

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
1	CSSI 9687 Snowy 2.0 Main Works	Schedule 2, Condition 2	The Proponent must carry out the development: (a) generally in accordance with the Exploratory Works and Main Works; and (b) in accordance with the conditions of this approval. Notes: • The key documents for the Exploratory Works and Main Works are identified in the definitions of this approval. • The general layout of the development is shown in Appendix 2.	We have deemed this site non-compliant based on the letters from DPHI (including 7 August 2023). This states: The Department of Planning and Environment ('the department') is alleging Snowy Hydro Limited (SHL) has breached the Environmental Planning and Assessment Act 1979 ('the Act') in regard to the Snowy 2.0 Main Works project, in particular section 5.14 of the Environmental Planning and Assessment Act 1979 (the Act) by carrying out development not in accordance with conditions of approval. Part b) of the CSSI states - in accordance with the conditions of this approval. Due to the aspects discussed in this audit we have deemed the site to be non - compliant with part b). This is a high level condition and recommendations are covered elsewhere in the compliance table.	No non-compliance recommendation	Snowy Hydro acknowledge the non-compliance. Snowy Hydro will report on the progress in addressing other actions. Any non-compliance identified as part of this IEA that relates to Schedule 2, Condition 2 will be reported on as part of the Monthly close out of actions identified in the audit action plan to DPHI. Snowy Hydro has implemented a new compliance tracking tool to improve performance against commitments under conditions of approval, licences, management plans, leases and other correspondence where an undertaking has been made. This acknowledges the complexity of the project, the sensitivity of the environment and its management and the need for a more capable system than what had previously been implemented.	25/09/2026	Snowy Hydro	Non Compliant
2	CSSI 9687 Snowy 2.0 Main Works	Schedule 2, Condition 4	The Proponent must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: (a) any strategies, plans or correspondence submitted in accordance with this approval; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and (c) the implementation of any actions or measures contained in these documents.	Biosecurity Risk Management Plan Consultation Letter (25/10/2023) from DPHI states that Snowy Hydro can stage the submission of the BioMP. However, Stage 1 must be submitted by 1 Dec 2023 and Stage 2 prior to 1 Dec 2024. Stage 1 was approved by DPI in a letter dated 25 Oct 2024 in response to submission of the BioMP on 18 May 2024. The submission of Stage 1 is outside of the approved submission timeframe set by DPHI. Therefore non-compliant under Part a) and c) of this condition. No NC REC allocated to this condition as the BioMP has since been approved by DPHI on 25 Oct 2024. IEMA understands that there were factors for the delayed approval of Stage 1. However, an official extension should had been requested from DPHI. Site has stated in Snowy 2.0 Fish Management Plans Update - Monthly Working Group Meeting with DPIRD (3 March 2025) that the Stage 2 BioMP submission is targeted for June 2025. The submission of Stage 2 is outside the approved timeframe set by DPHI therefore is non-compliant under Part a) and c) of this condition. No NC REC allocated to this condition as it is addressed in NC REC 10 which is assigned to S3, C22. IEMA notes that Section 1.5.1 of the Biosecurity Risk Management Plan states 'Stage 2 of the BRMP is to be approved prior to the commencement of construction of the fish screens at Tantangara'. Although the fish screen construction is not scheduled to commence until 2026, there was clear direction in the letter from DPHI (dated 25/10/2023) that it was to be approved by 1 Dec 2024. Letter from DPHI dated 09/03/2025 states that the project is non-compliant with implementation of the Heritage MP due to failure to undertake Annual Reporting for the periods 2021 to 2024 for the Ravine Block Streams and Ravine tufa. Therefore, Snowy is non-compliant under Part a) and c) of this condition. No NC REC allocated to this condition as it is addressed in NC REC which is assigned to S3, C36. Fortnightly Subsidence Monitoring Reports not uploaded on to the Snowy 2.0 website as directed in 'Snowy 2.0 - Main Works – Tunnel Boring Machine (TBM) Florence Monitoring Report' letters from DPHI ('In accordance with Schedule 4 condition 12 of the approval, please ensure this report is uploaded to the Snowy 2.0 website.'). Snowy Hydro has not complied with the direction of these letters and is therefore non-compliant for Part a) of this condition. No NC REC allocated to this condition as it is addressed in NC REC which is assigned to S3, C65. Letter from DPE (dated 12 October 2023) states ' <i>In accordance with Schedule 2, condition 4 of the Approval, the Secretary directs SHL to review and revise the TARPs in the Water Management Plan, Surface Water Management Plan and the Groundwater Management Plan in consultation with NSW Planning Assessments, Environment Protection Authority (EPA) and National Parks and Wildlife Service and submit the Plans to the Secretary for approval by COB 1 December 2023 via the Major Projects Portal.</i> No evidence of the TARPs in the Water Management Plan, Surface Water Management Plan and the Groundwater Management Plan being reviewed and revised in consultation with NSW Planning Assessments, Environment Protection Authority (EPA) and National Parks and Wildlife Service and then submitting the Plans to the Secretary for approval by COB 1 December 2023. Therefore, site is non-compliant under Part a) of this condition. No NC REC allocated to this condition as it is addressed in NC REC which is assigned to S4, C20. NPWS noted issues related to biosecurity in a letter dated 17 April 2025. See Section 1.5.1 for full details.	No non-compliance recommendation	Snowy Hydro acknowledge the non-compliance. Snowy Hydro has submitted a letter to DPHI advising delay of the submission of Stage 2 Biosecurity Risk Management Plan. Snowy Hydro will submit Stage 2 in accordance with DPHI's recommendations. Snowy Hydro has procurement in progress to undertake monitoring for implementation of the Heritage Management Plan, in regards to undertaking annual reporting for Ravine Block Streams and Ravine tufa. Snowy Hydro submitted the two Fortnightly Monitoring Reports for 1/02/24-14/02/2024 and 15/02/24-28/02/2024 to the Planning Portal on the 30th June 2025 The Main Works Water Management Plan (inclusive of the TARPs) is currently in review. Within one week of approval of the final plan, Snowy Hydro will publish the Plan to the Snowy 2.0 website. Snowy Hydro will provide photographs and reports for incidents relating to impacts outside of the construction envelope.	25/09/2026	Snowy Hydro	Non Compliant
3	CSSI 9687 Snowy 2.0 Main Works	Schedule 2, Condition 8	Within 6 months of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must surrender the infrastructure approval (CSSI 9208) for the Exploratory Works in accordance with Clause 197 of the EP&A Regulation	The process is underway with Snowy Hydro working through the process of surrender. A letter from FGJV to Snowy Hydro dated 16/05/2021: Surrender of Exploratory Works Approval (CSSI9208) outlining updated plans and those that may require discussion or clarification with DPHI. Further work is required for surrender, hence site is non-compliant with the timing requirement. See NC recommendation.	NC REC 1: Work with DPHI regarding the surrender of CSSI 9208) for the Exploratory Works.	Snowy Hydro acknowledge the non-compliance. Snowy Hydro will review Exploratory Works management plans in comparison to Main Works management plans. Snowy Hydro will work with DPHI regarding the surrender of CSSI 9208 for the Exploratory Works.	25/09/2026	Snowy Hydro	Non Compliant
4	CSSI 9687 Snowy 2.0 Main Works	Schedule 2, Condition 9	Prior to surrendering the infrastructure approval (CSSI 9208) for the Exploratory Works, the Proponent must update the approved management plans for the development to incorporate the approved management plans for the Exploratory Works to the satisfaction of the Planning Secretary.	The process is underway with Snowy Hydro working through the process of surrender. A letter from FGJV to Snowy Hydro dated 16/05/2021: Surrender of Exploratory Works Approval (CSSI9208) outlining updated plans and those that may require discussion or clarification with DPHI. Further work is required for surrender, hence site is non-compliant with the timing requirement. This is covered by the recommendation in the condition above (S2, C8), hence no recommendation.	No non-compliance recommendation	Snowy Hydro acknowledge the non-compliance. Actions identified in relation to Sch. 2, Condition 8 apply	25/09/2026	Snowy Hydro	Non Compliant

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5	CSSI 9687 Snowy 2.0 Main Works	Schedule 2, Condition 13	All plant and equipment used on site, or in connection with the development must be: (a) maintained in a proper and efficient condition; (b) operated in a proper and efficient manner; and (c) kept free of weeds, seeds and pathogens when entering or leaving the site.	<p><u>Site records:</u> See files in RFI request.</p> <ul style="list-style-type: none">• Evidence of Light Vehicle Delivery and Yearly Inspection Forms being completed.• Evidence of pre-start checklists being completed for plant and equipment.• Evidence of Plant Delivery and Quarterly Inspection Forms being completed.• Evidence of Weekly Service Forms being completed.• A selection of Hygiene Declaration forms were provided as part of the RFI. However, it was noted that all 5 of the forms were only partially completed. <p><u>Site Inspection:</u></p> <p>a) Generally equipment was maintained in a proper and efficient manner. Site speed limits were enforced. Erosion and sediment control structures were maintained. Inspections completed by FGJV and Snowy Hydro. Evidence of maintenance.</p> <p>b) Generally the site had been operated in an efficient manner. Evidence of water usage through water trucks, water sprays and use of water treatment plants. Dust was generally managed well, however improvements could be made with the use of more water carts. NPWS noted a lack of water carts in some visits, but we did not note this issue at the audit inspection.</p> <p>c) Evidence of some wheel washes however NPWS have noted issues relating to wheel washes in a letter dated 17 April 2025. See Section 1.5.1 for full details. Though discussions with Snowy/FGJV, IEMA understands that some wheel washes were removed. However, IEMA was not provided with any evidence of consultation between Snowy Hydro and NPWS relating to the removal of wheel washes. IEMA has found Snowy Hydro to be <u>Non-compliant</u> for this condition due to the non-compliance bullet points below:</p> <ul style="list-style-type: none">• There was limited weed and pest monitoring data or a defined Weed Spraying Program (as per Section 5.1.2.1 of the Weed, Pest and Pathogen Management Plan) provided to IEMA during the RFI. Therefore non-compliant with Condition 13(c). See IMP Rec.• Wheel wash out-of-commission for 10 hours on 27/02/2025 due to power failure. During that time period, 46 LVs and 8 HVs entered through Marica gatehouse without driving through wheel wash. It could not be determined where the vehicles originated and therefore the risk of weed entry is unknown. Therefore site is non-compliant with condition 13(c). See NC REC.	NC REC 2: Liaise with NPWS around the best locations and ongoing needs for biosecurity. This includes both wheel washes and wash down facilities. Develop a mitigation measure for instances when the wheel wash is out-of-commission. Such as utilising a washdown station, halting traffic from entering/exiting site and recording vehicle registrations and where the vehicles originated from.	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>FGJV notes that the Biodiversity Management Plan does not include the requirement to liaise with NPWS regarding best locations and ongoing needs for biosecurity.</p> <p>FGJV will investigate possible mitigation measures for instances when wheel washes are out of commission, such as secondary mobile wash down systems.</p> <p>Snowy Hydro will seek assurance from FGJV that hygiene forms have been completed.</p> <p>Wheel wash/wash down facilities to be added to the monthly LOC meeting agenda.</p> <p>Snowy Hydro will instruct FGJV to liaise with weed contractor to implement actions from NPWS.</p>	25/09/2026	Snowy Hydro/FGJV	Non Compliant
6	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 2	Within 6 months of the commencement of construction, the Proponent must prepare a Digital Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: (a) be prepared in consultation with the NPWS; (b) identify innovative ways to give effect to the requirements in condition 1 above; and (c) include a program to develop a digital application for users of the Kosciuszko National Park to bring key information to life in an interactive way and enhance the enjoyment of the park.	<p><u>Preparation</u></p> <p>Main works construction commenced on 22 October 2020. The Digital Strategy was approved in a letter from DPHI dated 25 June 2024. Therefore the Digital Strategy was not prepared to the satisfaction of the Planning Secretary within 6 months of commencement of construction and is therefore non-compliant with this condition. No non-compliance recommendation as the Digital Strategy has since been approved.</p> <p>Plan approved by DPHI in letter dated 25/06/2024</p> <p>(a) Section 1.4 (Consultation) of the Digital Strategy provides consultation undertaken with NPWS</p> <p>(b) Sections 5.2 and 6.1 of the Digital Strategy address this condition</p> <p>(c) Sections 5.2 and 6.1 of the Digital Strategy address this condition</p>	No non-compliance recommendation	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>The Digital Strategy is now approved however, its delay in finalisation is noted. This finding underscores the importance of new systemic controls being implemented across the Project. The progress and completion of actions identified will be tracked in the project's compliance management system, EnviroSys.</p>	25/09/2026	Snowy Hydro	Non Compliant

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7	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 4	<p>The Proponent must:</p> <p>(a) minimise the spoil generated by the development;</p> <p>(b) test and classify the relevant physical and chemical characteristics of the spoil;</p> <p>(c) manage, use or dispose of the spoil in accordance with its classification;</p> <p>(d) develop and implement suitable procedures for handling, storing and disposing of any:</p> <ul style="list-style-type: none">• potentially acid forming material;• asbestiform mineral fibres;• contaminated material; <p>(e) only place non-reactive spoil, which has a low geochemical risk and is suitable for reuse, in the western emplacement area;</p> <p>(f) maximise the reuse of non-reactive spoil on site and in other parts of the Kosciuszko National Park;</p> <p>(g) maximise the use of the permanent spoil emplacement areas;</p> <p>(h) minimise the spoil left at Lobs Hole and Marica for incorporation into the final landform;</p> <p>(i) minimise the water quality impacts of the temporary and permanent emplacement areas;</p> <p>(j) not place any spoil from the tunnel boring machines in the active storages or below the full supply level of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary; and</p> <p>(k) not place any spoil from dredging, channel excavation or underwater blasting in the eastern and western emplacement areas, or in the active storages or below the full supply level of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary.</p>	<p><u>General Spoil and Leachate Dam Discussions</u></p> <p>Section 6.12 of the Spoil Management Plan main document states: To manage potential leachate seepage from the PSEs, specific Leachate Detection Procedures will be implemented and followed for each of the spoil emplacement areas. Monitoring will be carried out at applicable surface water and ground water point which will continually assess if leachate is occurring from the spoil emplacement.</p> <p>The data and information gathered during monitoring will to feed into management processes that seeks to minimise the Project's impact on surface and groundwater. Potential seepage and runoff will be collected in a leachate basin downstream of the treatment emplacement area. Collected water will be tested for potential contamination which will be guided by the EPL. Water will be irrigated to the spoil emplacement area (to promote evaporation) or, where the water quality is not suitable for reuse, treated in the process water treatment plant. Should the water treatment plant have insufficient capacity to treat the water, the water will be classified and will be disposed on offsite at a facility licensed to accept the classification of water.</p> <ul style="list-style-type: none">• We noted the defined spoil stockpile areas at Tantangara, Lobs Hole and Marica. <p>Section 4.5 of the Spoil Management Plan Appendix J - Rock Forest Emplacement Area states: <i>Snowy Hydro has worked with the NSW EPA on a precautionary liner option to prevent seepage of water into the groundwater table, with details covered in the Project EPL. Additional controls include:</i></p> <ul style="list-style-type: none">• <i>The basins will be impermeable.</i>• <i>The spoil testing and water monitoring programs will be increased following learnings from GF01.</i>• <i>A Nitrogen Management Plan is under development in consultation with the NSW EPA which will detail measures to be minimise the impacts of nitrogen and associated contaminants derived from spoil.</i> <p><u>Other things to note:</u></p> <ul style="list-style-type: none">• Spoil testing and basin water quality testing (leachate dams) has indicated high levels of nitrogen draining from the spoil areas at Lobs Hole. This is significantly higher than the background levels. The EIS did not identify these material and leachate issues.