changing the classification of water from leachate.</p> <p>INC 2413 - Standpipe left on - Lickhole Gully 2/2/23. in-situ and comprehensive sampling of the leachate basin, sump, upstream and downstream locations. Preventive / corrective actions were documented.</p>	<p>The systems in place to address the findings of previous IEAs has improved significantly. This was previously assessed as non-compliant.</p> <p>Whilst there have been improvements noted, incidences of failure of Wheel Wash facilities have been identified both internally and externally. During the site inspection, the wheel wash at Marica did not operate when the vehicle the auditor was travelling in passed through the wheel wash. Failures have also been observed during previous IEAs and regulator visits.</p> <p>A review of incident reports and investigations generally found that the causes are investigated and corrective actions are documented. The examples sighted included reasonable investigation of effectiveness and appropriate corrective / preventive action.</p> <p>Whilst there have been 2 incidents reported internally in the Event and Incident Register, over the past 12 months the actual incidence may be under-reported given the frequency of failures identified by external bodies.</p> <p>The Incident reporting procedures (including draft Guideline Document to improve external incident classification and reporting) are not clear on any triggers for external reporting / notification of wheel wash failures, or other process failures designed to prevent weed and pathogen spread.</p> <p>It was advised by the FGJV Environmental Manager that as a result of the incident INC 2387 in Jan 2023, if the wheel wash wasn't working for 24 hours, it would be reported, however this is not documented.</p> <p>The effectiveness of actions carried out following non-compliances was flagged as a focus area by NPWS and DPE.</p>	Compliant OBS

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status						
			ENVIRONMENTAL MANAGEMENT									
329.		2.8	Works within the Construction Envelope	S2-FGJV-ENV-LST Master Tracker Clearing Register last updated 13/06/2023 WebGIS (live system) Interviews with SHL and FGJV representatives Clearing permits (refer to Biodiversity tables)	The Master tracker indicates that the total disturbance area was 84% of the projected Disturbance area of 531 ha (446 ha) and is therefore currently compliant to the first requirement.  The Master tracker shows that the native vegetation disturbance area was 90% of the predicted total disturbance area of 478 ha (430 ha) and is therefore compliant with the second requirement. At the time of the audit, the majority of clearing had been completed with only 2-3 areas remaining to be cleared.  GIS - visual system - can click and draw on various layers - cross checks are conducted between database and GIS. GIS is main process for checking clearing boundary. See document sent. GF01 included in figures.  Every drawing has an EIS boundary in bold red lines. Construction footprint - built in buffer to allow minor errors.  Designs are reviewed internally at FG and then reviewed by SHL.  Clearing permits are issued based on the design - must be (with minor exceptions) on Issued for Construction drawings. - minor exceptions need to be approved by Enviro Manager. It is estimated that there are around 300 clearing permits. Pre-clearing permits part of the process.  It was discussed that although the project team are confident that there will be no exceedances of areas cleared, they still aim to minimise all clearing.  Monthly aerial photography in active areas - maps show cleared areas.	Compliant						
			The precise location of the disturbance area will be fixed within the construction envelope following final design. All vegetation clearing which occurs on the project will be monitored regularly to record the extent of clearing which has occurred, and to ensure that the clearing limits are not exceeded.  <table><caption>Table 2-3: Maximum disturbance area and native vegetation clearing</caption><thead><tr><th>Matter</th><th>Exploratory Works</th><th>Main Works</th><th>Total</th></tr></thead><tbody><tr><td>Maximum Disturbance Area</td><td>126 ha</td><td>504 ha</td><td>630 ha</td></tr><tr><td>Maximum Native Vegetation Clearing</td><td>107 ha</td><td>425 ha</td><td>532 ha</td></tr></tbody></table>				Matter	Exploratory Works	Main Works	Total	Maximum Disturbance Area	126 ha
Matter	Exploratory Works	Main Works	Total									
Maximum Disturbance Area	126 ha	504 ha	630 ha									
Maximum Native Vegetation Clearing	107 ha	425 ha	532 ha									

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
330.		4.1.8	<p><b>Progressive Erosion and Sediment Control Plans</b></p> <p>Progressive erosion and sediment control plans (ESCPs) are to be developed and will show the site layout and approximate location of erosion and sediment control structures on site. They will be developed for all work areas prior to commencing activities and will be updated as changes occur on site.</p> <p>ESCPs will be regularly reviewed as site conditions change and flow paths are altered.</p>	<p>Main Yard ESCP Rev G 5/4/2023</p> <p>ESCP - Main Camp Rev F</p> <p>Tantangara Spoil Road ESCP Rev E;</p> <p>Talbingo Intake ESCP Rev D</p> <p>GF01 PESCP Rev B</p> <p>Upstream Surge Shaft PESCP 01/09/2021</p> <p>Explosives Main Yard ESCP Rev Quarry Trail Road AR03 ESCP Rev I</p> <p>TS01 Marica Horizontal Directional Drilling PESCP Rev C</p> <p>Marica Road PESCP Rev I</p>	<p>Erosion and sediment control specialists SEEC prepares the ESCPs and PESCP and these are reviewed on site</p> <p>It was advised that SHL person will be engaged to undertake do independent reviews of the FGJV performance on implementation of the ESCPs.</p> <p>Also refer to Surface Water section of the audit tables</p>	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
331.		5.1	<b>Site Induction</b> All personnel (including sub-contractors) will be required to attend a compulsory site induction that includes an environmental component prior to commencement on site.	Environmental Awareness Training / onboarding Presentation 22/02/2023  Signed sign-on sheets - Environmental Awareness - Tantangara 29/03/23, 30/03/23, 2/4/23, 3/4/23, 4/3/23  HSE Site Induction presentation	Recently updated induction The same induction material is used to refresh employees and contractors in toolbox talks - rotate between different topics - including - incident reporting, fauna strike, spill prevention, waste management, plastic bottle recycling - see evidence folder. Chemical awareness is an online course - as part of induction process - 2000 people have completed it.  Training - chemical awareness (e.g. dewatering team), snake handling, water management, dewatering training - (PowerPoint presentation) - dewatering permits, ERSED controls, water pollution and fines etc).  Snowy did chemical audit late last year. - check dates with Ben  Environmental Awareness Package - Gooandra Trail - more specific - relating to boundary, housekeeping and storage.	Compliant
332.		5.3	<b>Toolbox Talks and Environmental Awareness</b> Toolbox talks, environmental awareness training and construction methodology briefings will be delivered by Future Generation as necessary to achieve a suitable level of workforce awareness and competence appropriate to the activities.  Toolbox talks will be tailored to specific environmental issues relevant to upcoming works or previous incidents and will include general and specific discussion of the key environmental aspects of the project.	Dewatering training PowerPoint presentation (concrete washout) - Attendance records - Marica 13/03/23, 1/8/22, 6/8/22  Environmental Awareness Training - Gooandra, Nungar and Tantangara Trunkline Services. Training attendance records - 12/09/2022  Dewatering Training - training package for dewatering of sediment basins. Training records - Tantangara 23/08/22, 05/09/22, 21/05/22, 22/01/23, 23/01/23  Interdepartmental Site Overview Register (environmental training attendance / activities / learnings - Lobs Hole, Tantangara, Talbingo Intake Snake Handling, snake relocation and control course register. Chemical handling competency list - training completed 2022 and 2023 Treated Effluent re-use training record 07/04/22, 22/01/23,	Various records and presentation documents were sighted for general and specific environmental training requirements.  It was noted that whilst chemical handling training is conducted, the site inspection found a number of issues regarding chemical storage. FGJV need to revisit the training and the target audience to ensure the appropriate personnel are trained (e.g. - Water treatment plant personnel) - Refer to non-compliance - Sch 3 Condition 30(p)	Compliant



ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
333.			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.			
334.		5.4	<b>Daily Pre-start meetings</b> Daily pre-starts will be conducted by the Future Generation Supervisors prior to the start of work each day to inform workers of key safety, environmental and activity coordination considerations, and other information that may be relevant in the performance of the day's work. Records of pre-starts meetings will be maintained and be available on site	Pre-start folder Prestart record Lobs Hole 10/09/22, 28/12/22, 30/04/23 - signed	Signed random pre-starts at MAT Portal - discussed desilting basins, maintenance works and traffic control restrictions. Signed by participants	Compliant
335.		6.1.2	<b>Community communication</b> Communication tools which will be used by the project to inform stakeholders and the community will include: <ul style="list-style-type: none"> <li>• notifications of construction activities;</li> <li>• written correspondence (letters / emails);</li> <li>• advertisements (as required);</li> <li>• fact sheets;</li> <li>• newsletters (as required);</li> <li>• meetings / doorknocks;</li> <li>• targeted presentations (as required);</li> <li>• the project website; and</li> <li>• enquiries and complaints line.</li> </ul> Relevant information which is required by Snowy Hydro for communications activities (such as for notifications, fact sheets, maintaining the website etc) will be provided by Future Generation.	Interview with the FGJV Community and Stakeholder Engagement Manager	<p>There are five (5) persons in the Community and Stakeholder Team and 3 have an external interface and there are internal interfaces with the Traffic and Transport department.</p> <p>Notifications is one of the main communication methods - via email. Around 1000 people are signed up to the notification system to date. Anyone can subscribe through the FGJV website.</p> <p>FGJV publish regular advertisements on the website and on the local newspapers, for example, regarding oversize loads, disruptions, and road safety campaigns.</p> <p>FGJV also participate in public forums - twice a year with evening meetings Q&amp;A - in Cooma, Adaminaby, Talbingo, Tumut and Tumbarumba. Presentation are made and an opportunity to ask questions is provided - various reps from FGJV attend to answer questions.</p> <p>Consultation with Aboriginal Groups - see Heritage tables</p>	Compliant
336.		6.2	<b>Complaint Management</b>  A complaints management system including the complaints register will be maintained by Snowy Hydro and Future Generation.	<p>Interview with the FGJV Community and Stakeholder Engagement Manager</p> <p>Darzin (complaints management system) - primarily used for complaints and concerns.</p>	<p>A complaints management system continues to be maintained (previously assessed as compliant).</p> <p>Snowy Hydro maintain the complaints register. Complaints included as part of weekly dashboard and area also reported in the Monthly Reports. There have not been many complaints recorded, with most related</p>	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
			<p>The complaints management system will include a process to manage complaints including receiving, recording, tracking and responding to complaints within a defined timeframe. If a complaint cannot be responded to immediately, a follow up phone call or verbal response will be made to the complainant in accordance with the timeframes detailed below.</p> <p>The key processes involved in recording complaints and enquiries are as follows:</p> <ul style="list-style-type: none"> <li>– all enquiries / complaints will be recorded in a complaints register;</li> <li>– complaints received for the duration of the project will be acknowledged verbally within 2 hours from the time of complaint unless the complainant agrees otherwise. Any received out of hours will be responded to on the next working day;</li> <li>– complaints received via email will be acknowledged within 24 hours;</li> <li>– complaints received via letters will be acknowledged within 5 days of receipt. Where a phone number or email address is supplied, a response will be provided within 24 hours.</li> </ul>		<p>to traffic and transport.</p> <p>The Weekly dashboard is compiled by FGJV from emails, phone records, meeting records etc and is added into an excel spreadsheet and forwarded to Snowy Hydro.</p>	
337.		7.2.1	<p><b>Incident Reporting in accordance with the Infrastructure Approval</b></p> <p>Future Generation will immediately notify Snowy Hydro of an incident which arises through the Infrastructure Approval. The notification will set out the location and nature of the incident. Snowy Hydro will then notify DPIE and NPWS, via the NSW Major Projects portal, immediately after becoming aware of an incident on site.</p> <p>Incidents are defined in the Infrastructure Approval as being <i>'An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.'</i></p>	Incident Reports and Investigations (many) - see Sch 4 Cond 6(a) for detail	FGJV provide incident reports to Snowy Hydro, and Snowy Hydro are required to submit notifiable incidents to the appropriate authorities. Refer to Sch 4 Cond 6a for details (non-compliant)	Non-compliant
		8.1	<b>Environmental Inspections</b>			Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
338.			<p>The effectiveness of environmental protection measures described in this EMS and management plans will be inspected and assessed on a <b>weekly</b> basis through the use of a weekly checklist.</p> <p>The findings of inspections will be discussed at toolbox meetings and concerns raised will be considered by the Future Generation project management team for review or improvement of the environment procedures.</p> <p>In addition to the weekly inspections, the Future Generation environmental staff and Snowy Hydro environment staff will jointly undertake regular inspections of work sites, and in particular critical activities throughout construction of the project. Stakeholders such as DPIE, NPWS and EPA will be invited to attend relevant inspections.</p>	<p>Site Inspection as part of audit</p> <p>Interviews with Environmental coordinators</p> <p>Weekly environmental inspections - FGJV</p> <p>During / Post rainfall inspections - 10/06/23 13/06/23; 22/06/23 (Tantangara - during)</p> <p>Pre-rainfall inspection checklists Tantangara- 19/05/23, 06/06/23</p> <p>Weekly (general) environmental inspection (on Borealis) 08/01/23 - Tantangara</p> <p>Weekly (general) environmental inspection (on Borealis) Marica / Gooandra Trail - 25/11/23, 10/02/23, 15/05/23; 24/03/23, 28/04/23, 10/5/23 (hand written)</p> <p>Corrective Action Register (each site)</p>	<p>Various inspection programs are in place: FGJV undertake weekly, before and during rain, and post rainfall inspections.</p> <p>Inspection program by SHL - undertake a joint site inspection weekly with FGJV and the report is sent to FGJV for action via Aconex.</p> <p>Joint agency inspections are undertaken monthly with DPE, NPWS and EPA - Snowy prepare the minutes, and any actions are communicated to FGJV through the minutes.</p> <p>Pre and Post Rainfall inspections are undertaken by the Environmental Coordinator with the area supervisor and focus on surface water.</p> <p>Snowy Hydro is also planning on rolling out an internal audit/inspection for specific areas such as dewatering, workshops etc against specific related conditions.</p> <p>Each site has a corrective action register (Lobs Hole, Tantangara, Marica (covers trunk services) managed by the Environment Department - team controls the close out process. A copy or screen shot is sent out to site to relevant supervisors for review and actions.</p>	
339.	3		<p><b>Staging and Updating of Strategies, Plans or Programs</b></p> <p>With the agreement of the Planning Secretary, the Proponent may submit any strategy, plan or program required under this approval on a staged basis. The Proponent may also submit updates to approved strategies, plans or programs at any time.</p> <p>With the agreement of the Planning Secretary, the Proponent may prepare the staged or updated strategy, plan or program without undertaking all the consultation required under the applicable condition in this approval.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>While any strategy, plan or program may be submitted on a progressive basis, the Proponent will need to ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times.</li> </ul>	<p>EMS updated - needed to work outside the boundary - emergency situation relating to the sinkhole.</p>	<p>The Spoil Management Plan has been staged. Since the last audit, further appendices for permanent emplacement areas have been added. Spoil operations did not commence at GF01 or Tantangara (commenced since last audit) until the Appendices had been approved.</p> <p>The Rehabilitation Plan has not yet been submitted or approved, however will also be staged. The staging was included in the draft Rehabilitation Plan.</p>	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
			<p>– 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.</p>			

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
340.	4		<p><b>Update of Strategies, Plans or Programs</b></p> <p>Within 3 months of the following, unless the Planning Secretary agrees otherwise, the Proponent must review and (if necessary) update the approved strategies, plans and programs for the development to the satisfaction of the Planning Secretary:</p>	<p>FGJV Approvals Register - provides current status of all management plans</p> <p>Status of Management Plans:  EMS - Rev J - revised to include emergency works  10/02/23, Rev K - revised to address NPWS comments  14/03/23, comments received by DPE 13/07/23, currently drafting Rev L;</p> <p>Biodiversity Management Plan and sub-plans / appendices - internal review after 6 month audit  <b>REQUIRES REVIEW</b></p> <p>Water Management Plan (including Surface and Groundwater MPs) Reviewed for currency and to update prior to in-reservoir placement of spoil Rev H Sept 2022, comments from SHL incorporated, - Rev I issued to Agencies 14/02/2023</p> <p>Heritage Management Plan - Rev G - reviewed following 6 and 12 month audits and on 24/03/23 - reviewed for currency with no updates required at this time.</p> <p>Transport Management Plan (and associate sub-plans)  Rev H - updated to address audit findings Nov 2022, issued to SHL for comment, updated to address SHL comments 10/01/23, Issued to agencies 9/01/23, updated to address agency comments - under internal review 2/03/23;</p> <p>Spoil Management Plan Rev I - updated to address DPE comments - approved 27 June 2022, Further updated to include Tantangara SMP, address DPE comments on GF01 - approved 26 Aug 2022, Further updated to address DPE comments on Tantangara MP - approved 13/9/22;</p>	<p>The status of the currently approved management plans was reviewed in detail (as per evidence assessed column). Whilst the Management Plans have not necessarily been reviewed within 3 months of each of the triggers (incident, IEA report), there is evidence of the review and where required, revision of plans.</p> <p>It is considered by the auditor that the 3 month time frame to review and if necessary, revise each approved management plan following each incident, and following each of the 6 monthly IEAs is quite onerous for a project on the scale and complexity of Snowy 2.0. In particular, it would be very challenging to submit the revised Management Plans to DPE within 3 months due to the requirement to consult with various other agencies prior to submission.</p> <p>Despite the above, it is considered that the majority of the Management Plans have been internally reviewed as necessary, however the Biodiversity Management Plan now requires review (not formally reviewed internally since the first 6 monthly IEA) and potentially be updated following this IEA. In addition, the Natural Hazards Management Plan has been revised and comments provided by NPWS however this Plan now needs to be formally submitted for approval.</p> <p>In light of the above, an Observation has been raised against this condition to ensure that going forward, the Management Plans that have not been reviewed or revised since the first IEA are now scheduled for internal review.</p>	Compliant OBS
341.	4 (a)		a) the submission of an incident report under condition 6 below;			
342.	4 (b)		b) the submission of an independent environmental audit report under condition 10 below; and	Spoil Management Plan Appendices - Spoil Characterisation, NOA, AMD, GF01, Ravine Bay - Various reviews since Jan 2022, updated to address various agency comments, approved June to Aug 2022		
343.	4 (c)		c) any modification to the conditions of this approval; or	Construction Noise Management Plan - Rock Forest - Rev F - updated to reflect updated noise assessment, Rev G - updated to include public reporting (19/5/22), Rev H and I - revised to updated additional information requested by DPE Oct and Dec 2022, Approved 31/03/23;		

