

BARNETT & MAY

Hunter Power Project (Kurri Kurri Gas Fired Power Station)

September 2025 Construction Phase
Independent Environmental Audit

Prepared for
Snowy Hydro Limited

Client representative
Angela van der Kroft

Date: 24 October 2025
Rev 0



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Prepared by — K. Holmes		Date 24 October 2025
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Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
A	Draft for client Review	K Holmes	R Peterson	K Holmes	9/10/25
0	Final	K Holmes	R Peterson	K Holmes	24/10/25

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1. Introduction

Barnett & May was engaged by Snowy Hydro Ltd, to conduct the seventh construction phase Independent Environmental Audit (IEA) of the Hunter Power Project (Kurri Kurri Gas Fired Power Station). The development is located at 73 Dickson Road, Loxford, NSW. This IEA was required under Part C, Conditions C15 to C19 the Project Approval 12590060.

The audit was undertaken in accordance with the requirements of the New South Wales Department of Planning and Environment (DPE) Independent Audit Post Approval Guidelines (May 2020). Barnett and May was commissioned to undertake the construction phase Independent Environmental Audits in March 2023 following approval of the auditor by DPE on 10 February 2023.

This audit was undertaken by Ken Holmes (Accredited Lead Auditor) on 8 September 2025. This audit report was peer reviewed by Richard Peterson (Auditor)

1.1 Project Description and Status of Construction

The Hunter Power Project (Kurri Kurri Gas Fired Power Station) will comprise two heavy-duty, open cycle gas turbines (OCGT). The OCGTs will operate on natural gas. While the units will be hydrogen-ready, diesel will be used as back-up fuel. The power station will have a capacity of 660 megawatts.

Construction of the Power Station commenced on 29 March 2022. At the time of this IEA:

- Civil works, roads and hardstand areas were largely complete;
- The power station and associated infrastructure were over 95% complete;
- Permanent surface water drainage and stormwater retention infrastructure was substantially complete with construction phase sediment basins being converted to their operational configuration (all surface water is now diverted to the oil / water separator pit, for treatment (if required) prior to discharge;
- Temporary workforce accommodation was operational;
- Connection to the Hunter gas pipeline was complete with disturbed work areas rehabilitated; and
- Commissioning of Unit 1 had commenced.

Management were expecting that construction would be finalised prior to the end of the current calendar year.

1.2 Audit Objectives

The objectives of this Independent Environmental Audit, in accordance with the Post Approval Audit Guidelines, were to:

1. Assess compliance against the conditions of the Project Approval.
2. Review all relevant post approval documentation required by the Project Approval(s) including an assessment of the implementation of Environmental Management Plans and Sub-plans.
3. Review compliance against other environmental licences and approvals excluding any Environmental Protection Licence issued under the Protection of the Environment Operations Act 1997.
4. Review the environmental performance of the development including:
 - a. A high-level comparison of actual impacts against predicted impacts as documented in the environmental impact assessment.
 - b. The physical extent of the development in comparison with the approved project boundaries.
 - c. Review of environmental incidents, non-compliances, and complaints relevant to the audit period.
 - d. Performance against any applicable environmental policy or environmental issue identified through consultation with the relevant Regulatory Authorities.
 - e. Feedback received from DPHI, other Agencies or Stakeholders including the community Consultative Committee (or equivalent body if applicable) relating to environmental performance of the development.
5. Review of the status of non-compliances and recommendations made in the preceding Independent Environmental Audit.
6. A high-level assessment of the adequacy of the Environmental Management Plans and Sub-plans required by the Approval.
7. Review performance of the development against any other matters considered relevant by the auditor or the Department, considering relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

1.3 Audit Scope

The audit provides an assessment of the compliance of the project with the conditions of Project Approval 12590060 and EPBC Approval 2021/8888. Note that no other relevant approvals were identified for this development.

The scope of this audit was developed to meet the requirements of the New South Wales Department of Planning, and Environment (DPE) Independent Audit Post Approval Guidelines May 2020 (as specified in the Approval). The audit scope was therefore developed with consideration of:

- Requirements of the Project Approval(s);
- Relevant correspondence from DPE (provided by the Auditee);
- Inputs provided by the Stakeholders consulted as part of this IEA;
- Review of the findings of the previous IEA; and
- The Auditor's experience in relation to relevant industry practices.

1.4 Audit Period

This audit of the construction phase of the project covers the period of 10 March 2025 to 8 September 2025.

1.5 Limitations of this Report

In preparing this Independent Environmental Audit Report, Barnett and May has assessed the activities appropriate and necessary to evaluate the compliance status against the conditions contained in the Auditee's Project Approval. Barnett and May has addressed the general technical matters which might reasonably be considered to be relevant to such an assessment.

The findings of this Independent Environmental Audit are based on observations of the site, interviews with personnel nominated by the Auditee and review of the documentation provided by the Auditee. Barnett and May has relied on the accuracy and completeness of the documentation and other information provided by the Auditee.

Barnett and May can only advise based on the information provided to them and therefore cannot dismiss the possibility that compliance or environmental performance issues, other than those presented in the report existed at the time of this Audit.

The audit findings presented in this report are professional opinions based solely upon Barnett and May's visual observations of the site, and upon Barnett and May's interpretation of the documentation reviewed, interviews and conversations with personnel nominated by the Auditee, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated. Opinions presented in this report apply to the site's conditions and features as they existed at the time of the audit, and those reasonably foreseeable. They necessarily cannot apply to conditions and features which Barnett and May is unaware of and has not had the opportunity to evaluate. This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation.

2. Definitions

Acronyms	Description
AQMP	Air Quality Management Plan
ASS	Acid Sulphate Soils
BCA	Australian Building Codes
BCS	Biodiversity, Conservation and Science Directorate (DPE)
BMP	Biodiversity Management Plan
CCS	Community Consultation Strategy
CEMS	Construction Environmental Management Strategy
CAQMP	Construction Air Quality Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CTMP	Construction Traffic Management Plan
CWMP	Construction Waste Management Plan
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DECC	Department of Environment and Climate Change (now DPHI)
DPE	Department of Planning and Environment (known as DPHI from 1 January 2024)
DPHI	Department of Planning, Housing and Infrastructure (formerly the Department of Planning and Environment / Department of Planning, Infrastructure and Environment)
EA	Environmental Assessment
EIS	Environmental Impact Statement
EP&A	Environmental Planning and Assessment Act 1979
EPA	NSW Environment Protection Authority
ER	Environmental Representative
ERSED	Erosion and Sediment Control
ESD	Ecological Sustainable Development
HMP	Heritage Management Plan
IEA	Independent Environmental Audit
ICNG	EPA Interim Construction Noise Guideline
MOD	Modification to the Conditions of Consent
OEH	NSW Office of Environment and Heritage
PIRMP	Pollution Incident Response Management Plan
SHL	Snowy Hydro Limited
SSD	State Significant Development
TfNSW	Transport for New South Wales
VOC	Volatile Organic Carbon

3. Auditor Certification

Independent Audit Certification Form	
Development Name	Hunter Power Project (Kurri Kurri Gas Fired Power Station)
Application Number	12590060
Description of Development	Gas Fired Power Station
Development Address	73 Dickson Road, Loxford, NSW
Proponent	Snowy Hydro Limited
Title of Audit	Hunter Power Project (Kurri Kurri Gas Fired Power Station) September 2025 Independent Environmental Audit
<i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (May 2020).</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</i> <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <i>Note.</i> <i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i> <i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i>	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	102 / 75-77 Foamcrest Avenue, Newport, NSW
Email Address	ken@baeckea.com.au
Auditor Certification	Exemplar Global 14065
Date	24 October 2025

3.1 Audit Details

Table 1 - Audit Details

Audit Title:	Hunter Power Project – September 2025 Construction Phase Independent Environmental Audit
Site:	Hunter Power Project (Kurri Kurri Gas Fired Power Station)
Client Contact:	Angela van der Kroft
Position:	Environmental Manager
Client:	Snowy Hydro Limited
Client Address:	Monaro Highway, Cooma, NSW 2630
Client Phone Number	02 64532888
Client Email:	Angela.vanderKroft@snowyhydro.com.au
Auditors:	Ken Holmes (Certified Lead Auditor) Richard Peterson (Auditor)
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baeckea.com.au
Date of Audit Commencement	8 September 2025

4. Audit process

4.1 Audit Guidelines

This audit report has been prepared in accordance with the 'Independent Audit Post Approval Requirements (2020)' as required by Conditions C15- C19 of the project approval and specifically with the audit frequency specified in that edition of the audit guidelines. For consistency with current audit scopes, this audit also satisfies the general scope specified in the current edition of the DPE Independent Audit Post Approval Requirements (2020).

Table 2 lists key requirements from the Audit Guidelines, the relevant Section of the Guidelines which references the requirement and indicates where each is addressed in this report.

Table 2 - Post Approval Audit Guidelines

Section	Independent Audit Report Requirements	Addressed
4.1	Version Control 1) the application number of the project; 2) each version or revision number of the report; 3) the date on which the report was prepared and issued to the Department; and 4) the title and name of the person who certified the Independent Audit Report.	Section 3 Page iii Page iii Section 3.1
4.2	Contents	
4.2.1	Introduction – a brief overview of the audit including: 1) background of the project; 2) the audit team (including qualifications and experience); 3) the objectives of the audit; 4) the audit scope; and 5) the temporal period covered by the audit.	Section 1.1 Section 4.3.1 and Appendix E Section 1.2 Section 1.3 Section 1.4
4.2.2	Audit Methodology 1) documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 2) how the audit scope was developed; 3) a summary of the audit process adopted to determine the compliance status and assess if documents are adequate; 4) site personnel interviewed including their name and position title (and including if access was not granted or possible with any required personnel and why); 5) details of site inspections undertaken (including any areas where access was not granted or possible and why); 6) a summary of the consultation undertaken; and 7) meanings of compliance status descriptors used, as set out in this document.	Appendix C Section 1.3 Section 4 Section 4.5.3 Section 4.5.2 Section 5 Section 4.6
4.2.3	Audit Findings 1) a list of the approvals and documents audited; 2) a summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period. Graphics	Appendix A Section 6.1

Section	Independent Audit Report Requirements	Addressed
	can be used to summarise project performance in relation to compliance requirements;	
	3) a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period;	Section 7.3
	4) exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance;	Section 6.2
	5) a brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action. Details must include the source of the action, reference (condition number), action proposed, proposed completion date, the status (date completed, if relevant) and the action complete.	Section 7.6
	6) a brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement;	Section 7.5
	7) a discussion of other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance;	Section 7.9
	8) documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation;	Section 5
	9) a summary of complaints, and the adequacy of the response to, and management of complaints;	Section 7.2
	10) details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents;	Section 7.1
	11) an assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the Environmental Planning and Assessment Act 1979;	Section 7.8
	12) evidence collected through site inspections undertaken during the audit;	Appendix A
	13) evidence to support compliance assessment provided by the personnel interviewed during the audit;	Appendix A
	14) a brief discussion of any continual environmental management improvement opportunities identified as part of the audit; and	Section 6.2
	15) key strengths of the development's environmental management and performance identified by the auditor.	Section 7.4

Section	Independent Audit Report Requirements	Addressed
4.2.4	Recommendations and opportunities for Improvement	Section 6.3
4.2.5	Appendices	
	1) a completed Independent Audit Table with all relevant conditions of consent, identifying each requirement, compliance status assessed, documenting verified evidence and providing recommendations for any non-compliance that is identified;	Appendix A
	2) a copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s);	Appendix C
	3) documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee;	Appendix D
	4) completed and signed Independent Audit Declaration Form(s);	Section 3
	5) any reports prepared by the agreed technical specialist(s), as required; and	Not required
	6) site inspection photographs.	Appendix B

4.2 Overview

The audit process and methodology are summarised in this section, and comprised the following key undertakings:

- Preliminary planning activities
- Review of information and preparation of a compliance register (audit protocol / checklist)
- Site inspection and interviews
- Opening and Closing meetings
- Site inspection
- Review of relevant records
- Review of additional information provided after the site inspection
- Preparation of this audit report.

4.3 Preliminary activities

Off-site planning for the site audit comprised:

- Initial discussions with client representative, to organise the site inspection and access to audit documentation
- Update the audit compliance checklist
- Completion of a project specific Risk Assessment
- Review of online information
- Submission of a preliminary document / record request
- Consultation with DPHI and other relevant agencies.

4.3.1 Approval of audit teams

Proponent sought the Secretary's endorsement for the audit team to undertake this Independent Environmental Audit. The Secretary approved the appointment of the Lead Auditor (Ken Holmes) on 10 February 2023 (Appendix C):

4.3.2 Consultation with Agencies

The Auditor consulted with the following agencies during the audit planning stage:

- Department of Planning, Housing and Infrastructure (DPHI)
- NSW Environment Protection Authority (EPA)
- Cessnock City Council
- Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW).

Emails were initially sent (via Email) to each of the above agencies advising them of the audit and the scope of the audit and inviting them to provide comments/requirements or specific environmental issues they required the audit to target. Where required (where no response was provided by the nominated stakeholder organisation, a follow up email was sent to repeat the invitation to provide input into the audit. Details of the responses from each group / organisation is provided in Section 5 with the Auditor's findings in relation to the issues raised in Section 7.9.

4.4 Information Review and Compliance Register

Prior to the site inspection the Auditor prepared a detailed audit checklist (spreadsheet) that was used to assess and track compliance. This spreadsheet formed the basis of the compliance register presented in Appendix A of this report.

4.5 Site audit

The site inspection component of the audit was undertaken on 8 September 2025.

4.5.1 Opening Meeting

The opening meeting was held and attended by the following personnel:

- Angela van der Kroft –Environmental Manager (SHL)
- Cristina Lang – Senior Environmental Advisor (UGL)
- Ken Holmes (Lead Auditor).

Introductions were made, and the purpose and scope of the audit was outlined. An explanation of the audit process was communicated. That is, a site inspection, site interviews and detailed review of records to identify compliance with the approval conditions relevant to the current operations at the site.

4.5.2 Site Inspections

The site inspection included observation of:

- Site access and security
- Construction works
- Equipment Laydown areas
- Fuel and Chemical Storage areas
- Waste storage areas; and
- Surface water management infrastructure.

4.5.3 Site Interviews

Audit interviews comprised of a series of meetings with:

- Angela van der Kroft –Environmental Manager (SHL)
- Cristina Lang – Senior Environmental Advisor (UGL)

4.5.4 Closing Meeting

The closing meeting was held at the completion of the site inspection and attended by the following personnel:

- Angela van der Kroft –Environmental Manager (SHL)
- Cristina Lang – Senior Environmental Advisor (UGL)
- Ken Holmes (Lead Auditor)

Preliminary audit findings were presented and tasks and timeline for completion of the audit agreed.

4.5.5 Document review

Compliance related documents that were not available prior to were requested to be provided following the audit. The Auditee's personnel assisted with the provision of documentation following the audit, through secure file transfer mechanisms. The key documents reviewed during this audit are listed in the Compliance Registers against specific conditions.

4.6 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix B**. A summary of the non-compliances identified during this audit are provided in Table 6. The audit criteria used to determine compliance for this audit is defined in Table 3.

Table 3 - Compliance Assessment Matrix

Assessment	Criteria
Complies	Compliance The site complies with the requirements of applicable pre-operational Consent Conditions. A judgment made by an auditor that the activities undertaken, and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.
Non-Compliance	Non-Compliance Clear evidence has been collected to demonstrate the requirement has not been complied with and is within the scope of the audit. Site displays little or no evidence of compliance with the requirements of the regulatory documentation. Note: Where the auditor has not been able to collect enough verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of enough verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. As the condition cannot be verified it is treated as a non-compliance.
Not Triggered	Not Applicable / Not Triggered The respective condition / requirement was not activated within the scope of the audit.
Noted	A statement or fact, where no assessment of compliance is required.

Risk levels for each non-compliance identified have been assessed in accordance with Table4.

Table 4 - Risk Assessment Matrix

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences but is likely to occur.
Low	Non-compliance with: • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences but is likely to occur.
Administrative non-compliance	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

5. Stakeholder Consultation

Table 5 provides a summary of the Stakeholder Consultation undertaken by the Auditor.

Table 5 - Summary of Stakeholder Inputs

Department	Contact	Stakeholder Comments	Auditor's Response
NSW Department of Planning, Housing and Infrastructure	Jennifer Sage / Joel Flemming	Thank you for contacting the department for consultation on the upcoming independent audit of the Hunter Power Project (Kurri Kurri Gas-Fired Power Station) (SSI-12590060). We appreciate your thorough approach to this process. Could you please review the current plans/strategies implemented by Snowy Hydro for the Hunter Power Plant Project (SSI-12590060) relating to community and stakeholder consultation and engagement to ensure they are being adequately implemented? This should include methods for keeping community up to date on the progress of the project using methods such as a project website (is the website up to date).	The Auditor reviewed the implementation of the community and stakeholder notification commitments made in the Construction Environmental Management Plan and concluded that while the intent of the Plan was met and homeowners in the immediate vicinity of the HPP site were informed of the impending commissioning works that the broader community provided with sufficient information regarding the commissioning and potential impacts. Refer to Section 7.4.2 below.

Department	Contact	Stakeholder Comments	Auditor's Response
Environmental Representative	Alex Gale	During this period I have undertaken regular inspections on the Hunter Power Project. With regard to the construction phase of the works environmental issues have been well managed. In addition to this continued sealing of the site and use of the oil separator sump has seen the erosion and water quality risk profiles reduce. The project did, however, receive a number of complaints whilst undertaking commissioning of turbine number 1. It is my understanding that the complaints related to odour, noise and a visible exhaust plume, while turbine number 1 was undertaking diesel commissioning. There was a lack of monitoring data captured during this initial diesel commissioning. Diesel commissioning on turbine number 1 was suspended and gas commissioning commenced. The exhaust monitoring undertaken during gas commissioning demonstrated compliance with the project's EPL and a reduction in complaints was also observed. During my most recent site inspection on 05/09/2025, the project informed me that diesel commissioning would recommence, however an adjusted process would be implemented that should result in a more complete burn of diesel and a reduction of exhaust emissions. I have not received any results or communication regarding the recommencement of diesel commissioning to date, however have requested this information once it is available. In summary, my main concern is the commissioning phase exhaust management. I intend to regularly follow up with the Hunter Power Project requesting information that can be assessed to determine compliance.	Noted
Cessnock City Council	Peter Giannopoulos	No response was received from Council	Noted
NSW EPA	Jessica Goodwin	The EPA regulates the Hunter Valley Power Station under Environment Protection Licence 21627, issued to Snowy Hydro Limited. The EPA encourages the preparation of audits as useful tools for industry to determine how to meet statutory obligations and identify potential or actual risks towards achieving these obligations. As a regulatory authority, the EPA administers and regulates statutes for environmental management and protection. As such the EPA is not directly involved in the carrying out of audits to achieve those objectives and does not review or comment on such documents. As a result, the EPA has no comment to provide for this request but directs you to the EPA's public register at https://apps.epa.nsw.gov.au/prpoeoapp/ to view the Licence's associated notices.	Noted
DCCEEW	Victoria Bartlett	No response was received from DCCEEW	Noted

6. Statutory Compliance and Recommendations

Compliance with the Conditions of Consent have been reviewed by assessing compliance against the various documentation related to project approval, as listed in section 2.2 of this report. The Compliance Register presented in Appendix A provides a detailed review of the compliance status of the site, including recommendations to address non-conformances.

6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 6 - Summary of Statutory Compliance. The number of conditions include sub-clauses within each approval document.

Table 6 - Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non- Compliant	Noted	Not Triggered
Project Approval 12590060	218	133	2	13	70
EPBC 2021/8888	28	11	1	0	16

6.2 Non-Compliances and Recommendations for Improvement.

Seven non-compliances were identified during the site inspection, interviews and document reviews that are recorded in detail in the Compliance Registers in Appendix A and are summarised in Table 7.

Table 7- Statutory Non-Compliances and Observations

No.	Condition	Finding	Recommendation	Risk Level
Project Approval 12590060				
B2	The Proponent must carry on any activity, or operate any plant, in or on the premises by such reasonably practicable means as may be necessary to prevent or minimise air pollution	Over a period of two days, (8 and 9 July 2025) during the initial commissioning of Unit 1, odour and smoke was emitted from the Unit 1 stack resulting in twenty-one smoke / odour complaints. The incident was investigated and reported to DPHI and the EPA.	Implement all commissioning related emission reduction controls as specified by the EPA.	Low
B4	The Proponent shall not permit any offensive odour to be emitted beyond the boundary of the site.	Twenty-one odour / smoke related complaints were received over a two-day period (8 and 9 July 2025) during the initial commissioning of Unit 1.	Implement all commissioning related emission reduction controls as specified by the EPA.	Low
EPBC 2021 - 8888				
EPBC 1	To ensure there is no adverse impact on the environment as a result of the action, the approval holder must comply with conditions A8-A12 of Part A, B1-B11, B19-B20, B35-40, B41-B43, B46 of Part B, C1-C4 of Part C of the State development consent (to the extent the conditions in Part C relate to environment).	Refer to Conditions B2 and B4 of the Planning Approval. Non-compliances against the air quality conditions of the planning approval were identified during this audit period.	Refer to recommendations provided under Conditions B2 and B4 above.	Low
RECOMMENDATIONS FOR IMPROVEMENT				

No.	Condition	Finding	Recommendation	Risk Level
C1	The Proponent must prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary.	Refer to Section 7.2.4 below. The Auditor understands that SHL did not specially notify the broader community (outside of the noise impact zone) of the commissioning activities, and the two targeted communications did not address any potential air quality impacts. Therefore, it is concluded that it did not provide sufficient information to the broader community of the commencement of commissioning and any potential impacts associated with that commissioning. While the intent of the communications section of the CEMS was met, the Auditor recommends that the project ensure that the broader community is notified of any future commissioning or operational activities that have the potential to impact those communities.	Ensure that the broader community is notified of any future commissioning or operational activities that have the potential to impact those communities	Recommendation for Improvement

7. Independent Audit Post Approval Requirements

This audit focused on the compliance requirements established by the Conditions of Approval. This section of the report covers the specific requirements contained in the DPE Guidelines.

7.1 Summary of Environmental Incidents

Reportable Environmental Incidents

One reportable environmental incident was recorded during the audit period. The incident involving the emission of offensive odours from the site. The EPA and DPHI were notified. The incident occurred over a period of two days (8 and 9 July 2025), during which twenty complaints relating to the incident were received by SHL.

Non-Reportable Environmental Incidents

During the audit period, twenty minor environmental incidents were recorded by UGL, the construction contractor. The incidents are summarised in Table 7.