• Evidence of geosynthetic clay liner (GCL) and other material (crushed rock protection layer) placed over the liner to reduce puncturing at some locations.• Evidence of third party Construction Quality Assurance for Tantangara Spoil Disposal Area.• Evidence of water testing in creeks and leachate dams. Evidence of water treatment of the leachate water through the water treatment system. The site has struggled to meet the nitrate levels required for regular discharge under the EPL licenced discharge points. <p><u>Assessment Against Condition</u> We have assessed the site as non-compliant with part d) and i).</p> <p>a) Spoil is minimised by the optimum tunnelling design. b) Evidence of testing program and test results. Discussion onsite about testing process. Review of online GIS system which included information on material type for different areas of the tunnelling project. We had a meeting with spoil engineer to discuss the management process. c) Evidence of spoil management process (management plan and spoil engineer). d)<ul style="list-style-type: none">• PAF - Evidence of material management including the process of PAF material. Evidence of designated areas onsite, PAF material treatment including blending. Further testing following blending.• Asbestos Material - none noted yet with the site approaching the NOA zone.• Contaminated Material (Non-compliant) - The process of blasting has led to increased levels of nitrogen in the spoil. See Leachate dams at the base of the spoil areas has detected high levels of nitrogen. We have therefore classified this material as contaminated. There is evidence that not all flows are captured in the leachate dams, with elevated levels in some surface and groundwater locations. No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S3, C32.<p>e) No reason to determine non-compliance based on material testing, tracking and discussions with spoil engineer. f) and g) The spoil areas from the tunnelling process are placed in designated areas of the site. There is no reuse potential for spoil. Spoil areas are permanent. h) A material balance is going to be completed for closure to assist with spoil management and the final landform. i) There have been water quality impacts from the process of storing spoil from the tunnelling program. In particular at Lobs Hole. See Part d) of this condition. Therefore non-compliant. No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S3, C32. j) From review of the site inspection this has not occurred. k) Not triggered.</p><p><u>Government Liaison</u> NPWS noted issues related to sediment, leachate and process water basin over-toppings in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p></p>	No non-compliance recommendation	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>FGJV confirms that as per Condition (d) that suitable procedures for handling, storing and disposing of contaminated materials have been developed and are implemented.</p> <p>FGJV will continue to work with relevant stakeholders, including the NSW EPA and Snowy Hydro as to minimise the water quality impacts of the temporary and permanent emplacement areas.</p>	25/09/2026	FGJV	Non Compliant

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8	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 8	The Proponent must implement the approved Spoil Management Plan for the development	<p><u>Implementation:</u> <u>Government Liaison</u> In December 2023, the NSW Environment Protection Authority (EPA) issued a Clean-Up Notice to Snowy Hydro Limited after elevated nitrate levels were detected in surface and groundwater near spoil storage areas at the site.</p> <p><u>Non-compliance for spoil management</u> due to the nitrogen issues. The process of blasting has led to increased levels of nitrogen in the spoil. See Leachate dams at the base of the spoil areas has detected high levels of nitrogen. At Lobs Hole there is evidence that not all runoff is captured in the leachate dams, with elevated nitrogen levels at some surface water and groundwater locations. No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S3, C32.</p> <p>There has been significant consultation with the EPA and other agencies about the nitrogen issue.</p> <p>• <u>Non-compliance topsoil</u> - there were issues at site in regards to topsoil storage. This was mostly to do with topsoil heights (above 2.5 m height), topsoils not being seeded. Some topsoil stockpiles also contained weeds. There was also a large topsoil area at Lobs Hole where a hardstand had been built on top of the topsoil stockpile. This is obviously not best practice.</p> <p>Site has stated in the RFI <i>'The topsoil stockpile at Lobs Hole has been raised as an internal issue within FGJV but not formally raised as an incident with SHL. Remediation training will be provided by SHL contractor FGJV.'</i> See NC RECs.</p>	<p>NC REC 3: Remove the hardstand area that has been constructed on top of the topsoil stockpiles at Lobs Hole.</p> <p>NC REC 4: Ensure topsoil stockpiles are stored and managed in accordance with the Topsoil Procedure. This includes spraying for weeds on stockpile at Lobs Hole. Signpost stockpile and separate non-topsoil. There is also a small amount of potential spoil material adjacent to the topsoil stockpiles.</p>	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>Snowy Hydro notes that the hardstand has since been removed from the non-compliant stockpile and affected topsoil relocated and stockpiled in accordance with requirements</p> <p>Snowy Hydro will (a) continue to implement actions to assure compliance with EPL 21266 and relevant Clean Up Notice (b) amend the Main Works General Environmental Inspection Form to include specific and targeted items relating to spoil management and topsoil in particular.</p>	25/09/2026	Snowy Hydro	Non Compliant

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9	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 10	<p>Rehabilitation Management Plan</p> <p>Within 18 months of the commencement of construction, the Proponent must prepare a Rehabilitation Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, BCD, EPA, NSW DPI and TfNSW;</p> <p>(b) be consistent with the Spoil Management Plan, Recreation Management Plan, Long-Term Road Strategy and Visual Mitigation Management Plan;</p> <p>(c) include a conceptual plan for the rehabilitation of the whole site;</p> <p>(d) include the detailed program for the rehabilitation of roads in the Kosciuszko National Park in accordance with the approved Long-Term Road Strategy;</p> <p>(e) include a topsoil balance for the site, which includes a strategy for:</p> <ul style="list-style-type: none">• maximising the reuse of topsoil on site (provided it is suitable for reuse);• using other suitable growth media; and• importing additional topsoil to the site (if necessary); <p>(f) include a native seed collection and propagation program in accordance with Florabank (www.florabank.org.au) and/or NPWS guidelines for the site, which includes a strategy for:</p> <ul style="list-style-type: none">• maximising the collection and use of native seed resources from the site prior to disturbance;• collecting seed from the surrounding area, including other parts of the Kosciuszko National Park (with the approval of the NPWS); and• prioritising the use of local sources of seed for the ecological rehabilitation of the site; <p>(g) include detailed plans for the rehabilitation of the disturbance area at each of the following sites, describing the measures that would be implemented to comply with the rehabilitation objectives in Table 3 or 5:</p> <ul style="list-style-type: none">• Talbingo Reservoir;• Lobs Hole;• Marica;• Plateau;• Tantangara Reservoir; and• Rock Forest; <p>(h) include a detailed ecological rehabilitation management plan for the development that:</p> <ul style="list-style-type: none">• provides an overarching description of the proposed ecological rehabilitation works, identifying the:- plant community types to be established; and- area of land to be established for each plant community type; <ul style="list-style-type: none">• provides maps showing the proposed location of each plant community type;• describes the detailed measures that would be implemented to comply with the ecological rehabilitation objectives in Table 4; <p>(i) identify the key risks to the successful completion of the rehabilitation and describe the contingency measures that would be implemented to address these risks;</p> <p>(j) include detailed completion criteria and performance indicators for the rehabilitation of the development (having regard) to the criteria and indicators in Table 4, including criteria for triggering remedial action (if necessary); and</p> <p>(k) include a program to monitor and publicly report on:</p> <ul style="list-style-type: none">• the rehabilitation of the site;• the implementation of the each of the detailed plans, including the effectiveness of the proposed mitigation and contingency measures; and• progress against the detailed completion criteria and performance indicators.	<p>DPHI Letter - Snowy 2.0 Main Works (SSI 9687) Approval of Management Plan Staging (dated 21/12/2023) states the RMP Stage - 1 must be approved by the Planning Secretary by 31 December 2023 and that the RMP - Stage 2 must be approved by the Planning Secretary by 31 December 2024. RMP - Stage 1 was approved in a letter from DPHI dated 24 Oct 2024. This was after the required date provided by DPHI. Therefore, Snowy Hydro is non-compliant. No non-compliance recommendation as the RMP Stage - 1 has since been approved. RMP - Stage 2 has not yet been approved and the required approval date set by DPHI has now lapsed. Therefore Snowy Hydro is non-compliant. See NC REC.</p> <p>(a) Sections 1.5 and 1.7. Plan developed by a team of suitably qualified and experienced people. Consultation undertaken with NPWS, BCD, EPA, TfNSW and NSW DPI. The RMP provides a table of the agencies consulted with and the type of consultation undertaken. The RMP however does not provide a full detailed description of the consultation that was undertaken with each individual agency.</p> <p>(b) Section 1.6 discusses the requirement of Condition 10(b) and states that Appendix C will provide the details of integration between these MPs. However, as the Project is staged, other MPs have not yet been developed. The RMP states that as the other plans are developed, the RMP will be updated in parallel to incorporate any requirements.</p> <p>(c) Sections 5 and 6 address this requirement.</p> <p>(d) Sections 6.2 and 6.3.3.4. The Long-Term Road Strategy is currently being prepared. On completion of the LTRS, the RMP will be reviewed and revised where required.</p> <p>(e) Section 6.3.1.4 discusses the requirement of a topsoil balance and Appendix H is the current stockpile inventory.</p> <p>(f) Section 6.3.1.1 address this condition.</p> <p>(g) Sections 1.1 and 5. Note: RMP states '<i>Site specific RMPs to be included as they are progressively developed. Plans will be developed in order of priority and availability of long term land use confirmation.</i>' Table 1-1 of the RMP states Marica and Plateau RMPs will be developed in Stage 1 and Talbingo Reservoir, Lobs Hole, Tantangara Reservoir, and Rock Forest will be developed in Stage 2. Site Specific Rehabilitation MPs (Appendix K to P) are staged (as per DPHI approval letter).</p> <p>(h) Sections 5, 6.3, Appendix C and Appendix J of the RMP. Appendix C (Final Land Use Domains) not yet developed. Note: RMP states '<i>Additional detail will be included as required in the Site Specific RMPs (Appendices K to P).</i>'</p> <p>(i) Sections 3 and 10. Section 3 list the High and Extreme Risks as well as proposed controls. Section 10 lists the key threats to Rehabilitation and provides the TARP for Rehabilitation.</p> <p>(j) Section 4 outlines completion criteria and performance indicators which includes criteria from Table 4.</p> <p>(k) Section 8 includes monitoring with Section 8.3 discussing the reporting requirements.</p> <p>"As there has been minimal final rehabilitation we have deemed this condition not triggered. We still have a number of recommendations relating to spoil management and final rehabilitation as the site has some challenges ahead.</p> <p>IEA Site Inspection Notes: Following a review of the Rehabilitation Management Plan there is no information relating to spoil (potential leachate material), leachate ponds and long-term rehabilitation and closure.</p> <p>There has been minimal final rehabilitation completed at the Project apart from some road batters of sealed roads.</p> <p>Seed collection during the audit period at Marika. Due to the fire in 2020 there are still difficulties in collecting seed. The site is currently working with NPWS regarding seed supply issues, hence we no recommendation regarding seed supply. The fires also caused a large loss to felled trees and logs that would be used in rehabilitation.</p> <p>There are lots of exposed batters and surfaces that require hydromulching at site. These are still operational construction areas. It is difficult to determine these surfaces as dye has not been used in the process. Despite there being exposed surfaces there is minimal erosion on batters and other erosion and sediment control structures.</p> <p>Section 6.1 of the RMP states 'disturbed areas and areas of completed final earthworks should be rehabilitated in progressive sequence as soon as practicable following the completion of earthworks, or when disturbed areas (such as lay-down areas or access tracks) are no longer required for construction purposes.' It should be noted that in recent times only a small section of the site are becoming available for final rehabilitation. Hence we have no compliance issue with this condition, but several recommendations.</p> <p>Government Liaison</p> <ul style="list-style-type: none">• We were not provided with any specific rehabilitation consultation with government agencies.• NPWS noted issues related to rehabilitation in a letter dated 17 April 2025. See Section 1.5.1 for full details.	<p>NC REC 5 - Submit the RMP - Stage 2 to DPHI for approval.</p>	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>DPHI requested and were provided the records of consultation and subsequently approved the plan</p> <p>Rehabilitation Management Plan to be updated with further links to Rec MPS, Visual MP, SM will be integrated in Spoil Emplacements area specific plans</p> <p>Rehabilitation Management Plan to be updated to reflect Long Term Road Strategy.</p> <p>Topsoil inventory to be updated.</p> <p>Overarching plans to be developed for the key project areas to satisfy stage 2 - Sub Plans of these areas to be developed in order of priority to support final land use and rehabilitation implementation</p> <p>Further detail to be included in site specific plans referenced in Condition G.</p>	25/09/2026	Snowy Hydro	Non Compliant

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10	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 13	Additional Biodiversity Offset Payment Within 3 years of the commencement of construction, the Proponent must submit a report via the Major Projects Portal that: a. identifies the final disturbance area of the Main Works; b. calculates the difference between the maximum disturbance area and the final disturbance area of the Main Works; and c. calculates the value of the outstanding biodiversity offset payment on a proportionate basis	<p>The Snowy 2.0 letter (dated 8 November 2024) states that the report has not yet been compiled due to the final disturbance area not yet being known. Due to unforeseen delays, the Project is behind schedule which has led to a delay in establishing a final disturbance area.</p> <p>Snowy Hydro's best estimate as to when the 'final disturbance area' should be known with certainty is March 2026 which is when final design will be complete. With the benefit of this information, Snowy Hydro should then be in a position to submit the Additional Report required by Condition 13 by June 2026.</p> <p>Snowy 2.0 have stated in the RFI that '<i>Nil response has been received from DPHI in response to the letter submitted on 8 Nov 2024.</i>'</p> <p>The report required by Schedule 3 Condition 13 was not provided to DPHI within the required timeframe of 21 October 2023. Therefore, site is non-compliant with this condition. NPWS also identified this as an issue in the correspondence with IEMA (EM - NPWS to IEMA - Snowy 2.0 Main Works - NPWS feedback for IEA#5 - 17 Apr 2025). The site is non-compliant as the disturbance area was not defined at the time of the audit meaning a bond can not be paid yet. See NC REC.</p>	NC REC 6: Establish the final disturbance area and submit the additional report to DPHI in relation to the biodiversity offset payment.	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>Snowy Hydro note that changes to the project disturbance area may result from design reviews to improve overall performance of the project including minimising the environmental footprint. Accordingly, Snowy Hydro will establish the project disturbance area and submit the final report to DPHI in relation to the biodiversity offset payment no later than six-months prior to the completion of construction. The timing for completion of construction is currently December 2028, the report would therefore be submitted no later than 31 May 2028.</p> <p>Snowy Hydro has been in consultation with DPHI to confirm the timing of the final disturbance area report.</p>	31/05/2028	Snowy Hydro	Non Compliant