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
				Natural Hazard Management Plan (incorporating Bushfire Management Plan) - Rev G - revised to bring plans up to currency and address FGJV and NPWS comments 25/11/22, Rev H & I - revised to include SHL comments, 11 & 16/11/22 Rev J - revised to incorporate Agency comments and improvements on site (currently drafting - not yet issued to agencies for approval) SHOULD BE ISSUED TO AGENCIES FOR APPROVAL ASAP.		
344.	4 (d)		d) a direction of the Planning Secretary under condition 4 of schedule 2.  <i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i>	Letter from DPE to Snowy Hydro - Snowy 2.0 – Main Works CSSI 9687 Environment Management Strategy ("Direction") dated 13 January 2023  Letter from SHL to DPE dated 28 February 2023 requesting an extension to submit the EMS  Letter from DPE to Snowy Hydro Subject: Extension Request to submit Environmental Management Strategy (EMS) dated 28/02/2023 granting an extension until 24 March 2023	The DPE letter dated 13/01/2023 directs SHL to undertake a review of, and update, the Environmental Management Strategy (EMS) in consultation with DPE, NSW Fisheries and Water NSW expanding the definition of what is an emergency and clarification of incidents associated with the Project. The updated EMS is to be submitted to the Planning Secretary, via the Major Projects Portal, for approval by no later than 28 February 2023.  The DPE letter dated 28/02/2023 granted and extension to 24 March 2023 noting that the EMS amendments are still under consultation with the other external agencies for their review and comments. The EMS was submitted to DPE on 24 March 2023. DPE provided comments back on 13 July 2023 and the EMS was currently being updated to address the comments at the time of the audit..	Compliant
					Noted	Compliant
345.	5		<b>Monitoring</b>  The Proponent may undertake monitoring outside the construction envelope of the development provided this monitoring is required under the conditions of this approval and authorised under an approved management plan.	There are some monitoring sites outside the construction envelope - detailed in the BMP.	Assessed as compliant at Audit #1 for commencement (one-off requirement)	Compliant Compliant
	6		<b>REPORTING</b>			Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
346.			<b>Notification of Dates</b> At least 1 week prior to the relevant notification date, the Proponent must notify the Department, NPWS and NSW DPI via the Major Projects Portal of the date of the:		Assessed as compliant at Audit #1 for commencement (one-off requirement) Commencement of road upgrades was assessed at Audit #1. Road upgrades were in progress at the time of the audit and have not been completed, therefore this condition is not triggered.	Not triggered
	6 (a)		a) commencement of the development of the Main Works;			
	6 (b)		b) commencement of development on the following sites under this approval: <ul style="list-style-type: none"> <li>– Marica site;</li> <li>– Plateau site;</li> <li>– Tantangara site; and</li> <li>– Rock Forest site;</li> </ul>			



ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
347.	6 (c)		c) commencement and completion of the required road upgrades;		The commencement of construction was notified and reported on at Audit#1. Construction is ongoing, therefore this condition is not triggered at this audit.	Not triggered
	6 (d)		d) commencement and completion of construction;		The power station has not yet been constructed, therefore this condition is not triggered.	Not triggered
	6 (e – k)		e) commencement of commissioning and testing the power station; f) completion of the initial rehabilitation of the site following construction; g) completion of the ecological rehabilitation of the site, apart from the areas used for operations; h) commencement and completion of operations; i) commencement of decommissioning the development; j) completion of the final rehabilitation of the site; and k) completion of the ecological rehabilitation of the areas used for operations.		The power station has not yet been constructed, therefore this condition is not triggered.	Not triggered Non-compliant

348.	6 (a)	<p><b>Incident Reporting</b></p> <p>The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.</p>	<p>INC 1379 - 1/4/22 - Process water release to sediment basin. 570,000 l of turbid water reaching the basin (70% of capacity).;</p> <p>INC 1533 - 29/05/22 - Vehicle failure to wheel wash;</p> <p>INC 1598 - 16/6/22 - Sediment Plume within the Yarrangobilly River – plume was traced back to Yard 4 Main Yard Lobs Hole. PIN issued;</p> <p>INC 1641 - 28/06/22 - Sediment falling into reservoir outside of silt curtain – Talbingo Adit (notified late on 7/7/22)</p> <p>INC 1805: - 24/08/22 - Water leaving main yard boundary;</p> <p>INC 2001: - 17/10/22 - Uncontrolled Release of drill fluid. Actions taken to prevent entry of 3m/3 to Eucumbene River (none reached river;</p> <p>INC 2017 - 17/10/22 - Slurry outside CG boundary Spoil Road (approx. 10 litre);</p> <p>INC 2172 - 2/12/22 - Sediment basin overtopping – reached Yarrangobilly River– 12mm rain, design capacity 21.8 External notification section – EPA 3/12/22. Basins maintenance schedule developed;</p> <p>INC 2221: - 14/12/22 - Bentonite spill – Dip Creek – approx. 100 litres.</p> <p>INC 2387: - 28/01/23 - Wheel wash failure – had not been working for 2 days (no notification sighted):</p> <p>INC 2396: - 30/01/23 -Diluted leachate leaving PSE area (notified):</p> <p>INC 2413: - 2/2/23 - Standpipe left turned on - sump had water flowing out of the spillway and was reaching Yarrangobilly River (notified);</p> <p>INC 2639: - 8/4/23 - Basin overtopping. TARP triggered, sampling occurred – approx. 1700 litres. (notified):</p> <p>INC 2660 -12/4/23 - Disturbance outside site boundary – watercart went off track (MAAS) (no notification sighted)</p>	<p>Adequate evidence was not provided to demonstrate that all incidents are reported to the appropriate authority with required timeframes.</p> <p>Various incident reports were reviewed in detail, and found that whilst nine of the reports reviewed were verified as having been notified to the relevant agencies, two could not be verified as notified (INC 2660 -disturbance outside the boundary and 2935 – sediment laden water to creek), one was notified late (INC 1641), and it was not clear whether some of the other incidents required notification under the current definitions (e.g. wheel wash failure for 2 days (INC 2387), and treated water tank overflow (INC 2390) and sink hole formation at Tantangara (n INC number or formal report)</p> <p>There were inconsistencies between the information provided in the FGJV Event and Incident Register; the notification requirements / status documented within the Incident / Investigation reports and the actual incidents notified to the agencies.</p> <p>It was noted that the Environmental Management Strategy EMS) has been revised and updated in response to a direction from DPE, which provides greater clarity on reporting of incidents / non-compliances, however is not yet approved or implemented.</p> <p>It is not clear whether there have been any incidents which have triggered a notification to DAWE / DCCEEW. See OBS No ???2</p>	Non-compliant
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349.	6a cont'd			<p>NC 2724: - 3/5/23 - Dirty water left site via drain. Visible sediment plume in Talbingo reservoir. FGJV and SHL deemed this as a non-reportable incident, however, will be installing further methods to mitigate sediment travelling to Yarrangobilly River.</p> <p>INC 2832 - 4/6/23 -HV vehicle track outside the EIS boundary (notified):</p> <p>INC 2877 - 17/07/23 -HV vehicle track outside the EIS boundary. Works along Gooandra trail ceased (notified);</p> <p>INC 2935 - 30/06/23 - Sediment laden water to creek – infiltrating the clean water drain and reporting into the Eucumbene River.</p>	Some of the incidents not notified would also be classified as non-compliances (wheel wash failure - INC 2387) and disturbance outside the boundary INC 2660)	
350.	7		<p><b>Reporting Non-compliances</b></p> <p>Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department via the Major Projects portal of the non-compliance. This notice must set out the non-compliance, the reasons for the non-compliance (if known) and what actions have been taken, or will be taken, to address the non-compliance.</p>	See evidence above	<p>Some of the incidents not notified would also be classified as non-compliances (wheel wash failure - INC 2387) and disturbance outside the boundary INC 2660)</p> <p>Six (6) monthly Spoil specific reports have not been provided on the Project website as required by Table 9-4 of the Spoil Management Plan, however some have been developed by FGJV.</p> <p>Detailed Quarterly Spoil Monitoring Reports are prepared to satisfy the reporting requirements of the Environmental Protection Licence 21266 (5 October 2022), Condition R4.5. The EPL does not require the Spoil Monitoring Reports to be made publicly available.</p> <p>The quarterly reports provide detailed information relating to the location, quantities and characteristics of the spoil generated and emplaced, which may not be appropriate for provision on a public website.</p> <p>Annual Reports addressing the biodiversity matters listed in Section 6.5 of the Biodiversity Management Plan (BMP) and in Appendix F of the BMP had also not been completed / undertaken. Refer to Sch 3 Cond 19 non-compliance</p>	Non-compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
351.	8		<b>Reporting on Environmental Performance</b> The Proponent must provide regular reporting on the environmental performance of the development on its website in accordance with the requirements in any approved strategies, plans or programs.	6 Monthly Spoil Report August 2021-Jan 2022 Rev A Jan 2023 (Word - track changes version) (not on website)  EPL Water Monitoring Results 2022 and 2023  Quarterly Environmental Monitoring Reports - EPL 21266 ( 5 reports - Dec- Feb 2022; Mar to May 2022; June to Aug 2022; Sept to Nov 2022; Dec 2022 to Feb 2023);  Bi-Annual EPL Monitoring Reports - Dec to May 2022';June to Nov 2022; Dec 2022 to May 2023.  Biodiversity Monitoring Program Year 1 - 2020 to 2022 and Year 2 - 2021 to 2022;  Annual Mortality Monitoring Report 2021 to 2022;  Lobs Hole Road Fauna Underpass Monitoring Results - April to Sept 2022 and Sept to Dec 2022;  Fauna Camera Review 17 Mar to 1 April 2023  Quarterly Vehicle Movement Reports (6 reports from Jan 2022 to June 2023;  A Post fire Geomorphic Assessment of Tributary Streams at Lobs Hole;	Six (6) monthly Spoil specific reports have not been provided on the Project website as required by Table 9-4 of the Spoil Management Plan, however some have been developed by FGJV.  Detailed Quarterly Spoil Monitoring Reports are prepared to satisfy the reporting requirements of the Environmental Protection Licence 21266 (5 October 2022), Condition R4.5. The EPL does not require the Spoil Monitoring Reports to be made publicly available.  The quarterly reports provide detailed information relating to the location, quantities and characteristics of the spoil generated and emplaced, which may not be appropriate for provision on a public website.  Annual Reports addressing the biodiversity matters listed in Section 6.5 of the Biodiversity Management Plan (BMP) and in Appendix F of the BMP had also not been completed / undertaken. Refer to Sch 3 Cond 19 non-compliance. The IEA audits are being conducted at a higher frequency than required by this Condition. Due to the complex nature of the project, Snowy Hydro determined that the IEAs should be undertaken at a higher frequency, and an initial audit program was developed and approved by DPE (previously DPIE), and Audits 1, 2 and 3 were delivered under that program. A further program was developed following the Annual Audit in 2022 as it was found that the frequency of 6 monthly was too high. A revised Audit Program was approved by DPE to conduct IEAs every 18 months going forward unless otherwise revised.  This audit was the first IEA under the new program and was undertaken within the program timeframes.	Non-compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
352.	9		<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>  Within one year of the commencement of construction, and every 3 years thereafter unless the Planning Secretary agrees or directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:	Independent Environmental Audit Report (Initial)– Snowy 2.0 January 2021 (issued 9 April 2021);  Independent Environmental Audit Report # 2 (Interim) - Snowy 2.0 July 2021 (issued Sept 2021)  Independent Environmental Audit Report # 3 (Annual - Snowy 2.0 February 2022 (issued May 2022)  Independent Environmental Audit Report # 4 (Annual - Snowy 2.0 July 2023 (issued May 2022) (This audit)	The IEA audits are being conducted at a higher frequency than required by this Condition. Due to the complex nature of the project, Snowy Hydro determined that the IEAs should be undertaken at a higher frequency, and an initial audit program was developed and approved by DPE (previously DPIE), and Audits 1, 2 and 3 were delivered under that program. A further program was developed following the Annual Audit in 2022 as it was found that the frequency of 6 monthly was too high. A revised Audit Program was approved by DPE to conduct IEAs every 18 months going forward unless otherwise revised.  This audit was the first IEA under the new program and was undertaken within the program timeframes.  The audit was conducted by Julie Dickson (an Exemplar Global qualified Lead /Master Auditor) of Dickson Environmental Consulting and Audit.  Julie Dickson was approved by DPE as the Independent Environmental Auditor on 13 April 2023  A copy of the approval letter is included in Appendix E of the IEA Report.	Compliant
353.	9 (a)		a) be conducted by a suitably qualified, experienced and independent team of experts, including a lead auditor, whose appointment has been endorsed by the Planning Secretary;		The consultation process and summary of consultation with the relevant agencies is included in Section 2.3 and detailed responses to specific agency concerns are included in Appendix B of this report.	Compliant
354.	9 (b)		b) include consultation with the relevant agencies;	Section 2.3 and Appendix B of this Report – Consultation with Agencies	Environmental performance is reflected in the audit findings, recommendations and various sections of this report.	Compliant
355.	9 (c)		c) assess the environmental performance of the development and whether it is complying with the requirements in this approval (including the requirements of any approved strategy, plan or program);	This report – including findings table with actions and recommendations	The adequacy of the majority of approved strategies, plans and programs was assessed at Audit #1, and the Noise Management Plan – Rock Forest was assessed for adequacy at Audit #2.  Management Plans revised since the last audit were reviewed for adequacy. At this audit, the revised Environmental Management Strategy was reviewed and findings were raised regarding the adequacy of the Incident and non-compliance guideline.	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
356.	9 (d)		d) review the adequacy of the approved strategies, plans or programs for the development; and	This report – including findings table with actions and recommendations	This report provides recommended / agreed actions to improve the environmental performance of the development.	Compliant
357.	9 (e)		e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any approved strategies, plans or programs.	This report – including findings table with actions and recommendations	IEA #3 Audit report provided to DPIE shortly after the issue of the report by the auditor in May 2022.	Compliant
358.	10 (a)		Within 12 weeks of commissioning this audit, unless the Planning Secretary agrees otherwise, the Proponent must submit the following via the Major Projects Portal:		Report was submitted to DPE shortly after it was provided to Snowy Hydro	Compliant
			a) a copy of the audit report;		Responses to the recommendation is the report were included in the Action Plan. Snowy Hydro has provided updates on status since the issue of the IEA report.	
359.	10 (b)		b) its response to the recommendations in the audit report; and	Letter to DPE from Snowy Hydro dated 12 Dec 2022 Infrastructure Approval No. SSI 9687 – IEA #2 & 3 non-compliance and Action plan update	The Action Plan was prepared as a separate document for use by Snowy Hydro. The main action plan was included in the IEA Report (same information however in a format that could be used to track each individual action.)	Compliant
360.	10 (c)		c) a copy of the proposed audit action plan to address the recommendations		<p>The previous audit determined that the project was non-compliant to this condition, and as such, the auditor prepared a separate Action Plan to be used as a tool to systematically address the audit findings at that time.</p> <p>The Action Plan was effectively used as a tool by Snowy Hydro to follow-up and review the status of actions required to be undertaken by FGJV.</p> <p>Whilst all non-compliances and observations had not been fully addressed / closed out, it was noted that there was significant improvement in the processes for addressing the findings and the outcomes. It is therefore determined that the project is now compliant with this condition.</p>	Compliant