Table 8 – Incident Summary

Date	Incident	Reportable
3/03/2025	Worker stung by wasps	No
11/03/2025	Hazard - redback spider infestation	No
11/03/2025	Hazard - cooking oil and food dumped on the ground	No
18/03/2025	Minor diesel spill from Light tower at GT2	No
9/04/2025	Minor oil spill in lube oil building GT2	No
14/04/2025	Minor oil leakage	No
30/04/2025	Diesel fuel spill in unloading bund area	No
4/05/2025	Minor oil leak underneath 275t crane	No
14/05/2025	Minor oil leak under lube oil strainer - GT1 north side	No
23/05/2025	Minor oil leak from GT-1 lube oil regulating Valve	No
28/05/2025	Minor oil leak - GT1 fuel gas valve control oil	No
5/06/2025	Minor oil leak GT-1	No
11/06/2025	Minor oil Spill GT2 - Unknown cause	No
14/06/2025	60L bin full of hydrocarbon waste 132kv switchyard fence line	No
15/06/2025	Minor oil spill @ GT1 lube oil tank	No
19/06/2025	Hydrocarbon spill from light tower north of GT1	No
21/06/2025	Minor oil leak @ gt2 lube oil	No
8/07/2025	Diesel spill to ground during refuelling	No
16/07/2025	Light vehicle collision with wallaby. No damage to vehicle	No
3/09/2025	Hydraulic oil leakage	No

Those incidents were managed and investigated appropriately. None of the incidents recorded resulted in any off-site impact and did not meet the threshold as “material environmental impacts” and therefore were not required to be reported to DPHI, EPA or any other Authority.

7.1.1 Incident Response Assessment

During this IEA the Auditor accessed the incident management system and reviewed the Incident Register. The system implemented as documented in the EMS includes:

- Incident reporting
- Implementation of immediate response actions
- Incident investigation
- Development of corrective and preventative actions
- Reporting (internal and external)
- Incident record management.

The Auditor sighted evidence that the incident management system is well understood and fully implemented, however the incident reporting undertaken did not meet the requirements of the Approval.

7.2 Summary of Complaints

Twenty-two complaints have been received by the Proponent during the Audit Period. Twenty-one of those complaints related to smoke and odour emissions associated with commissioning of Unit one over a two-day period in July 2025. The other complaint related to construction noise. The complaint details are provided in Table 8.

Table 9 - Complaints Received

Date	Nature of Complaint	Description	Response	HPP Responsible
06/05/2025	Noise	Complaint received via Community Hotline. The stakeholder (SH) reported a noise disturbance the previous night for approximately 30 minutes. SH described the sound as similar to the crashing noise of heavy objects being dropped. SH also reported that they had experienced a similar sound on several other occasions (dates unknown).	HPP Communication and Stakeholder Engagement Manager (CSEM) received the initial call. CSEM confirmed she would refer the issue to the construction team to identify any potential causes of the noise and update SH. CSEM updated SH on her progress with the construction team at 11:38 on 6/5/25. CSEM and the construction team identified a potential source of the noise, however, they could not conclude it was the definitive source. The team implemented mitigation measures as a precaution. CSEM updated the stakeholder 16:55 on 6/5/25. Noise monitoring was administered at various points throughout the night to ensure mitigation measures were effective. It was noted by the team that a nearby warehouse was also producing noise at this time. CSEM is continuing to work with SH.	Yes
08/07/2025	Smoke & Odour	Complaint received by Snowy Reception. The stakeholder (SH) in Heddon Greta reported an acrid smell when she went outside to put her rubbish out. SH described having stinging eyes and nausea from the odour.	SHL Reception Cooma received the initial call and emailed details to HPP Communication and Stakeholder Engagement Manager (CSEM) at 2:14 pm. CSEM and HPP Environment Manager (EM) called SH back at 2: 58 pm. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
08/07/2025	Smoke & Odour	Complaint received via Community Hotline. The stakeholder (SH) in Sawyers Gully reported experiencing smoke and odour at their premises.	HPP Environment Manager received the initial call at 3:17 pm. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
08/07/2025	Smoke	Complaint received by Snowy Reception. The stakeholder (SH) in Buchanan reported experiencing smoke at their premises which was affecting her asthma.	- HL Reception Cooma received the initial call and emailed details to SHL Manager - Environment and Lands at 3:55 pm who forwarded the email to at 2:14 pm. HPP Environment Manager (EM) called SH back at 2:58 pm. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes

Date	Nature of Complaint	Description	Response	HPP Responsible
08/07/2025	Odour	Complaint received by Community Hotline. The stakeholder (SH) in West Wallsend reported a diesel odour at their premises.	HPP Environment Manager received the initial call at 5:06 pm. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Smoke & Odour	Complaint received by Community Hotline. The stakeholder (SH) in Pokolbin who was concerned about the impact of the emissions on the vineyards.	HPP Environment Manager received the initial call at 10:55 am. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Smoke	Complaint received by Community Hotline. The stakeholder (SH) in Buchanan was concerned about the impact of the emissions on residents using tank water.	SH left a voicemail at 10:55 am and HPP Environment Manager returned the call at 11:06 am. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Odour	Complaint received by Community Hotline. The stakeholder (SH) reported a diesel odour at their premises.	SH left a voicemail at 11:00 am and HPP Environment Manager returned the call at 11:48 am. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Smoke & Odour	Complaint received by Community Hotline. The stakeholder (SH) in West Wallsend reported smoke and a diesel odour at their premises.	SH left a voicemail at 11:19 am and HPP Environment Manager returned the call at 11:39 am. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Odour	Complaint received by Community Hotline. The stakeholder (SH) in Belmont reported a diesel odour at their premises.	HPP Environment Manager received the initial call at 11:33 am. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Smoke & Odour	Complaint received by Community Hotline. The stakeholder (SH) in Heddon Greta reported smoke a diesel odour at their premises.	HPP Environment Manager received the initial call at 11:49 am. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes

Date	Nature of Complaint	Description	Response	HPP Responsible
09/07/2025	Odour	Complaint received by Community Hotline. The stakeholder (SH) in Kurri Kurri reported a diesel odour at their premises.	HPP Environment Manager received the initial call at 11:35 am. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Odour	Complaint received by Community Hotline. The stakeholder (SH) in Heddon Greta reported a diesel odour at their premises.	HPP Environment Manager received the initial call at 12:14 pm. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Odour	Complaint received by Community Hotline. The stakeholder (SH) in West Wallsend reported a diesel odour at their premises.	HPP Environment Manager received the initial call at 12:29 pm. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Odour	Complaint received by Community Hotline. The stakeholder (SH) in West Wallsend reported a diesel odour at their premises.	HPP Environment Manager received the initial call at 12:47 pm. EM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Odour	Complaint received by Community Hotline. The stakeholder (SH) in Bolton Point area reported a diesel odour at their premises.	Communication and Stakeholder Engagement Manager (CSEM) received the initial call at 12:57 pm. CSEM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Odour	- Complaint received by Community Hotline. The stakeholder (SH) in Elebana reported a diesel odour at their premises.	SH left a voicemail at 12:56 pm and Communication and Stakeholder Engagement Manager (CSEM) returned the call at 12: 59 pm. CSEM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
09/07/2025	Odour	Complaint received by Community Hotline. The stakeholder (SH) in Kurri Kurri reported a diesel odour at their premises.	Communication and Stakeholder Engagement Manager (CSEM) received the initial call at 1:16 pm. CSEM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes

Date	Nature of Complaint	Description	Response	HPP Responsible
09/07/2025	Smoke & Odour	Complaint received by Community Hotline. The stakeholder (SH) in Kurri Kurri reported a diesel odour at their premises.	Communication and Stakeholder Engagement Manager (CSEM) received the initial call at 2:29 pm. CSEM explained to SH that the smoke and odour being experienced were a normal part of the process of commissioning the power station and that the impacts would subside over the coming week.	Yes
08/07/2025	Odour	- Complaint received to the community email. - The stakeholder (SH) in Kurri Kurri reported a diesel odour at their premises.	SH sent email at 1:56 pm. Communication and Stakeholder Engagement Manager (CSEM) responded via email at 5:23 pm on 17 July 2025. - Communication and Stakeholder Engagement Manager (CSEM) responded advising the stakeholder that the odour was due to the process of commissioning the power station and has been paused while the project considers how to mitigate these impacts.	Yes
09/07/2025	Odour	- Complaint received to the community email. - The stakeholder (SH) reported a diesel odour at their premises.	SH sent email at 10:16 pm. Communication and Stakeholder Engagement Manager (CSEM) responded via email at 5:26 pm on 17 July 2025. - Communication and Stakeholder Engagement Manager (CSEM) responded advising the stakeholder that the odour was due to the process of commissioning the power station and has been paused while the project considers how to mitigate these impacts.	Yes
10/07/2025	Smoke & Odour	- Complaint received to the community email. - The stakeholder (SH) reported a diesel odour at their premises and smoke.	SH sent email at 10:50 am. Communication and Stakeholder Engagement Manager (CSEM) responded via email at 5:29 pm on 17 July 2025. - Communication and Stakeholder Engagement Manager (CSEM) responded advising the stakeholder that the odour and smoke was due to the process of commissioning the power station and has been paused while the project considers how to mitigate these impacts.	Yes

7.2.1 Compliant Management System Assessment

During this IEA the Auditor accessed the complaints management system. The system implemented as documented in the EMS includes:

- Complaint reporting;
- Communication protocol (initial and on-going contact with complainants);
- Compliant investigation;
- Development of corrective and preventative actions (where appropriate);
- Reporting (internal and external);
- Complaint record management.

The system as described in the EMS is considered appropriate for the project.

7.3 Summary of Notices

The following compliance-related notices were issued to the project during the audit period:

7.3.1 DPHI Notices

The following notices were issued by the DPHI to SHL during this audit period:

1. Letter dated 7 August 2025 titled “Hunter Power Project – Incident – Air Quality Impacts”, notifying SHL that DPHI had identified two non-compliances against Conditions B2 and B4 of the Planning Approval and potential breaches of Conditions B30, B31, B32 and C1 of the Planning Approval. The Auditor has reviewed the impact of the incident in terms of compliance with Conditions B30, B31, B32 and C1. The operation of the plant during commissioning of the plant did not trigger a non-compliance in relation to hours of operation (B30, B31 and B32) or a failure to implement the CEMS (Condition C1). Note however the recommendation for improvement in Table 7 above and discussion in Section 7.4.2 below.
2. 12 August 2025 – Notice to furnish information and records relating to the implementation of the EMS, specifically the notification of the local community and relevant agencies and maintenance of the project website.
3. 12 August 2025 – Notice to furnish information and records relating to the hours of construction, specifically asking for information relating to the timing of commissioning activities undertaken during the July 2025 commissioning of Unit 1.

7.3.2 EPA Notices

The following notices were issued by the NSW EPA to SHL during this audit period:

1. 13 December 2024 - Section 284 Exemption Order No. 1646446 authorising exceedances to emissions from the plant during commissioning.
2. 25 July 2025 – Section 200 Notice to provide reasonable assistance - requiring SHL to maintain all records relating to the smoke and odour emissions during the commissioning activities on 8 and 9 July
3. 6 August 2025 - Section 191 Notice for Information and / or Records – Ref 3513249 relating to the smoke and odour emissions during the commissioning activities on 8 and 9 July.
4. 21 August 2025 – Section 96 Prevention Notice – requiring preventative actions to be taken in relation to future commissioning activities including startup using natural gas instead of diesel, the installation of stack particulate emission monitoring system, preparation of appropriate Trigger Action Points related to commissioning activities, and preparation and implementation of a Diesel Commissioning Environmental Management Plan.
5. 26 August 2025- Section 212A Notice authorising an extension of time for the provision of information required by the 6 August Section 191 Notice.

7.4 Project Environmental Management System

The Hunter Power Project operates in accordance with the Environmental Management Strategy that was prepared in accordance with the requirements of the Project Approval. The EMS, as documented, generally satisfies the intent of ISO 14001.

Considering the letter from DPHI to SHL of 7 August 2025, the Auditor has reviewed the implementation of the Construction Environmental Management Strategy, Version 4, dated 27 November 2024 as it applies to the notification of the community and relevant stakeholders of the commencement of commissioning and the timing of the commissioning activities.

In Section 1.2 Scope of the CEMS the strategy states that the

“CEMS is the principal environmental management document that describes the systems in place to minimise and manage environmental risks associated with the construction and commissioning of the project”.

The works covered by the CEMS is again described in Section 3.1 Table 3-1 Construction and Commissioning activities summary and again specifies that commissioning activities are covered by the CEMS.

The hours of approved work cover Section 3.3 Construction and Commissioning hours (and in the Noise and Vibration Management Plan, Appendix G to the CEMS) and consultation / notification of the community and relevant regulators is covered in Section 6 of the CEMS.

7.4.1 Commissioning Hours

Section 3.3.2 of the CEMS deals specifically with commissioning hours and states:

The above construction hours are also applicable to cold commissioning activities.

Hot commissioning would also generally take place during standard construction hours but will also take place during the evening and night. As the activity is more akin to operations, it will be undertaken in accordance with Noise Limit Conditions in Condition B21 (and EPL Condition L4.1) with commissioning activities to take place during the day, evening and night periods.

The CEMS therefore clearly states that hot commissioning, the activity undertaken on 8 and 9 July 2025, was intended to be undertaken at any time, and therefore those works were undertaken in accordance with times specified in the CEMS.

7.4.2 Community and Stakeholder Communications

Table 6-1 Communication Tools in Section 6.2 of the CEMS lists the methods of communication to be used to advise community members and community stakeholders throughout the construction of the Project. There is no specific reference in that section to communications with the Regulators.

Table 6-1 specifies that the following relevant communications tools will be used for construction related notifications:

- Project webpage – notification of major milestones and any activities that may impact the community
- Letters to specific households that maybe impacted
- Paid advertising notifying the broader community of major milestones and any activities that may impact the community
- Media Releases – project updates
- Letterbox drops – general project communications to the broader community
- Subscribed communications (for example monthly construction updates)

SHL notified DPHI on 27 August 2025, in response to the DPHI notice of 12 August 2025, that prior to the commencement of the commissioning of Unit 1, the following communications were undertaken:

- A letter was sent to the residents within the HPP noise catchment zone on 19 June 2025 notifying them of the planned commencement of commissioning and that they may experience some increased noise as a result.
- An email was sent to the local Emergency Management Committee (Cessnock) on 24 June 2025 advising of the planned commencement of commissioning.

The Auditor therefore understands that SHL did not specially notify the broader community (outside of the noise impact zone) of the commissioning activities, and the two targeted communications did not address any potential air quality impacts. Therefore, it is concluded that did not provide sufficient information to the broader community of the commencement of commissioning and the potential impacts associated with that commissioning.

While the intent of the communications section of the CEMS was met, the Auditor recommends that the project ensure that the broader community is notified of any future commissioning or operational activities that has the potential to impact of those communities.

7.5 Implementation of the Environmental Management Plan and Sub-plans

The Conditions of Approval required the preparation and implementation of the following management plans:

- Environmental Management Strategy
- Biodiversity Management
- Water Management Plan
- Cultural Heritage Management Plan
- Construction Pedestrian and Traffic Management Plan
- Waste Management Plan
- Air Quality Management Plan

During the document review phase of the project the contents of each of the plans were reviewed and were found to reflect the requirements of the Approval.

In general, the Auditor is satisfied that, with the exception of the community notification noted in Section 7.4.2 above, all plans were being implemented appropriately.

7.6 Status of Previous IEA Findings

No non-compliances were identified during the last Independent Environmental Audit.

7.7 Specialist Auditor Reports

No specialist auditor reports were required as part of this audit.

7.8 Environmental Impacts

The assessment of construction impacts against those predicted in the Environmental Impact Assessment, prepared by Ethos Urban (28 October 2018), are summarised in [Table 8](#).

Table 10 - Predicted vs Actual Impacts

Category	Predicted Impact	Actual Impacts to Date
Biodiversity	Proposal would result in the direct removal of some native vegetation. The estimated native vegetation clearing is approximately 1.54 ha consisting of the following: Parramatta Red Gum – Narrow-leaved Apple – Prickly-leaved Paperbark shrubby woodland in the Cessnock- - Kurri Kurri area (PCT 1633) – 1.49 ha - Typha Brushland (PCT 1737) – 0.05 ha. One Threatened Ecological Community (TEC) listed under the BC Act would be impacted by the Proposal: - Parramatta Red Gum – Narrow-leaved Apple – Prickly-leaved Paperbark shrubby woodland in the Cessnock- Kurri Kurri area (PCT 1633) – 1.49 ha.	The total clearing undertaken for the project resulted in the removal of slightly less vegetation than proposed in the EIS.
Aquatic Biology	The Proposal is unlikely to result in a significant impact as no channel works are proposed and as no significant impacts to water quality or hydrology are predicted.	The earthworks associated with the proposal are complete with robust erosion and sediment controls and chemical storage facilities in place. There were no reported chemical spills or water releases during the audit period that would result in an impact to aquatic ecology.
Surface Water	The following potential impacts were identified: - Erosion of soils and sedimentation of waterways - Reduced water quality from elevated turbidity, increased nutrients and other contaminants associated with construction (ie. heavy metals which are bound to sediment or fuels, oils and grease from accidental spills) - Smothering of aquatic organisms from increased sediments and associated low dissolved oxygen levels - Potential increased occurrence of algal blooms associated with reduced water quality - Migration of litter off-site - Contamination due to accidental leaks or spills of chemicals and fuels.	No material surface water impacts have been identified during the audit period.

Category	Predicted Impact	Actual Impacts to Date
Groundwater	The groundwater impact assessment (see Chapter 12) does not predict any measurable changes in groundwater levels or flows beyond the Proposal Site, and therefore impacts to GDE are not predicted.	No impacts on groundwater have been identified.
Heritage	Most impacts that would result from the Proposal are located within already disturbed and impacted areas and the Proposal is unlikely to further harm Aboriginal objects, if present. No known or listed non-Aboriginal heritage items have been identified within or near the Proposal Site.	No heritage artifacts have been identified during the excavation works. No unexpected heritage finds were discovered during the audit period
Soil Contamination	The following potential impacts could occur during construction of the Proposal: - Risks associated with soil erosion during the earthworks associated with site regrading, the stormwater basin, foundation excavation and services installation - Construction of the Proposal would also involve the storage, treatment or handling of fuels, chemicals, building materials, wastes and other potential contaminants. Potential for chemical and fuel spills during construction may result in localised contamination of soils and/or groundwater.	No significant erosion or sediment control issues have been reported during the audit period. No incidents relating to fuel or chemical management have been reported during the audit period.
Construction Noise	The construction phases which were predicted to result in the highest noise levels at the nearest sensitive receiver are the initial site earthworks, and the surfacing works (i.e. Phases 1 and 8). These works would result in noise levels of 51 dB(A) and 49 dB(A) at the nearest residential receiver, respectively.	No noise or vibration related complaints have been received during the audit period. No noise impacts in excess of the predicted impacts have been recorded.
Construction Air Quality	Construction and commissioning of the Proposal would generate fugitive emissions in the form of: - Dust from handling of soils and exposed excavations, including the site excavations for the gas turbine facility and switchyard, construction of on-site access roads, overall site grading activities and vehicle movements - Emissions generated by combustion of fuel from construction plant including small volumes of particulates, carbon monoxide, carbon dioxide, hydrocarbons and nitrogen oxides.	Smoke and nuisance odours were emitted during the initial commissioning of Unit 1, while starting up on Diesel. The incident resulted in the receipt of twenty one complaints from local residents by the proponent. It is noted that the EPA also received a significant number of complaints as a result of those emissions.
Traffic and access	Additional construction vehicle movements generated by the Proposal are not expected have a large impact on the operation of the Hart Road interchange. The interchange currently carries low traffic volumes and has spare capacity to accommodate additional construction traffic. No impacts to road access are expected as no public roads are proposed to be closed during construction of the Proposal. Existing access to surrounding land uses and for emergency vehicles would be maintained throughout construction works.	No traffic impacts exceeding the predictions in the EIS have been identified.

7.8.1 Extent of Project Operations

The original Environmental Assessment and modifications defined the proposed project boundaries. A review of current aerial imagery (Google Maps) and the Auditor's observations during the site inspection found that the construction works are confined to the approved site boundaries, with the exception of an equipment laydown that is outside the approved site boundary. The laydown area is located within the area known as Precinct 3B. This area that is on land owned by Hydro Aluminum, was added to the project footprint in Modification 1. The Kurri Regrowth project holds access rights to the area as part of their development of the site.

The Auditor considers that the use of an off-site temporary construction material storage area that is appropriately licensed and consistent with the planning approvals for the area does not conflict with the Hunter Power Project Planning Approval.

7.9 Other Matters

No other matters were identified during this audit.