11	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 17	The Proponent must: (a) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance area; (b) minimise the clearing of native vegetation and habitat within the disturbance area; (c) minimise the trimming of trees required for safety purposes along the approved road network within the Kosciuszko National Park and adjoining the disturbance area; (d) minimise the impacts of the development on threatened flora and fauna species or ecological communities within the disturbance area and its surrounds, including the: • Alpine Sphagnum Bogs and Associated Fens; • Alpine She-oak Skink; • Alpine Tree Frog; • Booroolong Frog; • Broad-toothed Rat; • Caladenia montana; • Clover Glycine; • Eastern Pygmy-possum; • Gang-gang Cockatoo; • Hoary Sunray; • Kiandra Leek Orchid; • Leafy Anchor Plant; • Mauve Burr-daisy; • Max Mueller's Burr-daisy; • Raleigh Sedge; • Slender Greenhood; • Smoky Mouse; • Spotted tailed Quoll; • Southern Myotis; • Thelymitra alpicola; • White-bellied Sea-eagle; (e) minimise potential fauna strike in sensitive habitat areas on the road network within the site, including reducing speed limits between sunset and sunrise and constructing suitable underpasses; (f) undertake pre-clearance surveys; (g) maximise the salvage of resources within the disturbance area for reuse in the restoration of vegetation and habitat on site, including native vegetative material, hollows logs, ground timber, and topsoil containing vegetative matter and native seed bank; (h) collect seeds for use in the ecological rehabilitation of the site; (i) minimise the spread of weeds, pathogens and feral pests on site, and import or export of these matters to or from the site, including the Phytophthora, Chytrid Fungus, African Lovegrass and Ox-eye Daisy; (j) minimise the generation and dispersion of sediment to watercourses, particularly Yarrangobilly River and Wallace Creek; NSW Government 17 Department of Planning, Industry and Environment (k) minimise the light spill from night works, including using directional and LED lighting; and (l) minimise bushfire risk.	<p>We have deemed this non-compliant for Part i) of this condition.</p> <p>Site has stated in writing that the Biodiversity Monitoring Program: Year 4 Annual Monitoring Report (2023/2024) is yet to be finalised by EMM.</p> <p>(a) Boundary rope that delineates the construction boundary and clearing boundary was observed during the site inspection. However, due to the presence of horses entering the construction zones, the boundary rope was knocked down across majority of the site or had been removed completely. There have been some minor issues of disturbance outside the footprint with these outlined in the incident management section of the IEA report.</p> <p>(b) This has been minimised. However disturbance areas require clearing.</p> <p>(c) No excessive tree removal or pruning was observed along the road network.</p> <p>(d) Generally we believe this has been minimised by clearance process and through monitoring program. However, note NPWS letter around the unexpected finds protocol where they sighted this condition.</p> <p>(e) Wildlife underpasses observed along sealed roads within project footprint during the site visit. In-Vehicle Management System (IVMS) installed on project vehicles</p> <p>(f) Pre-clearing Survey Reports developed prior to clearing. See Pre-clearing Survey Report for Marica Pad 1 and Lined Spoil Pad developed by NARLA Environmental.</p> <p>(g) Site visit identified the stockpiling of habitat logs, bush rock and topsoil for use during future rehabilitation.</p> <p>(h) NARLA Environmental has undergone seed collection across the site. Evidence provided in the form of Seed Change of Custody</p> <p>(i) Some wheel wash stations sighted however, NPWS have noted issues with this in a letter dated 17 April 2025. See Section 1.5.1 for full details. There has been no evidence of a defined and structured weed management program at the site. Works completed have been sporadic.</p> <p>• Plant and vehicles must complete Hygiene Declarations when arriving on site.</p> <p>• Selection of Weed Control - Daily Spray Records provided by site show that weed control is taking place across Tantangara, Marica, Gooandra and Lobs Hole. However, IEMA did not observe a consistently applied weed or pest management control program. Therefore, non-compliant. No specific NC REC as it is covered by other biodiversity recommendations in S3, C19.</p> <p>We have deemed this condition non-compliant based on the lack of detailed spraying records and there not being a defined and structured weed management program. NPWS also noted issues related to biosecurity in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p> <p>(j) Although there were some discharges, we did not identify this as a compliance issue.</p> <p>(k) Site lighting directed inwards to the site</p> <p>(l) Site provided evidence of RFS attending site to assess bushfire risk (evidence was provided in the form of a hard copy newsletter). Fire fighting equipment was sighted across site during site visit.</p> <p>• During the site inspection, IEMA observed rabbit burrows in basin batters at Tantangara.</p> <p>• Unexpected finds procedure has been enacted as per the Pimelea Assessment email. The email is direction from Snowy Hydro for FGJV to prepare a proposal to undertake a threatened species assessment in accordance with the Unexpected Finds Procedure.</p>	No non-compliance recommendation	<p>Snowy Hydro acknowledge the non-compliance in relation to part (i).</p> <p>The Year 4 Annual Monitoring Report has subsequently been finalised and published on the Snowy 2.0 website</p> <p>FGJV will recommend that Snowy Hydro submit the next review of the Biodiversity Management Plan, and associated appendices (including the unexpected threatened species finds procedure), to the NPWS in accordance with Schedule 3 Condition 18 of the CoA, for their review.</p>	25/09/2026	FGJV	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
12	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 19	The Proponent must implement the approved Biodiversity Management Plan for the development.	<p><u>Site Records</u> Clearing (Land Disturbance) Permit</p> <ul style="list-style-type: none">• See evidence of a selection of clearance permits.• As per part D of the permit, the third party ecologist confirmed that habitat threes and features had been identified, GPS mapped and marked. Additionally, the comments included in the same section further confirm a "high volume of habitat features requiring 24 hour grace period prior to removal" further confirming that Stage 2 is required.• there is no reference to whether Stage 2 ecological clearance is required within the Clearing (Land Disturbance) Permit. See recommendation.• However noted that some of the Clearing (Land Disturbance) Permit do not have sections completed for Part F - Approval and Acceptance of Conditions (Plant Operators and field staff) and Part G Disturbance/Clearing Close Out. Due to the forms not fully being completed we have deemed this non-compliant. See NC REC. <p><u>Washdown stations</u> Site has stated in the RFI that "Washdown stations were utilised prior to the installation of wheel washes. As such there has been no use of these during the audit period." Section 5.1.1.2 of the Weed, Pest and Pathogen MP states "Washdown stations will be established in the vicinity of the key access points to the site, as soon as practically possible, at the commencement of construction....." Section 2.4 of the Biodiversity MP also lists the use of washdown stations as a management measure. We do not believe the site has implemented the commitment of washdown facilities. The Biodiversity Management Plan is vague in the location of washdown stations. We understand some have been removed however there is no evidence provided for specific consultation with NPWS and any other relevant agency. Therefore non-compliant with implementation of the Biodiversity Management Plan. See Schedule 2 Condition 13 for the recommendation.</p> <p><u>Government Liaison</u> NPWS noted issues related to biodiversity, and implementation of the unexpected finds procedure in a letter dated 17 April 2025. See Section 1.5.1 for full details. From recent discussions, Snowy Hydro have stated: 'Unexpected finds procedure has been enacted as per the Pimelea Assessment email.' The email is direction from Snowy Hydro for FGJV to prepare a proposal to undertake a threatened species assessment in accordance with the Unexpected Finds Procedure.</p> <p>Section 5.1.2.1 of the Weed Pest and Pathogen MP states: 'At minimum, a twice-annual weed control program will take place throughout the construction of the project. This will generally involve a spring and summer round of weed spraying.....' • Weed spraying undertaken across the site. However, during the site inspection a number of weeds were identified across all work fronts. Site advised that weed management is undertaken by contractor. Contractor missed previous spray cycle which was reported as an non-compliance to relevant agencies. • The Weed, Pest and Pathogen Management Plan (Section 6.1), Appendix F to the Biodiversity Management Plan states that the Annual Biodiversity Report will report on: 'details on the weed control actions undertaken since the last report including: • a list of the control activities undertaken; • map of areas where control activities were undertaken; • efficacy of the control measures in relation to the objective of minimising weed, pest and pathogen distribution and/or abundance in the project area; • recommendations for future control activities.' The Annual Report does not detail the weed controls undertaken, only the weed monitoring. This is also the case with pest animal species.</p>	<p>NC REC 7: Ensure the Clearing (Land Disturbance) Permit have sections completed for Part F - Approval and Acceptance of Conditions (Plant Operators and field staff) and Part G Disturbance/Clearing Close Out. These need to be completed for every clearance area as per Appendix C - Pre Clearing and Clearing Procedure.</p> <p>NC REC 8: Additional detail needs to be included in the Annual Biodiversity Monitoring Report. This should include an assessment of the commitments within the Biodiversity Management Plan, not just a summary of biodiversity monitoring. There is a detailed list of requirements in Section 6.5 of the Biodiversity Management Plan.</p> <p>There appear to be gaps in the following components:</p> <ul style="list-style-type: none">• Tracking of vegetation clearing and habitat loss against approved limits,• Inclusion of post-clearing ecology reports,• Reporting on fauna strike mitigation strategy actions,• Summary of any incidents or non-compliances,• Additional information on weed management (weed species, control methods and areas),• Formal evaluation against performance measures listed in Section 6.5.1. <p>Also from a timing point of view the report is taking too long to write and there is always a lag between monitoring and reporting.</p>	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>The Year 4 Annual Monitoring Report has subsequently been finalised and published on the Snowy 2.0 website</p> <p>Snowy Hydro:</p> <p>(a) has changed the approach to production on the annual biodiversity monitoring report including the contractors undertaking monitoring, analysis and in report production. The auditor's recommendations will be included as part of the report production scope.</p> <p>(b) in collaboration with FGJV, will implement <i>Phytophthora</i> presence/absence monitoring as per Section 9.3, Appendix B of the Biodiversity Management Plan will be implemented and a register of samples and analyses will be maintained. A summary of this monitoring will be extracted from the register and incorporated into future annual biodiversity monitoring reports.</p> <p>FGJV will:</p> <p>(a) provide monthly assurance reports to Snowy Hydro demonstrating compliance with all procedures concerning clearing. These reports will include copies of all permits issued with reference to documentation produced in support of each permit.</p> <p>(b) conduct an assessment to confirm the nature of biosecurity risks and the effectiveness of existing controls in acheiving the outcome under Sch. 3, Condition 17(i). Based on the findings, Snowy Hydro, in consultation with NPWS, will revise the Weed, Pest and Pathogen Management Plan to implement the agreed measures.</p>	25/09/2026	Snowy Hydro	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
13	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 20	Biosecurity and Fish Management Requirements The Proponent must: (a) minimise the development-related biosecurity risks, including the movement and spread of weeds, pests and pathogens; (b) minimise the impact of the development on threatened fish species and their habitat, particularly the Macquarie Perch, Stocky Galaxias and Murray Crayfish; and (c) minimise the impact of the development on recreational fishing in Tantangara Reservoir and Lake Eucumbene.	<p>(a) This relates to spread of weeds, pests and pathogens.</p> <p>• Wheel Wash stations sighted however NPWS have noted issues with this in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p> <p>Wash Down Station: Section 5.1.1.2 - 5.1.1.2 of the Weed, Pest and Pathogen MP states there is a requirement for '<i>Washdown stations will be established in the vicinity of the key access points to the site, as soon as practically possible1 at the commencement of construction. These locations include:</i></p> <ul style="list-style-type: none">• <i>entry to Lobs Hole Ravine Road (near Link Road);</i>• <i>access to Tantangara (initially near Snowy Mountains Highway, to be relocated to Quarry trail post upgrade of Tantangara Road); and</i>• <i>access to Marica (near to junction of Snowy Mountains Highway).</i> <p>Site has stated '<i>Washdown stations were utilised prior to the installation of wheel washes. As such there has been no use of these during the audit period.</i>' Section 5.1.1.2 of the Weed, Pest and Pathogen MP states '<i>Washdown stations will be established in the vicinity of the key access points to the site, as soon as practically possible, at the commencement of construction.....</i>' Section 2.4 of the Biodiversity MP also lists the use of washdown stations as a management measure. Site has not implemented the commitment of washdown facilities.</p> <p>• Hygiene declarations and inspections for plant and equipment transported to site.</p> <p>(b)</p> <ul style="list-style-type: none">• Evidence of Stocky Galaxias Salvage Procedure developed by Austral Research and Consulting (24 Jan 2025)• Construction of the Galaxiid Barrier• Captive breeding program for Stocky Galaxias and Macquarie Perch reported in the 2023/2024 Annual Report - Snowy 2.0 TFMP• Fish screens at Tantangara Dam and the inlet to the Murrumbidgee to Eucumbene tunnel (as per S3, C21)• Annual Stocky Galaxias monitoring reported in the 2023/2024 Annual Report - Snowy 2.0 TFMP• Annual Macquarie Perch monitoring reported in the 2023/2024 Annual Report - Snowy 2.0 TFMP• Annual Murray Crayfish monitoring reported in 'The status of Murray Crayfish in Talbingo Reservoir, Yarrangobilly River and Wallace Creek in June 2024' (Zukowski, 2024) <p>(c) Recreational Fishing MP (see Condition 26 below)</p> <ul style="list-style-type: none">• Snowy Hydro's to spend \$5 million over 5 years from the commencement of the program to develop the capability to restock, and to restock, Tantangara Reservoir and Lake Eucumbene with salmonid fish - addressing Schedule 3 Condition 26(b(i)) of the CoA. <p>NPWS noted issues related to biosecurity in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p> <p>IEMA have assessed this condition as non-compliant based on the biosecurity issues identified in Schedule 3, Condition 22 and 23. No non-compliance recommendation provided as it is addressed in other conditions.</p>	NC REC 9: Snowy Hydro to maintain a spreadsheet that comprises the Phytophthora monitoring data (laboratory results) for each monitoring location with additional results added after each monitoring program.	<p>Snowy Hydro note that Sch. 3, Condition 20 relates to biosecurity in an aquatic context and that the requirements for management of terrestrial biosecurity are established by Sch. 3, Condition 17(i). Accordingly Snowy Hydro do not acknowledge any non-compliance in relation to aquatic biosecurity under Part (a). This is addressed by the response to the finding on Sch. 3, Condition 19 above.</p> <p>Snowy Hydro does not concur with the audit findings and contends there is no non-compliance against this condition. Notwithstanding, Snowy Hydro adopts the recommendation as part of addressing the non-compliance under Sch. 3, Condition 19.</p>	25/09/2026	Snowy Hydro	Non Compliant
14	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 22	Biosecurity Risk Management Plan Within 2 years of the commencement of construction, the Proponent must prepare a Biosecurity Risk Management Plan for the development to the satisfaction of the Director-General of NSW DPI. This plan must: (a) be prepared by a suitably qualified and experienced person in consultation with DPIE, NPWS and DAWE; (b) include a detailed biosecurity risk management framework for minimising the ongoing biosecurity risks of the development required in condition 20(a) above, including: • developing systems to prevent spills from the Tantangara Reservoir so far as is reasonably practicable; and • pest fish and disease surveillance and eradication/management measures to protect the Macquarie Perch and Stocky Galaxias in the Mid to Upper Murrumbidgee catchment and the salmonid fishery in Lake Eucumbene; (c) include detailed plans for the installation and use of the fish screens and barriers required in condition 21 above, including: • minimising the environmental impacts associated with installing the screens, • testing the effectiveness of the screens before they are used; and • maintaining and improving the effectiveness of the screens and barriers over time; (d) include a program to monitor, evaluate and publicly report on these plans, including: • carrying out monitoring using epidemiologically designed surveys; and • conducting fish, disease and eDNA surveys.	<p>The Biosecurity Risk MP was prepared to satisfy the requirements of both state and federal environmental approvals for the Snowy 2.0 Main Works project. It aims to minimise the biosecurity risks associated with the construction and operation of this pumped hydroelectric scheme, particularly the potential transfer of pest fish and diseases through newly created hydrological connections.</p> <p>Appendix A to the Biosecurity MP (Independent Peer Review Report) states 'Construction of Main Works commenced in October 2020 and therefore the BRMP is outside the timing requirements of Condition 22. Note that this requirement cannot be satisfied until the BRMP is approved by the Director-General of NSW DPI. Notwithstanding, its pre-requisites have been satisfied as set out in this table and via the completion of this Peer Review Report.' Therefore non-compliant.</p> <p>Biosecurity Risk MP Consultation Letter (25 Oct 2023) from DPHI states that Snowy can stage the submission of the Biosecurity Risk MP. However, Stage 1 must be submitted by 1 Dec 2023 and Stage 2 prior to 1 Dec 2024. Stage 1 was approved by DPI in a letter dated 25 Oct 2024 in response to submission of the Biosecurity Risk MP on 18 May 2024. The submission of Stage 1 is outside of the approved submission timeframe set by DPHI. Therefore non-compliant. No non-compliance recommendation as the Biosecurity Risk MP Stage 1 has since been approved.</p> <p>Site has stated in Snowy 2.0 Fish Management Plans Update - Monthly Working Group Meeting with DPIRD (3 March 2025) that the Stage 2 Biosecurity Risk MP submission is targeted for June 2025. The submission of Stage 2 is outside the approved timeframe set by DPHI therefore is non-compliant. See NC REC.</p> <p>(a) Section 1.5 and Approval Record on page i state the qualification and that the person developing the Biosecurity Risk MP C is suitably qualified. Section 1.5 states that the Biosecurity Risk MP was prepared in consultation with DPHI and DAWE. Appendix A provides details of consultation undertaken with NPWS, DCCEEW and DPIRD.</p> <p>(b) Part 1</p> <ul style="list-style-type: none">• Part 1, Section 6 (Tantangara Reservoir Spill Management)• Part 1, Section 4 (Pest Fish Surveillance and Management) and Part 1, Section 5 (Disease Surveillance and Management) <p>(c) Part 2</p> <ul style="list-style-type: none">• Part 2, Section 8.6 (Minimising Environmental Impacts)• Part 2, Section 8.4 (Testing Screen Effectiveness)• Part 2, Section 8.7 (Maintaining and Improving Effectiveness Over Time) <p>(d) Part 1</p> <ul style="list-style-type: none">• Part 1, Sections 4, 5 and 7	NC REC 10: Submit the Biosecurity MP Stage 2 to DPHI for approval.	<p>Snowy Hydro acknowledge the non-compliance</p> <p>Snowy Hydro will submit Stage 2 of the Biosecurity Risk Management Plan Stage to DPHI for approval</p>	25/09/2026	Snowy Hydro	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