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
361.	11		The Proponent must implement any approved audit action plan for the development.	IEA #3 Action Plan - populated with follow-up comments and evidence of actions taken to address IEA # Audit findings.	Following Plans were not on the Snowy Hydro website at the time of the audit, however were on the FGJV website: * Natural Hazards Management Plan (was there in June, but appears to have been removed in July - replaced with Emergency Response Management Plan: * Surface Water Management Plan (Appendix A to Water Management Plan - not attached) * Groundwater Management Plan (Appendix B to Water Management Plan - not attached)	Compliant OBS



ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
362.	12 (a)		<b>ACCESS TO INFORMATION</b> From the commencement of the development of the Main Works until the completion of the ecological rehabilitation of the areas used for operations, the Proponent must: a) make copies of the following information publicly available on its website:		Following Plans were not on the Snowy Hydro website at the time of the audit, however were on the FGJV website: * Natural Hazards Management Plan (was there in June, but appears to have been removed in July - replaced with Emergency Response Management Plan: * Surface Water Management Plan (Appendix A to Water Management Plan - not attached) * Groundwater Management Plan (Appendix B to Water Management Plan - not attached) The documents referred to in the definition of the Exploratory and Main Works were included on the website	Compliant OBS
			* the documents referred to in the definition of the Exploratory Works and Main Works;	<a href="https://www.snowyhydro.com.au/snowy-20/documents/">https://www.snowyhydro.com.au/snowy-20/documents/</a>	Current statutory approvals were included on the website (Main Works approval)	Compliant
			* current statutory approvals for the development;	-	Management Plans were available on both the Snowy Hydro Project website (some were updated, but not approved documents), and on the Future Generation JV website (non-updated / approved documents).  For consistency, the Snowy Hydro website should be designated as the main website that holds all relevant project documentation.  Management Plans that were not necessarily the approved versions on the Snowy Hydro website (but on FGJV website) included:  * Natural Hazards Management Plan * Surface Water Management Plan (Appendix A to Water Management Plan); * Groundwater Management Plan (Appendix B to Water Management Plan; * Transport Management Plan.  It is recommended that:  * To maintain consistency, ensure the approved version of all relevant project documents required under this approval are uploaded to a single Project Website (Snowy Hydro); * Review the need to maintain project documents on both the Snowy Hydro and Future Generation websites. * Assign responsibilities to a person / position (Snowy Hydro) to regularly review website content to ensure all required documents are uploaded and are current (recommend monthly check).	Compliant OBS

ID	S4 - CoA No	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<b>ENVIRONMENTAL MANAGEMENT</b>			
363.			* approved strategies, plans or programs;	<a href="https://www.futuregenerationjv.com.au/">https://www.futuregenerationjv.com.au/</a>	Six (6) monthly Spoil specific reports have not been provided on the Project website as required by Table 9-4 of the Spoil Management Plan	Non-compliant
			* a comprehensive summary of the monitoring results of the development, reported in accordance with the requirements in the conditions of this approval, or any approved strategies, plans and programs;	-	Summary of Complaints was on the website.	Compliant
			* a monthly summary of complaints;	-	Whilst the Incident and Non-compliance Register was uploaded to the website, the latest version was dated 21 February 2023 as at the end of July 2023.  Whilst no timeframe is specified in the CoAs, the incident and Non-compliance Register should be updated in a timelier manner (e.g. - Monthly or quarterly)	Compliant OBS
			* a record of all incidents and non-compliances;	-	The previous 3 IEA Reports were uploaded to the website. The IEA reports included the proponent's response to the recommendations.	Compliant
			* any independent environmental audit, and the Proponent's response to the recommendations in any audit;	-	The approved action plan was included as part of the IEA report. A separate audit action plan has been prepared and is to be used as a tool to address audit actions and report progress to DPE - it is not required to be uploaded to the public website	Compliant
			* any approved audit action plan;	-	No other matters required by the Planning Secretary were flagged by the proponent.	Not triggered
			* any other matter required by the Planning Secretary;	-	As noted in Cond 12 a) Management Plans were available on both the Snowy Hydro Project website (some were updated, but not approved documents), and on the Future Generation JV website (non-updated / approved documents).	Compliant OBS
364.	12 (b)		b) keep this information up to date.		Between the two websites, the information was up-to-date	Compliant