Compliance Table

Appendix A

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S2 A1	Obligation to Minimise harm to the Environment	In addition to meeting the specific performance criteria established under this approval, the Proponent must implement all feasible and reasonable measures to prevent, and if prevention is not feasible and reasonable, minimise any material harm to the environment that may result from the construction, operation, decommissioning or rehabilitation required under this approval.	Documents as noted in this audit report.		Reasonable and feasible measures observed during the audit site inspection on 8/9/25	All reasonable and feasible measures were observed during the audit site inspection with documented evidence provided to demonstrate their effective implementation.	Noted	
S2 A2	Terms of Approval	The Proponent must carry out the Development in accordance with the: a. EIS;		SHL Environmental Manager No consistency assessments were undertaken during this audit period.		The assessment of compliance in relation to this approval has been undertaken against the requirements of the consolidated approval and is presented in detail below.	Complies	
		b. In accordance with all written directions of the Secretary; and		SHL Environmental Manager – no directions have been issued to Snowy hydro during the audit period.		No directions related to the construction phase of the have been issued to Snowy Hydro Limited (SHL) during the audit period.	Not Triggered	
		c. site plan and building elevation drawings at Appendix 1 and Appendix 6	Appendix 1 and Appendix 6 of the EIS.		Administration and workshop buildings have been completed	The location of the workshop and administration buildings is generally consistent with the site plan shown in Appendix 1 and Appendix 6.	Complies	
S2 A3	Terms of Approval	If there is any inconsistency between the documents in condition A2 above, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this approval prevail to the extent of any inconsistency.					Noted	
S2 A4	Terms of Approval	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent; and		SHL Environmental Manager– no directions have been issued to Snowy hydro during the audit period.			Not Triggered	
		b) any reports, reviews or audits undertaken or commissioned by the Department regarding compliance with this approval; and		SHL Environmental Manager– no directions have been issued to Snowy hydro during the audit period.		No written directions have been issued by DPHI	Not Triggered	
		c) the implementation of any actions or measures contained in these documents.		SHL Environmental Manager– no directions have been issued to Snowy hydro during the audit period.			Not Triggered	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S2 A5	Terms of Approval	Any document that must be submitted within a time frame specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Secretary. This condition does not apply to the immediate written notification required in respect of an incident under condition C6.	Letter from DPE (S O'Donoghue) to SHL (I Smith) titled "Hunter Power Project (SSI-1290060) Management Plan Staging", dated 22 December 2021.			DPE approved the submission of management plans in two stages, construction, and operations. The Auditor sighted the DPE approval letters for each of the construction stage plans required under this Approval. Extensions of time have been granted from DPE for several conditions including the Voluntary Planning Agreement with Council (A5) and the installation of met equipment (B26).	Complies	
S2 A6	Lapse of Approval	This approval will lapse five years after the date on which it is granted unless construction has physically commenced on or before that time.	Letter from DPE (H Watters) to SHL (I Smith) titled "Hunter Power Project (SSI-1290060) Notification of commencement of construction", dated 4 April 2022.	SHL Environmental Manager— construction works commenced on 29 March 2022.	Construction works were nearing completion at the time of the audit site inspection.	Construction of the project has commenced and was well advanced at the time of the audit.	Not Triggered	
S2 A7	Limits on Approval	The development must be a dual fuel power station using natural gas and/or liquid fuel (diesel) and shall comprise two open cycle gas turbine power plants with a total nominal output capacity of up to 750 megawatts.	https://www.snowyhydro.com.au/hunter-power-project/	SHL Environmental Manager— the power station is designed to operate on both natural gas (primary fuel) and diesel (backup fuel).		The description of the power station provided on the SHL website is for a 660-megawatt dual fuel power station. These criteria were confirmed by the SHL Environmental Assurance Advisor	Complies	
S2 A8	Limits on Operations	Fuel burning equipment must not be operated for the purpose of generating electrical power at the premises for more than 1,100 cumulative hours per calendar year.		SHL Environmental Manager— There was no operation of fuel burning equipment for the purpose of generating electrical power during the audit period. All operations during the audit period have been for the purposes of commissioning.		Operations of the power station have not commenced. This condition has not yet been triggered.	Not Triggered	
S2 A9	Limits on Operations	Fuel burning equipment must not be fired on diesel for the purpose of generating electrical power at the premises for more than 175 cumulative hours per calendar year.				Operations of the power station have not commenced. This condition has not yet been triggered.	Not Triggered	
S2 A10	Limits on Operations	Diesel fuel used in the power station must comply with the <i>Australian Government's Fuel Quality Standards (Automotive Diesel) Determination 2019</i> made under the <i>Fuel Quality Standards Act 2000</i> .	Diesel Fuel Analysis Certificate – prepared by Caleb Brett, laboratory report number 5679394.			An analysis of the fuel in use at the time of this audit confirmed compliance with the relevant standard.	Complies	
S2 A11	Limits on Operations	The Proponent is permitted to exceed the maximum hours specified in A8 and A9 in the event that operation, or continued operation, is required if: (a) the AEMO, or a person authorised by AEMO, directs the Proponent, under the National Electricity Law and the National Electricity Rules, to take relevant actions to maintain or restore the security or reliability of the electricity network; (b) the relevant AEMO direction referred to above remains in force; and (c) the Proponent takes all practical measures to prevent or minimise air pollution.				Operations of the power station have not commenced. This condition has not yet been triggered.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S2 A12	Limits on Operations	The Proponent must notify the Secretary and the EPA of any and all limit exceedances of conditions A8 to A10 or activation of condition A11.				No exceedances of the limit conditions contained in Conditions A8, A9 or A10 have been identified. This condition has not yet been triggered.	Not Triggered	
S2 A13	Statutory Requirements	The Proponent must ensure that all licences, permits and approvals are obtained and maintained as required throughout the life of the development. No condition of this approval removes the obligation for the Proponent to obtain, renew or comply with such licences, permits or approvals. The Proponent must ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the life of the development.	Planning Approval SSI-12590060. Environment Protection Licence No. 21627 EPBC 2021/8888. Refer also to the SHL website: Documents - Snowy Hydro.			Copies of the Planning Approval, EPL and EPBC approval were in place and were available on the SHL website. No other environmental license or approval is required for the construction of the project. The project website includes copies of the Commonwealth Controlled Action approval and the EPL in addition to EPL specific documents including the Pollution Incident Response Management Plan and environmental monitoring data.	Complies	
S2 A14	Statutory Requirements	For the purpose of section198 of the EP&A Regulation, the relevant provisions, as defined in section 198(1) of the EP&A Regulation, apply to this approval.					Noted	
S2 A15	Notification	At least two weeks prior to the commencement of the following activities, unless otherwise agreed by the Secretary, the Proponent must notify the Department in writing of the date of commencement of: a) construction of the development;	Letter from DPE (H Watters) to SHL (I Smith) titled "Hunter Power Project (SSI-1290060) Notification of commencement of construction", dated 4 April 2022.	SHL Environmental Manager– construction works commenced on 29 March 2022.		DPE's letter of 4 April 2022 acknowledged SHL's original notification (7 February 2022) of commencement of construction on or after 23 February 2022. The letter also acknowledges SHL's updated advice (28 March 2022) that construction start was to start on 29 March 2022.	Complies	
		b) commissioning of the gas power station;	Letter from SHL (D Young) to DPHI (J Turner) titled SSI-12590060 – Notification of intent to commence Commissioning", dated 28 April 2025.			DPHI was notified of the intent to commence commissioning on 28 April 2025.	Complies	
		c) operations; and				Operations of the power station have not commenced. This condition has not yet been triggered.	Not Triggered	
		d) the decommissioning of the development and rehabilitation of the site.				Operations of the power station have not commenced. This condition has not yet been triggered.	Not Triggered	
S2 A16	Structural Adequacy	The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.	.			Construction certificates were sighted during the previous IEAs. All works that were relevant have been signed off by the independent verifier as complying with the relevant requirements of the BCA.	Complies	
S2 A17	Demolition	The Proponent must ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.		SHL Environmental Manager– No demolition works were undertaken during this audit period.	No evidence of demolition observed during the site inspection	No demolition works were undertaken during this audit period.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S2 A18	Protection of Public Infrastructure	The Proponent must: a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the project.	Complaints Register.	SHL Environmental Manager– no incidents relating to damage to public infrastructure occurred during this audit period.	No observed damage to public infrastructure (specifically Hart Rd Loxford) observed during site inspection	No incidents relating to damage to public infrastructure occurred during this audit period.	Not Triggered	
		b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the project.		SHL Environmental Manager– no incidents relating to damage to public infrastructure occurred during this audit period.		No public infrastructure has required relocation due to the project	Not Triggered	
S2 A19	Operation of Plant and Equipment	The Proponent must ensure that all plant and equipment used on the site is: a) maintained in a proper and efficient condition.	Machine Inspection Checklist, dated 21 August 2025, Australian Civil Water Pty Ltd Gato Repairs Pty Ltd, Invoice for maintenance works on Kobelco plant, dated 30 June 2025.	SHL Environmental Manager– UGL have been commissioned as construction contractor and are responsible for maintaining their own equipment on site.	All plant and equipment observed was operational and appeared to be appropriately maintained. No evidence of leaks or excessive fumes. Construction works were being undertaken by UGL at the time of the IEA.	Records of inspections and maintenance covering the audit period were sighted by the Auditor. Plant and equipment sighted during the audit were operational and appeared to be in good condition with no visible leaks, excessive noise or exhaust fumes observed by the Auditor.	Complies	
		b) operated in a proper and efficient manner.	Dean Heather Mechanical, Service Record (Isuzu XO.23R), dated 25 June 2025. UGL Maintenance Request (EWP2800) dated 1 September 2025 CPESC work sheets (documenting compliance and maintenance inspections of the ERSED system by G Fletcher), dated 20 March 2025				Complies	
S2 A20	Environmental Representative	Prior to commencing the development, an environmental representative (ER) must be approved by the Secretary and engaged by the Proponent.	Letter from DPHI (S O'Donoghue) to SHL (A van der Kroft) titled "Replacement of Environmental Representative – Hunter Power Project (SSI-12590060)", dated 22 July 2024.	Environmental Manager – No change to ER occurred during this audit period.		Approval of the appointment of the current Environmental Representative (and alternates) was provided by DPHI on 22 July 2024.	Complies	
S2 A21	Environmental Representative	The Secretary's approval of an ER must be sought no later than one (1) week before commencing the development.	Letter from DPHI (S O'Donoghue) to SHL (A van der Kroft) titled "Replacement of Environmental Representative – Hunter Power Project (SSI-12590060)", dated 22 July 2024.	Environmental Manager – No change to ER occurred during this audit period.		Approval of the appointment of the current Environmental Representative (and alternates) was provided by DPHI on 22 July 2024.	Complies	
S2 A22	Environmental Representative	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in condition A2 and is independent from the design and construction of the development. The ER must meet only the requirements set out in sections 2.2, 2.3, 2.4 and 3 in the <i>Environmental Representative Protocol</i> (Department of Planning and Environment, October 2018).		Environmental Manager – No change to ER occurred during this audit period.		The CV's of the Environmental Representative (and alternates) have been reviewed and are appropriately qualified and experienced.	Complies	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S2 A23	Environmental Representative	From commencing the development, until commencing operation, or as agreed with the Secretary, the approved ER must: a) review the documents identified in conditions B5, B8, B12, B13, B19, B29, B33, B40, B43, B48 and C1 and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) make a written statement to this effect before submission of such documents to the Secretary (if those documents are required to be approved by the Secretary); or (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Department for information or are not required to be submitted to the Department);	Letter from DPHI (J Turner) to SHL (A van der Kroft) titled "Hunter Power Project (SSI-12590060 Revision of Management Plans)", dated 6 February 2025.	Environmental Representative– the ER undertakes monthly inspections and provides an inspection report. The ER has been involved in the review of documents throughout the audit period in accordance with this condition.		Correspondence from the DPHI to SHL confirmed that the ER endorsed the documents specified in this Condition.	Complies	
		b) as may be requested by the Secretary, assist the Department in the resolution of community complaints; and		Environmental Representative – DPHI did not request the ER to assist in the resolution of any community complaints during the audit period.		DPHI did not request the ER to assist in the resolution of any community complaints during the audit period.	Not Triggered	
		c) consider any minor amendments to be made to the plans / strategies in conditions B5, B8, B12, B13, B19, B29, B33, B40, B43, B48 and C1 that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval.				Correspondence from the DPHI to SHL confirmed that the ER endorsed the documents specified in this Condition. Refer to Condition B13 below.	Complies	
S2 A24	Environmental Representative	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A23, as well as the complaints register for any complaints received (on the day they are received)	ER site inspection reports covering the audit period.	Environmental Representative - SHL provided the ER with all information required by the relevant conditions to allow the ER to perform their functions under this Approval.		SHL provided the ER with all information required by the relevant conditions to allow the ER to perform their functions under this Approval. The ER inspects the site monthly. The site inspection and meeting provide a forum for the ER to discuss issues, complaints, and information requirements to enable them to perform their functions in accordance with condition A23 and A24.	Complies	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 A25	Planning Agreement	Within 6 months of the date of commencement of development under this approval, or other timeframe agreed by the Secretary, the Proponent must enter into a Planning Agreement with Council: (a) in accordance with Division 7.1 of Part 7 of the EP&A Act; and	Letter from DPE (G Lucas) to SHL (D Young) titled "Extension Request to enter into Planning Agreement (SSI-12590060)", dated 29 August 2023 Hunter Power Project (Kurri Kurri Power Station) Planning Agreement – Cessnock City Council / Snowy Hydro Limited, signed and dated 22 November 2023. Email from DPHI (Major Projects) to SHL (I Smith) titled "Hunter Power Project (Kurri Kurri Power Station) – Planning Agreement - Extension of time", dated 30 August 2023.			On 29 August 2023, DPE approved an extension of time for the finalisation of the planning agreement till the 29 February 2024. The planning agreement was executed in November 2023.	Complies	
		b) the terms of the Proponent's offer to Council in Appendix 3.	Hunter Power Project (Kurri Kurri Power Station) Planning Agreement – Cessnock City Council / Snowy Hydro Limited, signed and dated 22 November 2023.			The planning agreement was executed in November 2023 in accordance with the offer to council (Appendix 3).	Complies	
S2 A26	Planning Agreement	If the Proponent and Council do not enter into a Planning Agreement within the timeframe under condition A25, then prior to the commencement of operation of the development, the Proponent must make a Section 7.12 of the EP&A Act contribution to Council of \$880,000. The amount to be indexed in accordance with the provisions of the Council's <i>City Wide Infrastructure Contributions Plan 2020</i> .	Hunter Power Project (Kurri Kurri Power Station) Planning Agreement – Cessnock City Council / Snowy Hydro Limited, signed and dated 22 November 2023.			The planning agreement was executed in November 2023.	Not Triggered	
S2 A27	Planning Agreement	If there is any dispute between the Proponent and Council in regard to conditions A25 and A26 then either party may refer the matter to the Secretary for resolution.	Hunter Power Project (Kurri Kurri Power Station) Planning Agreement – Cessnock City Council / Snowy Hydro Limited, signed and dated 22 November 2023.			The planning agreement was executed in November 2022.	Not Triggered	
S2 A28	Temporary Additional Construction Area	Prior to the operation of the development, unless otherwise agreed by the Secretary, the Proponent may utilise the temporary additional construction area identified as Precinct 3B in Figure 2 of Appendix 2 of this approval for construction activities.			Audit site inspection, 8/9/25 – activities in precinct 3B were observed to be undertaken in an environmentally responsible manner.	Noted, activities in precinct 3B were observed to be undertaken in an environmentally responsible manner.	Complies	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B1	Air Quality General Operating Conditions	The premises must be maintained and operated in a manner that minimises or prevents dust emissions from the premises.	Complaints Register. UGL Incident Register Hunter Power Project Site Familiarisation Induction (prepared by UGL).	SHL Environmental Manager – – no dust complaints were received during the audit period. No notices or directions have been received from the EPA or DPHI in relation to nuisance dust or air quality issues during the audit period.	At the time of the site inspection internal roads and hardstand areas were sealed and mostly complete, thereby controlling dust hazards (Photographs 2,4,5). No dust emissions were observed. The site speed limit is 10 kmh. Signage advising of the speed limit was sighted	No dust complaints or dust related incidents were reported during the audit period. No dust related issues were observed during the site inspection. An air quality management plan has been prepared for the project and has been substantially implemented (for further information please refer to Condition C1 below). Mobile plant and equipment are regularly maintained to minimise air (exhaust) emissions, refer to Condition S2 A19 above. The environmental induction provided to site (construction personnel) includes appropriate information regarding dust and air quality management including site speed restrictions. Appropriate controls implemented on site include stabilised access and egress, vehicle speed restrictions, site watering as well as vehicle washdown to prevent mud tracking and dust generation. Completion of internal roads and hardstand has further controlled dust emissions.	Complies	
S3 B2	Air Quality General Operating Conditions	The Proponent must carry on any activity, or operate any plant, in or on the premises by such reasonably practicable means as may be necessary to prevent or minimise air pollution.	Complaints Register. Incident Register. Machine Inspection Checklist, dated 20 July 2024, Much Shifting Solutions Gato Repairs Pty Ltd, Invoice for maintenance works on Kobelco plant, dated 11 April 2024. Hunter Power Project Site Familiarisation Induction (prepared by UGL). Letter from DPHI to SHL titled "Hunter Power Project – Incident – Air Quality Impacts", dated 7 August 2025	SHL Environmental Manager – – no dust complaints were received during the audit period; however, 21 odour / smoke complaints were received.	At the time of the site inspection internal roads and hardstand areas were sealed and mostly complete, thereby eliminating dust hazards (Photographs 2,4,5). No dust emissions were observed.	Over a period of two days, (8 and 9 July 2025) during the initial commissioning of Unit 1, odour and smoke was emitted from the Unit 1 stack resulting in twenty-one complaints. The incident was investigated and reported to DPHI and the EPA. DPHI notified SHL on 7 August 2025 confirming noncompliance with Conditions S3 B2 and S3 B4.	Non-Compliance	Implement all commissioning related emission reduction controls as specified by the EPA.
S3 B3	Air Quality General Operating Conditions	Trucks entering and leaving the premises that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and.	Hunter Power Project Construction Air Quality Management Plan, Revision 3, dated 29 December 2023. Complaints Register.		No trucks carrying dust generating materials were observed. All major earthworks are complete.	The CAQMP specifies the requirement that all trucks entering and leaving the site must be covered. No dust complaints were received during this audit period.	Complies	
S3 B4	Air Quality General Operating Conditions	The Proponent shall not permit any offensive odour to be emitted beyond the boundary of the site.	Complaints Register. Letter from DPHI to SHL titled "Hunter Power Project – Incident – Air Quality Impacts", dated 7 August 2025	SHL Environmental Manager–odour complaints were received during the audit period.	No offensive odours were encountered during the site inspection.	Twenty-one odour / smoke related complaints were received over a two-day period (9 and 10 July 2025) during the initial commissioning of Unit 1. DPHI notified SHL on 7 August 2025 confirming noncompliance with Conditions S3 B2 and S3 B4.	Non-Compliance	Implement all commissioning related emission reduction controls as specified by the EPA.

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B5	Final Design Verification	Prior to the commencement of the installation of the gas turbines, the Proponent must provide a revised Air Quality Impact Assessment (AQIA) to the Secretary and EPA that is based on the detailed design of the plant and includes emission specifications (emission rates and concentrations) based on manufacturer performance guarantees. Should the plant design and emissions characteristics differ from what was assessed previously (Hunter Power Project, Air Quality Impact Assessment, Jacobs, 30 July 2021), the revised AQIA must include remodeling of emissions based on final design and reassessment of impacts.	Letter from ER (G Byrnes) to SHL (I Smith) titled "Hunter Power Project Final Design: Updated Air Quality Impact Assessment (4 August 2022)", dated 15 August 2022. Hunter Valley Project Updated Air Quality Impact Assessment, Revision 3, dated 4 August 2022.	SHL Environmental Manager— There have been no design changes made during this audit period, however the final design verification is not yet available.		There have been no design changes made during this audit period. The Auditor has reviewed the Revised AQIA. The assessment concludes <i>"that the detailed design has resulted in negligible changes to slight reductions in ground level concentrations of pollutants, when compared with the air quality modelling results produced for the Project EIS"</i> . The revised assessment satisfies the requirements of Condition B5. The ER endorsed the revised AQIA on 15 August 2022. The AQIA was submitted to EPA via email on 16 August 2022. DPE comments on the AQIA were received on 30 September 2022. In their letter dated 29 September 2023, DPE acknowledged that the revised air quality assessment:	Complies	
S3 B6	Final Design Verification	The final design, installation and operation of the power station must not preclude the ability for air pollution emissions controls to be retrofitted.	Email from Jacobs (M. Luger) to SHL (I Smith) dated 30 September 2022. Letter from DPE (S' ODonohue) to SHL dated 29 September 2022 Email from DPE (J Turner) to SHL (I Smith) dated 30 September 2022.			- is based on the final land design including the increased stack height and updated characteristics of the substation - demonstrates that the proposed final design will result in a reduction in air quality impacts compared to the approved project - has been provided to the NSW Environment Protection Authority who advised the Department it had no comment on the revised assessment.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B7	Air Quality Verification	Within six months of commissioning the power station (unless otherwise agreed by the Secretary in consultation with the EPA) and during a period in which the development is operating under high design loads, the Proponent must undertake a monitoring program to confirm the air emission performance of the power station.				Commissioning of the power station has not been completed; therefore, this condition has not yet been triggered.	Not Triggered	
		The monitoring program must include, as a minimum (or as otherwise permitted by the applicable EPL): (a) two rounds of post-commissioning monitoring of the pollutants and parameters in Table 1 below for each discharge point;				Commissioning of the power station has not been completed; therefore, this condition has not yet been triggered.	Not Triggered	
		(b) consideration of the dual-fuel and peaking operability of the power station in capturing representative air pollutant emission concentrations and normal operating parameters; and				Commissioning of the power station has not been completed; therefore, this condition has not yet been triggered.	Not Triggered	
		(c) sampling methods as per the NSW EPA's <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> (latest version).				Commissioning of the power station has not been completed; therefore, this condition has not yet been triggered.	Not Triggered	
S3 B8	Air Quality Verification	Within six weeks of completing post-commissioning testing (unless otherwise agreed by the Secretary in consultation with the EPA), the Proponent must submit a Post-Commissioning Verification Report (the Report) to the EPA.				Commissioning of the power station has not been completed; therefore, this condition has not yet been triggered.	Not Triggered	
		The Report must: a) include all analytical results of post-commissioning monitoring required for all discharge points. Any external report must be reproduced in full;				Commissioning of the power station has not been completed; therefore, this condition has not yet been triggered.	Not Triggered	
		b) include all the information listed in section 4 of the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> (latest version);				Commissioning of the power station has not been completed; therefore, this condition has not yet been triggered.	Not Triggered	
		c) describe all the operational parameters during post-commissioning testing;				Commissioning of the power station has not been completed; therefore, this condition has not yet been triggered.	Not Triggered	
		d) compare analytical results from post-commissioning monitoring against final design emission specifications and modelled emission parameters (emission rates and concentrations) in the AQIA required under condition B5 (final design verification assessment); and				Commissioning of the power station has not been completed; therefore, this condition has not yet been triggered.	Not Triggered	

Project Approval 12590060										
Cond.	Title	Condition		Documents Reviewed		Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B8	Air Quality Verification	e) should any comparison under B8(d) identify monitored discharge concentrations or emission rates above the emissions characteristics in the revised AQIA or the <i>Protection of the Environment Operations (Clean Air) Regulation 2021</i> standards of concentration, the Proponent must: (i) re-assess and evaluate both the emissions concentrations against the <i>Protection of the Environment Operations (Clean Air) Regulation 2021</i> standards of concentration and the impacts against the relevant impact assessment criteria in the <i>Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i> (latest version); and/or (ii) identify actions and measures to be implemented to reduce emissions of air pollutants to no greater than those predicted in the AQIA. Details of the actions and measures and a timetable for implementation must be submitted to the Secretary and the EPA for approval.						Commissioning of the power station has not been completed; therefore, this condition has not yet been triggered.	Not Triggered	
S3 B9	Monitoring / Discharge Points	The following points referred to in Table 2 below (or alternative points as permitted by the applicable EPL) are identified for the purposes of monitoring and/or setting of limits for the emission of pollutants to the air from the point.							Noted	
	Table 2	Emission Point	Type of Monitoring Point	Type of Discharge Point	Description of Location					
		1	Air Emissions	Discharge to Air	Gas Turbine Stack 1					
		2	Air Emissions	Discharge to Air	Gas Turbine Stack 1					
S3 B10	Discharge Limits	For each monitoring/discharge point specified by Table 3 below (or alternative points as permitted by the applicable EPL) the concentration of a pollutant discharged at that point, must not exceed the concentration limits specified for that pollutant in the table (or alternative limits as permitted by the applicable EPL).		Air Monitoring Data- July 2025 Air Monitoring Data- August 2025 Air Monitoring Data- August 2025 Environment Protection Licence 21627				Hot commissioning of the power station has commenced in July. Air quality monitoring data is available for the months of July, August and September (on the project website). The EPA approved a variation to the EPL (12 December 2024, that allows for an exemption from these discharge limits for the period of the commissioning works undertaken from 1 January 2025 to 31 December 2025.	Not Triggered	
	Table 3	Pollutant		Fuel Type	100 percentile limit (mg/m³)	Reference Conditions		Averaging Period		
		Nitrogen dioxide (NO ₂) or Nitric Oxide (NO) or both as NO ₂ Equivalent		Natural Gas	51	Dry, 273 °K, 101.3 kPa, 15% O ₂		1 hr.		
				Diesel	86					
		Carbon Monoxide (CO)		Natural Gas	12.5	Dry, 273 °K, 101.3 kPa, 15% O ₂		1 hr.		
				Diesel	63					