15	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 23	The Proponent must implement the approved Biosecurity Risk Management Plan for the development.	Site Records • Annual Monitoring Reports developed by EMM Government Liaison • Snowy keeps DPIRD updated on the fish screen and weir with Monthly Working Group meetings. IEA Site Inspection Notes: This MP relates to aquatic management, Fish Screen and Fish Weir. These were either not sighted or not yet established during the site inspection. Weed management, pest and pathogen management is a requirement of biosecurity. This Biosecurity Management Plan refers back to Biodiversity Management Plan, Appendix F - Weed, Pest and Pathogen Management Plan. Due to these issues noted in Schedule 3 Condition 20 (and other conditions around weed management) we have deemed this condition non-compliant. No NC Rec as it is addressed in previous conditions.	No non-compliance recommendation	Snowy Hydro note that Sch. 3, Condition 23 implementation of the Biosecurity Risk Management Plan which addresses aquatic biosecurity matters. The requirements for management of terrestrial biosecurity are established by Sch. 3, Condition 17(i). Accordingly Snowy Hydro do not acknowledge any non-compliance in relation to implementation of the BRMP. Snowy Hydro does not concur with the audit findings as described in the response to the finding against Sch. 3, Condition 20 and contends there is no non-compliance against this condition.	25/09/2026	Snowy Hydro	Non Compliant
16	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 24	Threatened Fish Management Plan Within 12 months of the commencement of construction, the Proponent must prepare a Threatened Fish Management Plan for the development to the satisfaction of the Director-General of NSW DPI. This plan must: (a) be prepared by a suitably qualified and experienced person in consultation with DPIE and DAWE; (b) include the establishment and use of an expert advisory committee to provide advice to the proponent on the implementation of the plan; (c) describe the detailed measures that would be implemented to comply with condition 20(b) above; (d) include a detailed captive breeding program for the Macquarie Perch and Stocky Galaxias involving the spending of \$5 million over 5 years from the commencement of the program that provides for: • population monitoring, surveillance and research on the Macquarie Perch and Stocky Galaxias in the Mid to Upper Murrumbidgee catchment; • habitat surveys to identify suitable receiving sites for stocking insurance populations of Stocky Galaxias and Macquarie Perch; • captive breeding, stocking and monitoring of Macquarie Perch and Stocky Galaxias with the aim of achieving self-sustaining populations of these species; • habitat enhancement for the Macquarie Perch in the mid-Murrumbidgee catchment in accordance with the National Recovery Plan to increase the existing population's resilience to the potential biosecurity risks from the development (e) include a review after 5 years of the commencement of the captive breeding program in (d) above and detail the trigger, action and response plan for the extension of the program; (f) include a program to minimise the impacts of the development on the Murray Crayfish in Talbingo Reservoir, including: • population monitoring and surveillance for Murray Crayfish; • relocating any Murray Crayfish from the disturbance area of the development prior to disturbing the relevant area; and • habitat enhancement for the Murray Crayfish habitat in the vicinity of the disturbance area at the Talbingo Reservoir, including the use of woody debris salvaged during construction; and (g) include a program to monitor and publicly report on the progress of each program/plan and the effectiveness of these measures.	Main works construction commenced on 22 October 2020. The Threatened Fish Management Plan was approved in a letter from DPHI dated 26 Oct 2023. Therefore the Threatened Fish Management Plan was not prepared to the satisfaction of the Planning Secretary within 12 months of commencement of construction. Therefore, Snowy Hydro is non-compliant with this condition. No non-compliance recommendation as the Threatened Fish Management Plan has since been approved. (a) Section 1.5 states that the TFMP was prepared by suitably qualified and experienced persons in consultation with NSW DPI, DPE, NPWS and DCCEEW. The names, qualifications and experience of those who developed the TFMP is included in Section 1.5 and the Certificate of Approval. (b) Section 2.2 Outlines the role of the Expert Advisory Committee. (c) Sections 3.2, 3.3, 4.2, 4.3 and outlines the measures to reduce impacts on the Stocky Galaxias, Macquarie Perch and Murray Crayfish. (d) Section 3.3 outlines the captive breeding program for Stocky Galaxias and Section 4.3 outlines the captive breeding program for Macquarie Perch. (e) Section 5 outlines the review of the captive breeding program and provides the TARP for the extension of the captive breeding program. (f) Sections 6.3.1, 6.3.2 and 6.3.3 outline the population monitoring, relocation and habitat enhancement of the Murray Crayfish. Note: Sections 6.3.2 and 6.3.3 which discuss relocation and habitat enhancement just refer the reader to the AqHMP for info on the relocation and habitat enhancement details. (g) Section 2.4 outlines the Annual Reporting requirements of the TFMP	No non-compliance recommendation	Snowy Hydro acknowledge the non-compliance. The Threatened Fish Management Plan is now approved, however, its delay in finalisation is noted. This finding underscores the importance of new systemic controls being implemented across the Project. The progress and completion of actions identified will be tracked in the project's compliance management system.	25/09/2026	Snowy Hydro	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
17	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 26	Recreational Fishing Management Plan Within 12 months of the commencement of construction, the Proponent must prepare a Recreational Fishing Management Plan for the development to the satisfaction of the Director-General of NSW DPI. This plan must: (a) be prepared by a suitably qualified and experienced person in consultation with DPIE, NPWS and relevant recreational fishing groups; (b) describe the detailed measures that would be implemented to comply with condition 20(c) above, including: • a program involving the spending of \$5 million over 5 years from the commencement of the program to develop the capability to restock, and to restock, the Tantangara Reservoir and Lake Eucumbene with salmonid fish; • a program to monitor the impacts of the development on recreational fishing in Tantangara Reservoir and Lake Eucumbene; • a review after 5 years of the commencement of the restocking program and detail the trigger, action, and response plan for the continuation of the restocking of Tantangara Reservoir and/or Lake Eucumbene salmonid fish; (c) include a program to monitor and publicly report on the effectiveness of these measures.	<u>Preparation condition:</u> Main works construction commenced on 22 October 2020. RFMP was approved in a letter from DPI dated 31 Oct 2023. Therefore the RFMP was not prepared to the satisfaction of the Director-General of NSW DPI within 12 months of commencement of construction. Therefore Snowy Hydro is non-compliant with this condition. No non-compliance recommendation as the RFMP has since been approved. (a) Section 1.4 and the Certificate of Approval outline the names of the personnel who prepared the RFMP. Section 1.4 and Appendix A provide details of the consultation undertaken with DPI, DPIE, NPWS and DCCEEV. (b) • Section 2 Outlines the captive breeding and restocking of Tantangara Reservoir and Lake Eucumbene with salmonid fish. • Section 3 outlines the monitoring of impacts to recreational fishing. • Section 2.11 Describes the review of captive breeding capability, capacity and stocking commitments. The TARP for the review is provided in Table 3. (c) Section 4 outlines the requirement to publicly report on the RFMP.	No non-compliance recommendation	Snowy Hydro acknowledge the non-compliance. The Recreational Fishing Management Plan is now approved, however, its delay in finalisation is noted. This finding underscores the importance of new systemic controls being implemented across the Project. The progress and completion of actions identified will be tracked in the project's compliance management system.	25/09/2026	Snowy Hydro	Non Compliant
18	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 29	Water Pollution Unless an environment protection licence authorises otherwise, the Proponent must comply with Section 120 of the POEO Act. Note: Section 120 of the POEO Act makes it an offence to pollute any waters.	Definitions: Section 120 of the POEO Act 1997 (NSW) makes it an offence to pollute any waters. This applies to all activities unless specifically authorised by an environmental protection licence. "pollute" means to introduce, directly or indirectly, into the waters any matter that results in pollution. "pollution" means— (a) <i>placing in or on, or otherwise introducing into or onto, the waters (whether through an act or omission) any matter, whether solid, liquid or gaseous, so that the physical, chemical or biological condition of the waters is changed, or</i> (b) <i>placing in or on, or otherwise introducing into or onto, the waters (whether through an act or omission) any matter, whether solid, liquid or gaseous, that is likely to change the physical, chemical or biological condition of the waters.</i> According to the records provided by Snowy Hydro/FGJV, the Incidents relating to water included, but not limited to: • Sediment basin overtopping events (15 instances during audit period, as per website incident spreadsheet.) • Sediment-laden water entering water way (8 instances during audit period, as per website incident spreadsheet.) • Elevated nitrates and total nitrogen (2 instances during audit period, as per website incident spreadsheet.) • Leachate sediment laden water reporting to various water ways (5 instances during audit period, as per website incident spreadsheet.) • Discharge of non-compliant water (3 instances during audit period, as per website incident spreadsheet.) Due to these uncontrolled discharge events the site is non-compliant with this condition due to water pollution. No recommendation allocated to this condition as it is addressed in S3, C32. Government Liaison NPWS noted issues related to sediment, leachate and process water basin over-toppings in a letter dated 17 April 2025. See Section 1.5.1 for full details.	No non-compliance recommendation	Snowy Hydro acknowledge the non-compliance. FGJV will continue to work with relevant stakeholders, including the NSW EPA, Snowy Hydro and external third party specialists as to minimise the pollution of waters.	25/09/2026	FGJV	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
19	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 30	<p>Water Management Requirements</p> <p>The Proponent must:</p> <p>(a) maximise the recycling and reuse of water on site;</p> <p>(b) maximise the diversion of clean water runoff around the disturbance areas;</p> <p>(c) minimise the flow rates and velocities of any clean water runoff diversions to adjoining watercourses;</p> <p>(d) minimise the flooding impacts of the development;</p> <p>(e) minimise groundwater take from the Gooandra Volcanics and Kellys Plain Volcanics using pre and post grouting of the tunnel, to minimise the loss of stream flows in the waterways above these geological formations, including Gooandra Creek and the headwaters of the Eucumbene River;</p> <p>(f) minimise erosion and the generation and dispersion of sediment using suitable controls in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction guidance series and adopting adaptive erosion and sediment controls;</p> <p>(g) design all instream works, particularly the inlet and outlet works, to minimise scour and erosion;</p> <p>(h) unless permitted by this approval, avoid carrying out of any development within 40 metres of any watercourse;</p> <p>(i) carry out all instream works or development within 40 metres of any watercourse generally in accordance with the requirements in the Guidelines for Controlled Activities on Waterfront Land;</p> <p>(j) treat all wastewater and surplus process water prior to discharging it at the approved discharge points at the Talbingo Reservoir or Tantangara Reservoir;</p> <p>(k) reduce the number of diffuser points for low velocity discharges to the Talbingo Reservoir or Tantangara Reservoir;</p> <p>(l) not discharge any surplus process water to the stormwater basins on site;</p> <p>(m) minimise the surface water quality impacts of the development, including:</p> <ul style="list-style-type: none">• the development carried out in the vicinity of waterways, particularly the Talbingo Reservoir, Tantangara Reservoir and Yarrangobilly River;• all instream works, including dredging, channel excavations, underwater blasting, barge infrastructure, fish barriers and screens, culverts and bridges, and service crossings;• the temporary and permanent spoil emplacement areas;• development at the Marica, Plateau and Rock Forest sites;• road works;• the operation of the power station and associated infrastructure, including the operation of the inlets and outlets to minimise sediment disturbance risks and the dewatering of the tailrace tunnel; <p>(n) minimise the risk of spills or leaks on site, and clean up any spills or leaks as quickly as possible;</p> <p>(o) minimise the groundwater quality impacts of the development, particularly through the design of the temporary and permanent spoil emplacement areas and all water storages on site;</p> <p>(p) store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards.</p>	<p>a) WMP – Section 4.2, SWMP – Section 5.1, Section 5.3.1, Table 5-3: SW14 Basin water used as dust suppression in water carts, irrigation dewatering methods to adjacent lands within the construction envelope. Process Water Treatment Plants, Wastewater Treatment Plants and Potable Water Treatment Plants operating across the main construction sites. Due to parameters imposed on authorised discharge criteria, it is not possible to discharge water from LDPs.</p> <p>b) SWMP – Section 5.1, Table 5-3: SW04, SW06 Clean water Diversion Drains are installed and working to direct clean water around the construction sites.</p> <p>c) SWMP - Section 5.1, Table 5-3: SW08 Clean water diversions designed to minimise potential scour impacts in adjoining watercourses.</p> <p>d) SWMP – Section 5.2, Table 5-3: SW18, SW19 Natural Hazard Management Plan (S2-FGJV-ENV-PLN0090) Spoil Management Plan (S2- FGJV-ENV-PLN-0019) Where possible, stockpiles are located where they are not exposed to concentrated of flood flow</p> <p>e) GMP – Section 5.1 and Table 5-1: GW04, GW05</p> <p>f) SWMP – Section 5.1, Table 5-3: SW03 ESCPs developed for work sites. The ESCPs have been approved by CPESC. ErSed controls installed across site. It appears ESC's have been generally well designed but its hard to manage as per Blue Book due to the difficulty in discharging from sediment dams and treated leachate water.</p> <p>g) SWMP - Section 5.7, Table 5-3: SW58, SW59</p> <p>h) SWMP – Section 5.7, Table 5-3: SW51</p> <p>i) SWMP – Section 5.7, Table 5-3: SW51, SW52</p> <p>j) SWMP – Section 5.3, Table 5-3: SW22, SW30 and Annexure F Water is treated prior to discharge. However, due to the strict criteria the water must reach prior to discharge, the site is unable to reach criteria levels that are acceptable for discharge.</p> <p>k) SWMP – Section 5.3.4, Table 5-3: SW27, SW35 and Annexure F</p> <p>l) SWMP – Section 5.3, Table 5-3: SW28. Treated process water is water that has gone through the water treatment plants. This is continued to be recycled through the system or it is discharged if criteria has been met.</p> <p>m) SWMP – Section 5, Table 5- 3 (All measures). There have been water quality impacts through issues with leachate at some surface water and groundwater locations. Also discharges from sediment dams offsite and into the reservoir at Lobs Hole. The site has attempted to manage water, however it is a difficult project in relation to water management. Non-compliant. No non-compliance recommendation allocated to this condition as it is addressed in recommendations that are assigned to S3, C32.</p> <p>n) SWMP – Section 5.4, Table 5-3: SW36, SW37, SW39, SW41, Annexure C (Spill Response Procedure) During the site inspection incorrect Hazchem storage and Hazchem spills were observed in the Contractors work area at Lobs Hole (see Schedule 3, Condition 52)</p> <p>o) GMP – Section 5.4 and Table 5-1: GW09 Spoil Management Plan (S2- FGJV-PLN-0019)</p> <p>p) SWMP - Section 5.4, Table 5-3: SW41, Annexure C (Spill Response Procedure) Site generally manages hydrocarbons well. There was however incorrectly stored hydrocarbons and hydrocarbon spills at the Lobs Hole Contractors work area that requires clean up (see Schedule 3, Condition 52). Therefore non-compliant with condition 30(p). See recommendation. See photos in IEA report.</p> <p>There are improvements relating to hydrocarbon storage and spill management. See improvement recommendation under Schedule 3, Condition 52 for more details.</p> <p>Government Liaison NPWS noted issues related to sediment, leachate and process water basin over-toppings in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p>	<p>NC REC 11: FGJV to review all contractor areas to ensure they have the correct equipment to undertake maintenance and spill response for hydrocarbons and chemicals, noting most of the contractor areas do not contain bunding or drain to an oily water separator.</p>	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>FGJV will continue to work with relevant stakeholders, including the NSW EPA, Snowy Hydro and external third party specialists as to minimise the pollution of waters.</p> <p>FGJV will review all contractor areas to ensure they have the correct equipment to undertake maintenance and spill response for hydrocarbons and chemicals. Subject to the findings, FGJV will address identified issues, which may also include additional personnel training and aweness.</p>	25/09/2026	FGJV	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