**TABLE H – Environment Protection Licence No 21266 Conditions**

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
	1	<b>Administrative Conditions</b>	The Administrative conditions have not been included in the scope of this audit, as they outline the scheduled activities to which the licence applies and do not have specific compliance obligations. No compliance status has been assigned.		
	2	<b>Discharges to Air and Water and Applications to Land</b>			
	3	<b>Limit Conditions</b>			
	L1	<b>L1 Pollution of waters</b>			
365		L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Review incident register - include review Snowy Register.  FGJV received the PIN. Snowy got Show Cause letter. Was at Main Yard Lobs Hole - no longer viewable.	Water pollution incidents have been recorded over the audit period and reported in the Environment Protection Licence Annual Return. Key incidents included:  Sediment laden water discharged to the Yarrangobilly River 16/06/2022. An Official Caution letter (3504699) was issued by EPA on 29/03/2023;  Surface water discharge at Tantangara Road Nungar Creek 27/09/23. A Show Cause letter was issued by EPA on 19/12/2022, and a \$15k Penalty Notices was issued by EPA on 29/03/2023;  Diluted leachate water mixed with sediment laden water leak from spoil emplacement area at Lobs Hole on 30/01/2023 (Cond O1.1). An Official Caution letter (3505349) was issued by EPA to SHL on 23/05/2023;  Sediment laden water discharged to Gooandra Creek (23/03/23). An Official Caution (3505611) was issued by EPA to SHL 06/06/2023.	Non-compliant

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366.	L2	<b>L2 Concentration limits</b>																																																												
367.	L2.1	L2.1 For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Incident Full Investigation Report INC 2683 21/04/2023  Incident Full Investigation Report INC 2896	<p>An incident was recorded by FGJV in April 2023 where there were elevated levels of total nitrogen were recorded at the Talbingo water treatment plant discharge location (EPL 41) on the same day that discharge had occurred into Talbingo reservoir.</p> <p>FGJV requested the external lab review the results to confirm accuracy (15th March). Results sent to Environmental Manager for review on 2nd April, confirming Total Nitrogen results of 0.79 mg/L above the 90 percentile criteria of 0.35 mg/L. Note that as the EPL does not have a 100 percentile concentration limit for Total Nitrogen, FGJV reported this to prevent reoccurrence and to remain compliant moving forward.</p> <p>Corrective actions to avoid recurrence were documented in the report</p> <p>An incident was recorded on 19/06/2023 by FGJV (notified to EPA on 28/06/2023) noting: <i>"Monthly comprehensive water quality monitoring of treated water (EPL41), taken from the Reverse Osmosis treatment plant at Talbingo during a discharge event has identified water quality not meeting the necessary water quality criteria. However, in situ water quality criteria had been met and assurance provided by the HSE team prior to discharge. Once identified, the FGJV Environmental Manager issued an instruction to immediately cease discharge to Talbingo Reservoir until confirmation could be provided that the water being discharged was meeting the relevant compliance criteria. The water quality parameters that did not meet the requirements throughout the incident period were Ammonia, total Nitrogen, Phosphorus, and Oil and Grease.</i> The investigation report notes that no water has been discharged since June 2023.</p> <p>This incident constitute a breach of the EPL and is therefore non-compliant to this EPL condition. The breach was also notified late to EPA and is therefore non-compliant to the notification requirements.</p>	Non-compliant																																																									
368.	L2.2	L2.2 Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.																																																												
369.	L2.3	L2.3 To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table/s.																																																												
370.	L2.4	<p>L2.4 Water and/or Land Concentration Limits:</p> <p>POINT 41</p> <table border="1"> <thead> <tr> <th>Pollutant</th><th>Units of Measure</th><th>50 Percentile concentration limit</th><th>90 Percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr> </thead> <tbody> <tr> <td>BOD</td><td>milligrams per litre</td><td></td><td>1</td><td></td><td>5</td></tr> <tr> <td>Electrical conductivity</td><td>microsiemens per centimetre</td><td></td><td></td><td></td><td>700</td></tr> <tr> <td>Faecal Coliforms</td><td>colony forming units per 100 millilitres</td><td></td><td>10</td><td></td><td>100</td></tr> <tr> <td>Nitrogen (ammonia)</td><td>milligrams per litre</td><td></td><td>0.2</td><td></td><td>2</td></tr> <tr> <td>Nitrogen (total)</td><td>milligrams per litre</td><td></td><td>0.35</td><td></td><td></td></tr> <tr> <td>Oil and Grease</td><td>milligrams per litre</td><td></td><td>2</td><td></td><td>5</td></tr> <tr> <td>pH</td><td>pH</td><td></td><td></td><td></td><td>6.5-8.5</td></tr> <tr> <td>Phosphorus (total)</td><td>milligrams per litre</td><td></td><td>0.1</td><td></td><td>0.3</td></tr> <tr> <td>Total suspended solids</td><td>milligrams per litre</td><td></td><td>5</td><td></td><td>10</td></tr> </tbody> </table>				Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	BOD	milligrams per litre		1		5	Electrical conductivity	microsiemens per centimetre				700	Faecal Coliforms	colony forming units per 100 millilitres		10		100	Nitrogen (ammonia)	milligrams per litre		0.2		2	Nitrogen (total)	milligrams per litre		0.35			Oil and Grease	milligrams per litre		2		5	pH	pH				6.5-8.5	Phosphorus (total)	milligrams per litre		0.1		0.3	Total suspended solids	milligrams per litre	
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		ENVIRONMENT PROTECTION LICENCE No 21266									
	L3	L3 Volume and mass limits									
371.	L3.1	<div>L3.1 For each discharge point or utilisation area specified below (by a point number), the volume/mass of: a) liquids discharged to water; or; b) solids or liquids applied to the area; must not exceed the volume/mass</div> <table><tr><th>Point</th><th>Unit of Measure</th><th>Volume/Mass Limit</th></tr><tr><td>43</td><td>megalitres per day</td><td>4.32</td></tr></table>	Point	Unit of Measure	Volume/Mass Limit	43	megalitres per day	4.32		Could not be verified - records provided did not include volumes	Not assessed
Point	Unit of Measure	Volume/Mass Limit									
43	megalitres per day	4.32									
372.	L3.2	<div>L3.2 For each discharge point or utilisation area specified below (by a point number), the flow rate of: a)</div> <table><tr><th>Point</th><th>Unit of Measurement</th><th>Flow rate</th></tr><tr><td>43</td><td>litres per second</td><td>50 litres per second</td></tr></table>	Point	Unit of Measurement	Flow rate	43	litres per second	50 litres per second			
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10.	4	Operating Conditions									
373.	O1	<b>O1 Activities must be carried out in a competent manner</b>  O1.1 Licensed activities must be carried out in a competent manner.  This includes:  a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and  b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Site Inspection Environmental Management Strategy; Spoil Management Plan; Water Management Plan; Transport Management Plan.	An Environmental Management Strategy and other management plans for the development has been prepared to define the methods to operate in a competent manner throughout the duration of the project. A set of management plans specific to address different environmental aspects have been developed to minimize environmental impacts of the project.  A non-compliance has been raised against the conditions of approval and this condition for inadequate storage of substances on the project. (refer to Non-compliance)	Non-compliant						

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
374	O2	<b>O2 Maintenance of plant and equipment</b>  O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:  a) must be maintained in a proper and efficient condition; and  b) must be operated in a proper and efficient manner.	Interview with FGJV Plant Maintenance Engineer	FGJV use Plant Assessor as the basis for scheduling plant planned maintenance and breakdown maintenance. The Plant department conduct Quarterly inspections, weekly inspections, and operators are required to complete daily pre-starts on an app - any faults trigger a report to fix the issue. Plant Assessor provides warnings when a service is coming up and displays a red cross when it is overdue. The maximum plant and vehicle maintenance can go overdue is 50 hours (lower than standard requirements). Complete history records of each machine are retained on the company server.  The site inspection identified one instances in which an item of plant was not maintained in good condition - a pump was leaking from a damaged / incorrectly joined fitting within a bunded pallet. The water flowed into the bund then into a drain (potential contamination issue). The fitter explained that there was an insufficient supply of fittings to replace the faulty fitting. This has been raised as an Observation (as opposed to Non-compliance) as it was a relatively minor incidence of equipment not being maintained in a proper manner	Compliant OBS
375	O3	<b>O3 Dust</b> O3.1 All operations and activities occurring at the premises must be carried out in a manner that minimises or prevents the emission of dust from the premises.	Site Inspection Environmental Management Strategy; Spoil Management Plan; Water Management Plan; Transport Management Plan.	Controls to minimize or prevent the emission of dust are included in various management plans.  Dust suppression is managed via the use of water carts recycling WTP water from site. Speed limits enforced throughout the project and the maintenance of roads minimizes the dust generated by traffic, particularly from heavy vehicles.  Lobs Hole Ravine Road has been sealed since the last audit.	Compliant
376	O4	<b>O4 Waste management</b>			Compliant

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		O4.1 The licensee must assess, classify and manage any waste generated at the premises in accordance with the Waste Classification Guidelines 2014 and the Act. Waste need to be transported to a place that can lawfully accept that waste.	Waste registers and waste dockets were sighted - refer to Waste Management tables	Waste was appropriately classified and transported to facilities that could lawfully accept waste. Also see Sch 3 Cond 52.	