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B11	Monitoring Conditions	The Proponent must, for each air monitoring/discharge point, determine the pollutant concentrations and emission parameters specified in Table 4 below. For each pollutant, the Proponent must use the sampling method, units of measure, and sample at the frequency specified opposite in the other columns. Sampling methods as per the NSW EPA's <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> (latest version) (or alternative methods as permitted by the applicable EPL).	Air Monitoring Data- July 2025 Air Monitoring Data- August 2025 Air Monitoring Data- August 2025 Environment Protection Licence 21627			Hot commissioning of the power station has commenced in July. Air quality monitoring data is available for the months of July, August and September (on the project website). The required emissions monitoring has been undertaken on Unit 1 during each of the three months since commencement of commissioning. Note that commissioning of Unit 2 has not commenced.	Complies	
	Table 4	Pollutant / Parameter	Units of Measure	Frequency	Sampling Method			
		Nitrogen dioxide (NO ₂) or Nitric Oxide (NO) or both as NO ₂ Equivalent	mg/m ³	Continuous	CEM-2 and US EPA Procedure 1			
		Carbon Monoxide (CO)	mg/m ³	Continuous	CEM-4 and US EPA Procedure 1			
		Moisture	%	Continuous	Special Method 1 and US EPA Procedure 1			
		Oxygen	%	Continuous	CEM-3 and US EPA Procedure 1			
		Temperature	°C	Continuous	TM-2 and US EPA Procedure 1			
		Velocity	m/s	Continuous	CEM-6 and US EPA Procedure 1			
		Volumetric flow rate	m ³ /s	Continuous	CEM-6 and US EPA Procedure 1			
		Selection of sampling positions	-	-	TM-1			
S3 B12	Hazards and Risks Preconstruction	Prior to the commencement of the installation of the gas turbines, unless otherwise agreed by the Secretary, the Proponent must prepare and submit to the satisfaction of the Secretary: a) A Fire Safety Study based on the detailed design of the development. This study must cover the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. The study must be prepared in consultation with NSW Rural Fire Service to verify the required Asset Protection Zone (APZ) in view of up to 14 MPa gas releases from the gas receiving station. The study must also be submitted for the approval of Fire and Rescue NSW.	Fire Safety Study, AECOM dated 5 October 2022. Email from Jacobs (M Luger) to RFS (general email address) titled "Hunter Power Station: Fire Safety Study - request for feedback from NSW Rural Fire Service" dated 11 October 2022. Letter from RFS (J O'Carroll) to SHL (I Smith) titled "Review of Fire Safety Study (FSS) – Kurri Kurri Power Station – Hart Road Loxford", dated 17 November 2022. Letter from ER (G Byrnes) to SHL (I Strachan) titled Hunter Power Project Fire Safety Study (Rev 0 5th October 2022), dated 13 December 2022. Letter from DPE (Stephen O'Donoghue) to SHL (I Strachan) titled Hunter Power Project (SSI-12590060) – Fire Safety Study dated 20 December 2022. DPE Post Approval form (ref 20221117001755).	SHL Environmental Manager- Draft report has been prepared by AECOM and is currently being reviewed by SHL.		The Fire Safety Study was issued to RFS on 11 October 2022 The RFS responded on 17 November 2022 and confirmed the Fire Safety Study would meet the requirements of FRNSW subject to a number of conditions relating to: • An Emergency Response Plan • Emergency Services Information Package • Emergency Responders Induction Package SHL noted that these recommendations will be implemented by the operational readiness team prior to the commencement of operations. SHL are aware of these obligations and are tracking progress through existing compliance programs. The Fire Safety Study was endorsed by the ER on the 13 December 2022 and approved by DPE on 20 December 2022 Evidence of how the RFS comments have been addressed will be required to fully meet the requirements of this condition. No changes to the Fire Safety Study during the audit period.	Complies	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B12	Hazards and Risks Preconstruction	b) A Hazard and Operability Study based on the detailed design of the development, chaired by a qualified person independent of the development, approved by the Secretary prior to the commencement of the study. The study must be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 8, 'HAZOP Guidelines'. The study report must be accompanied by a program for the implementation of all recommendations made in the report. If the Proponent intends to defer the implementation of a recommendation, reasons must be documented. The scope of the study must include and not be limited to: (i) components and processes associated with the power station, including the storage, handling and use of diesel fuel; and (ii) the supply tie-in at the gas receival station.	Letter from DPE (S O'Donoghue) to SHL (I Smith) titled "Hunter Power Project (SSI-1290060) HAZOP Chairperson Approval", dated 21 December 2021. Hunter Power Project Hazop Report Revision 0 dated 16 October 2022. Email from DPHI (M Mazaheri) to SHL (A. van der Kroft) titled "Hunter Power Project MOD 3 – DPHI Hazards Team Advice", dated 24 October 2024.			DPE approved the appointment of D Lockley as Chairperson of the HAZOP study in December 2021. The HAZOP Study has now been completed and is available on the project website. In October 2024, DPHI confirmed that the original HAZOP report covered the proposed use of diesel fuel during the first year of operation.	Complies	
S3 B12	Hazards and Risks Pre-commissioning	c) A Final Hazard Analysis based on the detailed design of the development, prepared in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'</i>. The scope of the study must include and not be limited to specifying all design variations between the final detailed design and the conceptual design described in the EIS.	Letter from ER (G Byrnes) to SHL (I Smith) titled "Hunter Power Project Final Hazard Analysis (22 February 2022)", dated 8 August 2022. Hunter Power Project Final Hazard Analysis, Revision C, dated 22 July 2022.			The Final Hazard Analysis report – Revision C (prepared by Jacobs) was issued on 22 July 2022. The report was endorsed by the ER on 8 August 2022. No changes to the Final Hazard Analysis during the audit period.	Complies	
S3 B13	Hazards and Risks Pre-commissioning Pre-startup	Prior to the commencement of operations, unless otherwise agreed to by the Secretary, the Proponent must prepare and submit to the satisfaction of the Secretary: a) A comprehensive Emergency Plan and detailed emergency procedures for the development. The Emergency Plan must include consideration of the safety of all people outside of the development who may be at risk from the development. The plan must be prepared in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'</i>.	Letter from DPHI (S O'Donoghue) to SHL (A van der Kroft) titled "Emergency Plan and Safety Management System", dated 28 April 2025.			Operation of the power station has not commenced. However, the Emergency Plan and Safety Management System have been prepared by SHL covering the commissioning works and has been approved by DPHI.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B13	Hazards and Risks Pre-commissioning Pre-startup	b) A document setting out a comprehensive Safety Management System , covering all on-site operations and associated transport activities involving hazardous materials. The document must clearly specify all safety related procedures, responsibilities and policies along with details of mechanisms for ensuring adherence to the procedures. Records must be kept on-site and must be available for inspection by Secretary upon request. The Safety Management System must be developed in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'</i> . The Safety Management System must also include Safety and Operating Plans required under AS 2885.	Letter from DPHI (S O'Donoghue) to SHL (A van der Kroft) titled "Emergency Plan and Safety Management System", dated 28 April 2025.			Operation of the power station has not commenced. However, the Emergency Plan and Safety Management System have been prepared by SHL covering the commissioning works and has been approved by DPHI.	Not Triggered	
S3 B14	Hazards and Risks Pre-startup	One month prior to the commencement of operation of the development, the Proponent must submit to the Secretary, a Pre-Startup Compliance Report detailing compliance with conditions B12 and B13, including:				Operation of the power station has not commenced.	Not Triggered	
		a) dates of study/plan/system submission, approval, commencement of installation of the gas turbines and commissioning						
		b) actions taken or proposed, to implement recommendations made in the studies/plans/systems; and				Operation of the power station has not commenced.	Not Triggered	
		c) responses to any requirement imposed by the Secretary under condition A2.				Operation of the power station has not commenced.	Not Triggered	
S3 B15	Hazards and Risks Post-startup	Three months after the commencement of operation of the development, the Proponent must submit to the Secretary, a Post-Start-up Compliance Report verifying that: a) the Emergency Plan required under condition B13(a) is effectively in place and that at least one emergency exercise has been conducted; and				Operation of the power station has not commenced. This condition has not yet been triggered.	Not Triggered	
S3 B16	Hazards and Risks Post Commissioning Requirements	b) the Safety Management System required under condition B13(b) has been fully implemented and that records required by the system are being kept.				Operation of the power station has not commenced. This condition has not yet been triggered.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B17	Hazards and Risks General	Twelve months after the commencement of operations of the development and every three years thereafter or at such intervals as the Secretary may agree, the Proponent must carry out a comprehensive Hazard Audit of the development and within two months of each audit submit a report to the satisfaction of the Secretary for approval. The audits must be carried out at the Proponent's expense by a qualified person or team, independent of the development and approved by the Secretary prior to commencement of the audit. Hazard Audits must be carried out in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit'</i> . The audit must include a review of the site Safety Management System and a review of all entries made in the incident register since the previous audit. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Proponent intends to defer the implementation of a recommendation, reasons must be documented.				Operation of the power station has not commenced. This condition has not yet been triggered.	Not Triggered	
S3 B17	Hazards and Risks General	The Proponent must store all chemicals, fuels and oils used in accordance with:	HPP Site Plan – location of all construction related fuels and chemicals	SHL Environmental Manager- Fuels stored on site include petrol and diesel fuel, oil for small plant such as generators, large mobile is fuelled by a mobile fuel truck that brings spill mats to place under vehicles during the refuelling process. There are also chemicals stored at the water treatment area – that is in a chemical container with a bund.	At the time of this IEA, construction works were nearing completion. No significant storage of fuels and oils was present at the site. Photographs 3 and 10, show self-bunded and ventilated dangerous goods, chemical and construction stage fuel storage as well as mobile containment bunds. Spill kits were in place and a bunded area has been established to contain any spills during vehicle refueling (photograph 14).	Construction of the bulk fuel tanks was complete. The bunding for those tanks meets the requirement of Condition B17 b).	Complies	
		a) the requirements of all relevant Australian Standards;					Complies	
		b) within a bunded area with a minimum bund capacity of 110% of the volume of the largest single stored vessel within the bund; and					Complies	
		c) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids.					Noted	
S3 B18	Hazards and Risks General	For the purpose of condition B17, any tanks or other storage vessels that are interconnected and may distribute their contents either by gravity or automated pumps must be considered a single vessel.			.		Noted	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B18A	Temporary Workforce Accommodation Facility	The proponent must: a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;			Fire extinguishers were available at the facility. There is no vegetation on the facility.	Firefighting equipment has been installed at the facility.	Complies	
		b) ensure that the development; i) complies with the relevant asset protection requirements in the Rural Fire Service's Planning for Bush Fire Protection 2019 (or equivalent) and Standards for Asset Protection Zones. The entire site must be managed as an Inner Protection Area in accordance with the requirements of Appendix 4 of Planning for Bush Fire Protection 2019; and ii) is suitably equipped to respond to any fires on site, including connection to the Hunter Water reticulated system or provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a Fire and Rescue NSW compatible suction connection;	P1906 Snowy Hydro Project BAL-12.5 Rectification Works ITR, signed and dated 4 January 2024.		Asset protection buffer zone (between buildings and site boundary) is in place. Firefighting equipment and water supply available (static water supply).	BAL requirements and Asset protection requirements were verified on 4 January 2024. Firefighting equipment and static water supply is available.	Complies	
		c) ensure that the Temporary Workforce Accommodation Facility is designed and constructed to ensure that: i) all accommodation units are located within the 10 kW/m2 setback from bushfire prone land ii) all other building structures within the facility site are located within the 12.5 bush fire attack level and are constructed to the relevant construction standard of Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas; iii) there is an on-site shelter located within the 12.5 bush fire attack level capable of housing all potential occupants that is constructed to a minimum of a BAL-12.5 construction standard of Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas iv) there is a 10 metre defendable space around the perimeter that permits unobstructed vehicle access and is managed as an asset protection zone (including the defendable space). The vehicular access to the site must be compliant with Table 6.8C of Planning for Bush Fire Protection 2019; and v) a minimum 2.1 metre high radiant heat shield made of non-combustible materials must be constructed along the eastern and southern boundary of the limit of significant vegetation. All posts and rails must be constructed of steel. The bottom of the fence is to be in direct contact with the finished ground level or plinth;	Occupation Certificate issued by the GMA Certification Group to Australian Portable Camps Pty Ltd for New Construction of Accommodation Buildings, Office, Amenities Blocks, Dining Hall, Gymnasium ,Wet Mess & Workshop, dated 19 December 2023.		The temporary accommodation facility was operating at the time of the IEA.	The temporary accommodation facility Occupation Certificate has been issued, confirming compliance with the relevant codes and standards.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B18A	Temporary Workforce Accommodation Facility	d) assist the Rural Fire Service and emergency services as much as practicable if there is a fire in the vicinity of the site; and					Noted	
		e) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.	Email from SHL (A van der Kroft) to Local Emergency Management Committee (P McLachlan) titled "Hunter Power Project – Bushfire Emergency Management and Evacuation Plan", dated 18 December 2023.	Environmental Manager – Sent by email to LEMC on 18/12/2023 "Snowy Hydro Limited Mail - Hunter Power Project - Bush Fire Emergency Management and Evacuation Plan.pdf".		The temporary accommodation facility commenced operations (first occupant arrival) on 2 January 2024. A Copy of the Bushfire Emergency Management and Evacuation Plan was sent to the Local Emergency Management Committee representative on 18 December 2023.	Complies	
S3 B18B	Temporary Workforce Accommodation Facility	Prior to occupying the Temporary Workforce Accommodation Facility, the Proponent must prepare a Bush Fire Emergency Management and Evacuation Plan for the Temporary Workforce Accommodation Facility consistent with the NSW Rural Fire Service document, A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan. The plan must: a) be prepared by a suitably qualified bushfire planning and design accredited level 3 bushfire expert;	Emergency Management and Evacuation Plan Temporary workforce accommodation facility Hunter Power Project, Revision 1.0, dated 13 December 2023.	Environmental Manager -The Plan was prepared by Nicole van Dorst (B. App. Sc., Grad. Dip., BPAD-L3 23610). Note that the first HPP Occupants commenced their stays at the Facility on 2 January 2024.		The Emergency Management and Evacuation Plan was prepared by Waratah Bushfire, an accredited bushfire planning consultant.	Complies	
		b) include contact details for the local Rural Fire Service District Office;	Emergency Management and Evacuation Plan Temporary workforce accommodation facility Hunter Power Project, Revision 1.0, dated 13 December 2023.			A list of emergency contacts, including the RFS is provided in Section 4 of the plan.	Complies	
		c) include procedures for coordinated evacuation of the site in consultation with local emergency services;	Emergency Management and Evacuation Plan Temporary workforce accommodation facility Hunter Power Project, Revision 1.0, dated 13 December 2023.			The Evacuation Procedures are provided in Section 5 of the plan. Those procedures include consultation with local emergency services.	Complies	
		d) include procedures for the use of an on-site shelter in the case where evacuation routes cannot be accessed; and	Emergency Management and Evacuation Plan Temporary workforce accommodation facility Hunter Power Project, Revision 1.0, dated 13 December 2023.			Trigger for on-site shelter is detailed in Section 6 of the plan.	Complies	
		e) adopt an early evacuation approach and include detailed plans of all emergency assembly areas, including on-site and off-site arrangements as stated in AS 3745 Planning for emergencies in facilities, are clearly displayed.	Emergency Management and Evacuation Plan Temporary workforce accommodation facility Hunter Power Project, Revision 1.0, dated 13 December 2023.			Early evacuation is discussed Section 1.1 of the Plan with detailed procedure given in Section 5 and includes plans showing emergency assembly areas.	Complies	
S3 B18C	Temporary Workforce Accommodation Facility	A copy of the Bush Fire Emergency Management and Evacuation Plan must be provided to the Local Emergency Management Committee and the Secretary prior to occupying the Temporary Workforce Accommodation Facility.	Email from SHL (A van der Kroft) to Cessnock Council (P McLachlan) titled "Hunter Power Project – Bushfire Emergency Management and Evacuation Plan", dated 18 December 2023. Email from DPHI (Major Projects) to SHL (A van der Kroft) titled "Hunter Power Project (Kurri Kurri Power Station) - Post Approval Document Received - (SSI-12590060-PA-68)", dated 29 December 2023.	Environmental Manager – Sent by email to LEMC on 18/12/2023 "Snowy Hydro Limited Mail - Hunter Power Project - Bush Fire Emergency Management and Evacuation Plan.pdf" Submitted via Planning Portal as SSI-12590060-PA-68 "Snowy Hydro Limited Mail - Hunter Power Project (Kurri Kurri Power Station) - Post Approval Document Received - (SSI-12590060-PA-68).pdf".		The temporary accommodation facility commenced operations (first occupant arrival) on 2 January 2024. A Copy of the Bushfire Emergency Management and Evacuation Plan was sent to the representative (P McLachlan) on 18 December 2023. DPE acknowledged receipt of a copy of the plan on 29 December 2023.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B19	Aviation Safety	Prior to the commencement of installation of the gas turbines, the Proponent must provide an updated plume rise assessment report based on the final generator design to the satisfaction of the Secretary. The report must: a) be prepared in consultation with Civil Aviation Safety Authority, Department of Defence and RAAF Base Williamtown;	Hunter Power Project Revised Plume Rise Assessment for Final Design, Revision 1, dated 3 June 2022. Letter from DoD (C Mangion) to SHL (I Smith) titled "Hunter Power Project (Kurri Kurri Power Station), Hart Road, Loxford NSW – updated plume rise assessment", dated 27 June 2022. Letter from CASA (B Parker) to DPE (C Preshaw) titled "Hunter Power Project - Kurri Kurri Power Plant", dated 27 June 2022.			The Revised Plume Assessment Report has been reviewed by the Auditor. Letters from DoD and CASA evidencing consultation in accordance with this Condition was sighted by the Auditor. There was no change to the Plume Assessment Report during the audit period.	Complies	
		b) demonstrate that the critical plume extent is consistent with the predictions in the EIS; and	Hunter Power Project Revised Plume Rise Assessment for Final Design, Revision 1, dated 3 June 2022.			The Revised Plume Rise Assessment report concludes that the plume rise heights are consistent (in fact having a slightly lower impact) compared to the predictions in the Environmental Impact Statement.	Complies	
		c) demonstrate that reasonable and feasible at source mitigation measures have been applied to further minimise the critical plume extent.	Hunter Power Project Revised Plume Rise Assessment for Final Design, Revision 1, dated 3 June 2022.			The Revised Plume Rise Assessment report concludes that the plume rise heights are consistent (in fact having a slightly lower impact) compared to the predictions in the Environmental Impact Statement.	Complies	
S3 B20	Aviation Safety	Prior to the commencement of installation of the gas turbines, the Proponent must submit final design drawings to the following organisations: a) Department of Defence – Land Planning and Regulation Branch;	Letter from SHL (I Smith) to the Department of Defence – Land Planning and Regulation Branch (T Hogan) titled "Hunter Power Project – Final Design Drawings", dated 7 July 2022. Letter from DPE (S O'Donoghue) to SHL (I Smith) titled "Hunter Power Project (SSI-12590060) – Final Design Drawings" dated 22 September 2022.			SHL has provided a copy of the final stack design drawings to DoD as required by this Condition. The DPE Letter confirms that the Final Design was issued to: • Department of Defence – Land Planning and Regulation Branch • RAAF Base – Williamstown • Aeronautical Information Service – Air Force • Air Services Australia • Newcastle Airport Pty Ltd • Cessnock Airport and • Maitland Airport.	Complies	
		b) RAAF Williamstown	Letter from SHL (I Smith) to the Department of Defence – Land Planning and Regulation Branch (T Hogan) titled "Hunter Power Project – Final Design Drawings", dated 7 July 2022.	SHL Environmental Manager– We worked with our specialist aeronautical subcontractor to understand those entities within DoD as well as various telephone enquiries and emails with CASA and DoD and were satisfied that these entities are covered by DoD Land Planning and Regulation/ CASA processes.		SHL has provided a copy of the final stack design drawings to RAAF Williamtown as required by this Condition.	Complies	
		c) Aeronautical Information Services – Air Force				SHL has provided a copy of the final stack design drawings to Aeronautical Information Services as required by this Condition.	Complies	
		d) Air Services Australia	Letter from SHL (I Smith) to Air Services Australia (D Jackson) titled "Hunter Power Project – Final Design Drawings", dated 7 July 2022.			SHL has provided a copy of the final stack design drawings to Air Services Australia as required by this Condition.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B20	Aviation Safety	e) Newcastle Airport Limited	Letter from SHL (I Smith) to Newcastle Airport (B Kochanski) titled “Hunter Power Project – Final Design Drawings”, dated 7 July 2022.			SHL has provided a copy of the final stack design drawings to Newcastle Airport as required by this Condition.	Complies	
		f) Cessnock Airport; and	Letter from SHL (I Smith) to Cessnock Airport (T Allan) titled “Hunter Power Project – Final Design Drawings”, dated 7 July 2022.			SHL has provided a copy of the final stack design drawings to Cessnock Airport as required by this Condition.	Complies	
		g) Maitland Airport	Letter from SHL (I Smith) to Maitland Airport (G Thompson) titled “Hunter Power Project – Final Design Drawings”, dated 7 July 2022.			SHL has provided a copy of the final stack design drawings to Maitland Airport as required by this Condition.	Complies	
		Evidence of notification/ provision of detailed design drawings must be submitted to the Secretary prior to the commencement of installation of the gas turbines.	Post Approval Submission Form – Evidence of submission Aviation.			Document transmission (Post Approval) form evidencing submission of final design drawings was sighted by the Auditor.	Complies	
S3 B21	Noise Limit Conditions	Operational noise generated at the premises must not exceed the noise limits at the times and locations in Table 5 below (or alternative limits as permitted by the applicable EPL).				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
	Table 5	Location	Noise Limits in dB(A)					
			Day	Evening	Night	Night		
			L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{AFmax}		
		13 Bishops Bridge Road, Sawyers Creek	50	58	41	52		
		10 Dawes Road, Loxford	45	45	43	53		
		20 Bowditch Ave, Loxford	43	43	38	52		
		464 Cessnock Road, Gilleston Heights	40	35	35	52		
		58 Sawyers Gully Road, Sawyers Gully	42	42	38	52		
S3 B22	Noise Limit Conditions							
S3 B22 S3 B23	Table 6	The noise limits set out in condition B21 apply under the meteorological conditions described in Table 6.					Noted	
	Table 6 Noise Limit Conditions	Assessment Period	Meteorological Conditions					
		Day	Stability Categories A, B, C and D with wind speeds up to and including 3 m/s at 10 m above ground level					
		Evening	Stability Categories A, B, C and D with wind speeds up to and including 3 m/s at 10 m above ground level					
Night	Stability Categories A, B, C and D with wind speeds up to and including 3 m/s at 10 m above ground level; or Stability Category E with wind speeds up to and including 2 m/s at 10 m above ground level							
S3 B24	Noise Limit Conditions	For those meteorological conditions not referred to in condition B22, the noise limits that apply are the noise limits in condition B21 plus 5 dB(A).					Noted	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B25	Noise Limit Conditions	For the purposes of condition B22, the meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station (point to be established) and the stability category shall be determined using the sigma-theta data method (section D1.4) from Fact Sheet D of the <i>Noise Policy for Industry</i> (NSW EPA, 2017), or latest version.				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
S3 B26	Meteorological Monitoring	For the purpose of determining the noise generated from the premises, the modifying factor corrections in Table C1 in Fact Sheet C of the <i>Noise Policy for Industry</i> (NSW EPA, 2017), or latest version, must be applied, if appropriate, to the noise measurements by the noise monitoring equipment.				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
S3 B26	Meteorological Monitoring	Prior to the commencement of the installation of the gas turbines, unless otherwise agreed by the Secretary, the Proponent must ensure there is a suitable meteorological weather station operating located on the premises or at a location approved by the EPA that:	https://www.snowyhydro.com.au/hunter-power-project/documents	SHL Environmental Manager – The met station has been established and the data fed through to the DCS.	A meteorological monitoring station has been installed at the site.	A meteorological monitoring station has been installed at the site. Weather monitoring is being undertaken in accordance with this Condition. A summary of the Met Data for commissioning periods can be found on the website https://www.snowyhydro.com.au/hunter-power-project/documents/	Complies	
		a) complies with the NSW EPA's <i>Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales</i> (or latest version);	https://www.snowyhydro.com.au/hunter-power-project/documents				Complies	
		b) <i>is capable of continuous real-time measurement of wind speed, wind direction, sigma theta, air temperature, rainfall and relative humidity; and</i>	https://www.snowyhydro.com.au/hunter-power-project/documents				Complies	
S3 B27	Noise Monitoring	Within six months of full operation post commissioning, attended noise validation monitoring must be undertaken during a period of full load and must:				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
		a) occur at <i>each</i> receiver location listed in condition B21;				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
		b) occur annually in a reporting period;				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
		c) occur during day, evening and night period as defined in the Noise Policy for Industry (or latest version) over two 15-minute compliance measurements during each period;				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
		d) occur for three consecutive operating days.				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B28	Noise Monitoring Report	On completion of post commissioning attended noise validation monitoring required in condition B27, that shows compliance with conditions B21 and B23, ongoing attended noise monitoring must be undertaken to the satisfaction of the EPA.				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
S3 B29	Noise Monitoring Report	A noise compliance assessment report must be submitted to the EPA and the Secretary within 30 days (or an alternative timeframe agreed by the Secretary) of the completion of the post commissioning validation monitoring and any annual monitoring.				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
		The assessment must be prepared by a qualified person and include: a) an assessment of compliance with noise limits presented in conditions B21 and B23; and				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
		b) an outline of any management actions taken within the monitoring period to address any exceedances of the limits contained in conditions B21 and B23.				Operation of the power station has not commenced. This monitoring condition has not yet been triggered.	Not Triggered	
S3 B30	Hours of Construction	All construction work at the premises must be conducted between 7 am and 6 pm Monday to Friday and between 8 am and 1 pm Saturdays and at no time on Sundays and public holidays.	Hunter Power Project Site Familiarisation Induction (prepared by UGL). Complaints Register.	SHL Environmental Manager – no complaints related to out of hours work were received during the audit period. Last OOHW Approval occurred in September 2024 and ended on 31 December 2024. Evidence in Folder Since the OOHW approvals lapsed, HPP continued to work outside of standard construction hours under the exemption to these construction hours which is provided for in both the EPL and SSI Approval (Conditions L5.2 and B31 respectively. Given that we have completed 17 rounds of monthly noise monitoring with no exceedances identified, and no complaints have been received in that time, we are confident that our out of hours works are compliant with the above exemption. Further, there is a noise monitor available on site for the use of the night shift supervisor to conduct checks of the noise levels should there be any potential issues.		No complaints related to out-of-hours work were received during the audit period. No evidence of breaches of the work hours limits was found during this IEA. The environmental induction provided to site (construction personnel) includes appropriate information regarding construction working hours. Out-of-hour work is being undertaken under the exemption provided in the Planning Approval and EPL.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B31	Exceptions to Construction Hours	The following activities may be carried out outside the recommended construction hours: a) construction that causes $L_{Aeq(15\text{minute})}$ noise levels that are: (i) no more than 5 dB above Rating Background Level at any residence in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009); and (ii) no more than the Noise Management Levels specified in Table 3 of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) at other sensitive land uses; or b) for the delivery of materials required by the police or other authorities for safety reasons; or c) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; or d) as approved through the process outlined in condition B32 of this approval.	Hunter Power Project Site Familiarisation Induction (prepared by UGL).	SHL Environmental Manager – There were no OS/OM deliveries during the audit period			Noted	
S3 B32	Variation of Construction Hours	The hours of construction activities specified under condition B30 of this approval may be varied with the prior written approval of the Secretary. Any request to alter the hours of construction shall be: a) considered on a case-by-case or activity-specific basis;		SHL Environmental Manager – No applications for out of hours works have been sought.		No applications for out-of-hours work have been sought.	Not Triggered	
		b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours		SHL Environmental Manager – No applications for out of hours works have been sought.		No applications for out-of-hours work have been sought.	Not Triggered	
		c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of relevant Council(s) (and other relevant agencies) has been and will be undertaken		SHL Environmental Manager – No applications for out of hours works have been sought.		No applications for out-of-hours work have been sought.	Not Triggered	
		d) all feasible and reasonable noise mitigation measures have been put in place; and		SHL Environmental Manager – No applications for out of hours works have been sought.		No applications for out-of-hours work have been sought.	Not Triggered	
		e) accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECCW, 2009), or latest version.		SHL Environmental Manager – No applications for out of hours works have been sought.		No applications for out-of-hours work have been sought.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B33	Biodiversity Management Plan	Prior to commencement of construction, unless otherwise agreed by the Secretary, the Proponent must prepare a Biodiversity Management Plan to the satisfaction of the Secretary. This plan must: a) be prepared by a suitably qualified and experienced biodiversity expert/s;	Hunter Power Project Biodiversity Management Plan, Amended Final Version 5, dated 29 November 2024. Letter from ER (A Gale) to SHL (I Smith) titled "Hunter Power Project Biodiversity Management Plan Amended Final 5 (29 November 2024)", dated 18 December 2024. Letter from DPHI (J Turner) to SHL (A van der Kroft) titled "Hunter Power Project (SSI-12590060 Revision of Management Plans)", dated 6 February 2025.	SHL Environmental Manager – the Biodiversity Management Plan was not updated during this audit period.		No changes were made to this plan during this audit period. A current version of the Biodiversity Management Plan (Revision 5, dated 29 November 2024) was prepared by Jacobs (a suitably experienced and qualified consultant) and subsequently updated by SHL to cover commissioning activities. The revised plan was endorsed by the ER. The plan was submitted to DPHI for review and approval in accordance with Condition C5.	Complies	
		(b) be prepared in consultation with the BCS;	Letter from DPHI (S O'Donoghue) to SHL (D Young) titled "Revision of Management Plans following Modification 2 and Independent Environmental Audit – Hunter Power Project (SS_-12590060)", dated 12 March 2024.			Correspondence from BCS (dated 29 November 2021) demonstrated that BCS was consulted during the preparation of the original BMP. DPHI waived the consultation requirements of this Condition for the current revision of this plan.	Complies	
		(c) describe the short, medium and long-term measures to be undertaken to manage vegetation and fauna habitat on the site;	Hunter Power Project Biodiversity Management Plan, Amended Final Version 5, dated 29 November 2024.			Section 3 of the plan describes the management of flora and fauna on the site.	Complies	
		(d) describe how biodiversity offsets required in condition B34 will be retired;	Hunter Power Project Biodiversity Management Plan, Amended Final Version 4, dated 29 December 2023.			Section 2.6 of the plan describes the biodiversity off sets required.	Complies	
		(e) describe measures to be implemented within the site to minimise: (i) the amount of clearing; (ii) impacts on fauna, including undertaking pre-clearance surveys and maximising the salvage of resources for habitat enhancement; (iii) impacts on threatened flora and fauna species or ecological communities within the development footprint and its surrounds; (iv) the spread of weeds and fungal pathogens; (v) the generation and dispersion of sediment to watercourses; and (vi) light spill from night works; and	Hunter Power Project Biodiversity Management Plan, Amended Final Version 5, dated 29 November 2024.			Section 3 of the plan describes the management of flora and fauna on the site.	Complies	
		(f) include a program to monitor, evaluate and report on the effectiveness of the measures.	Hunter Power Project Biodiversity Management Plan, Amended Final Version 5, dated 29 November 2024.			Section 4.2 of the plan describes the monitoring of flora and fauna on the site.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	
S3 B34	Biodiversity Offsets	The Proponent must implement the approved Biodiversity Management Plan.	Vegetation Clearing Checklists (25/7/22 and 27/7/2022). Vegetation Clearance Ecological Report, Hunter Power Project, Jacobs, Rev 2 dated 30 June 2023.	SHL Environmental Manager – no clearing of vegetation was undertaken during this audit period.	No additional clearing was observed during the site inspection.	No vegetation clearing was undertaken during this audit period.	Complies		
		Prior to the commencement of any construction activity that would impact on any of the vegetation communities or species identified in Tables 7 and 8 below, the Proponent must retire biodiversity credits of a number and class specified in Tables 7 and 8 below in consultation with the BCS and to the satisfaction of BCT.	Letter from DPE (R Hawkesbury) to SHL (I Smith) titled “Hunter Power Project (SSI-1290060) - Retirement of biodiversity credits (SSI-12590060)”, dated 24 January 2022.			Correspondence from DPE (dated 24 January 2022) verified that the required biodiversity off-sets were retired prior to commencement of construction.	Complies		
		The retirement of these credits must be carried out in accordance with the <i>NSW Biodiversity Offsets Scheme</i> and can be achieved by: (a) acquiring or retiring ‘biodiversity credits’ within the meaning of the <i>Biodiversity Conservation Act 2016</i> ;	Letter from DPE (R Hawkesbury) to SHL (I Smith) titled “Hunter Power Project (SSI-1290060) - Retirement of biodiversity credits (SSI-12590060)”, dated 24 January 2022.			Correspondence from DPE (dated 24 January 2022) verified that the required biodiversity off-sets were retired prior to commencement of construction.	Complies		
		(b) making payments into an offset fund that has been developed by the NSW Government; or	Letter from DPE (R Hawkesbury) to SHL (I Smith) titled “Hunter Power Project (SSI-1290060) - Retirement of biodiversity credits (SSI-12590060)”, dated 24 January 2022.			Correspondence from DPE (dated 24 January 2022) verified that the required biodiversity off-sets were retired prior to commencement of construction and payments were made into the Biodiversity Conservation Fund.	Complies		
		(c) funding a biodiversity conservation action that benefits the threatened entity impacted by the development, consistent with the ‘ <i>Ancillary Rules: Biodiversity conservation actions</i> ’.	Letter from DPE (R Hawkesbury) to SHL (I Smith) titled “Hunter Power Project (SSI-1290060) - Retirement of biodiversity credits (SSI-12590060)”, dated 24 January 2022.			Payments to the Biodiversity Conservation Fund were made by SHL. Therefore, this condition was not triggered.	Not Triggered		
		Written evidence of the retirement of these credits must be provided to the Department prior to commencing construction activity.	Letter from DPE (R Hawkesbury) to SHL (I Smith) titled “Hunter Power Project (SSI-1290060) - Retirement of biodiversity credits (SSI-12590060)”, dated 24 January 2022.			Correspondence from DPE (dated 24 January 2022) verified that the required biodiversity off-sets were retired prior to commencement of construction.	Complies		
	Table 7 Table 8	Vegetation Community			PCT ID	Credits Required			
		Parramatta Red Gum – Narrow-leaved Apple – Prickly-leaved Paperbark shrubby woodland in the Cessnock-Kurri Kurri area			1633	13			
	Table 8	Species	Credits Required						
		Earp’s Gum	74						
		Southern Myotis	9						
		Regent Honeyeater	14						
		Common Planigale	9						