20	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 32	The Proponent must implement the approved Water Management Plan for the development	<p><u>IEA Inspection Notes</u></p> <ul style="list-style-type: none">• Drains and sediment dams onsite generally had minimal erosion. Being a construction site, upgrades were constant throughout the period.• WTP's were viewed with leachate water moved through the WTP's several times in an attempt to meet criteria from the Water Management Plan. The main issue has been around the level of nitrates with the site struggling to meet the tight criteria. Without meeting that criteria the site can not discharge from LDP's putting pressure on capacity from the water management system.• Water is used from sediment dams for dust suppression. It has been noted that the site does not currently use flocculants and hence TSS is difficult to reduce to allow controlled releases under the Blue Book. With difficulties to do controlled water releases this means the site can not achieve the blue book requirements of dewatering sediment basins and leachate dams. <p><u>Government Liaison</u> NPWS noted issues related to sediment, leachate and process water basin over-toppings in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p> <p><u>Implementation Summary:</u> Refer to the '2025 MP Implementation table' for more details. Non-compliances relating to implementation of the Water Management Plan included the following commitments:</p> <ul style="list-style-type: none">• SW02• SW11• SW15• SW25• SW41• GW07 <p><u>Monitoring Data Summary:</u> See Section 4.9 of the main report which includes a discussion on monitoring results for surface water, groundwater and leachate.</p> <p>The website monitoring reporting includes:</p> <ul style="list-style-type: none">• Summary of EPL Water Monitoring Results for 2022 – 2024.• Quarterly EPL monitoring reports 2022 to August 2024.• Bi annual Environmental Monitoring Reports June 2024 to November 2024. <p>A review of these monitoring reports indicates exceedances of criteria. With there being so much monitoring data across several reports it has been difficult to determine how the site has performed in terms of compliance (criteria and Water Management Plan). This does not necessarily mean the site has not met the monitoring requirements.</p> <p>Appendix D of the June to November 2024 Biannual Monitoring Report outlines the exceedance map of monitoring locations. It indicates a large number of exceedances and IEMA is questioning the validity of the trigger levels because of there being so many exceedances. There is very little discussion within the June to November 2024 Biannual Monitoring Report regarding the causes of exceedances, potential site contributions, comparison between upstream and downstream results (surface water), comparison between upgrade and downgrade results (groundwater) and any assessment against current results against data from the EIS phase. See recommendation about more targeted detail in reports.</p>	NC REC 12: Undertake a leachate water assessment of the source point of the leachate (including surface and groundwater monitoring/assessment). Pending the outcome of the assessment there may be a requirement to undertake leachate groundwater removal or other additional controls based on the advice from a specialist. Consultation with key agencies would be required for implementation.	Snowy Hydro acknowledge the non-compliance. FGJV confirms that this report has already been completed and in accordance with the Clean Up Notice issued by the EPA are removing impacted groundwaters for treatment.	25/09/2026	FGJV	Non Compliant
21	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 33	Protection of Heritage Items The Proponent must ensure that the development does not affect: (a) any Aboriginal heritage items outside the construction envelope (see Appendix 3); (b) the rock shelter (AHIMS 57-4-276) to the west of the Tantangara site (see Appendix 3); (c) any of the historic heritage items outside the construction envelope (see Appendix 3); (d) the heritage items listed in Table 4-2 and Table 4-4 in Appendix 4; and (e) the tufa deposits outside the construction envelope (see the figures in Appendix 3).	<p>(e) As stated in the DPHI letter dated 09/03/2025, Snowy Hydro did not undertake Annual Reporting for the periods 2021 to 2024 for the Ravine Block Streams and Ravine tufa, (including cliff edge tufa deposits). Therefore non-compliant with Condition 33(e). Without implementation of annual rapid condition assessment, it is not possible to assess heritage items. No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S3, C36.</p> <p><u>Government Liaison</u> NPWS noted issues related to natural heritage monitoring in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p>	No non-compliance recommendation	Snowy Hydro acknowledge the non-compliance. Snowy Hydro/FGJV will complete the relevant assessments and reporting moving forward.	25/09/2026	FGJV	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
22	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 36	The Proponent must implement the approved Heritage Management Plan for the development.	<p><u>Site Records</u></p> <p>Site has stated in the RFI that: <i>'No incidents - only one unexpected European item; the unexpected finds procedure was followed, the Heritage specialist deemed the item of no historical value. Reporting - SHL missed the annual reporting of geoheritage for the last 4 years, this was discovered recently upon a self check of compliance matters, this breach of condition has been reported to the NSW Planning Portal.'</i></p> <p>Section 6.1 of the HMP states <i>'Rapid Condition Assessments for Ravine block streams and Ravine tufa, including cliff edge tufa deposits (i.e. Lick Hole Gully and Cave Gully) is required at a frequency of 'Prior to Main Works construction, then annually' .</i> Site has stated in the RFI that <i>'This is the current subject of a 'Notice to Produce' with DPHI".</i> Further evidence in the form of a letter from DPHI (dated 09/03/2025) acknowledging the missed reporting and stating <i>'NSW Planning will be investigating this matter'.</i> Therefore site is non-compliant with implementation of the HMP. See NC REC.</p> <p>Sensitive Area Plans marked with known heritage items as per Section 3.3.1 of the HMP.</p> <p>Salvage Report for Main Works salvage and artefact analysis in progress. Site has stated <i>'In progress, however not due within audit period'.</i></p> <p>Evidence of heritage awareness training via the Environmental Awareness PowerPoint presentation and tool boxes</p> <p>Lobs Hole archival record of the history of settlement and mining in the Lobs Hole Ravine not yet provided to agencies as stated by Snowy Hydro <i>'In progress, however not due within audit period'</i></p> <p>Weekly environmental inspections being undertaken which assess Heritage on site (see Weekly environmental inspection checklists)</p> <p><u>Government Liaison</u> NPWS noted issues related to natural heritage monitoring in a letter dated 17 April 2025. See Section 1.5.1 for full details. <i>See Letter from DPHI - Snowy 2.0 -Main Works-Failure to implement the Heritage Management Plan failure to undertake Annual Reporting - 2021 to 2024 (dated 09/03/2025)</i></p>	NC REC 13: Undertake Rapid Condition Assessments for Ravine block streams and Ravine tufa, including cliff edge tufa deposits. Complete all reporting as per the Heritage Management Plan (including annual reporting requirement).	Snowy Hydro acknowledge the non-compliance. Snowy Hydro/FGJV will complete the relevant assessments and reporting moving forward.	25/09/2026	FGJV	Non Compliant
23	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 39	<p>Recreation Management Plan</p> <p>Within 12 months of the commencement of construction, the Proponent must prepare a Recreation Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, NSW DPI and TfNSW;</p> <p>(b) include a conceptual recreation strategy for the site, identifying the recreational facilities that would be provided during the rehabilitation of the site;</p> <p>(c) describe how the implementation of this strategy would be co-ordinated with the implementation of the Rehabilitation Management Plan;</p> <p>(d) include detailed plans for the provision of recreational facilities at, and future recreational use of, the following sites:</p> <ul style="list-style-type: none">• Talbingo Reservoir;• Lobs Hole;• Tantangara Reservoir; <p>e) describe the measures that would be implemented to comply with the recreation mitigation requirements in condition 38 above; and</p> <p>(f) monitor and publicly report on the implementation of these plans and measures.</p>	<p>DPHI Letter - Snowy 2.0 Main Works (SSI 9687) Approval of Management Plan Staging (dated 21/12/2023) states the RecMP Stage - 1 must be approved by the Planning Secretary by 31 May 2024 and that the RecMP - Stage 2 must be approved by the Planning Secretary by 31 May 2025.</p> <p>RecMP - Stage 1 was approved in a letter from DPHI dated 24 Oct 2024. This was after the required date provided by DPHI. Therefore, Snowy Hydro in non-compliant. No non-compliance recommendation as the RecMP Stage - 1 has since been approved.</p> <p>RecMP - Stage 2 has not yet been approved and the required approval date has not yet been reached at the time of this IEA.</p> <p>(a) Prepared by Snowy 2.0 Senior Environmental Advisor in consultation with NPWS, DPI and TfNSW</p> <p>(b) Section 2 (Recreation Strategy) addresses this condition</p> <p>(c) Section 1.5 (Co-ordination with Rehabilitation Management Plan) addresses this condition.</p> <p>(d) Section 1, Section 3 and Appendix A address this condition</p> <ul style="list-style-type: none">• Section 3.1.1 and Appendix A address this condition• Section 3.1.1 and Appendix A address this condition• Section 3.1.2 addresses this condition <p>(e) Section 3.5 addresses this condition</p> <p>(f) Section 3.6.4 addresses this condition</p> <p>Government Liaison NPWS noted issues relating to the monitoring and maintenance of Tantangara Road in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p> <p>IEMA comment to NPWS</p> <ul style="list-style-type: none">• NPWS have noted issues but we have seen evidence of repair and management of roads. Being a highly trafficked site ongoing maintenance is required. We don't have a specific recommendation as we note mitigation measures are ongoing for Tantangara Road.• Incident notification for vehicle roll over that took place on 21 Mar 2025 provided by site.	No non-compliance recommendation	Snowy Hydro acknowledge the non-compliance. The Recreation Management Plan is now approved, however, its delay in finalisation is noted. This finding underscores the importance of new systemic controls being implemented across the Project. The progress and completion of actions identified will be tracked in the project's compliance management system.	25/09/2026	Snowy Hydro	Non Compliant
24	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 50	<p>Long-Term Road Strategy – Kosciuszko National Park</p> <p>Within 2 years of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Long-Term Road Strategy for the development to the satisfaction of the Planning Secretary. This strategy must be:</p> <p>(a) be prepared in consultation with the NPWS and TfNSW;</p> <p>(b) identify the road network within the Kosciuszko National Park required for the development during operations, including the detailed specifications for this road network;</p> <p>(c) identify which roads within the Kosciuszko National Park can be narrowed or closed following construction and then rehabilitated;</p> <p>(d) include a detailed program for the rehabilitation of these roads, which can be incorporated into the Rehabilitation Management Plan for the development; and</p> <p>(e) identify future road maintenance and funding responsibilities for the long-term road network following construction.</p>	<p>DPHI Letter - 'Snowy 2.0 Main Works (SSI 9687) Approval of Management Plan Staging' (dated 21/12/2023) states the LTRS Stage - 1 must be approved by the Planning Secretary by 31 March 2024 and that the LTRS - Stage 2 must be approved by the Planning Secretary by 31 March 2025.</p> <p>LTRS - Stage 1 was approved in a letter from DPHI dated 04 March 2025. This was after the required date provided by DPHI. Therefore, Snowy Hydro is non-compliant. No non-compliance recommendation as the LTRS Stage - 1 has since been approved.</p> <p>LTRS - Stage 2 has not yet been approved and the required approval date has not yet been reached at the time of this IEA (Required approval date is 3 days after the IEA period).</p> <p>(a) Section 4 (Consultation) addresses this condition. Consultation undertaken with NPWS and TfNSW</p> <p>(b) Section 3.3 (Permanent Road Network)</p> <p>(c) Section 3.4.1 (Roads to be Narrowed or Closed)</p> <p>(d) Section 3.4.2 (Proposed Rehabilitation Program)</p> <p>(e) Section 3.5 (Future Funding and Maintenance)</p>		Snowy Hydro acknowledge the non-compliance. Snowy Hydro to ensure Stage 2 of the Long Term Road Strategy Management Plan is submitted to the DPHI for approval	25/09/2026	Snowy Hydro	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
25	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 52	Excluding the spoil generated by the development, the Proponent must: (a) minimise the waste generated by the development; (b) maximise the reuse and recycling of any waste; (c) classify all waste generated on site in accordance with the Waste Classification Guidelines (NSW EPA 2014), or its latest version; (d) Store and handle all waste generated on site in accordance with its classification; and (e) ensure all waste is disposed of off-site at facilities that are lawfully permitted to accept such waste.	<u>IEA Site Inspection Notes:</u> • In general FG's areas of waste management were of a high standard. • 600ml water bottles are being phased out by replacing with steel bottles. • Evidence of tool box talks and site records. • The Waste Management Plan states that commercial bins need to have lids closed. This was not the case on all bins. Therefore non-compliant . See NC REC. • Waste team liaises with the waste contractors for waste removal onsite. • Waste management was completed well for the majority of the site. Issues were noted in the contractor area on site in particular around hydrocarbon and chemical storage (e.g. waste oil, waste coolant). Some material was not stored as per AS 1940 i.e. not banded with 110% capacity. Therefore, non-compliant . See photos in the report for evidence. See NC REC. • We also noted that there were no lids on some bins which increases the risk of rubbish to be blown in the national park. Section 4.6 of the Waste Management Plan has requirement for lids for domestic waste. A Waste Management Plan is referenced in other MPs. However, site has stated in the RFI that " <i>The latest Waste Management Plan (updated January 2025) has been submitted to NSW Planning and is awaiting approval before being published on the SHL website</i> ". <u>Government Liaison</u> NPWS noted issues related to uncontained litter and construction waste discarded across project areas and outside the project boundary in a letter dated 17 April 2025. See Section 1.5.1 for full details	NC REC 14: Set up designated areas in the contractor yard at Lobs Hole that meets Australian standards for chemicals and hydrocarbons. This would include hydrocarbon storage areas and liquid waste storage areas (e.g. waste oil, waste coolant). NC REC 15: Lids should be required for all bins where waste material could be blown away or accessed by animals. This is a requirement of the Section 4.6 of the Waste MP.	Snowy Hydro acknowledge the non-compliance. FGJV will undertake a review to consider installation of a designated chemical, liquid waste and hydrocarbon storage area, that meets relevant standards at the contractor yard at Lobs Hole. The review will include consideration of practicable measures to address the potential for litter dispersal by wind and access by animals. Following completion of this review, FGJV will: (a) update the Waste Management Plan to include revised waste management measures (b) implement the revised Waste Management Plan (c) produce a summary report with recommendations for improved management of chemical, liquid waste and hydrocarbon storage with a corresponding implementation plan identifying procurement and construction timeframes and approvals where relevant	25/09/2026	FGJV	Non Compliant