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
	<b>5</b>	<b>Monitoring and Recording Conditions</b>			
	<b>M1</b>	<b>M1 Monitoring records</b>			
377	M1.1	M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	CWT Plant productivity and consumption (monthly Oct 2022 to June 2023)  EPL Monthly reports from July 2022 to June 2023	Monitoring reports were reviewed including in-situ water quality measurements however individual records of monitoring was not fully reviewed or assessed. Based on the evidence available, this condition is determined as compliant	Compliant
378	M1.2	M1.2 All records required to be kept by this licence must be:  a) in a legible form, or in a form that can readily be reduced to a legible form;  b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	In-situ Water Quality Measurements - August 2022 to May 2023  Quarterly Environmental Water Reports  EPL 2126 - Bi-annual Monitoring Report Dec 2022 to May 2023		
379	M1.3	M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:  a) the date(s) on which the sample was taken;  b) the time(s) at which the sample was collected;  c) the point at which the sample was taken; and  d) the name of the person who collected the sample.			
380	M2	<b>M2 Requirement to monitor concentration of pollutants discharged</b>			
381	M2.1	M2.1 For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1.	EPL Monthly reports from July 2022 to June 2023 In-situ Water Quality Measurements - August 2022 to May 2023	Concentration of pollutants has been monitored for the required EPL points identified.	Compliant



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		The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:																																																																			
382	M2.2	M2.2 Water and/ or Land Monitoring Requirements – Point 1, 2, 4, 25:  POINT 1,2,4,25 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Aluminium (dissolved)</td><td>micrograms per litre</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Copper (dissolved)</td><td>micrograms per litre</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Dissolved Oxygen</td><td>percent saturation</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Electrical conductivity</td><td>microsiemens per centimetre</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Iron (dissolved)</td><td>micrograms per litre</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Lead (dissolved)</td><td>micrograms per litre</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Manganese (dissolved)</td><td>micrograms per litre</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Nickel (dissolved)</td><td>micrograms per litre</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Nitrogen (total)</td><td>micrograms per litre</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Oxidation Reduction Potential</td><td>millivolts</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Reactive Phosphorus</td><td>micrograms per litre</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Silver (dissolved)</td><td>micrograms per litre</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Turbidity</td><td>nephelometric turbidity units</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>Zinc (dissolved)</td><td>micrograms per litre</td><td>Quarterly</td><td>Grab sample</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	Aluminium (dissolved)	micrograms per litre	Quarterly	Grab sample	Copper (dissolved)	micrograms per litre	Quarterly	Grab sample	Dissolved Oxygen	percent saturation	Quarterly	Grab sample	Electrical conductivity	microsiemens per centimetre	Quarterly	Grab sample	Iron (dissolved)	micrograms per litre	Quarterly	Grab sample	Lead (dissolved)	micrograms per litre	Quarterly	Grab sample	Manganese (dissolved)	micrograms per litre	Quarterly	Grab sample	Nickel (dissolved)	micrograms per litre	Quarterly	Grab sample	Nitrogen (total)	micrograms per litre	Quarterly	Grab sample	Oxidation Reduction Potential	millivolts	Quarterly	Grab sample	pH	pH	Quarterly	Grab sample	Reactive Phosphorus	micrograms per litre	Quarterly	Grab sample	Silver (dissolved)	micrograms per litre	Quarterly	Grab sample	Turbidity	nephelometric turbidity units	Quarterly	Grab sample	Zinc (dissolved)	micrograms per litre	Quarterly	Grab sample	EPL Monthly reports from July 2022 to June 2023		Compliant
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Zinc (dissolved)	micrograms per litre	Monthly	Grab sample																																																																																														

385.

### 386. M2.2 Water and/ or Land Monitoring Requirements – Point 10, 11, 41:

POINT 10,11,41

Pollutant	Units of measure	Frequency	Sampling Method
Aluminium (dissolved)	micrograms per litre	Monthly	Grab sample
Arsenite	milligrams per litre	Monthly	Grab sample
Arsenic (dissolved)	micrograms per litre	Monthly	Grab sample
BOD	milligrams per litre	Monthly	Grab sample
Chromium (dissolved)	micrograms per litre	Monthly	Grab sample
Copper (dissolved)	micrograms per litre	Monthly	Grab sample
Cyanide	micrograms per litre	Monthly	Grab sample
Electrical conductivity	microsiemens per centimetre	Monthly	In situ
Faecal Coliforms	colony forming units per 100 millilitres	Monthly	Grab sample
Hardness (as calcium carbonate)	milligrams per litre	Monthly	Grab sample
Iron (dissolved)	micrograms per litre	Monthly	Grab sample
Lead (dissolved)	micrograms per litre	Monthly	Grab sample
Manganese (dissolved)	micrograms per litre	Monthly	Grab sample
Nickel (dissolved)	micrograms per litre	Monthly	Grab sample
Nitrogen (total)	milligrams per litre	Monthly	Grab sample
Oil and Grease	milligrams per litre	Monthly	Grab sample
Oxidised nitrogen	milligrams per litre	Monthly	Grab sample
pH	pH	Monthly	In situ
Phosphorus (total)	milligrams per litre	Monthly	Grab sample
Reactive Phosphorus	milligrams per litre	Monthly	Grab sample
Silver (dissolved)	micrograms per litre	Monthly	Grab sample
Total Kjeldahl Nitrogen	milligrams per litre	Monthly	Grab sample
Total suspended solids	milligrams per litre	Monthly	Grab sample
Zinc (dissolved)	micrograms per litre	Monthly	Grab sample

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
387	M3	<b>M3 Testing methods - concentration limits</b>			
388	M3.1	M3.1 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	EPL Monthly reports from July 2022 to June 2023  In-situ Water Quality Measurements - August 2022 to May 2023  Quarterly Environmental Water Reports  EPL 2126 - Bi-annual Monitoring Report Dec 2022 to May 2023	A non-compliance was raised at the previous audit noting that the monitoring for the concentration of pollutants in monitoring points identified in condition M2.2 has not been conducted in accordance with the approved methods publication.  The non-compliance was resolved. An email 20 May 2022 from Dr Bob Symonds from Eurofins Environment Testing Australia and New Zealand stating "I can confirm that we are ISO/IEC 17025: 2017 accredited by NATA in both our Girraween and Dandenong South facilities for the tests in the aforementioned document (NSW EPA 2022 Approved methods for the sampling and analysis of water pollutants in NSW) and also for analyses conducted as part of our works with Future Generation Joint Venture". This non-compliance was closed.	Compliant
389	M3.2	M3.2 Condition M3.1 also applies to the monitoring of any points identified in Condition M2.2			
390	M4	<b>M4 Recording of pollution complaints</b>	Interview with the FGJV Community and Stakeholder Engagement Manager	The Complaints Register is maintained by SHL. There have been no pollution complaints recorded since the last audit (Jan 2022)	Compliant
391	M4.1	M4.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Complaints Register (on the project website)		
392	M4.2	M4.2 The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.			
393	M4.3	M4.3 The record of a complaint must be kept for at least 4 years after the complaint was made.			
394	M4.4	M4.4 The record must be produced to any authorised officer of the EPA who asks to see them.			

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status									
		ENVIRONMENT PROTECTION LICENCE No 21266												
395	M5	M5 Telephone complaints line	FGJV and Snowy 2.0 websites publish the hotline number. <a href="https://www.futuregenerationjv.com.au/contact">https://www.futuregenerationjv.com.au/contact</a> <a href="https://www.snowyhydro.com.au/contact/">https://www.snowyhydro.com.au/contact/</a>	There is a hotline number (1800 Snowy 2) for general enquiries, including complaints (but it is not a dedicated line for complaints); staffed 24x7.  FGJV: For enquiries or complaints contact the Snowy 2.0 Community Information Line 1800 766 992 (1800 Snowy 2) SHL: For environmental pollution incidents and complaints (noise, visual amenity, sewage overflow) related to site activities. Freecall: 1800 766 333.  Snowy 2.0 enquiries: 1800 Snowy2 (766 992).	Compliant									
396	M5.1	M5.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.												
397	M5.2	M5.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.												
398	M5.3	M5.3 The preceding two conditions do not apply until immediately from the date of the issue of this licence.												
399	M6	M6 Requirement to monitor volume or mass		Annual Return for period December 2022 to May 2023 showed volumes of liquids discharged to water were measured at Points 43, 44 and 45.	Compliant									
400	M6.1	M6.1 For each discharge point or utilisation area specified below, the licensee must monitor:												
		a) the volume of liquids discharged to water or applied to the area;												
		b) the mass of solids applied to the area;												
		c) the mass of pollutants emitted to the air;												
		at the frequency and using the method and units of measure, specified below.												
		<div>POINT 43</div> <table><tr><th>Frequency</th><th>Unit of Measure</th><th>Sampling Method</th></tr><tr><td>Continuous</td><td>megalitres per day</td><td>Ultrasonic flow meter</td></tr></table> <div>POINT 44,45</div> <table><tr><th>Frequency</th><th>Unit of Measure</th><th>Sampling Method</th></tr><tr><td>Continuous</td><td>megalitres per day</td><td>Ultrasonic flow meter</td></tr></table>	Frequency	Unit of Measure	Sampling Method	Continuous	megalitres per day	Ultrasonic flow meter	Frequency	Unit of Measure	Sampling Method	Continuous	megalitres per day	Ultrasonic flow meter
Frequency	Unit of Measure	Sampling Method												
Continuous	megalitres per day	Ultrasonic flow meter												
Frequency	Unit of Measure	Sampling Method												
Continuous	megalitres per day	Ultrasonic flow meter												

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
	<b>6</b>	<b>Reporting Conditions</b>			
	<b>R1</b>	<b>R1 Annual return documents</b>			
401	R1.1	<p>R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> <li>1) a Statement of Compliance,</li> <li>2) a Monitoring and Complaints Summary,</li> <li>3) a Statement of Compliance - Licence Conditions,</li> <li>4) a Statement of Compliance - Load based Fee,</li> <li>5) a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,</li> <li>6) a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and</li> <li>7) a Statement of Compliance - Environmental Management Systems and Practices.</li> </ol> <p>At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.</p>	<p>Annual Returns submitted to the EPA: Period from 9 May 2022 to 8 May 2023</p>	<p>Annual return have been submitted to the EPA in a timely manner.</p>	Compliant
402	R1.2	<p>R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.</p> <p><i>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</i></p>			
403	R1.3	<p>R1.3 Where this licence is transferred from the licensee to a new licensee:</p> <ol style="list-style-type: none"> <li>a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and</li> </ol>		No transfer of Licensee	

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
		<p>b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.</p> <p><i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i></p>			
404	R1.4	<p>R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p> <p>a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.</p>		Licence has not been surrendered or revoked	
405	R1.5	R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect <i>EPA</i> or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').			
406	R1.6	R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.		Copy retained electronically	
407	R1.7	<p>R1.7 Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p> <p>a) the licence holder; or</p> <p>b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</p>		Annual return is certified	
408	R2	<b>R2 Notification of environmental harm</b>			
409	R2.1	R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.	Internal Incident Report INC 2896 – breach of water quality discharge to Talbingo	The incident involving discharges of treated water from the reverse osmosis treatment plant into Talbingo reservoir over a period between January and May 2023 that exceeded water quality discharge parameters was not reported to EPA within 7 days of	Non-compliant

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
		<i>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</i>		the date in which they became aware of the incident.  The incident (INC 2896) was reported internally on 19 June 2023 and was not notified to EPA until 28 June 2023. (Late report).	
410	R2.2	R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.			



ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
	R3	<b>R3 Written report</b>			
411	R3.1	<p>R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <p>a) where this licence applies to premises, an event has occurred at the premises; or</p> <p>b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence,</p> <p>and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.</p>	<p>EPA Show Cause letter to Snowy Hydro dated 07/12/2022 - Alleged discharge of sediment laden water from sump at Main Yard, Lobs Hole into Yarrangobilly River.</p> <p>Letter from EPA to Snowy Hydro dated 21/11/2022 - Alleged pollution of waters Discharge of sediment laden water from the Premises into Nungar Creek – 27 September</p>	No compliance requirement - letters were sent to Snowy Hydro requesting written reports to invite Snowy Hydro to provide, in writing, any reasons why the EPA should not take regulatory action in response to the alleged offences.	Compliant
412	R3.2	R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	<p>Snowy 2.0 – Response to Show Cause Letter re. alleged discharge of sediment laden water from sump at Main Yard, Lobs Hole into Yarrangobilly River - letter number 3504346 dated 16/01/2023</p> <p>Snowy 2.0 - Response to Show Cause Letter re. alleged discharge of sediment laden water into Nungar Creek dated 19/12/2022</p>	Responses to the Show Cause letters were sighted and reviewed. The letters provided detailed information regarding the events included review of the causes of the events, actions taken to prevent further incidents of the kind happening, steps taken to reduce risks and minimise environmental harm and commitment to the environment and compliance record.	Compliant
413	R3.3	<p>R3.3 The request may require a report which includes any or all of the following information:</p> <p>a) the cause, time and duration of the event;</p> <p>b) the type, volume and concentration of every pollutant discharged as a result of the event;</p> <p>c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;</p> <p>d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p>	Letters as per R3.1	The Show Cause letters required reports which addressed some of these elements.	Compliant

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
414		f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and  g) any other relevant matters.			
415	R3.4	R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	EPA Show Cause letter to Snowy Hydro dated 10/04/2023 - Failure to comply with Prevention Notice number 3503960	EPA made written requests for further information in the letter - Failure to comply with Prevention Notice...  A Penalty Infringement Notice was issued to SHL – not raised as a non-compliance at this audit.	
	R4	<b>R4 Other reporting conditions</b>			
416	R4.1	R4.1 The licensee must notify the EPA within 24 hours by phone or in writing of any results from monitoring required by condition M2 that exceed the Australian and New Zealand Environment Conservation Council Guidelines and NSW Water Quality Objectives and caused by activities carried out by or on behalf of the Licensee.		The incident (INC 2896) was reported internally on 19 June 2023 and was not notified to EPA until 28 June 2023. (Late report). The incident was the result of an exceedance of the monitoring required under M2 (also non-compliant with R2.2)	Non-compliant
417	R4.2	R4.2 The licensee must submit an Environmental Monitoring Report every six (6) months to the EPA, unless otherwise agreed in writing by the EPA.	EPL 21266 - Bi-annual Monitoring Report - December 2021 - May 2022  EPL 21266 - Bi-annual Monitoring Report - June 2022 - November 2022  EPL 21266 - Bi-annual Monitoring Report - December 2022 - May 2023	Bi-annual (6 monthly) Environmental Monitoring Reports have been prepared and submitted to the EPA. The reports were uploaded to the Snowy Hydro website. This condition was non-compliant at the previous audit.	Compliant
418	R4.3	R4.3 The Environmental Monitoring Report must be prepared by a suitably qualified and experienced person and include, but not be limited to:  a) results of all water quality monitoring undertaken in the preceding six (6) month period;  b) results of all weather monitoring undertaken in the preceding six (6) month period;  c) assessment of historical trends in all water sampling data for each monitoring point inclusive of the current six (6) month period;	EPL 21266 - Bi-annual Monitoring Report - December 2021 - May 2022  EPL 21266 - Bi-annual Monitoring Report - June 2022 - November 2022  EPL 21266 - Bi-annual Monitoring Report - December 2022 - May 2023	The reports were prepared by Jessica Adams Environmental Coordinator for Future Generation. Jess holds a Bachelor of Environmental, and a Master of Environmental Law and Policy with 9 years' experience in environmental assessment, management and reporting across various construction and infrastructure projects. Water quality monitoring results for the period are presented in Section 3.1 of the reports  Weather monitoring is included in Section 2 - Weather Monitoring Results  Historical trends are addressed in Section 3 and Table 1.2	Compliant

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
419		<p>d) identification of instances where the water quality objective triggers for each relevant pollutant were exceeded at receiving water locations and/or where the predicted discharge water quality was exceeded at sediment basin discharge points;</p> <p>e) include details of any actions taken by the Licensee in response to exceedances identified under point (d), including but not limited to:</p> <ul style="list-style-type: none"> <li>i. additional monitoring</li> <li>ii. remedial actions; and</li> <li>iii. activation of trigger, action, response plans (TARPs);</li> </ul> <p>f) recommendations for future actions in relation to monitoring and/or management.</p>		<p>Addressed in Section 3, Appendix C and Appendix D</p> <p>Actions addressed in Sections 3 and 4 - include additional monitoring, remedial actions and TARPs</p> <p>Addressed in Section 4.2 of the reports</p>	
	7	<b>General Conditions</b>			
420	G1	<b>G1 Copy of licence kept at the premises or plant</b>	EPL 21266 held electronically by Snowy Hydro and FGJV - also available on the website	EPL available in digital form	Compliant
421	G1.1	G1.1 A copy of this licence must be kept at the premises to which the licence applies.			
422	G1.2	G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.			
423	G1.3	G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.			
	G2	<b>G2 Signage</b>			
424	G2.1	G2.1 Each monitoring point in condition P1.2 must be clearly marked by a sign that indicates the EPA point identification number.	Site inspection	Only few EPL points could be verified as labelled during the site inspection due to the large number, remote locations and time available for the audit. Signage was verified for the EPL points visited including EPL 41 (discharge point). The point had 2 labels, one of which was incorrect (labelled EPL 14). This is raised as an Observation - it was addressed shortly after the site audit had completed.	Compliant OBS

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
	<b>8</b>	<b>Special Conditions</b>			
	<b>E1</b>	<b>E1 Verification of mixing zone modelling</b>			
425	E1.1	E1.1 The licensee must engage a suitably qualified and experienced person(s) to prepare a Mixing Zone Verification Program.	Snowy 2.0 EPL Verification Monitoring - Progress report for the combined discharge of MAT Portal Process Water Treatment Plant, Ex Camp STP and Main Camp STP Draft/P01.01 07 Nov 2022	FGJV engaged Royal Haskoning DHV (RHDHV) to prepare a Mixing Zone Verification Program.	Compliant
426	E1.2	<p>E1.2 At least 4 weeks prior to the first discharge of each of the sewage treatment plants and process water treatment plants, the licensee must submit a written plan for the Mixing Zone Verification Program to the EPA's Manager Regulatory Operations. The plan for the Mixing Zone Verification Program must include, but need not be limited to:</p> <p>a) Sampling locations: Sampling locations must be comparable to the key locations identified in <i>Attachment F Waste and Process Water Mixing Zone Assessment</i> (7 February 2020) of the "Snowy 2.0 - Main Works - Response to Submissions Main Report - Appendix J Revised Water Management Report" and capture ambient water quality;</p> <p>b) Sampling frequency and duration: The frequency and duration of sampling must be adequate to capture the full range of receiving waterway conditions, including but not limited to, winds, current, temperature and rainfall, to allow modelling predictions under a range of scenarios to be verified;</p> <p>c) Sampling depth: Sampling must allow for variations at depth under a range of scenarios (i.e. thermal stratification); and</p> <p>d) Sampling parameters: The parameters must include, but need not be limited to:</p> <ol style="list-style-type: none"> <li>Total nitrogen;</li> <li>Total phosphorus;</li> <li>pH;</li> <li>Biological Oxygen Demand;</li> <li>Nitrogen (ammonia);</li> <li>Turbidity; and</li> <li>Electrical Conductivity.</li> </ol>	Snowy 2.0 EPL Verification Monitoring - Progress report for the combined discharge of MAT Portal Process Water Treatment Plant, Ex Camp STP and Main Camp STP Draft/P01.01 07 Nov 2022	<p>Compliance to this requirement could not be established. Report has been prepared however is in draft.</p> <p>Addressed in Section 1.2 of the Report - RHDHV prepared the report referred to.</p> <p>Weather and waterway conditions were taken into account</p> <p>Section 5.2.1 - Conductivity-Temperature-Depth (CTD) profiles were obtained in the field to understand the likely behaviour of the discharge plume during the post-discharge sampling period</p> <p>These parameters were included in the report - Ammonia, BOD, EC, Kjeldahl Nitrogen Total, Nitrite and Nitrate as N, Nitrogen Total, Total Phosphorus and TSS were measured.</p>	Not fully establishe