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B35	Water Supply	The Proponent must ensure it has sufficient water for the development; and if necessary, adjust the scale of development on site to match its available water supply.	Hunter Power Project Water Management Plan, Rev 4, dated 10 December2024.			Site water balances for the construction phase and operational phase are presented in Sections 4.1 and 4a) of the Water Management Plan. Based on the details provided in the Plan the Auditor has concluded that the Proponent has identified water supply requirements appropriate to the scale of the development. Construction phase water is being sourced from the Hunter Water (municipal) system.	Complies	
S3 B36	Water Quality	The Proponent must ensure that all surface water discharges from the site comply with all relevant provisions of the POEO Act, including any discharge limits (both volume and quality) set for the development in any EPL.	UGL Incident Register. Environment Protection Licence No. 21627. Monthly Environmental Monthly Reports (Website) Hunter Power Project Environment Inspection Reports Precinct 3B (completed by SHL) Surface Water Monitoring Results are available on the project website.		Surface water controls were inspected during the IEA. The permanent hardstand areas and access roads were nearing completion (>95%), the potential for soil erosion is now minimal. Site runoff is directed to the permanent oil interceptor pit (Photograph 7) for treatment if required). Both of the former construction sediment basins have been decommissioned (Photograph 8). The permanent site water discharge construction has been completed (Photograph 9).	Several minor (not reportable) oil spill related incidents were recorded in the UGL incident register during this audit period. No evidence was found of any material water impacts.. The results of surface water monitoring (for pH, TSS, Oil and Grease and total solids) undertaken during the audit period are available on the project website. No exceedances were reported. The controls observed on-site were consistent with the ERS&D plans, with a staged process for treatment and discharge. No evidence of off-site discharges of sediment laden water was observed during the site inspection. Construction of permanent hardstand areas and roadways has eliminated the risk of sediment generation.	Complies	
S3 B37	Water Quality	All process operational wastewater generated by the activity must:	Trade Waste Agreement – 1 Dickson Road, Loxford, issued by Hunter Water, dated 11 April 2025.			A trade waste agreement with Hunter Water is now in place for the disposal of process wastewater.	Complies	
		a) be discharged to the sewer network subject to a trade waste agreement with Hunter Water Corporation; or b) captured and stored at the premises and must only be disposed of by tanker transport to a licensed wastewater facility.	Trade Waste Agreement – 1 Dickson Road, Loxford, issued by Hunter Water, dated 11 April 2025.			A trade waste agreement with Hunter Water is now in place for the disposal of process wastewater.	Not Triggered	

c)