26	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 54	Visual Impact Management Plan Within 12 months of the commencement of construction, the Proponent must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared in consultation with the NPWS; (b) describe the measures that would be implemented to comply with condition 53 above; and (c) include detailed plans for minimising the visual impacts of the following permanent infrastructure: • Lobs Hole substation; • cable yard; • water intakes and associated infrastructure at the Talbingo Reservoir and Tantangara Reservoir; • Middle Bay barge ramp; • headrace surge shaft and ventilation shaft; and • fish screens and barrier.	DPHI Letter - Snowy 2.0 Main Works (SSI 9687) Approval of Management Plan Staging (dated 21/12/2023) states the VIMP Stage - 1 must be approved by the Planning Secretary by 31 Dec 2023 and that the VIMP - Stage 2 must be approved by the Planning Secretary by 31 Dec 2024. VIMP - Stage 1 was approved in a letter from DPHI dated 20 Sep 2024. This was after the required date provided by DPHI. Therefore, Snowy Hydro is non-compliant. No non-compliance recommendation as the VIMP Stage - 1 has since been approved. VIMP - Stage 2 has not yet been approved and the required approval date set by DPHI has now lapsed. Therefore non-compliant. See NC REC. a) Section 1.6 Summarises the consultation undertaken with NPWS b) Section 5 describes the Visual Impact Management Measures to be undertaken c) • Appendix A - Lobs Hole Substation • Appendix B - Lobs Hole Cable Yard • Appendix C - Talbingo Reservoir and Appendix D - Tantangara Reservoir • The Middle Bay barge ramp is not yet confirmed to be required or not for the project as it is dependent on the final design and construction methodology of the Talbingo Intake. If the barge ramp is required then this plan will be updated to include a interim design and detail on minimising the visual impact of the work • Appendix E - Headrace Surge Shaft • Appendix F - Fish Screens and Barrier	NC REC 16: Submit the Visual Impact Management Plan Stage 2 to DPHI for approval.	Snowy Hydro acknowledge the non-compliance. Snowy Hydro will allocate priority resources to complete the preparation of VMP Stage 2, including any outstanding design details and required consultation. The plan will be submitted to the DPHI for approval. FGJV will support Snowy Hydro with the VMP Stage 2.	25/09/2026	Snowy Hydro/FGJV	Non Compliant
27	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 65	The Proponent must implement the Subsidence Management Plan as approved by the Planning Secretary	Section 4 (Ground Subsidence Reporting) states: 'Snowy Hydro will report on the following monitoring aspects related to the Headrace Tunnel operations within the scope of this Subsidence Management Plan described in Section 1.2: 1. During construction, groundwater monitoring data will be collected, tabulated and assessed against thresholds. Reporting will occur in accordance with Section 6.8 of the GMP 2. A subsidence monitoring report will be submitted to the NSW Department of Planning & Environment on a fortnightly basis, and 3. Notification will be provided to the NSW Department of Planning & Environment in the event that any Action (yellow) or Alarm (red) trigger levels are reached, along with a description of the actions being undertaken in response. Refer to Attachment 5 for an example notification form.' 2. The requirement was to monitor the surface subsidence until TBM achieved 100m of ground cover. This was achieved in the 1st week of March. Therefore, the last fortnightly Advance and Monitoring Report was submitted on the 15th of March (Report 07). 3. The final fortnightly Advance and Monitoring Report (29/02/2024 to 14/03/2024) states 'Since the approval to recommence mining activities, no action or alarm levels have been triggered for the agreed parameters during any mining activities for TBM Florence.' There was no evidence of Fortnightly Advance and Monitoring Reports for 1/02/2024 to 14/02/2024 and 15/02/2024 to 28/02/2024 being submitted to DPHI. Therefore non-compliant. All other monitoring reports and DPHI acceptance letters are located on the Planning Portal except for those 2 report periods. See NC REC.	NC REC 17: Submit Fortnightly Advance and Monitoring Reports for 1/02/2024 to 14/02/2024 and 15/02/2024 to 28/02/2024 to DPHI.	Snowy Hydro acknowledge the non-compliance. Snowy Hydro submitted the two Fortnightly Monitoring Reports for 1/02/24-14/02/2024 and 15/02/24-28/02/2024 to DPHI through the Planning Portal on 30 June 2025	25/09/2026	Snowy Hydro/FGJV	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
28	CSSI 9687 Snowy 2.0 Main Works	Schedule 3, Condition 66	Within 6 months of the recommencement of the tunnelling works by tunnel boring machine Florence or commencing tunnelling for the Marica west adit as described in MOD3, unless otherwise agreed by the Planning Secretary, and at any other time requested by the Planning Secretary, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the Subsidence Management Plan described in condition 64. This audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts, including a lead auditor, whose appointment has been endorsed by the Planning Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the development and whether it is complying with the requirements in conditions 63 and 64; (d) review the adequacy of the approved strategies, plans or programs for the development; and (e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any approved strategies, plans or programs.	As stated in the Fortnightly Advance and Monitoring Report, 'The first advance, being advance 75, of TBM Florence in closed (slurry) mode occurred on 6 December 2023.' The Independent Environmental Audit of the Subsidence Management Plan required under this condition was due by 6 June 2024. No evidence of this being completed. This was also noted by the NPWS. Therefore the Project is non-compliant . See NC REC. <u>Government Liaison</u> NPWS noted issues related to the Independent Environmental Audit of the Subsidence Management Plan in a letter dated 17 April 2025. See Section 1.5.1 for full details.	NC REC 18: Completion of the Independent Environmental Audit of the Subsidence Management Plan and submission to DPHI. Implementation of any actions from the audit.	Snowy Hydro acknowledge the non-compliance. Snowy Hydro confirms that an auditor has been engaged and also endorsed by DPHI in accordance with Sch. 3, Condition 66(a), the audit is scheduled to commence in October 2025. Upon receipt of the final audit report from the independent auditors, Snowy Hydro will prepare its formal response to each recommendation. Concurrently, a draft Audit Action Plan will be developed, detailing the specific measures and actions to be taken to address the recommendations. Upon receiving approval from the DPHI, Snowy Hydro will implement all measures and actions as detailed in the final Audit Action Plan. The progress and completion of these actions will be tracked in the project's compliance management system.	25/09/2026	Snowy Hydro	Non Compliant
31	CSSI 9687 Snowy 2.0 Main Works	Schedule 4, Condition 18	The Proponent must implement the approved Environmental Management Strategy.	<u>Implementation</u> Evidence of inspections and training records. See evidence column. Evidence of complaints management. There are improvements required for incident/ non-compliance management and this has not been completed as per Section 7.2 of the EMS which requires reporting of non-compliances within 7 days. Based on site discussions there were some times where this did not occur, hence the non-compliance . No non-compliance recommendation allocated to this condition as it is addressed in NC RECs which are assigned to S4, C7. See Schedule 4 Condition 7 for more details of findings and recommendations.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. FGJV will continue to provide relevant incident information to Snowy Hydro as per the contract requirements to ensure statutory reporting timeframes can be met. This finding underscores the importance of new systemic controls being implemented across the Project. The progress and completion of actions identified will be tracked in the project's compliance management system.	25/09/2026	Snowy Hydro/FGJV	Non Compliant
32	CSSI 9687 Snowy 2.0 Main Works	Schedule 4, Condition 19	Staging and Updating of Strategies, Plans or Programs With the agreement of the Planning Secretary, the Proponent may submit any strategy, plan or program required under this approval on a staged basis. The Proponent may also submit updates to approved strategies, plans or programs at any time. With the agreement of the Planning Secretary, the Proponent may prepare the staged or updated strategy, plan or program without undertaking all the consultation required under the applicable condition in this approval. Notes: • While any strategy, plan or program may be submitted on a progressive basis, the Proponent will need to ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times. • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies,	DPHI has approved the staging of the following Plans/strategies with these approval dates in a letter dated 21/12/2023 RMP Stage 1: DPHI requested approval by 31 Dec 2023 - Actual approval: 24 Oct 2024, therefore non-compliant . No non-compliance recommendation as the RMP Stage 1 has since been approved. RMP Stage 2: DPHI requested approval by 31 Dec 2024 - Not yet approved, therefore non-compliant . No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S3, C10. Rec MP Stage 1: DPHI requested approval by 31 May 2024 - Approved 24 Oct 2024, therefore non-compliant . No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S3, C39. Rec MP Stage 2: DPHI requested approval by 31 May 2025 - Approval date not yet reached (required approval date is 3 days after the IEA period) LTRS Stage 1: DPHI requested approval by 31 Mar 2024 - Approved 4 Mar 2025, therefore non-compliant . No non-compliance recommendation as the LTRS Stage 1 has since been approved. LTRS Stage 2: DPHI requested approval by 31 Mar 2025 - Stage 2 has not yet been approved and the required approval date has not yet been reached at the time of this IEA (Required approval date is 3 days after the IEA period). VIMP Stage 1: DPHI requested approval by 31 Dec 2023 - Approved 20 Sep 2024, therefore non-compliant . No non-compliance recommendation as the LTRS Stage 1 has since been approved. VIMP Stage 2: DPHI requested approval by 31 Dec 2024 - Not yet approved, therefore non-compliant . No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S3, C54. DPHI Letter - Snowy 2.0 Main Works – Staging of Biosecurity Risk Management Plan (dated 25/10/2023) approves Snowy Hydro to stage the Biosecurity Risk Management Plan. Stage - 1 must be approved by 1 Dec 2023 and Stage - 2 must be approved by 1 Dec 2024. Stage - 1 was approved in a letter by DPIRD on 25 Oct 2024. The Biosecurity Risk MP Stage 1 was not submitted within the timeframe stipulated in the Staging letter approved by DPHI on 25/10/2023. No non-compliance recommendation as the Biosecurity Risk MP Stage 1 has since been approved. Stage 2 has not been submitted within stipulated timeframe provided by DPHI. Therefore, Snowy Hydro is non-compliant. No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S3, C22. <u>Government Liaison</u> NPWS noted issues related to management plan approvals and updates in a letter dated 17 April 2025. See Section 1.5.1 for full details.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. Snowy Hydro will finalise and submit the overdue staged management plans, in accordance with revised due dates established with DPHI.	25/09/2026	Snowy Hydro	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
33	CSSI 9687 Snowy 2.0 Main Works	Schedule 4, Condition 20	Update of Strategies, Plans or Programs Within 3 months of the following, unless the Planning Secretary agrees otherwise, the Proponent must review and (if necessary) update the approved strategies, plans and programs for the development to the satisfaction of the Planning Secretary: (a) the submission of an incident report under condition 6 below; (b) the submission of an independent environmental audit report under condition 10 below; and (c) any modification to the conditions of this approval; or (d) a direction of the Planning Secretary under condition 4 of schedule 2. Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.	a) No specific evidence provided to IEMA about whether incidents result in a review of the management plans. b) Many management plans were not updated after the last audit. But this is not mandatory to complete updates. c) Some management plans have not been updated after modifications. (d) Letter from DPE (dated 12 October 2023) states 'In accordance with Schedule 2, condition 4 of the Approval, the Secretary directs SHL to review and revise the TARPs in the Water Management Plan, Surface Water Management Plan and the Groundwater Management Plan in consultation with NSW Planning Assessments, Environment Protection Authority (EPA) and National Parks and Wildlife Service and submit the Plans to the Secretary for approval by COB 1 December 2023 via the Major Projects Portal. No evidence of the TARPs in the Water Management Plan, Surface Water Management Plan and the Groundwater Management Plan being reviewed and revised in consultation with NSW Planning Assessments, Environment Protection Authority (EPA) and National Parks and Wildlife Service and then being submitted the Plans to the Secretary for approval by COB 1 December 2023. Therefore, site is non-compliant under Part a) of this condition. See NC REC. <u>Government Liaison</u> NPWS noted issues related to management plan approvals and updates in a letter dated 17 April 2025. See Section 1.5.1 for full details.	NC REC 19: Following this IEA and other triggers under Schedule 4 Condition 20 review and if necessary update site management plans.	Snowy Hydro acknowledge the non-compliance. Snowy Hydro will ensure all strategies, plans or programs are captured within the compliance tracking tool. This will ensure updates to incident reports, Independent Environmental Audit reports and modification to the conditions of approval are appropriately undertaken to improve the environmental performance of the development.	25/09/2026	Snowy Hydro	Non Compliant
34	CSSI 9687 Snowy 2.0 Main Works	Schedule 4, Condition 7	Reporting Non-compliances Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department via the Major Projects portal of the non-compliance. This notice must set out the non-compliance, the reasons for the non-compliance (if known) and what actions have been taken, or will be taken, to address the non-compliance.	Snowy Hydro admits to not meeting the 7-day time frame for submission of the 7-day report for some events. These generally relate to non-compliance events (not incidents). We have not been provided specific dates of when Snowy Hydro did not meet the 7 day reports for non-compliance events. See NC RECs	NC REC 20: Provide a letter to the DPHI for the dates of when non - compliance reporting was not completed within 7 days of becoming aware of any non-compliance. NC REC 21: Set up an internal system to ensure Snowy Hydro meets the within 7 days of becoming aware of any non-compliance.	Snowy Hydro is not aware of instances within the audit period where non-compliance events under the Infrastructure Approval were not reported within the 7 day timeframe. However, Snowy Hydro will undertake a review of all events reported within the audit period and provide advice to DPHI either identifying which events were non-compliant or confirming there were no instances of non-compliance within the audit period. Snowy Hydro will review the current internal system and procedures for reporting non-compliance events and where relevant implement improvements to improve timeliness and accuracy of reporting in collaboration with FGJV.	25/09/2026	Snowy Hydro	Non Compliant
35	CSSI 9687 Snowy 2.0 Main Works	Schedule 4, Condition 8	Reporting on Environmental Performance The Proponent must provide regular reporting on the environmental performance of the development on its website in accordance with the requirements in any approved strategies, plans or programs	As per earlier comment the incident reporting register internal document has different records to the website version (website is only 3 July 2024 to 27 February 2025). Also see comments under Schedule 4 Condition 12. No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S4, C12.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. Snowy Hydro will collaborate with FGJV to ensure consistent environmental performance reports, making them accessible on the Snowy 2.0 website.	25/09/2026	Snowy Hydro/FGJV	Non Compliant
36	CSSI 9687 Snowy 2.0 Main Works	Schedule 4, Condition 11	The Proponent must implement any approved audit action plan for the development.	Implementation Action plan from previous IEA provided. Many actions are still either ongoing or work in progress and have passed their Action Due Date. Due to actions being either ongoing or work in progress and past the action due date, site is non-compliant for implementing the audit action plan. We don't have a recommendation as an updated audit action plan is required as part of this audit.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. Snowy Hydro will: (a) integrate the audit action plan and any outstanding prior actions into the newly implemented compliance tracking tool to ensure visibility and accountability (b) expedite completion of any outstanding actions (c) advise DPHI of the target date for close out of all outstanding actions (d) review progress against all actions on a fortnightly basis in the joint FGJV-Snowy Hydro Operational Environmental Meeting.	25/09/2026	Snowy Hydro	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