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
427	E1.3	E1.3 Within 6 weeks of the first discharge from each sewage treatment plant and the process water treatment plants, the licensee must submit a <b>written progress report</b> for the Mixing Zone Verification Program to the EPA's Manager Regulatory Operations.		EPL Verification Monitoring - Progress report for the combined discharge of MAT Portal Process Water Treatment Plant, Ex Camp STP and Main Camp STP Draft/P01.01 07 Nov 2022 was prepared (however was not established whether it has been submitted to the EPA yet.	Not fully established
428	E1.4	E1.4 Upon completion of the Mixing Zone Verification Program (as per Condition E1.2 (b)), the licensee must submit a <b>written final report</b> detailing the results of the Mixing Zone Verification Program for each of the sewage treatment plants and process water treatment plants to the EPA's Manager Regulatory Operations – Regional South.		Mixing Zone verification not yet complete	Not triggered
429	E1.5	<p>E1.5 The written progress report and final reports referred to in Condition E1.3 and E1.4 above must include, but need not be limited to:</p> <ul style="list-style-type: none"> <li>a) a statement of the ambient NSW Water Quality Objectives (WQOs) of the receiving waters (Talbingo/Tantangara Reservoir) relevant to the discharge, including the associated indicators and guideline values or criteria for the identified environmental values;</li> <li>b) a description of the ambient water quality of Talbingo/Tantangara Reservoir in relation to the relevant WQOs, to determine whether the WQOs are being achieved;</li> <li>c) ambient conditions (e.g. currents, temperature, density, storage level and thermal stratification processes);</li> <li>d) discharge and release conditions including but not limited to: <ul style="list-style-type: none"> <li>i. rate of discharge;</li> <li>ii. timing;</li> <li>iii. total volume;</li> <li>iv. water quality of discharge;</li> </ul> </li> <li>e) a description of the mixing zone, including the extent and shape of the mixing zone;</li> </ul>			Not triggered

ID	EPL - Cond No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266</b>			
		f) a comparison of point e. above with the modelled predications from <i>Attachment F Waste and Process Water Mixing Zone Assessment</i> (7 February 2020) of the "Snowy 2.0 - Main Works - Response to Submissions Main Report - Appendix J Revised Water Management Report" including discussion of the mixing zone modelling and whether the relevant guideline values are being met at the edge of the near-field mixing zone; and			
430		g) a continuous improvement plan for managing wastewater discharge over time, so as to reduce the extent and impact of the mixing zone.  <i>Note: This program has been developed to verify the modelled water quality impacts on the Talbingo and Tantangara reservoir of the proposed discharge of treated effluent from the sewage treatment and process water treatment plants. The EPA intends to use this information to refine discharge criteria in this licence.</i>			
		3) Ensure that appropriate quality control procedures are followed  4) Demonstrate the accuracy and reliability of the membrane filtration method; and  Provide recommendations on an appropriate frequency of monitoring for the membrane filtration method			

ID	PRP No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
<b>ENVIRONMENT PROTECTION LICENCE No 21266 PRP - Diffuse Source Water Pollution Management (Commenced 09/09/2022)</b>					
431.	DSWP 1 U1	Diffuse source water pollution is defined as water pollution that arises from a multitude of diverse urban and rural land uses across a catchment, rather than a discrete point source. Diffuse source water pollution is mainly driven by rainfall runoff, particularly from storms, although contamination of underground water systems and aquifers can occur over long periods independently of rainfall and may be linked to current or past land uses on the ground.			
432.	U1.1	<p>Prior to the progression of item number 1 outlined in the report titled "Assessment of Diffuse Source Water Pollution Management - Snowy 2.0 Project." (DOC23/27477), the licensee must provide a written proposal on the use of HES basins to the EPA's Manager Regulatory Operations - Regional South. The written proposal must include, but need not be limited to:</p> <ol style="list-style-type: none"> <li>1. A description of the proposed works</li> <li>2. Associated pollution controls to prevent pollution of waters</li> <li>3. Any proposed dosing to be used in conjunction with the HES basins</li> <li>4. A risk assessment of the potential environmental impact of the proposed works</li> </ol>	<p>Assessment of Diffuse Source Water Pollution Management - Snowy 2.0 Project." (DOC23/27477) dated 20 December 2022-written by SEEC</p>	<p>It was advised that a written proposal regarding HES basins has not yet been undertaken (no timeframe specified)</p> <p>It was advised that the requirement for HES basins had been removed from the draft licence (FGJV rep), however the June 2023 version of the Licence still had this requirement at the time of the audit.</p> <p>At the time of the audit, the written proposal was still outstanding, however, as there is no timeframe attached, this condition is determined to be compliant at this time.</p>	Compliant
433.	U1.2	By 30 June 2023, the licensee must implement the recommended action and controls for item numbers 7, 9, 10, 12, 26 and 28 outlined in the report titled "Assessment of Diffuse Source Water Pollution Management - Snowy 2.0 Project." (DOC23/27477).	<p>Diffuse Source Water Pollution Management Action Update Report Rev A 12 July 2023 by FGJV</p> <p>Fortnightly update 23/06/23 Condition EPL U1.2</p>	<p>Future Generation Joint Venture considers that the report satisfies the requirements of Condition U1.3 by providing supporting evidence of close out of all recommended actions listed in Condition U12.</p> <p>The fortnightly update 23/06/23 noted: "All batters areas of R6 -R14 have had hydromulch applied some needs reapplying where works have been conducted in recent weeks No significant areas not stabilised Complete close out evidence to be provided in close out report".</p> <p>The site inspection generally supported the assertion that most of the actions have been undertaken to address the items listed except completion of items 9 and 26. Items not fully closed out were weather dependent.</p>	Compliant

ID	PRP No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266 PRP - Diffuse Source Water Pollution Management (Commenced 09/09/2022)</b>			
434.	U1.3	By 17 July 2023, the licensee must provide a written report to the EPA's Manager Regulatory Operations - Regional South detailing the completion of the works outlined in condition U1.2 above.	Diffuse Source Water Pollution Management Action Update Report Rev A 12 July 2023. Email to EPA dated 17 July 2023 Diffuse Source Water Pollution Management Action Update Report update - report attached to satisfy the EPL 21266 Condition U1.3.	Written report was submitted to the EPA via email on the due date of 17 July 2023.	Compliant
435.	U1.4	By 31 October 2023, the licensee must implement the recommended action and controls for item numbers 2 and 3 outlined in the report titled "Assessment of Diffuse Source Water Pollution Management - Snowy 2.0 Project." (DOC23/27477).			Not triggered
436.	U1.5	By 17 November 2023, the licensee must provide a written report to the EPA's Manager Regulatory Operations - Regional South detailing the completion of the works outlined in condition U1.4 above.			Not triggered
437.	U1.6	By 11 December 2023, the licensee must implement the recommended action and controls for item number 8 outlined in the report titled "Assessment of Diffuse Source Water Pollution Management - Snowy 2.0 Project." (DOC23/27477).			Not triggered
438.	U1.7	By 8 January 2024, the licensee must provide a written report to the EPA's Manager Regulatory Operations - Regional South detailing the completion of the works outlined in condition U1.6 above			Not triggered
439.	U1.8	By 31 December 2023, the licensee must implement the recommended action and controls for item numbers 5 and 25 outlined in the report titled "Assessment of Diffuse Source Water Pollution Management - Snowy 2.0 Project." (DOC23/27477).			Not triggered
440.	U1.9	By 14 January 2024, the licensee must provide a written report to the EPA's Manager Regulatory Operations - Regional South detailing the completion of the works outline in condition U1.8 above			Not triggered



ID	PRP No	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<b>ENVIRONMENT PROTECTION LICENCE No 21266 PRP - Diffuse Source Water Pollution Management (Commenced 09/09/2022)</b>			
441.	Q	<p>The EPA reasonably suspects that an activity has been or is being carried on in an environmentally unsatisfactory manner at the Premises by SNOWY HYDRO LIMITED in that:</p> <p>a) Inadequate pollution controls on unsealed roads at Tantangara, including Tantangara Road, Quarry Trail and Spoil Road has led to sediment laden water discharging into multiple waterways across the Premises, resulting in pollution of waters in contravention of s120 of the Act</p>	Letter from EPA Snowy Hydro Limited – EPL 21266 Snowy 2.0 Pumped Hydro Power Station Talbingo and Tantangara Prevention Notice 3503960	<p>In the letter from the EPA dated 15/12/2022, they noted (among other things): The EPA has reviewed the information provided by SHL as directed by the Prevention Notice and takes the opportunity to provide further comment in Appendix A. The EPA does not consider that sufficient information has been provided to determine if all reasonable and feasible measures to address inadequate pollution controls at Tantangara has been undertaken by SHL. Most concernedly, SHL has failed to acknowledge specific measures to address potential pollution of waters at Nungar Creek, or to confirm which actions have been implemented. The EPA requires SHL to address the actions outlined in Appendix A by 18 January 2023.</p> <p>The site inspection, interviews and other parts of this audit report note that there has now been significant improvement (and will need to be maintained).</p> <p>A PIN was issued by the EPA – and in light of the above a non-compliance is not raised against this requirement at this audit.</p>	