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B38	Water Quality	Prior to the commencement of any construction the Proponent must install and maintain suitable sediment and erosion controls onsite, in accordance with the relevant requirements of <i>Managing Urban Stormwater: Soils and Construction – Volume 2A Installation of Services</i> (DECC 2008).	UGL Incident Register. Environment Protection Licence No. 21627. Monthly Environmental Monthly Reports (Website) Surface Water Monitoring Results are available on the project website. HPP Erosion & Sediment Control Plans (prepared by UGL, dated 20 September 2024).		Surface water controls were inspected during the IEA. The permanent hardstand areas and access roads were nearing completion (>95%), the potential for soil erosion is now minimal. Site runoff is directed to the permanent oil interceptor pit (Photograph 7) for treatment if required). Both of the former construction sediment basins have been decommissioned (Photograph 8). The permanent site water discharge construction has been completed (Photograph 9).	The controls observed on-site were consistent with the ERSED plans, with a staged process for treatment and discharge. No evidence of off-site discharges of sediment laden water was observed during the site inspection. Construction of permanent hardstand areas and roadways has eliminated the risk of sediment generation.	Complies	
S3 B39	Acid Sulphate Soils	The Proponent must ensure that any construction activities in identified areas of acid sulphate soil risk are undertaken in accordance with the <i>Acid Sulphate Soil Manual</i> (Acid Sulphate Soil Management Advisory Committee, 1998).	Acid Sulphate Soil Management Plan, Hart Road, Loxford NSW, prepared by ADE Consulting Group, Version v1f, dated 10 June 2022. UGL Incident Register.	SHL Environmental Manager— no acid sulphate soils are currently being treated on-site at this time.	.	As noted by previous audits, an acid sulphate soils management plan has been prepared by the civil contractor (Robson Civil). The plan provides appropriate procedures for the identification and management of ASS. No acid sulfate soils were being treated on-site at the time of this IEA.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B40	Water Management Plan	Prior to the commencement of construction, unless the Secretary agrees otherwise, the Proponent must prepare a Water Management Plan for the development to the satisfaction of the Secretary. This plan must: a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary;	Hunter Power Project Water Management Plan, Rev 4, dated 10 December 2024. Letter from ER (A Gale) to SHL (I Smith) titled "Hunter Power Project Biodiversity Management Plan Amended Final 5 (29 November 2024)", dated 18 December 2024. Letter from DPHI (J Turner) to SHL (A van der Kroft) titled "Hunter Power Project (SSI-12590060 Revision of Management Plans)", dated 6 February 2025.	SHL Environmental Manager – the Water Management Plan was not updated during this audit period to cover the commissioning phase of the project.		The Water Management Plan was not revised during this audit period to include the commissioning phase of the project.	Complies	
		b) be prepared in consultation with EPA, DPE Water, Hunter Water Corporation, and Council;	Letter from DPHI (J Turner) to SHL (A van der Kroft) titled "Hunter Power Project (SSI-12590060 Revision of Management Plans)", dated 6 February 2025.			Correspondence verifying that the required consultation was undertaken during the preparation of the original Construction Water Management Plan. DPHI waived the consultation requirements of this Condition for the current revision of this plan.	Complies	
		c) include a: (i) Site Water Balance that includes details of: a) predicted annual inflows to and outflows from the site; b) sources and security of water supply, including reasonable and feasible measures to minimise potable water demand through detailed design and operations; c) water and wastewater storage capacity; d) water use and management on site including demineralisation water treatment and wastewater transfer; and e) reporting procedure;	Hunter Power Project Water Management Plan, Rev 4, dated 10 December 2024.			The site water balance (construction phase) is presented in Section 4.1 of the Water Management Plan.	Complies	
		d) include a: (ii) Surface Water Management Plan that includes: a) baseline data on surface water flows and quality of watercourses and/or water bodies potentially impacted by the development;	Hunter Power Project Water Management Plan, Rev 4, dated 10 December 2024.			The elements of the Surface Water Management Plan are covered in the Water Management Plan, specifically: Section 5.1 the Water Management Plan states that the Principal Contractor will develop a Surface Water Management Plan including a Basin Discharge Procedure. UGL has prepared a CEMP covering the excavation stage of construction. Baseline surface water data is included in Section 3.2.3 of the WMP.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B40	Water Management Plan	d) include a: (ii) Surface Water Management Plan that includes: b) a detailed description of the surface water management system; including: - erosion control measures and pollution control measures which do not require an open basin excavated below the water table where practicable; and - measures to manage spills, off site flood impacts and stream erosion flows;	Hunter Power Project Water Management Plan, Rev 4, dated 10 December2024. UGL HPP Surface Water Management Plan – Revision 0, 7 September 2023.			A description of the Surface Water Management System and Erosion and Sediment Controls are described in Sections 16.1 and 16.2 of the UGL CEMP as well as UGL HPP/KNSS Erosion and Sediment Control Plan. The Progressive Erosion and Sediment Control Plans for Earthworks and Drainage works are provided in Appendix A of the UGL Surface Water Management Plan.	Complies	
		c) a program to monitor and evaluate: - disturbance of acid sulphate soils; - surface water discharges, stormwater and storage volumes; - rainfall and flooding events; and - the effectiveness of the surface water management systems to minimise erosion and sediment impacts;	Hunter Power Project Water Management Plan, Rev 4, dated 10 December2024.			Water quality monitoring is covered in Section 6.2 of the WMP and the UGL Surface Water Management Plan.	Complies	
		d) reporting procedures for the results of the monitoring program; and	Hunter Power Project Water Management Plan, Rev 4, dated 10 December2024.			Daily and weekly environmental inspections and erosion and sediment control and water quality control inspections are covered in the CEMS, the UGL Surface Water Management Plan, Section 6.2 of the WMP and Section 2.5 CMP.	Complies	
		e) a plan to mitigate any adverse surface water impacts of the development;	Hunter Power Project Water Management Plan, Rev 4, dated 10 December2024.			Measures to mitigate any adverse surface water impacts from the Project are identified in Section 5.2 and Table 5-2 of the WMP and the UGL Surface Water Management Plan.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B40	Water Management Plan	e) include a: iii) Groundwater Management Plan that includes: a) detailed baseline data of hydrogeology and groundwater levels and quality of groundwater resources potentially impacted by the development; b) water licencing requirements; c) a detailed description of the groundwater management and monitoring system, including measures to reduce potential for contamination or take of groundwater and estimated groundwater take, if the base of the pollution and surface water management basin is located less than 1 m above the water table; d) a program to monitor and evaluate groundwater flows, groundwater quality and the effectiveness of groundwater management systems, including e) reporting procedures for the results of the monitoring program; f) a plan to respond to any probable or actual exceedances of the groundwater performance criteria and repair, mitigate and/or offset any adverse groundwater impacts of the development.	Hunter Power Project Water Management Plan, Rev 4, dated 10 December2024.			Table 1.3 of the Water Management Plan states that the Groundwater Management Plan described in this condition is an operational requirement and will be included in the next revision of the Water Management Plan. The Auditor notes that this condition does not specify that the Groundwater Management Plan is solely an operational requirement. However, the groundwater issues covered in this Condition relate to the operational phase of the project.	Not Triggered	
S3 B41	Protection of Heritage Items	The Proponent must ensure the development does not cause any direct or indirect impacts on heritage items located outside the approved development footprint.	Incident Register. Hunter Power Project Cultural Heritage Management Plan, Version 5, dated 29 November 2024.	SHL Environmental Assurance Advisor) – no heritage sites outside of the project site have been impacted by the construction works.		No heritage sites outside of the project site have been impacted by the construction works. New South Wales Archaeology Pty Ltd has been commissioned by Snowy Hydro Limited to undertake a program of heritage impact mitigation for the Project. This report describes the work undertaken to meet the requirements of the CHMP. No direct or indirect impacts to Heritage Items have been reported during the audit period.	Complies	
S3 B42	Protection of Heritage Items	If Aboriginal archaeological heritage items are unexpectedly discovered during construction of the development, all works must cease, and a suitably qualified and experienced archaeologist be brought in to assess the find. Depending on the nature of the discovery, additional assessment, recording and management measures may be required prior to the recommencement of works in the affected area. Heritage NSW - ACH and/or members of the relevant Local Aboriginal Land Council must be notified of this discovery in writing.	Incident Register.	SHL Environmental Manager– no unexpected archaeological artifacts have been found during the construction works.		No unexpected archaeological artifacts have been found during the construction works.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B43	Aboriginal Cultural Heritage Management Plan	Prior to the commencement of construction, unless the Secretary agrees otherwise, the Proponent must prepare an Aboriginal Cultural Heritage Management Plan for the development to the satisfaction of the Secretary. The plan must: a) be prepared by suitably qualified and experienced persons;	Hunter Power Project Cultural Heritage Management Plan, Version 5, dated 29 November 2024. Letter from ER (A Gale) to SHL (I Smith) titled "Hunter Power Project Cultural Heritage Management Plan Amended Final 5 (29 November 2024)", dated 18 December 2024. Letter from DPPI (J Turner) to SHL (A van der Kroft) titled "Hunter Power Project (SSI-12590060 Revision of Management Plans)", dated 6 February 2025.	SHL Environmental Manager – the Cultural Heritage Management Plan was updated during this audit period to cover the commissioning phase of the project. The changes made were minor as no additional impacts are anticipated.		The Aboriginal Cultural Heritage Management Plan has been prepared and the final version published on 24 February 2022. The plan was prepared by Jacobs, an appropriately qualified and experienced consultant. The CHMP was revised during the audit period to include the commissioning phase of the project. The changes to the plan are minor. The document will be issued to the ER for endorsement and has been approved by DPPI.	Complies	
		b) be prepared in consultation with Registered Aboriginal Parties and Heritage NSW - ACH;	Letter from DPPI (J Turner) to SHL (A van der Kroft) titled "Hunter Power Project (SSI-12590060 Revision of Management Plans)", dated 6 February 2025.			Compliance with this condition for previous versions of the plan was verified in previous IEAs.	Complies	
		c) be submitted to the Secretary for approval prior to carrying out construction under this approval;				The revised Cultural Heritage Management Plan was approved.	Complies	
		d) describe the measures to be implemented on the site to: (i) ensure all workers receive suitable Aboriginal cultural heritage inductions prior to carrying out any activities which may cause impacts to Aboriginal objects or Aboriginal places, and that suitable records are kept of these inductions; (ii) protect, monitor and/or manage Aboriginal objects, including an archaeological monitoring program which includes a methodology for test and/or salvage excavations of intact alluvial deposits, and measures for the long-term management of Aboriginal objects if discovered during construction; (iii) protect Aboriginal objects and Aboriginal places located outside the approved disturbance area from impacts of the development; (iv) manage the discovery of suspected human remains and any new Aboriginal objects or Aboriginal places, including provisions for burials, over the life of the development; and (v) facilitate ongoing consultation and involvement of Registered Aboriginal Parties in the conservation and management of Aboriginal cultural heritage on the site;	Hunter Power Project Cultural Heritage Management Plan, Version 5, dated 29 November 2024.			Section 4.2 of the plan describes the induction training to be undertaken in relation to cultural heritage. Section 4 describes the impact mitigation and monitoring program to be implemented. Section 4.7 describes the unexpected finds protocol. An update to the Registered Aboriginal Parties was provided on the 25th of November 2022.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B43	Aboriginal Cultural Heritage Management Plan	e) an unexpected finds protocol;	Hunter Power Project Cultural Heritage Management Plan, Version 5, dated 29 November 2024.			Section 4.1 of the plan describes the processes for on-going consultation.	Complies	
		f) include a strategy for the care, control and storage of Aboriginal objects salvaged on the site, both during the life of the development and in the long term.	Hunter Power Project Cultural Heritage Management Plan, Version 5, dated 29 November 2024.			Section 4.6 describes the program for on-going protection and care of artifacts salvaged from the site.	Complies	
		The Proponent must implement the approved Aboriginal Cultural Heritage Management Plan.	Robson Civil Hunter Power Project Environmental Induction 6422 (dated 28 April 2022). UGL Hunter Power Project 3200-0663 Project Induction 2023. Hunter (Kurri Kurri) Power Project: Cultural Heritage Update, 25 November 2023.	SHL Environmental Manager– no unexpected archaeological artefacts have been found during the construction works.		Potential heritage impacts were more likely to occur during the early phase of construction. There has been no work undertaken during this audit period, for example land clearing, that could impact on heritage values. The site induction package delivered to all construction personnel describes the key requirements, including dealing with unexpected finds, for heritage management during construction. No unexpected cultural heritage finds were discovered during the audit period.	Complies	
S3 B44	Waste	Any waste materials exposed or created in association with the construction works and proposed to be disposed of to an offsite location, must be classified in accordance with the EPA's <i>Waste Classification Guidelines</i> .	UGL Waste offsite Report covering the audit period.	SHL Environmental Manager -- JJ Richards provide most waste collection and disposal services for the project. Central Waste (contracted by Seymour White – main civil sub-contractor, engaged by UGL) deals with some construction wastes.	Waste collection / storage areas were provided with appropriate storage bins (Photograph 11).	Waste is being appropriately managed. Records were provided to the auditor that demonstrated the appropriate classification, transport and disposal of waste.	Complies	
S3 B45	Hazardous Materials	Chemicals, fuels and oils used on-site must be kept in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling of Liquids: Environment Protection- Participants Manual</i> (Department of Environment and Climate change, 2007).		SHL Environmental Manager- Fuels stored on site include petrol and diesel fuel, oil for small plant such as generators, large mobile plant is fuelled by a mobile fuel truck that brings spill mats to place under vehicles during the refuelling process. There are also chemicals stored at the water treatment area – that is in a chemical container with a bund.	At the time of this IEA, construction works were nearing completion. No significant storage of fuels and oils was present at the site. Photograph 3 and 10, shows a self-bunded and ventilated dangerous goods, chemical and construction stage fuel storage as well as mobile containment bunds. Spill kits were in place and a bunded area has been established to contain any spills during vehicle refueling (photograph 14).	Construction of the bulk fuel tanks was complete. The bunding for those tanks meets the requirement of Condition B17 b).	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B46	Contamination	Construction cannot commence until a copy of the Site Audit Statement that covers the site subject to the development is provided to the Secretary. The Site Audit Statement must demonstrate the site is suitable for the development.	NSW EPA NSW Site Auditor Scheme Site Audit Statement no, 2021/03, dated 4 February 2022. This audit statement covers the former switchyard. NSW EPA NSW Site Auditor Scheme Site Audit Statement no, 2015/01a, dated 21 December 2021. This audit statement covers the remainder of the development site. Letter from DPE (S O'Donoghue) to SHL (I Smith) titled "Hunter Power Project (SSI-1290060) – Site Audit Statement", dated 1 March 2022.	SHL Environmental Manager– construction works commenced on 29 March 2022.		Two site audit statements were prepared for the site and provided to DPE. DPE confirmed that the Audit Statements were accepted on 1 March 2022.	Complies	
S3 B47	Traffic Management Requirements	The Proponent must:				Condition B47 a) (maintenance of site roads) is applicable to the operational phase only. Therefore, this condition has not been triggered.	Not Triggered	
		a) maintain all roads and utility-related infrastructure on site in a safe and serviceable condition;				Condition B47 b) (provision of parking) is applicable to the operational phase only. Therefore, this condition has not been triggered.	Not Triggered	
		b) provide sufficient parking on site for all vehicles;						
		c) ensure heavy vehicles entering and leaving the site have loads covered or contained;	Hunter Power Project Construction Air Quality Management Plan, Revision 4, dated 13 December 2024 Hunter Power Project Traffic Management Plan Version 6 dated 15 January 2024. Hunter Power Project Site Familiarisation Induction (prepared by UGL). Training Records for heavy vehicle drivers were sighted.	SHL Environmental Manager– Heavy vehicle drivers are required to attend the UGL Site Induction and sign off on the contents of the Driver Code of Conduct as part of that induction.		The CAQMP specifies the requirement that all trucks entering and leaving the site must be covered. It is noted that the Driver Code of Conduct does not specify that all incoming and outgoing loads must be covered, although this requirement is covered in the Environmental Induction. This is the key communication tool with heavy vehicle drivers during both the construction and operational phases. The Auditor reviewed the induction training register.	Complies	
		d) minimise dust and/or sediment being tracked onto Hart Road and the public road network;	Hunter Power Project Construction Air Quality Management Plan, Revision 4, dated 13 December 2024 Hunter Power Project Traffic Management Plan Version 6 dated 15 January 2024. Hunter Power Project Environmental Induction (2024).		At the time of the Audit, the permanent hardstand areas and access roads were nearing completion, thereby eliminating erosion risk. A wheel wash has been installed at the site exit. There was no significant dust / dirt observed on the public road servicing the site at the time of this IEA.	The CAQMP specifies the requirement that the public road servicing the site is regularly inspected and swept. A wheel wash has been installed at the site exit to remove dust / dirt from heavy vehicles. The Auditor reviewed the induction training register that verified training of heavy vehicle drivers. There was no significant accumulation of sediment at the site entrance or dust observed during the audit inspection. Dust and mud tracking risk is progressively eliminated as permanent roads and hardstand areas are completed.	Complies	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B47	Traffic Management Requirements	e) minimise the traffic noise impacts of the development; and	Drivers Code of Conduct.	SHL Environmental Manager– Heavy vehicle drivers are required to attend the UGL Site Induction and sign off on the contents of the Driver Code of Conduct as part of that induction.	No trucks were observed entering or leaving the site during the site inspection.	The TMP and Drivers Code of Conduct specifies the requirement that heavy vehicle noise is minimised. The Auditor reviewed the induction training register that verified training of heavy vehicle drivers.	Complies	
		f) keep the public informed of any road or infrastructure upgrades, disruptions to traffic, the closure of roads or other infrastructure, oversize overmass vehicle use, peak construction periods, and any emergencies.	Complaints Register.	SHL Environmental Manager–No oversize / over mass deliveries were received during this audit period.		No traffic-related complaints were recorded during the audit period. No oversize / over mass deliveries were received during this audit period.	Complies	
S3 B48	Traffic Management Plan	Prior to the commencement of construction, unless the Secretary agrees otherwise, the Proponent must prepare a Traffic Management Plan in consultation with Council and TfNSW for the development and to the satisfaction of the Secretary.	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024. Letter from ER (A Gale) to SHL (I Smith) titled “Hunter Power Project Traffic Management Plan Approved Version 7 (10 December 2024)”, dated 18 December 2024. Letter from DPHI (J Turner) to SHL (A van der Kroft) titled “Hunter Power Project (SSI-12590060 Revision of Management Plans)”, dated 6 February 2025.	SHL Environmental Manager–the Traffic Management Plan was not updated during this audit period.		The initial Traffic Management Plan was prepared and issued on 25 February 2022, prior to commencement of construction. During the previous audit period, the CTMP was reviewed and updated to include the commissioning phase of the project.	Complies	
		This plan must: a) describe the measures that would be implemented to comply with the transport management requirements in condition B47 above;	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024.			Section 6 of the Traffic Management Plan describes the impact mitigation measures to be implemented to address the requirements of Condition B47.	Complies	
		b) include details of the transport route to be used for all construction and operational traffic;	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024.			Section 4.3 of the Traffic Management Plan describes the transport routes for light, heavy and oversize / over mass vehicles.	Complies	
		c) include details of the measures that would be implemented to minimise traffic safety issues and disruption to local users of the transport route/s during construction and operations;	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024.			Section 6 of the Traffic Management Plan describes the impact mitigation measures to be implemented.	Complies	
		d) include oversize over mass requirements and management;	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024.			Section 6.11 of the Traffic Management Plan describes the management of oversize / over mass vehicles.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B48	Traffic Management Plan	e) include a driver's code of conduct that addresses: (i) travelling speeds; (ii) driver fatigue; (iii) procedures to ensure that drivers adhere to the designated transport routes; and (iv) procedures to ensure that drivers implement safe drive practise (sic)	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024.			The Driver Code of Conduct is provided in Appendix A and satisfies the requirements of Condition B48 e).	Complies	
		f) include a program to: (i) record and track vehicle movements; and (ii) monitor the effectiveness of these measures; and	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024.			Table 7-3 of the plan requires the recording of heavy vehicle movements to and from site.	Complies	
		g) include a protocol for undertaking independent dilapidation surveys to assess the existing condition of Hart Road, prior to and following construction and decommissioning activities.	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024.			Section 6.5 of the Traffic Management Plan describes the requirement for pre and post construction dilapidation surveys.	Complies	
		h) include measures to ensure that there are no more than 80 light vehicle movements per hour through the Main Road and Hunter Expressway interchange associated with the development in the morning and afternoon peak periods respectively during the construction period, including a protocol for the monthly verification of the origin of light vehicle movements in the morning and afternoon peak period; and	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024.			The traffic management plan was revised and updated to address these additional conditions from Mod 1 during the last audit period and includes these details.	Complies	
		i) describe measures to investigate opportunities to promote the use of shuttle buses and car-pooling during the construction period.	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024.			Section 4.3.1 of the Traffic Management Plan describes the management of light vehicles and covers the promotion of carpooling and use of the shuttle bus.	Complies	
		The Proponent must implement the approved Traffic Management Plan.	Hunter Power Project Traffic Management Plan Version 7 dated 10 December2024. Hunter Power Project Dilapidation Survey Hart Road, Loxford, prepared by Streetwise Road Safety and Traffic Services Pty Ltd, dated 14 February 2022.	SHL Environmental Assurance Advisor) – Heavy vehicle drivers are required to attend the Site Induction and sign off on the contents of the Driver Code of Conduct as part of that induction.		Induction training for heavy vehicle drivers is provided. The Auditor sighted sufficient evidence to confirm that the Traffic Management Plan is being implemented.	Complies	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3 B49	Visual and Lighting	The Proponent must: a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection;	Architectural Specification, Control and Administration Building, Workshop and Storage Building, Fire Pump Building, Chemical Storage Building, Aecom Rev E dated 31 March 2023. Hunter Power Station, Lighting and General Power, Lighting Site Design Parameters, Drawing No HPP-AEC-ELE-PR-GEN-DRG-0301 Rev 0.	SHL Environmental Manager– Building colours will be matt and are being specified as such with the OEM. Lighting, such as aviation lighting, is being specified in accordance with CASA requirements which include directing the light sources upwards so as to minimise off-site impacts. No complaints received due to the operation of temporary lighting.	Temporary lighting was observed during the site inspection. No residential areas were observed that would be visually impacted during OOH work.	An architectural specification has been prepared for the Control and Administration Building, Workshop and Storage Building, Fire Pump Building and the C Final design of visual and lighting elements is not yet complete, although design is progressing. Temporary mobile lighting is provided for OOH work with no complaints received.	Complies	
		b) ensure the visual appearance of infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and	Hunter Power Station, Lighting and General Power, Lighting Site Design Parameters, Drawing No HPP-AEC-ELE-PR-GEN-DRG-0301 Rev 0. Hunter Power Station, Lighting and General Power, Lighting Site Design Parameters, Drawing No HPP-AEC-ELE-PR-GEN-DRG-0302 Rev 0.			An architectural specification has been prepared for the Control and Administration Building, Workshop and Storage Building, Fire Pump Building and the C Final design of visual and lighting elements is complete. The specifications, including paint colours were sighted by the Auditor and meet the requirements of this Condition.	Complies	
		c) not mount any commercial advertising signs or logos on site, except where this is required for identification or safety purposes.	Technical Design Note: Reference – Reference HPP-AEC-ELE-NC-TCS-DTN-0003, AECOM 14 April 2022.			No advertising signage has been erected at the site. The signage in place covers site identification, site access and safety.	Complies	
S3 B50	Visual and Lighting	The Proponent must: a) minimise the off-site lighting impacts of the development; and	Complaints Register			No lighting complaints were received during the audit period.	Complies	
		b) ensure that any external lighting associated with the development: (i) is installed as low intensity lighting (except where required for safety or emergency purposes); (ii) does not shine above the horizontal; and (iii) complies with Australian Standard AS4282 (INT) 1997.		SHL Environmental Manager – SHL will commission a lighting audit to be undertaken on the as built plant prior to commencement of operations.			Not Triggered	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5 C1	Environmental Management Strategy	The Proponent must prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary.	Hunter Power Project Environmental Management Strategy Version 4, dated 27 November 2024. Letter from ER (A Gale) to SHL (I Smith) titled "Hunter Power Project Construction Environmental Management Plan Approved Version 4 (27 November 2024)", dated 18 December 2024. Letter from DPHI (J Turner) to SHL (A van der Kroft) titled "Hunter Power Project (SSI-12590060 Revision of Management Plans)", dated 6 February 2025.	SHL Environmental Assurance Advisor) – The Environmental Management Strategy was not revised during this audit period.		The original Construction Environmental Management Strategy Plan was prepared by Jacobs. The plan was reviewed and endorsed by the ER on 2 March 2022, prior to the commencement of construction. As noted in Section 7.4.2, all of the relevant community notification tools were not implemented prior to the commencement of commissioning. Refer to the recommendation for improvement in Table 6, and the details in Section 7.4.2..	Complies	
		The Strategy must: a) provide the strategic framework for environmental management of the project;	Hunter Power Project Environmental Management Strategy Version 4, dated 27 November 2024.			Section 1 of the EMS describes the purpose and scope of the document and establishes an appropriate strategic framework for environmental management of the project.	Complies	
		b) identify the statutory approvals that apply to the project;	Hunter Power Project Environmental Management Strategy Version 3, dated 29 December 2023.			Legislative requirements are detailed in Section 4 of the EMS.	Complies	
		c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	Hunter Power Project Environmental Management Strategy Version 4, dated 27 November 2024.			Roles and responsibilities for environmental management are described in Section 7.2 of the EMS.	Complies	
		d) describe the procedures that would be implemented to: - keep the local community and relevant agencies informed about the operation and environmental performance of the project; - receive, handle, respond to, and record complaints; - resolve any disputes that may arise during the course of the project; - respond to any non-compliance; and - respond to emergencies;	Hunter Power Project Environmental Management Strategy Version 4, dated 27 November 2024.			Community and stakeholder engagement is described in Section 6.2 of the EMS.	Complies	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5 C1	Environmental Management Strategy	e) include: (i) the following subplans: • construction air quality management plan prepared in consultation with the EPA; • construction noise management plan prepared in consultation with the EPA; and • construction and operational waste management plan, incorporating management of any contaminated materials disturbed during construction (ii) references to any strategies, plans and programs approved under the conditions of this approval; and (iii) a clear plan depicting monitoring to be carried out under the conditions of this approval.	Hunter Power Project Environmental Management Strategy Version 4, dated 27 November 2024.			The EMS and all required subplans are available on the project website, including the Waste Management Plan, the Noise and Vibration Management Plan and Construction Monitoring Program.	Complies	
		The Proponent must implement the approved Environmental Management Strategy.	Hunter Power Project Environmental Management Strategy Version 4, dated 27 November 2024.			The Auditor reviewed each management plan required under the Approval and was satisfied that the current construction works are being undertaken in accordance with those plans. Results of all monitoring undertaken (surface water, groundwater and noise) are on the website	Complies	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5 C2	Net Zero Power Generation Plan	Prior to the commencement of operations, the Proponent must prepare a Net Zero Power Generation Plan for the development, to the satisfaction of the Secretary.	Letter from DPHI (S O'Donoghue) to SHL (A van der Kroft) titled "Net Zero Power Generation Plan", dated 1 July 2025.			The Net Zero Plan has been prepared by SHL and approved by DPHI.	Complies	
		The plan must: a) be prepared by a suitably qualified, experienced and independent person approved by the Secretary;	Letter from DPHI (S O'Donoghue) to SHL (D Young) titled "Appointment of Experts to prepared Net Zero Power Generation Plan", dated 29 July 2024.	SHL Environmental Manager– Initial meeting held on 23 September 2024 Draft Plan sent to DPHI and EPA for early consultation on 1/4/25.		DPHI has approved the appointment of the author of the Net Zero Plan.	Complies	
		b) be prepared in consultation with the EPA and the Department's Climate and Atmospheric Science Group;	Letter from the NSW EPA (V Lee) to SHL (A van der Kroft) titled "" EPA comment of draft Net Zero Power Generation Plan Revision 2 Hunter Power Project – SSI 12590060", dated 25 April 2025 Email from DPHI (J Turner) to SHL (A van der Kroft) titled "HPP Net Zero Power Generation Plan", dated 7 April 2025 Letter from DPHI (S O'Donoghue) to SHL (A van der Kroft) titled "Net Zero Power Generation Plan", dated 1 July 2025.	The Department's Climate and Atmospheric Science Group (CAS) is now part of the EPA and known as the Net Zero Emissions Modelling Team (NZEM). Refer to email from Jack Turner of DPHI explaining this change and that consultation with the EPA covers off the requirement for consultation with CAS as they will ensure that NZEM are involved in the consultation process for the document.		The Plan has been reviewed by the EPA and the Department's Climate and Atmospheric Science Group during the preparation of the plan.	Complies	
		c) investigate opportunities to achieve Net Zero greenhouse gas emissions from the development including consideration of: (i) contemporary best practice and continuous improvement measures; (ii) applicable Commonwealth and State greenhouse gas emissions targets and policies including a commitment to Net Zero by 2050, and 50% reduction compared to 2005 levels by 2030; (iii) latest technology for displacing natural gas or diesel as the fuel supply, such as use of green hydrogen;	Hunter Power Project Net Zero Power Generation Plan, Approved Version 1, dated 26 June 2025			Section 6 of the Net Zero Power Generation Plan describes the measures to be implemented to minimise and off-set GHG emissions, and includes a comparison of those measures with industry best practice, emissions targets and the latest technology.	Complies	
		d) describe measures to displace or offset greenhouse gas emissions having regard to: (i) the investigations undertaken under condition C2(c); and (ii) the following Net Zero targets by calendar year: • from the commencement of operations until 2029: 10% of total Scope 1 greenhouse gas emissions; • from 2030 until 2039: all Scope 1 greenhouse gas emissions resulting from generating electrical power at the premises for more than 175 cumulative hours per calendar year (or 2% of the year); and • from 2040 onwards: all Scope 1 greenhouse gas emissions.				Section 6 of the Net Zero Power Generation Plan describes the measures to be implemented to minimise and off-set GHG emissions, and includes a comparison of those measures with industry best practice, emissions targets and the latest technology.	Complies	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5 C3	Net Zero Power Generation Plan	Every three years following the approval of the plan, or other timeframe agreed by the Secretary, a report shall be submitted to the Secretary to update the outcomes of the investigations and measures described in condition C2.					Noted	
S5 C4	Net Zero Power Generation Plan	The Proponent must implement the approved Net Zero Power Generation Plan.				Operation of the power station has not commenced; therefore, this condition has not yet been triggered.	Not Triggered	
S5 C5	Revision of Strategies, Plans and Programs. Incident Notification, Reporting and Response	The Proponent must review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary within 3 months of the submission of an: a) Submission of an incident report under condition 5 C6 below	Incident Register.	SHL Environmental Manager– No reportable incidents occurred during the audit period.		A significant air quality incident was reported during this audit period. In response to an EPA directive a commissioning plan has been prepared.	Complies	
		b) Submission of an independent environmental audit report under Conditions C15 to C19 below 7	Hunter Power Project Environmental Management Strategy Version 3, dated 29 December 2023.	SHL Environmental Manager–The CEMP and management plans were not during this audit period.		The previous IEA did not detect any non-compliances or significant opportunities for improvement; therefore a revision of the plans was not required.	Complies	
		c) the approval of any modification of the conditions of this approval;	Hunter Power Project Environmental Management Strategy Version 3, dated 29 December 2023.	SHL Environmental Manager–The CEMP and management plans were reviewed following the previous audit and the approval of Modification 2.		No Modifications to the project were approved during this audit period.	Not Triggered	
		d) the issue of a direction of the Planning Secretary		SHL Environmental Manager– No directions to revise any plans were received from DPHI during the audit period.		No directions were received from DPHI requiring the amendment of any plan required under the Approval during the audit period.	Not Triggered	
		The Proponent must review and, if necessary, revise the studies, strategies or plans required under the conditions of approval to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary.		SHL Environmental Manager– No reportable incidents occurred during the audit period.		No reportable incidents occurred during the audit period	Not Triggered	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5 C6	Incident Notification	The Secretary must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 4.	Letter from SHL (D Young) to DPHI (J Fleming) titled “SSI12590080 – Notification of Potential Incident”, dated 11 July 2025.	SHL Environmental Manager –The air quality incident that occurred in July 2025 was reported to the EPA and DPHI. The Continuous Emissions Monitoring System (CEMS) was monitoring emissions and recording data for the entirety of the operation on 8 and 9 July 2025. No high level emissions alarms occurred during this period, meaning SHL believed that the unit was operating in a compliant manner. It was not until the data from the CEMS was subsequently analysed that it was found to be erroneous. At this stage, SHL became aware of the potential incident and notified DPHI Immediately.		One reportable environmental incident was recorded during the audit period. The incident involving the emission of offensive odours from the site also represents a non-compliance against the Approval. The EPA and DPHI were notified. The incident occurred over a period of two days (8 and 9 July 2025), during which twenty complaints relating to the incident were received by SHL. DPHI was notified on 11 July 2025. The letter notifying DPHI of the incident contained the information required by this Condition.	Complies	
S5 C7	Non-compliance Notification	The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.					Complies	
S5 C8	Non-compliance Notification	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.		SHL Environmental Manager – no non-compliance reports were issued to DPHI during this audit period.		No non-compliance reports were issued to DPHI during this audit period.	Not Triggered	
S5 C9	Non-compliance Notification	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.					Noted	
S5 C10	Compliance Reporting	Compliance Reports of the development must be carried out in accordance with the Compliance Reporting Requirements outlined in the <i>Compliance Reporting Post Approval Requirements</i> (2020) or its latest version.	<i>Compliance Reporting Post Approval Requirements</i> (May 2020).			Compliance reports are not required by the <i>Compliance Reporting Post Approval Requirements</i> (2020) for construction projects.	Not Triggered	
S5 C11	Compliance Reporting	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the <i>Compliance Reporting Post Approval Requirements</i> (2020) or its latest version, unless otherwise agreed to by the Secretary.	<i>Compliance Reporting Post Approval Requirements</i> (May 2020).			Compliance reports are not required by the <i>Compliance Reporting Post Approval Requirements</i> (2020) for construction projects.	Not Triggered	
S5 C12	Compliance Reporting	The Proponent must make each Compliance Report publicly available within 60 days of submitting it to the Secretary, unless otherwise agreed by the Secretary.	<i>Compliance Reporting Post Approval Requirements</i> (May 2020).			Compliance reports are not required by the <i>Compliance Reporting Post Approval Requirements</i> (2020) for construction projects.	Not Triggered	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5 C13	Compliance Reporting	Notwithstanding the requirements of the <i>Compliance Reporting Post Approval Requirements</i> (2020) or its latest version, the Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.	<i>Compliance Reporting Post Approval Requirements</i> (May 2020).			Compliance reports are not required by the <i>Compliance Reporting Post Approval Requirements</i> (2020) for construction projects.	Not Triggered	
S5 C14	Notification to Department	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Proponent must notify the Department via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Proponent must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	Letter from DPE (S O'Donoghue) to SHL (I Smith) titled "Hunter Power Project (SSI-1290060) Management Plan Staging", dated 22 December 2021. Letter from DPE (H Watters) to SHL (I Smith) titled "Hunter Power Project (SSI-1290060) Notification of commencement of construction", dated 4 April 2022. Letter from DPE (S O'Donoghue) to SHL (I Smith) titled "Hunter Power Project (SSI-1290060) Staging Request", dated 10 February 2022.			SHL advised DPE of the commencement of construction as required by this Condition. SHL also requested approval for the staging of management plans. That request was approved by DPE.	Complies	
S5 C15	Independent Environmental Audit	Independent Audits of the development must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements</i> (2020) or its latest version.	Letter from DPE (I Strachan) titled "Hunter Power Project (SSI-12590060) - Independent Auditor Nomination to SHL dated 10 February 2023.			Ken Holmes of Barnett and May was approved by DPE Approval on 101/2/23. This audit commenced within 6 months of the previous audit and in compliance with this condition.	Complies	
S5 C16	Independent Environmental Audit	Proposed independent auditors must be agreed to in writing by the Secretary prior to the commencement of an Independent Audit.	Letter from DPE (H Watters) to SHL (I Smith) titled "Hunter Power Project (SSI-1290060) Independent Auditor Nomination", dated 26 July 2022.			DPE approved the appointment of the Lead auditor for this IEA in February 2023	Complies	
S5 C17	Independent Environmental Audit	The Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the <i>Independent Audit Post Approval Requirements</i> (2020).		SHL Environmental Manager– DPHI have not requested audits to be undertaken at alternative timeframes in accordance with this condition		DPHI have not requested audits to be undertaken at alternative timeframes in accordance with this condition	Not triggered	
S5 C18	Independent Environmental Audit	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Secretary within 2 months of undertaking the independent audit site inspection, as outlined in the <i>Independent Audit Post Approvals Requirements</i> (2020), unless otherwise agreed by the Secretary.				The previous Independent Environmental Audit Report was submitted to DPHI within the 2-month timeframe.	Complies	
S5 C19	Independent Environmental Audit	Notwithstanding the requirements of the <i>Independent Audit Post Approvals Requirements</i> (2020) or its latest version, the Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Secretary's satisfaction that independent operational audits have demonstrated operational compliance.					Noted	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5 C20	Access to Information Updating and Staging of Studies, Strategies and Plans	Before the commencement of construction until the completion of all rehabilitation required under this approval, the Proponent must: a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this approval) publicly available on its website: (i) the EIS; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this approval; (iv) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (v) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this approval; (vi) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this approval, or any approved plans and programs; (vii) a summary of the current phase and progress of the development; (viii) contact details to enquire about the development or to make a complaint; (ix) a complaints register, updated monthly; (x) the Annual Reviews of the development; (xi) audit reports prepared as part of any Independent Environmental Audit of the development and the Proponent's response to the recommendations in any audit report; (xii) any other matter required by the Secretary; and	Snowy Hydro Website (https://www.snowyhydro.com.au/hunter-power-project/documents/)	SHL Environmental Manager– The Secretary has not directed SHL to place any additional materials on the project website.		The following documents / records were available on the project website at the commencement of this IEA: i. EIS ii. Planning Approval (SSD 12590060), the EPL 21627 and EPBC Approval 2021/8888 iii. All plans and strategies required by the Approval iv. SHL does not plan to stage the construction of the power station, therefore no staging plans are required v. The EMS does not specify a specific program for reporting on environmental performance other than the IEA requirements of the Approval and monitoring results (vi below) vi. Monthly monitoring summary and noise monitoring results vii. The summary of the current status of the project (Progress and Approvals) has been updated in accordance with the recommendation made in the previous audit viii. Contact Details (Contact Tab) ix. Complaints Register x. Annual Reviews are not required by the Approval xi. Independent Audit Reports for all IEAs and Proponent's response xii. The Secretary has not requested that any other matters be reported on the website.	Complies	
		b) keep such information up to date, to the satisfaction of the Secretary.	SHL Website.			The documents available on the SHL website relating to the Hunter Power Project were up to date versions.	Complies	