37	CSSI 9687 Snowy 2.0 Main Works	Schedule 4, Condition 12	From the commencement of the development of the Main Works until the completion of the ecological rehabilitation of the areas used for operations, the Proponent must: (a) make copies of the following information publicly available on its website: • the documents referred to in the definition of the Exploratory Works and Main Works; • current statutory approvals for the development; • approved strategies, plans or programs; • a comprehensive summary of the monitoring results of the development, reported in accordance with the requirements in the conditions of this approval, or any approved strategies, plans and programs; • a monthly summary of complaints; • a record of all incidents and non-compliances; • any independent environmental audit, and the Proponent's response to the recommendations in any audit; • any approved audit action plan; • any other matter required by the Planning Secretary; (b) keep this information up to date.	Exploratory Works Definition: The development of an exploratory tunnel and associated infrastructure described in the Environmental Impact Statement for the Snowy 2.0 Exploratory Works (CSSI 9208) dated July 2018, and modified by the: - Submissions Report dated October 2018 and additional information provide to the Department on 17 October 2018, 19 November 2018 and 23 January 2019; - Modification Report dated 6 June 2019, associated Submissions Report dated 2 September 2019 and amendment letter dated 4 October 2019; and - Modification Report dated 17 October 2019 and associated Submissions Report dated 10 January 2020 Main Works Definition: The development of an underground power station and associated infrastructure described in the Environmental Impact Statement for the Snowy 2.0 Main Works (CSSI 9687) dated September 2019, and modified by the: - Preferred Infrastructure Report and Response to Submissions – Snowy 2.0 Main Works, dated February 2020; and - Additional information provided to the Department by EMM on 24 March 2020 and 7 April 2020 (a) • - Link to EIS for Snowy 2.0 Exploratory Works (CSSI 9208), Mods 1 and 2 and Submissions Report included on Snowy 2.0 website. • - Link to EIS for Snowy 2.0 Main Works (CSSI 9687), Mods 1,2 and 3, Response to submissions, and Additional information included on Snowy 2.0 website. • CSSI 9687 on website but Mod 2 or 3 is not. Therefore Non-Compliant. See NC REC. • Management Plans, Programs and Strategies located on website. • EPL Water Monitoring Results, Quarterly Environmental Monitoring Reports, Annual Monitoring Reports, Biodiversity Monitoring Program Results, Spoil Management Overview Reports and Quarterly Cumulative Traffic Reports included on Snowy 2.0 Website. Spoil Management Overview Report August - January 2025, Quarterly Cumulative Traffic Reports Sep 2024 and Dec 2024 reports on website. Biodiversity Monitoring Program 2023 to 2024 not on the website. Therefore non-compliant. See NC REC. • Monthly summary of complaints included on website. • Incidents and Non-compliances Register located on website. Register has recorded Incidents and NCs between 3 Jul 2024 to 27 Feb 2025. There were incidents and non-compliances prior to 3 Jul 2024 that are not recorded on the register. The condition states 'all incidents and non-compliances', therefore, non-compliant. See NC REC. • Both 2022 and 2023 IEAs and Audit Responses located on website. Previous IEAs not on website, therefore non-compliant. See NC REC • The 2022 and 2023 IEA Responses contain an audit action list. Previous audits not on website, therefore non-compliant. See NC REC • As directed in Letters from DPHI - Snowy 2.0 - Main Works – Tunnel Boring Machine (TBM) Florence Monitoring Report (multiple letters from audit period), Snowy has not uploaded the fortnightly Advance and Monitoring reports to the Snowy website 'in accordance with Schedule 4 condition 12 of the approval'. Therefore non-compliant. See NC REC. (b) Latest consent not on website, incident and Non-compliances Register missing data, and Biodiversity Monitoring Program 2023/2024 not on website, therefore, non-compliant. See NC RECs	IMP REC 34: The incidents and non-compliances register needs to be more regularly updated as its out of date. Consolidate previous years into the one register. IMP REC 35: Update website to include most recent Consent and latest Biodiversity Monitoring Program Report. IMP REC 36: Update website to include all previous IEAs, IEA Responses and IEA audit action plans. Audit 1 and 2 are not currntly on the website. IMP REC 37: Update website to include all Main Works – Tunnel Boring Machine (TBM) Florence Monitoring Reports.	Snowy Hydro acknowledge the non-compliance. Snowy Hydro note that as at the date of preparing this plan all licences and approvals published to the Snowy 2.0 website are current. Further, the Annual Biodiversity Monitoring Report for 2023/24 has been published as have additional historical audit reports and responses. Snowy Hydro will: (a) review the incidents and non-compliances register to consolidate all years into the one register. (b) implement a monthly review and update of the incidents and non-compliances register (c) update the Snowy 2.0 website with each updated document once reviewed and monthly thereafter on an ongoing basis to ensure all published materials are current (d) review content on the Snowy 2.0 website to confirm all materials are current including but not limited to prior audits and corresponding responses, and Main Works – Tunnel Boring Machine (TBM) Florence Monitoring Reports.	25/09/2026	Snowy Hydro	Non Compliant
38	Management Plans	SW02 Table 5-3: Surface water management measures	Unless authorised otherwise by an environment protection licence the requirements of Section 120 of the POEO Act will be complied with.	Definitions: Section 120 of the POEO Act 1997 (NSW) makes it an offence to pollute any waters. This applies to all activities unless specifically authorised by an environmental protection licence. "pollute" means to introduce, directly or indirectly, into the waters any matter that results in pollution. "pollution" means— (a) placing in or on, or otherwise introducing into or onto, the waters (whether through an act or omission) any matter, whether solid, liquid or gaseous, so that the physical, chemical or biological condition of the waters is changed, or (b) placing in or on, or otherwise introducing into or onto, the waters (whether through an act or omission) any matter, whether solid, liquid or gaseous, that is likely to change the physical, chemical or biological condition of the waters. IEMA Finding: Due to water incidents where discharge occurred the site is non-compliant with this condition. When results have been above EPL criteria (whether discharge occurs from a LDP or another source eg. sediment dam), we have deemed the site non-compliant. No non-compliance recommendation allocated to this commitment as it is addressed in the recommendations that are assigned to S3, C32. Note, most of the discharges occurred via sediment dams during rainfall above Blue Book designs. See earlier comments in the CSSI about difficulties to complete controlled discharges.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. FGJV will continue to work with relevant stakeholders, including the NSW EPA, Snowy Hydro and external third party specialists as to minimise the pollution of waters.	25/09/2026	FGJV	Non Compliant
39	Management Plans	SW11 Table 5-3: Surface water management measures	Stockpiles will be managed in accordance with the Spoil Management Plan	Some stockpiles on site did not meet these requirements. There were areas at each of the sites where stockpiles were greater than 2.5m high. This height limit is discussed in the Spoil Management Plan - Appendix B Topsoil Strategy. There was also a large topsoil area at Lobs Hole where a hardstand had been built on top of the topsoil stockpile. Therefore non-compliant. No non-compliance recommendation allocated to this commitment as it is addressed in NC RECs which are assigned to S3, C8. The majority of topsoil storages had effective erosion and sediment controls such as sediment fencing at the base of topsoils.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. Snowy Hydro notes that the hardstand has since been removed from the non-compliant stockpile and affected topsoil relocated and stockpiled in accordance with requirements FGJV will complete a topsoil stockpile audit as to ensure all relevant requirements are met.	25/09/2026	FGJV	Non Compliant
40	Management Plans	SW15 Table 5-3: Surface water management measures	Sprinkler irrigation systems shall be installed at each basin, on the spoil emplacement pads, in areas of rehabilitation and at the crushing and screening plant	Sprinklers were not installed 'at each basin'. No large areas of final rehabilitation hence that part is not triggered. We also did not see evidence of sprinklers at spoil emplacement pads. Noting the goal is not overly water these areas due to leachate production from spoil stockpiles. Therefore, site is non-compliant with this commitment. See IMP REC.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. FGJV will review the relevant REMM for opportunities for ammendment, as the current requirement is not feasible and does not align with EPA Clean Up Notice requirements	25/09/2026	FGJV	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
41	Management Plans	SW25 Table 5-3: Surface water management measures	Where practical, the storage and handling of chemicals that have potential to contaminate the process water system will be undertaken in bunded areas.	See Schedule 3 Condition 54 in the CSSI. See this condition for a recommendation. The majority of the site had a high standard of chemical and hydrocarbon storage. Issues were noted in the contractor area on site in particular around hydrocarbon and chemical storage. Some material was not stored as per AS 1940. This material if it did leak run into the catchments of process waters due to the lack of oily water separators at the contractor yard at Lobs Hole. Therefore, site is non-compliant. No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S3, C52.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. FGJV will investigate opportunities to set up a designated chemical and hydrocarbon storage area, that meets the relevant standards, at the contractor yard at Lobs Hole.	25/09/2026	FGJV	Non Compliant
42	Management Plans	SW41 Table 5-3: Surface water management measures	Fuels and chemicals will be stored in bunded areas to prevent chemical spills or leakages in accordance with the relevant Australian Standards including: • ASNZS 4452:1997 The storage and handling of toxic substances, • AS1940 – 2017 The storage and handling of flammable and combustible liquids, and • Areas to be used for long-term storage and handling (i.e. those at a site compound or dedicated fuel storage area) of hydrocarbons and chemicals will be enclosed with concrete bunds or other suitably sealed bunding.	The majority of the site had a high standard of chemical and hydrocarbon storage. Issues were noted in the contractor area on site in particular around hydrocarbon and chemical storage. Some material was not stored as per AS 1940. Therefore, non-compliant. See Schedule 3 Condition 30 and Schedule 3 Condition 52 for recommendations.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. As per the action in response to Sch. 3, Condition 52, FGJV will undertake a review to consider installation of a designated chemical, liquid waste and hydrocarbon storage area, that meets relevant standards at the contractor yard at Lobs Hole. The review will include consideration of practicable measures to address the potential for litter dispersal by wind and access by animals. Following completion of this review, FGJV will: (a) update the Waste Management Plan to include revised waste management measures (b) implement the revised Waste Management Plan (c) produce a summary report with recommendations for improved management of chemical, liquid waste and hydrocarbon storage with a corresponding implementation plan identifying procurement and construction timeframes and approvals where relevant	25/09/2026	FGJV	Non Compliant
43	Management Plans	GW07 Table 5-1: Groundwater management measures	Storage and handling of chemicals, fuels and oils will be as per manufacturer's instructions in bunded, storage areas.	The majority of the site had a high standard of chemical and hydrocarbon storage. Issues were noted in the contractor area on site in particular around hydrocarbon and chemical storage. Some material was not stored as per AS 1940. Therefore, non-compliant. See Schedule 3 Condition 30 and Schedule 3 Condition 52 for recommendations.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. As per the action in response to Sch. 3, Condition 52, FGJV will undertake a review to consider installation of a designated chemical, liquid waste and hydrocarbon storage area, that meets relevant standards at the contractor yard at Lobs Hole. The review will include consideration of practicable measures to address the potential for litter dispersal by wind and access by animals. Following completion of this review, FGJV will: (a) update the Waste Management Plan to include revised waste management measures (b) implement the revised Waste Management Plan (c) produce a summary report with recommendations for improved management of chemical, liquid waste and hydrocarbon storage with a corresponding implementation plan identifying procurement and construction timeframes and approvals where relevant	25/09/2026	FGJV	Non Compliant
44	Management Plans	GW09 Table 5-1: Groundwater management measures	Temporary and permanent emplacement areas will be managed in accordance with the Spoil Management Plan	IEMA was provided with many records relating to implementing the Spoil Management Plan. Contaminated Material (Non-compliance) - The process of blasting has led to increased levels of nitrate in the spoil. See Audit Report for more information. Leachate dams at the base of the spoil areas has detected high levels. At the Lobs Hole area there is evidence that not all flows are captured in the leachate dams, with elevated levels within some surface water and groundwater sites. No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S3, C32.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. FGJV will continue to work with relevant stakeholders, including the NSW EPA, Snowy Hydro and external third party specialists as to improve spoil management across the project.	25/09/2026	FGJV	Non Compliant
45	Management Plans	ECO02 Table 2-3: Revised environmental management measures from Main Works RTS	A weed and pathogen monitoring program will be implemented, with a weed control program to be implemented if weeds are identified along road verges. This may include wash-down stations to be constructed at a suitable location, with wash down for weeds as well as P.cinnamomi.	Evidence of weed spraying and monitoring. However, IEMA have determined there is not a defined spraying program. Hence non-compliance with recommendations within the consent. No recommendation allocated to this commitment as it is addressed in IMP REC which is assigned to S2, C13. <u>NPWS Feedback</u> NPWS noted issues related to biosecurity in a letter dated 17 April 2025. See Section 1.5.1 for full details.	No non compliance recommendation	Snowy Hydro acknowledge the non-compliance. FGJV has engaged a weed spraying contractor to undertake weed control programs biannually across the project, weed control for the Spring 2025 period commenced on 07 OCT 25 FGJV confirms that when wheel washes have been removed that alternative weed management measures have been implemented. FGJV confirms that the inconsistency between ox-eye daisy management is due to the differing population densities between project sites. Areas where there are infestations of the daisy are managed utilising weed spraying contractors spraying broad areas, which is consistent with NPWS management strategies. However in locations of low densities of the daisy, individual plant removal and appropriate disposal methods can be implemented.	25/09/2026	FGJV	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
46	Management Plans	BDAR-14 Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Construction of wash-down stations at a suitable location	<p>Site has stated in the RFI that <i>'Washdown stations were utilised prior to the installation of wheel washes. As such there has been no use of these during the audit period.'</i></p> <p>Section 5.1.1.2 of the Weed, Pest and Pathogen MP states <i>'Washdown stations will be established in the vicinity of the key access points to the site, as soon as practically possible, at the commencement of construction.....'</i></p> <p>Section 2.4 of the Biodiversity MP also lists the use of washdown stations as a management measure. We do not believe the site has implemented the commitment of washdown facilities. The Biodiversity Management Plan is vague in terms of the location of washdown stations. We understand some have been removed however there is no evidence provided for specific consultation with NPWS and any other relevant agency. Therefore non-compliant.</p> <p>We believe washdown stations (defined areas for hoses and disinfectants) are different to wheel wash stations (wheel wash with sprays and rumble grid, mostly for light vehicles). We note Section 5.1.1.2 Appendix F of the Biodiversity Management Plan states - <i>Where light vehicles move between the sites, they will be required to use wheel washes at entry and exit points.</i></p> <p>Note this doesn't mention heavy vehicles. We also note this wording in Appendix F of the Biodiversity Management Plan - <i>Wash vehicle and/or machinery as soon as possible (at site entry washdown point) before entering site or leaving a restricted area. When leaving restricted areas spray tyres thoroughly with a disinfectant.</i></p> <p>We were not provided evidenced of disinfectant in restricted areas at washdown facilities.</p> <p>No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S2, C13.</p>	No non compliance recommendation	<p>FGJV do not agree with the auditors interpretation for this requirement.</p> <p>Heavy equipment is required to have an associated hygiene declaration prior to coming to site confirming the plant is clean. Heavy equipment is also required to be washed down prior to relocation between sites (accompanied by associated hygiene declaration), all other vehicles when commuting between sites travel on sealed public roads, whereby wheel washes are utilised to manage weed seed mobilisation.</p> <p>Regardless, the action in response to the finding against Sch.3, Condition 19 will address the conclusion</p>	25/09/2026	FGJV	Non Compliant