Project Approval 12590060								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5 C21	Updating and Staging of Studies, Strategies and Plans	To ensure the studies, strategies and plans for the development are updated on a regular basis and incorporate any required measures to improve the environmental performance of the development, the Proponent may submit revised studies, strategies or plans required for the development under the conditions of approval at any time. With the agreement of the Secretary, the Proponent may also submit any study, strategy or plan required under the conditions of this approval on a staged basis.				There were no management plan reviews triggered during this audit period.	Complies	
S5 C22	Updating and Staging of Studies, Strategies and Plans	The Secretary may approve a revised strategy or plan required under the conditions of approval, or the stage submission of these documents, at any time. With the approval of the Secretary, the Proponent may prepare the revised or staged strategy or plan without undertaking consultation with all parties nominated under the applicable conditions in this approval.					Not triggered	

EPBC 2021/8889								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
1	Action Specific Conditions	To ensure there is no adverse impact on the environment as a result of the action, the approval holder must comply with conditions A8-A12 of Part A, B1-B11, B19-B20, B35-40, B41-B43, B46 of Part B, C1-C4 of Part C of the State development consent (to the extent the conditions in Part C relate to environment).				Refer to Conditions B2 and B4 of the Planning Approval. Non-compliances against the air quality conditions of the planning approval were identified during this audit period.	Non-Compliance	Refer to recommendations provided under Conditions B2 and B4 above.
2	Action Specific Conditions	The action must only occur within the boundary (shown in red) on the map at Attachment A.		Refer to Section 7.8.1 in the body of the audit report.	At the time of this IEA, other than the use of a temporary equipment laydown area, the construction works were confined to the approved Action boundary.	The construction works being undertaken within the approved Action boundary are consistent with the definition of construction works in the EPBC Approval. No works as defined in that Approval were being undertaken outside of the approved boundaries at the time of this IEA. Note that equipment storage (whether permanent or temporary) is not covered by the EPBC Approval definitions and as such the use of the temporary storage area outside of the approved Action boundaries is considered to be consistent with the requirements of the EPBC Approval.	Complies	
3	Notification of Commencement of the Action	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	Letter from SHL (M Bikil) to DAWE (Post Approvals Section) titled "Notification of commencement of action – Kurri Kurri Gas Fired Power Station, NSW (EPBC 2021/8888)", dated 29 March 2022.	SHL Environmental Manager– construction works commenced on 29 March 2022.		SHL advised DAWE of the commencement of construction on 29 March 2022.	Complies	
4	Notification of Commencement of the Action	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.			Construction activities were nearing completion at the time of this audit.	The Action has commenced.	Not Triggered	
5	Compliance Records	The approval holder must maintain accurate and complete compliance records.				All information (including documents and records relating to compliance) requested by the Auditor was available for review.	Complies	
6	Compliance Records	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.		SHL Environmental Manager– DAWE / DCCEEW did not requested copies of any compliance records during the audit period.		DAWE / DCCEEW did not request copies of any compliance records during the audit period.	Not Triggered	

EPBC 2021/8889								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
7	Annual Compliance Reporting	Following commencement of the action, the approval holder must prepare a compliance report addressing compliance with each of the conditions of this approval, including implementation of commitments made in all management plans and strategies required under any condition of the State development consent that is referred to in this approval, in respect of every calendar year, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:	Snowy Hydro, Hunter Power Project, EPBC 2021/8888 Annual Compliance Report, 2022, 01 March 2023 Snowy Hydro, Hunter Power Project, EPBC 2021/8888 Annual Compliance Report, 2023, 27 March 2024 Snowy Hydro, Hunter Power Project, EPBC 2021/8888 Annual Compliance Report, 2024, 27 March 2025			Three EPBC Annual Compliance reports have been prepared since the commencement of the project. Table 1 of each compliance report provides an assessment of the compliance of each condition of the EPBC Approval	Complies	
		a. publish each compliance report on a website within 3 months following the relevant 12 month period,	Documents - Snowy Hydro			All reports were provided on the SHL project website	Complies	
7	Annual Compliance Reporting	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 5 business days of the date of publication	Snowy Hydro, Hunter Power Project, EPBC 2021/8888 Annual Compliance Report, 2022, 01 March 2023 Snowy Hydro, Hunter Power Project, EPBC 2021/8888 Annual Compliance Report, 2023, 27 March 2024 Snowy Hydro, Hunter Power Project, EPBC 2021/8888 Annual Compliance Report, 2024, 27 March 2025			Each EPBC compliance report notes that the DCCEEW were notified the same day that the compliance report was published.	Complies	
		c. keep all compliance reports publicly available on the website until this approval expires	Documents - Snowy Hydro			All compliance reports were publicly available on the SHL website	Complies	
		d. exclude or redact sensitive ecological data from compliance reports published on the website	Snowy Hydro, Hunter Power Project, EPBC 2021/8888 Annual Compliance Report, 2024, 27 March 2025			No sensitive ecological data was included in the 2024 compliance report.	Not Triggered	
		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.	Snowy Hydro, Hunter Power Project, EPBC 2021/8888 Annual Compliance Report, 2024, 27 March 2025			No sensitive ecological data was included in the 2024 compliance report	Not Triggered	

EPBC 2021/8889								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
8	Reporting Non-compliance	The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than 2 business days after becoming aware of the incident or non-compliance. The notification must specify:	Email from SHL (a van der Kroft) to DCCEW titled "Kurri Kurri Gas Fired Power Station, NSW (EPBC 2021_8888)", dated 11 July 2025. Letter from SHL (D Young) to DCCEW titled "EPBC 2021_8888 – HPS Plume Follow Up Report", dated 22 July 2025.	SHL Environmental Manager– The incident was reported to DCCEW		One reportable environmental incident was recorded during the audit period. The Commonwealth was notified. The incident occurred over a period of two days (8 and 9 July 2025), during which twenty complaints relating to the incident were received by SHL. DCCEEW was notified on 11 July 2025.	Complies	
		a. any condition which is or may be in breach	Email from SHL (a van der Kroft) to DCCEW titled "Kurri Kurri Gas Fired Power Station, NSW (EPBC 2021_8888)", dated 11 July 2025.			The email to DCCEEW stated that SHL did not believe that a breach of the EPBC Approval had occurred.	Complies	
		b. a short description of the incident and/or non-compliance				The email included a description of the incident.	Complies	
		c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.				The email included the information required by this Condition.	Complies	
9	Reporting Non-compliance	The approval holder must provide the Department with the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:		SHL Environmental Manager-- SHL is not aware of any incidents or non-compliances with the conditions or commitments made in plans during the audit period.		SHL was not aware of any incidents or non-compliances with the conditions or commitments made in plans during the audit period.	Not Triggered	
		a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future				SHL was not aware of any incidents or non-compliances with the conditions or commitments made in plans during the audit period.	Not Triggered	
		b. the potential impacts of the incident or non-compliance				SHL was not aware of any incidents or non-compliances with the conditions or commitments made in plans during the audit period.	Not Triggered	
		c. the method and timing of any remedial action that will be undertaken by the approval holder.				SHL was not aware of any incidents or non-compliances with the conditions or commitments made in plans during the audit period.	Not Triggered	
10	Independent Audit	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.		SHL Environmental Manager-- SHL was not requested (by DAWE / DCCEEW to commission an independent audit during the audit period.		SHL was not requested (by DAWE / DCCEEW to commission an independent audit during the audit period.	Not Triggered	

EPBC 2021/8889								
Cond.	Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
11	Independent Audit	For each independent audit, the approval holder must:				SHL was not requested (by DAWE / DCCEEW to commission an independent audit during the audit period.	Not Triggered	
		a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department				SHL was not requested (by DAWE / DCCEEW to commission an independent audit during the audit period.	Not Triggered	
		b. only commence the independent audit once the audit criteria have been approved in writing by the Department				SHL was not requested (by DAWE / DCCEEW to commission an independent audit during the audit period.	Not Triggered	
		c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.				SHL was not requested (by DAWE / DCCEEW to commission an independent audit during the audit period.	Not Triggered	
12	Independent Audit	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.		SHL Environmental Manager-- SHL was not requested (by DAWE / DCCEEW to commission an independent audit during the audit period.		SHL was not requested (by DAWE / DCCEEW to commission an independent audit during the audit period.	Not Triggered	
13	Completion of Action	Within 30 days after the completion of the Action the approval holder must notify the Department in writing and provide completion data.				The Action was being undertaken during the audit period.	Not Triggered	
14	Changes to Development Consent	The approval holder must notify the Department in writing of any proposed change to the State development consent that may relate to environment within 2 business days of formally proposing a change or within 5 business days of becoming aware of any proposed change.				No modifications to the approval occurred during this audit period.	Not Triggered	
15	Changes to Development Consent	The approval holder must notify the Department in writing of any change to the State Development Consent conditions that may relate to environment, within 10 business days of a change to conditions being finalised.				No modifications to the approval occurred during this audit period.	Not Triggered	

Audit Photographs

Appendix B



Photograph 1: Gas Turbine exhaust stacks under construction



Photograph 2: Sealed internal roads



Photograph 3: Water Treatment Chemical Storage



Photograph 4: Sealed hardsstand and power island



Photograph 5: Water Cart in operation



Photograph 6: Connecting gas pipeline rehabilitation and scour protection



Photograph 7: Permanent oil pit interceptor utilised for site runoff



Photograph 8: Location of former construction sediment basin



Photograph 9: Surface water discharge structure



Photograph 10: Constuction Chemical Storage



Photograph 11: Construction Waste Storage

DPE Auditor Approval

Appendix C

Department of Planning and Environment

Isaac Strachan
Hunter Power Project
Wonnarua Country
1 Hart Rd
Loxford NSW 2326

10/02/2023

Dear Mr Strachan

Hunter Power Project (SSI-12590060) - Independent Auditor Nomination

I refer to your request (SSI-12590060-PA-57) for the Secretary's approval of suitably qualified persons to prepare the Independent Environmental Audit for the Hunter Power Project (SSI-12590060).

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, I can advise that the Secretary approves the appointment of Ken Holmes of Barnett and May Pty Ltd to prepare the Independent Environmental Audits (IEAs) for the construction phase of the development.

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

The IEA must be prepared, undertaken and finalised in accordance with the *Independent Audit Post Approval Requirements* (2020). 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. Further, the department notes that the auditor's certification was not listed on the Exemplar Global register at the date of this letter. This approval of the above auditor is conditional upon them maintaining certification as a lead or principal auditor with a relevant industry body.

Should you wish to discuss the matter further, please contact Jennifer Sage, Senior Compliance Officer on 0400 245 170 or compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters
Team Leader Northern
Compliance

As nominee of the Planning Secretary

Stakeholder Consultation

Appendix D

From: [Joel Fleming](#)
To: [Ken Holmes](#)
Subject: Re: Hunter Valley Power Station - Fifth Construction Phase Independent Environmental Audit - Consultation Request DPHI
Date: Thursday, 11 September 2025 10:28:04 AM
Attachments: [image.png](#)

Good morning Ken,

Thank you for contacting the department for consultation on the upcoming independent audit of the Hunter Power Project (Kurri Kurri Gas-Fired Power Station) (SSI-12590060). We appreciate your thorough approach to this process.

Could you please review the current plans/strategies implemented by Snowy Hydro for the Hunter Power Plant Project (SSI-12590060) relating to community and stakeholder consultation and engagement to ensure they are being adequately implemented? This should include methods for keeping community up to date on the progress of the project using methods such as a project website (is the website up to date).

Thanks.

Joel Fleming
Senior Compliance Officer

Development Assessment and Sustainability | Department of Planning, Housing and Infrastructure

T 02 6575 3416 | **M** 0467 715 429 | **E** joel.fleming@planning.nsw.gov.au

The Store, 6 Stewart Avenue, Newcastle West NSW 2302

www.dphi.nsw.gov.au



The Department of Planning, Housing and Infrastructure acknowledges that it stands on Aboriginal land.

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

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Thursday, September 04, 2025 3:26 PM
To: Heidi Watters <Heidi.Watters@Planning.nsw.gov.au>; Joel Fleming <joel.fleming@dpie.nsw.gov.au>
Subject: Hunter Valley Power Station - Fifth Construction Phase Independent Environmental Audit - Consultation Request DPHI

Heidi / Joel,

The NSW planning approval (PA 12590060) for the Hunter Valley Power Station requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the proponent, Snowy Hydro,

to undertake those audits. The fifth construction phase audit is scheduled for late this month and will be undertaken accordance with the Project Approval (Condition C15) that requires:

C15. Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) or its latest version.

The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (initially within 12 weeks of commencement of construction and then at intervals of no more than 26 weeks). The Audit Guidelines also require that the Auditor consults with relevant agencies.

I would therefore appreciate if you could provide me with any information, comments or concerns that DPHI may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Consultant
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

From: [Alex Gale](#)
To: [Ken Holmes](#)
Subject: RE: Hunter Power Project - Final Independent Environmental Audit - ER Consultation
Date: Monday, 8 September 2025 10:30:11 AM
Attachments: [image001.png](#)

Ken,

Thankyou for your note enquiring about compliance on the Hunter Power Project over the past six months.

During this period I have undertaken regular inspections on the Hunter Power Project. With regard to the construction phase of the works environmental issues have been well managed. In addition to this continued sealing of the site and use of the oil separator sump has seen the erosion and water quality risk profiles reduce.

The project did, however, receive a number of complaints whilst undertaking commissioning of turbine number 1. It is my understanding that the complaints related to odour, noise and a visible exhaust plume, while turbine number 1 was undertaking diesel commissioning. There was a lack of monitoring data captured during this initial diesel commissioning. Diesel commissioning on turbine number 1 was suspended and gas commissioning commenced. The exhaust monitoring undertaken during gas commissioning demonstrated compliance with the project's EPL and a reduction in complaints was also observed.

During my most recent site inspection on 05/09/2025, the project informed me that diesel commissioning would recommence, however an adjusted process would be implemented that should result in a more complete burn of diesel and a reduction of exhaust emissions. I have not received any results or communication regarding the recommencement of diesel commissioning to date, however have requested this information once it is available.

In summary, my main concern is the commissioning phase exhaust management. I intend to regularly follow up with the Hunter Power Project requesting information that can be assessed to determine compliance.

If you wish to discuss any of these issues further with me, please get in touch.

Regards

Alex Gale
Environmental Representative

✉: alex.gale@hbi.com.au
☎: 0409 833 410

Healthy Buildings International Pty Ltd
Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153
P: 02 9659 5433 | W: www.hbi.com.au



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From: Ken Holmes <Ken@baeckea.com.au>
Sent: Thursday, 4 September 2025 3:28 PM
To: Alex Gale <Alex.Gale@hbi.com.au>
Subject: Hunter Power Project - Final Independent Environmental Audit - ER Consultation

Alex,

I'm the DPHI approved Independent Environmental Auditor for the Hunter Power Project and I am currently undertaking the 6th six monthly audit of the project. I'd appreciate it if you could provide me with information on any concerns or comments you may have regarding compliance and environmental performance of the project over the past six months.

Regards

Ken Holmes
Principal Environmental Consultant
Director

Barnett & May

P +61 (0)438 046 261
E ken@baeckea.com.au
A PO Box 365 Belrose NSW 2085

Lead Auditor CV

Appendix E

KEN HOLMES

Senior Principal Environmental Consultant



Contact

Email ken@baeckea.com.au

Mobile +61 0438 046 261

Qualifications & professional affiliations

- Bachelor of Science (Industrial Chemistry)
- Master of Applied Science (Waste Management)
- Master of Business Administration (MBA)
- Accredited Lead Environmental Auditor (Exemplar Global #: 14065)

Ken Holmes is an acknowledged industry leader in environmental auditing, environmental management and project approvals. His career spans over 30 years and includes experience across Australia, Africa, Europe and South-east Asia.

Ken's extensive Environmental Audit, Infrastructure Planning and Approvals experience includes that preparation of environmental impact statements for major projects, pre-construction approvals, and operations environmental management experience.

He has led large scale projects on major road, rail, renewable energy, mining and water infrastructure projects across Australia. The projects presented below are a sample of the range and complexity of projects that Ken has delivered.

Project experience

Environmental Auditing (Audits completed in the recent years)

Project Energy Connect (2024 – on-going). Ken is currently undertaking the independent environmental audits of construction phase of this major (900km) electricity infrastructure project that consists of high voltage power line and associated infrastructure construction between Wagga Wagga and South Australia.

Victoria Cross Over Station Development IEA (2023 – on-going) Construction phase bi-annual independent audits - Ken has commenced a program of (six) environmental compliance audits of this landmark construction project in the North Sydney CBD. The audit program covered two separate Planning Approvals (for adjacent office tower construction sites). The audits cover the conditions of the project's Planning Approval requiring bi-annual independent environmental audit of compliance against the DP&E (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

Hunter Power Project (Construction Phase IEA 2022 – on-going) - Ken has been commissioned to undertake the construction phase independent environmental audits on the Hunter Power Project. The Hunter Power Project is the construction of a new gas fired power station located in the Hunter Valley in NSW. The conditions of approval for the project requires bi-annual independent environmental audit of compliance against:

- o DP&E Conditions of Approval / Development Approvals;
- o Commonwealth Approvals;;

The independent environmental audit are being undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

As auditor, Ken's role covers all technical areas including construction management, waste, greenhouse gas, surface water management, air quality and noise management.

Kurri Kurri Lateral Pipeline (Construction Phase IEA 2023 - 2025)- Ken has been commissioned to undertake the construction phase independent environmental audits on the Kurri Kurri gas pipeline project located in the Hunter Valley in NSW. The conditions of approval for the project requires bi-annual independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;

The independent environmental audit are being undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

As auditor, Ken's role covers all technical areas including construction management, waste, greenhouse gas, surface water management, air quality and noise management.

Dargues Gold Mine IEA (2023)- Ken led the independent environmental audit of environmental compliance audit of the this gold mining project located near Braidwood in southern NSW. The conditions of approval for the mine requires a two-yearly independent environmental audit of compliance against:

- o DP&E Conditions of Approval / Development Approvals;
- o Water Licences;
- o Environment Protection Licences;
- o Mining Leases;

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

Martin Place Over Station Development (2020 – 2023) Construction phase annual independent audits) - Ken undertook the (six) environmental compliance audits of this landmark construction project in the Sydney CBD. The audit program covered two separate Planning Approvals (for adjacent office tower construction sites). The audits covered the conditions of each project's Planning Approval requiring annual independent environmental audit of compliance against the DP&E (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

Mt Thorley / Warkworth Mine IEA (2023)- Ken led the multi-disciplinary team that completed the 2023 independent environmental audit of environmental compliance audit of this large mining complex located in the Hunter Valley, NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases;

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

Hera Gold Mine (2019 and 2023)- Ken led the independent

environmental audits for the environmental compliance audit of the Hera Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management, air quality and noise management.

Bingo Industries Eastern Creek Resource Recovery Facility and Landfill (2022) - Ken led the environmental compliance audit of Bingo's Resource Recovery Facility and Landfill located in western Sydney. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- DP&E (NSW) Conditions of Approval / Development Approvals;

Environment Protection Licence.

The Audit also included an odour audit and surface water audits undertaken by specialists within the audit team.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

McArthur River Mine (Northern Territory) (2022) - Ken is currently leading the environmental compliance audit of McArthur River Mine in the Cape of Carpentaria, NT. EPBC Approval requires an annual independent environmental audit of compliance against that Approval.

The independent environmental audit is being undertaken in accordance with AS/NZS ISO 19011:2014 and the DAWE Audit Guidelines.

Moolarben Coal Mine (2019 and 2022) - Ken led the environmental compliance audits of Moolarben Coal Mine located near Mudgee in Western NSW. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- EPBC Approval
- DP&E (NSW) Conditions of Approval / Development Approvals;
- Water Licences;

Environment Protection Licence; and all Mining Leases.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management, air quality and noise management.

Tomingley Gold Mine (2021 and 2024) - Ken was the lead auditor for the environmental compliance audit of the Tomingley Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Tritton Copper Mine (2018 and 2024) - Ken was the lead auditor for the environmental compliance audit of the Tritton Copper Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Bingo Industries Mortdale Resource Recovery Facility (2022) - Ken undertook the environmental compliance audit of waste recycling plant and transfer station located in Mortdale, NSW. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- DP&E (NSW) Conditions of Approval / Development Approvals;
- Environment Protection Licence.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

Client: Port Waratah Coal Loader (2018, 2021 and 2024)- Ken was the lead auditor for the last two independent environmental compliance audits of the Port Waratah Coal Loader located on Kooragang Island near Newcastle. The conditions of approval for the facility Barnett & May

requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

These independent environmental audit were undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water, air quality and noise management.

North Parkes Mine (2021 and 2024)- Ken was the lead auditor for the environmental compliance audit of the Tritton Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Metropolitan Coal Mine (2018, 2021 and 2024)

Ken was the independent environmental auditor for the last two independent environmental compliance audits of the Metropolitan Coal Mine south of Sydney, NSW. These conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management (covering the mine infrastructure areas), air quality and noise management.

Stratford and Duralie Coal Mines – (2020) Ken was the lead auditor for the environmental compliance audit of Ashton Coal Mine in the Hunter Valley. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in

accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Ashton Coal Mine (2020) - Ken was the lead auditor for the environmental compliance audit of Ashton Coal Mine in the Hunter Valley. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- EPBC Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Newcastle Coal Infrastructure Group (2019 and 2022) - Ken was the lead auditor for the environmental compliance audits of the NCIG Coal Loader located on Kooragang Island near Newcastle. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- EPBC Approvals;
- Water Licences;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Kables Sand Quarry EPBC Audit (2019) – Ken was the auditor for the EPBC audit of Hansons Kables Sand Quarry located in the Blue Mountains in NSW. The audit was a requirement of the project EPBC approval and was undertaken in accordance with the DAWE Audit Guidelines.

Bendicks Recycling Mayfield (2019)- Ken was the lead auditor for the environmental compliance audit of the Benedicks waste facility in Newcastle. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Oberon Quarries (2019) - Ken was the lead auditor for the environmental compliance audit of this Gravel Quarry located in near Oberon in western NSW. The conditions of approval for the quarry requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the

Department of Planning and NSW EPA audit guidelines.

Sibelco Dunes Sand Mine (2018 / 2019) – Ken was the auditor for the environmental compliance audit of the Sibelco Sand located near Nelson Bay in NSW. The conditions of approval for the mine required an independent environmental audit of against:

- DP&E Conditions of Approval / Development Approvals;
- EIS predications against actual impacts.

The Approval required that the audit be conducted within 12 months of completion of mining and focussed on mine site rehabilitation.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines

Ardglen Quarry (Daracon) (2018) - Ken was the lead auditor for the environmental compliance audit of the Ardglen Gravel Quarry located in the upper Hunter Valley. The conditions of approval for the quarry requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Holcim Hume Quarry (2017/8) - Ken was auditor for the environmental compliance audit of Holcim' hard rock quarry located near Queanbeyan in NSW. Ken undertook the compliance audits of the quarry's Conditions of Approval. The conditions of approval required a detailed assessment of compliance against:

- DP&E Conditions of Approval / Development Approvals
- Water Licences
- Environment Protection Licences.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

PGH Bricks (2017/8) - Ken was the lead auditor for the environmental compliance audits of PGH's NSW, QLD, Vic and SA quarries. Ken undertook the compliance audits of the quarries as required by the Conditions of Approval for each site. The conditions of approval required a detailed assessment of compliance against:

- DP&E Conditions of Approval / Development Approvals (for non-NSW sites)
- Mining (and Exploration) Leases
- Environment Protection Licences (or equivalent)

Enviroking (2017/8) - Ken was the lead auditor for an independent environmental audit undertaken in accordance with AS/NZS ISO 19011:2014 "Guidelines for auditing management systems" for the liquid waste facility. The audit reviewed Enviroking's compliance with conditions of approval, made recommendations to address non-compliances and identified opportunities for improvement in the project's environmental management and performance.

Ken has also undertaken environmental management system and statutory compliance audits for a wide range of industries and projects including:

- Cowal Gold Mine
- Manildra Limited / Castlereagh Coal
- Bougainville Copper Limited (Bougainville, PNG)
- News Limited
- Fairfax News Papers
- Norske Skog
- Alcoa
- Ok Tedi Mining (PNG)
- Albright & Wilson
- Seafood Specialities
- Rio Tinto
- Hunter Water
- Department of Foreign Affairs and Trade
- Sydney Water
- Transport for NSW
- Mount Isa Mines
- Scott Transport
- Roads and Traffic Authority (now Roads and Maritime Services)
- AbiGroup (now LendLease)
- Leighton Contractors (now CPB Contractors)
- John Holland Group
- Queensland Transport
- PMP (Printing)
- Straits Resources
- Mount Isa Mines
- Philips (electronics)
- Bonlac Foods
- BHP

Ken has also led a wide range of Acquisition / Due Diligence audits for private sector clients in Australia, PNG, Africa, South Pacific, New Zealand, China, Singapore, Indonesia, Thailand.

Project Approvals

Central Station Re-development – Transport for NSW - Ken led the team responsible for gaining the environmental approvals (preparation of EMPs /construction licences etc.) for the Sydney Central Station project. In this role, Ken was responsible for the interpretation of the Approval requirements (Minister's Conditions of Approval) and the provision of strategic advice on the approvals, licencing, construction environmental management and stakeholder management.

Sydney Metro – Transport for NSW - Transport for NSW (TfNSW) commissioned two demolition contractors to demolish a number of multistorey buildings within the Sydney CBD in preparation for the construction of the Sydney Metro project. Ken led the team responsible for the preparation of environmental management plans for these works (TfNSW was not comfortable that the demolition contractors had the appropriate skills to prepare the required plans and gain the required approvals for the works). Ken worked with the demolition contractors to streamline their internal management processes and to add the requisite environmental management functions within both their corporate and project management systems.

M2 Widening Project Approvals (Roads and Maritime Services) – Ken (Project Manager) led the environmental

approvals team for the preparation of the Environmental Impact Assessment and construction approvals (preparation of EMPs /construction licence etc.) for the M2 widening project.

The management and minimisation of vegetation clearing on this project (along with the minimisation of impacts on residents a high priority. Ken oversaw all the specialist studies that supported the preparation of the Environmental Impact Assessment and subsequent Environmental Management Plans, including:

- Ecological survey;
- Tree reports;
- Noise and vibration impact assessments;
- Contamination assessments;
- Traffic impact assessments; and
- Ground and surface water impact assessments.

Sydney Light Rail – Acciona / Transport for NSW - Ken led the team responsible for leading the construction approvals program and setting up the environmental management system for this significant brown fields infrastructure construction project. His responsibilities included:

- Establishing the project Environmental Management System;
- Interpreting the Conditions of Approval and the Project Deed and advising the Acciona management team on all aspects of compliance with those key approval and contractual documents;
- Gaining the construction environmental approvals (preparation of EMPs /construction licences etc.) for the Sydney Light Rail project. In this role, Ken provided strategic advice on the approvals, licencing, construction environmental management and stakeholder management. He was also responsible for all internal (Acciona / KMH) document quality control.
- Selecting, commissioning and supervising the wide range of specialist environment service providers including ecological survey, tree reports, and pre-construction vegetation clearance reports.
- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Ken also led the consultation with the NSW Government regulators and supported and mentored the Acciona Construction Environmental Manager. In addition, Ken personally led the community and business reference group consultation process on behalf of the design and construction joint venture, successfully gaining signoff from these consultation bodies on the environmental plans and strategies.

Environmental Management Representative (ER) - The role of Independent Environmental Representative on major infrastructure projects in NSW was established in 1998 and continues to be a requirement of the Conditions of Approval for all major infrastructure projects in NSW. The appointees are nominated by the project proponent or construction consortium but are approved by and report to the Director General of the Department of Planning and Environment (DPE).

- The scope of the ER's role is broad range and includes:
 - Interpreting and advising on requirements of the Project Approval.
 - Reviewing and assessing the performance of the project against the Conditions of Approval, Project Deed and other relevant project related approvals. In that role, the ER reviews and approves all environmental related plans (EMPs), audits the implementation of environmental management plans and strategies, verifies (through audit and surveillance) compliance with the relevant project approval and project deed requirements, monitors and reports on regulatory compliance and provides reports to the Department and the project proponent on these matters.
 - Reports on compliance related issues to the public and investigates environmental and compliance issues, complaints and incidents.
 - Review and approval of vegetation clearing and other high (environmentally) impact activities.

Ken has fulfilled the role of Independent Representative on seven major infrastructure projects:

- Hunter Expressway (Motorway construction, Hunter Valley) - (2011 – 2013)
- Integral Energy 9JA Project (Transmission Line Construction Western Sydney) - (2006-2007)
- Westlink M7 (40km Motorway project, Western Sydney) - (2003-2005)
- Towra Beach Nourishment Project (Wet land protection, dredging project, Botany Bay) - (2004)
- Warragamba Dam Auxiliary Spillway Project– (1998 – 2013)
- Cronulla Sewage Treatment Plant Upgrade – (1998 – 2000)
- Liverpool Sewage Treatment Plant Upgrade – (2000)

Upper Hunter Valley Alliance (UHVA) – Leighton Contractors /ARTC - Ken led the team responsible for the provision of the environmental approvals (preparation of EMPs /construction licences etc.) on this major ARTC rail infrastructure program in the Hunter Valley of New South Wales. Ken's team on this project provided the entire environment and community and stakeholder team as a Sub-Alliance partner. In this role, Ken provides strategic advice on the approvals, licencing, construction environmental management and stakeholder management. His responsibilities included:

- Establishing the project Environmental Management System;
- Interpreting the Conditions of Approval and the Project Deed and advising the Leighton management team on all aspects of compliance with those key approval and contractual documents;
- Gaining the construction environmental approvals (preparation of EMPs /construction licences etc.) for range of projects delivered by the Alliance. In this role, Ken provided strategic advice on the approvals, licencing, construction environmental management and stakeholder management. He was also responsible for all internal document quality control.
- Selecting, commissioning and supervising the wide range of specialist environment service providers

- including ecological survey, tree reports, and pre-construction vegetation clearance reports.
- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Other relevant Infrastructure Projects led by Ken include:

- Joint Defence Headquarter Construction Project (ACT) – Environment Approvals Manager
- Melbourne Desalination Plant Project – EMP preparation
- Ballina Bypass (Pacific Highway construction project) - Environment Approvals Manager
- Northern Hume Alliance (Hume Highway Duplication) - Environment Approvals and Community Manager
- Anvil Hill Coal Mine (Hunter Valley) - Environment Approvals Manager
- Shannon Creek Dam Construction Project - Environment Approvals and Community Manager
- Liverpool to Ashfield Pipeline Project (Sydney Water) - Environmental Approvals Manager
- Networks Alliance (Sydney Water –water and sewage mains renewals project) – KMH Management Representative
- Technical Reviewer and Economic Impact Analyst – DEC Construction Noise Management Guidelines (2006)
- Northwest Transit Way - Environment Approvals Manager
- Lane Cove Tunnel - Environment Advisor to Approvals and Construction Team
- North Connex – Environmental Management Plan preparation, consistency assessments and preparation of Environmental Impact Assessments to support variations to the project approvals
- Sydney Desal Plant -Internal QA Reviewer
- Keepit Dam Safety Upgrade – Project Director
- Cordeaux Water Treatment Plant – Lead Consultant and Project Manager

Investigative / Expert Roles

Minter Ellison – Expert Opinion / Report (2018/9) - Ken was commissioned by Minter Ellison on behalf of their client (a consortium of major construction contractors) to provide an expert opinion regarding the interpretation of impact of changes to the Conditions of Approval for a major Sydney linear infrastructure project on environmental investigation and reporting obligations and project cost impacts. This expert opinion was commissioned to support the resolution of a contractual dispute between the consortium and their client.

Environment Protection Authority — Investigation of Illegal Land Clearing and Waste Disposal Activities (April 2015 – July 2017) - Ken was the lead auditor for the investigations undertaken by the KMH team commissioned by the NSW Environment Protection Authority (EPA) to investigate an alleged illegal vegetation clearing and waste disposal operations located in the Hunter Valley, Hawkesbury River Basin and Arcadia (north western Sydney). Ken developed and supervised the implementation site investigation strategies that included a series of investigative processes designed to identify the location and extent of vegetation clearing, and to determine the depth and volumes

of buried construction and demolition wastes.

Environment Protection Authority — Expert Reports Illegal Land Clearing and Waste Disposal Activities (2018)

- Ken was commissioned by the NSW Environment Protection Authority (EPA) to provide expert opinion regarding the alleged illegal vegetation clearing and waste disposal at a site in the Hawkesbury River Basin and Arcadia (north western Sydney).

Ken was subsequently briefed to provide expert opinion in the legal actions taken by the EPA in these matters.

Qenos Mandatory Environmental Audit - Ken was commissioned as the Expert Independent Environmental Auditor (Lead Auditor) for the Qenos Mandatory Audit. As a result of a series of environmental incidents, Qenos were required by the NSW EPA to commission an independent auditor to determine if the plant is capable of being operated and maintained and if the plant is being competently operated and maintained, in order to minimise the risk of environmental incidents and better protect the environment.

In doing this, the audit Assessed the:

- adequacy of Risk Assessment procedures and practices
- adequacy of maintenance and operational Systems
- physical condition and reliability of the Plant
- adequacy and suitability of environmental risk management
- adequacy and suitability of performance monitoring equipment
- processes and procedures for identifying and rectifying plant and equipment issues.

Incidents and assessed of the adequacy the investigations and responses to those incidents.

Orica Port Botany Ground Water Remediation Project – Expert Auditor - Ken was the lead auditor for the independent compliance audit of the Orica groundwater remediation project. These annual audits were a condition of licence established by the (then) Department of Environment and Climate Change and the Department of Planning.

Other

Kelian Equatorial Mining (Kalimantan, Indonesia) - Ken led a specialist environmental and social impact audit team that was established by Rio Tinto (and approved by the Government) to investigate and report on the environmental and social impacts associated with alluvial mining operations

(downstream) from the Rio Tinto (major owner) operated gold mine located in the remote, mountainous region of Kalimantan. The audit team included Government representatives and was undertaken to address the concerns of local village communities that were being impacted socially and economically.

Bougainville Copper Limited (Bougainville, PNG) - Ken led two specialist projects for Bougainville Copper Limited. Including Investigation of the Loloho Port Facility on Bougainville Island. Ken lead the investigation team commissioned to identify and plan for the clean-up of hazardous chemicals left after BCL evacuated Bougainville at the commencement of the civil war in 1990. The investigation covered gases, PCBs, and minerals processing chemicals. The second project was clean up and destruction of chlorine and other compressed gases located at the Loloho Port facility on Bougainville Island.

Ken subsequently lead a team dispatched to Bougainville to chemically destroy 1 tonne of chlorine and other toxic gases. The team built a treatment plant on site and successfully removed the toxic gas threat.

Waste Management

Review of Energy to Waste Technologies – Client Confidential (Australian Based Waste Management Company)

Ken participated (as technical reviewer) in the preparation of a technical review of energy to waste technologies for a major waste management group operating in Australia. The purpose of the review has to provide the client with a detailed assessment of all available and emerging energy to waste technologies available including determining the barriers to implementation within the Australian market, political and social framework.

Shredder Waste Disposal Assessment – Sims Metal

Metal shredders produce a complex waste stream consisting of a mixture of plastic, rubber, metal and other materials that is costly to dispose of. Ken led the KMH team that researched the options for management of this waste stream and prepared recommendations for the development of waste treatment and disposal options (including energy extraction) for Sims Metal.