47	Management Plans	BDAR-16 Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Design and implementation of a weed and pathogen monitoring program.	<p>Weekly inspections have a weed section. Mentioned in ecology reports. Pre clearance process covers pathogens/weeds.</p> <p>Weeds are mentioned in reporting, but we have not seen a detailed weed and pathogen monitoring program being implemented. Therefore non-compliant.</p> <p>No recommendation allocated to this commitment as it is addressed in IMP REC which is assigned to S2, C13.</p>	No non compliance recommendation	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>Our Annual Biodiversity/Monitoring Report(s) provide comprehensive details on Snowy Hydro's weed and pathogen monitoring programs. We are committed to demonstrating to both our external stakeholders and for the upcoming IEA that these programs are being effectively executed.</p>	25/09/2026	Snowy Hydro/FGJV	Non Compliant
48	Management Plans	BM32 Table 5-1: Biodiversity management measures	Measures to prevent the introduction and/or spread of pests and disease-causing agents such as bacteria and fungi (Inc. chytrid) will be implemented in accordance with the Weed, Pest and Pathogen Management Plan within Appendix F	<p>Evidence of some wheel washes. However, Wheel washes out-of-commission or removed from active project area access routes (e.g. Marica Trail, Gooandra Trail). Snowy Hydro provided the audit team with incident reports including:</p> <p>Wheel wash out-of-commission for 10 hours on 27/02/2025 due to power failure. During that time period, 46 LVs and 8 HVs entered through Marica gatehouse without driving through wheel wash. It could not be determined where the vehicles originated and therefore the risk of weed entry is unknown. Therefore site is non-compliant. Therefore, non-compliant.</p> <p>No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S2, C13.</p> <p>Weed spraying improvements are noted. See earlier comments around the difference between wheel washes and washdown stations.</p> <p>NPWS noted issues related to biosecurity in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p>	No non compliance recommendation	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>FGJV confirms that when wheel washes have been removed that alternative weed management measures have been implemented.</p> <p>FGJV has engaged a weed spraying contractor to undertake weed control programs biannually across the project.</p>	25/09/2026	FGJV	Non Compliant
49	Management Plans	BM34 Table 5-1: Biodiversity management measures	Pathogen measures as detailed within Appendix F– Weed, Pest and Pathogen Management Plan will be implemented to minimise the introduction and spread of weeds and pathogens. These include in-situ washdown procedures to minimise the dispersal of existing weeds and pathogens across the project area.	<p>Evidence of some wheel washes. However, Wheel washes out-of-commission or removed from active project area access routes (e.g. Marica Trail, Gooandra Trail). Snowy Hydro provided the audit team with incident reports including:</p> <p>Wheel wash out-of-commission for 10 hours on 27/02/2025 due to power failure. During that time period, 46 LVs and 8 HVs entered through Marica gatehouse without driving through wheel wash. It could not be determined where the vehicles originated and therefore the risk of weed entry is unknown. Therefore site is non-compliant. Therefore, non-compliant.</p> <p>No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S2, C13.</p> <p>Weed spraying improvements are noted. See earlier comments around the difference between wheel washes and washdown stations.</p> <p>NPWS noted issues related to biosecurity in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p>	No non compliance recommendation	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>FGJV confirms that when wheel washes have been removed that alternative weed management measures have been implemented.</p> <p>FGJV has engaged a weed spraying contractor to undertake weed control programs biannually across the project.</p>	25/09/2026	FGJV	Non Compliant

No.	Source	Reference	Requirement	Independent Audit Finding	Independent Audit Recommendation	Proposed Actions/Response to Recommendations	Proposed Action Due Date	Responsible	Audit conclusion
50	Management Plans	BM35 Table 5-1: Biodiversity management measures	Hygiene controls including washdown and inspection procedures will be carried out to minimise the spread of biosecurity matters including terrestrial and aquatic weeds, pest and pathogens as detailed in the Weed, Pest and Pathogen Management Plan (Appendix F).	<p>See earlier comment.</p> <p>Site has stated in the RFI that <i>"Washdown stations were utilised prior to the installation of wheel washes. As such there has been no use of these during the audit period."</i></p> <p>Section 5.1.1.2 of the Weed, Pest and Pathogen MP states <i>"Washdown stations will be established in the vicinity of the key access points to the site, as soon as practically possible, at the commencement of construction....."</i></p> <p>Section 2.4 of the Biodiversity MP also lists the use of washdown stations as a management measure. We do not believe the site has implemented the commitment of washdown facilities. The Biodiversity Management Plan is vague in terms of the location of washdown stations. We understand some have been removed however there is no evidence provided for specific consultation with NPWS and any other relevant agency. Therefore non-compliant.</p> <p>We believe washdown stations (defined areas for hoses and disinfectants) are different to wheel wash stations (wheel wash with sprays and rumble grid, mostly for light vehicles). We note Section 5.1.1.2 Appendix F of the Biodiversity Management Plan states - <i>Where light vehicles move between the sites, they will be required to use wheel washes at entry and exit points.</i></p> <p>Note this doesn't mention heavy vehicles. We also note this wording in Appendix F of the Biodiversity Management Plan - <i>Wash vehicle and/or machinery as soon as possible (at site entry washdown point) before entering site or leaving a restricted area. When leaving restricted areas spray tyres thoroughly with a disinfectant.</i></p> <p>We were not provided evidenced of disinfectant in restricted areas at washdown facilities.</p> <p>No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S2, C13.</p>	No non compliance recommendation	<p>FGJV do not agree with the auditors interpretation for this requirement.</p> <p>Heavy equipment is required to have an associated hygiene declaration prior to coming to site confirming the plant is clean. Heavy equipment is also require to be washed down prior to relocation between sites (accomponied by associated hygiene declaration), all other vehicles when commuteing between sites travel on sealed public roads, whereby wheel washesare utilised to manage weed seed mobilisation.</p> <p>Regardless, the action in response to the finding against Sch.3, Condition 19 will address the conclusion</p>	25/09/2026	FGJV	Non Compliant
51	Management Plans	BM36 Table 5-1: Biodiversity management measures	A chemical weed control program will be implemented as detailed in the Weed, Pest and Pathogen Management Plan (Appendix F)	<p>Evidence of some weed spraying records. However, there was limited weed and pest monitoring data or a defined Weed Spraying Program (as per Section 5.1.2.1 of the Weed, Pest and Pathogen Management Plan) provided to IEMA during the RFI. Therefore non-compliant.</p> <p>No recommendation allocated to this commitment as it is addressed in IMP REC which is assigned to S2, C13.</p> <p>NPWS noted issues related to weed management in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p>	No non compliance recommendation	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>FGJV has engaged a weed spraying contractor to undertake weed control programs biannually across the project.</p>	25/09/2026	FGJV	Non Compliant
52	Management Plans	SOIL02 Table 2-2: Management measures from the RTS relevant to spoil management	Development and implementation of soil management measures to assist in the preservation of the quantity and quality of the soil resource including: • an inventory of soils to be stripped, including depths and volumes; and • topsoil management measures including stripping and stockpiling procedure.	<p>Evidence of topsoil tracking including GIS. Evidence of Topsoil Stripping Procedure. Evidence of topsoil being recorded in clearance process.</p> <p>However this commitment also includes implementation.</p> <p>Issue also identified in S3, C8 of the CSSI relating to the Spoil Management Plan.</p> <p>NC topsoil - there were issues at site in regards to topsoil storage. This was mostly to do with topsoil heights, topsoils not being seeded. Some containing weeds. There was also a large topsoil area at Lobs Hole where a hardstand had been built on top of the topsoil stockpile. This is not best practice an both Snowy Hydro and FGJV are aware of the issue.</p> <p>No non-compliance recommendation allocated to this commitment as it is addressed in NC RECs which are assigned to S3, C8.</p>	No non compliance recommendation	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>Snowy Hydro notes that the hardstand has since been removed from the non-compliant stockpile and affected topsoil relocated and stockpiled in accordance with requirements</p> <p>FGJV will complete a topsoil stockpile audit as to ensure all relevant requirements are met.</p>	25/09/2026	FGJV	Non Compliant
53	Management Plans	SM24 Table 8-1: Spoil management measures	The Surface Water Management Plan will be implemented to ensure impacts on surface waters as a result of spoil handling and placement are minimised	<p>The site has leachate dams and sediment basins in place. Water treatment is undertaken. Despite these controls there have been noted issues with leachate water. This has been identified at select surface and groundwater locations. Therefore non-compliant See CSSI condition around spoil management for more details.</p> <p>No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S3, C32.</p>	No non compliance recommendation	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>FGJV will continue to work with relevant stakeholders, including the NSW EPA, Snowy Hydro and external third party specialists as to minimise the pollution of waters.</p>	25/09/2026	FGJV	Non Compliant
54	Management Plans	HER18 Table 5-1: Heritage management measures	Natural heritage monitoring will be undertaken in accordance with Section 6.1.	<p>A report is required annually as part of the project. This has not been completed. Recommendation within the CSSI.</p>	<p>See NC REC 12 for Schedule 3, Condition 36 of the CSSI.</p> <p>NC REC 12: Undertake Rapid Condition Assessments for Ravine block streams and Ravine tufa, including cliff edge tufa deposits. Complete all reporting as per the Heritage Management Plan (including annual reporting requirement).</p>	<p>Snowy Hydro acknowledge the non-compliance.</p> <p>Snowy Hydro has engaged geoheritage experts to undertake natural heritage monitoring and reporting. Due to commercial and seasonal constraints, this will be deployed in Spring 2026. Snowy Hydro will track the due date of this report using the new implemented compliance tracking tool, to ensure future commitments are met.</p>	25/09/2026	Snowy Hydro	Non Compliant

Aspect	Condition/Management Plan Commitment Reference	Improvement Rec Number	Independent Audit Recommendations	Response to recommendations	Due Date
CSSI 9687					
Administrative	Schedule 2, Condition 1	IMP REC 1	Use the spreadsheet that IEMA developed outlining the key MP commitments to track and keep internal links of management plan implementation. Develop risk levels for each commitment and nominate whether they are a one-off commitment or ongoing commitment.	Snowy Hydro acknowledges this recommendation however will use compliance tracking software EnviroSys to internally track the key management plan commitments and implementation.	25/09/2026
Operation of plant and equipment	Schedule 2, Condition 13	IMP REC 2	Ensure all Hygiene Declaration Forms are completed in full.	Snowy Hydro acknowledges this recommendation and will seek assurance from FGJV that hygiene forms have been completed.	25/09/2026
		IMP REC 3	Liaise with weed contractor and NPWS to implement an effective Weed Spraying Program as per Section 5.1.2.1 of the Weed Pest and Pathogen Management Plan.	Snowy Hydro acknowledges this recommendation and will seek assurance from FGJV that an effective weed spraying program will be implemented	25/09/2026
Administrative	Schedule 3, Condition 1	IMP REC 4	Liaise with DPHI about what this condition means single, open source database. Is it linked to Schedule 3 Condition 2 and 3.	Snowy Hydro comply with this condition through the external website which provides a single, open-source database. Snowy Hydro considers this condition to not be linked to Schedule 3 Condition 2. The requirements for the Digital Strategy are defined in Schedule 3 Condition 2 and 3.	25/09/2026
Spoil	Schedule 3, Condition 6	IMP REC 5	Complete a material balance assessment of whether there is suitable capping material onsite, in particular relating to the spoil areas and leachate ponds. If the material balance assessment requires material to be brought into site then Snowy Hydro needs to review against what is allowed under the EIS and key management plans. Liaison would be required with key government agencies. Specialist input is recommended.	Snowy Hydro acknowledges this recommendation	25/09/2026
Rehabilitation	Schedule 3, Condition 9	IMP REC 6	There is an opportunity to complete final seeding activities in the following areas: <ul style="list-style-type: none"> Sediment basin decommissioning area at Eucumbene River. Slopes that lead to the Talbingo Dam at Ravine Bay. 	Snowy Hydro acknowledges this recommendation	25/09/2026
		IMP REC 7	Liaison with required between Snowy Hydro and FGJV regarding the Gooandra trail and rehabilitation activities. NPWS should be made informed on planning and as executed rehabilitation activities.	Snowy Hydro will continue to liaise with NPWS and DPHI regarding Gooandra trail and rehabilitation activities.	25/09/2026

	Schedule 3, Condition 11	IMP REC 8	<p>Site specific RMP's should be developed and sent to the regulator for comments. The update should include a reviewed risk assessment and include site specific characteristics of locations such as:</p> <ul style="list-style-type: none"> • landform designs. • Interface with the general public. • Management of former spoil areas and developing a system for in perpetuity management (including spoil material and leachate). • A summary of rehabilitation requirements for different PCT's. • Summary of different resources for rehabilitation including topsoil and mulch. • Information around the different soil types and amelioration requirements. <p>Specialist advice will be required as part of the RMP update including the management of former spoil areas and leachate (see recommendation under Schedule 3, Condition 6).</p>	Snowy Hydro acknowledges this recommendation and will consult with regulators when necessary to ensure the appropriate amount of information are included in the site specific rehabilitation plans. Consultation with NPWS has commenced	25/09/2026
		IMP REC 9	This RMP should review potential water management during initial rehabilitation (i.e. leachate basins) as well as whether leachate basins can be removed in the final landform (i.e. once rehabilitation has been established and the area is classified as non-polluting).	Snowy Hydro acknowledges this recommendation	25/09/2026
		IMP REC 10	Develop completion criteria for the rehabilitation and closure phase relating to the spoil and leachate area. This should be completed in liaison with key government agencies.	Snowy Hydro acknowledges this recommendation and will consult with key government agencies.	25/09/2026
		IMP REC 11	We recommend a third-party specialist is engaged to assist with landform design to a natural fluvial landform. FGJV had already identified this as a potential knowledge gap.	Snowy Hydro acknowledges this recommendation	25/09/2026
		IMP REC 12	Implement additional hydromulching program at site as there are lots of areas that require temporary stabilisation. Record these areas in the hydromulching register.	Snowy Hydro acknowledges this recommendation. Hydromulch and clear polymer product are used on site to maintain stabilisation and reduce sediment mobilisation.	25/09/2026
		IMP REC 13	Reinstate jute mesh on slope at Ravine Bay permanent spoil emplacement area. This may require additional steel pegs. Completed final rehabilitation works here.	Snowy Hydro acknowledges this recommendation	25/09/2026
	Schedule 3, Condition 11A	IMP REC 14	Make the Tantangara Surface Depression Rehabilitation Plan publicly available on the Snowy Hydro Website.	Snowy Hydro acknowledges this recommendation	25/09/2026
Biodiversity	Schedule 3, Condition 19	IMP REC 15	Liaison with NPWS and using the advice of an ecologist about the completion of fauna crossings that meet the requirement of Section 3.1.2 of Appendix G to the Biodiversity Management Plan.	Snowy will continue to liaise with NPWS and specialist ecologists to meet Biodiversity Management Plan commitments	25/09/2026

Water		IMP REC 16	Complete a risk-based approach to determine which areas of the sites do not require boundary roping (i.e. final areas, or areas along sealed and constructed roads). Liaison with NPWS prior to removing as operational areas still need delineation.	Snowy Hydro acknowledges this recommendation	25/09/2026
		IMP REC 17	Investigate ways to reduce rabbits from the area, noting this will be a difficult task. This may include options of additional baiting in consultation with the NPWS or options such as fencing. Without additional controls rabbits are likely to cause issues with current batter slopes and future final rehabilitation areas.	Snowy Hydro acknowledges this recommendation and will continue to liaise with NPWS	25/09/2026
	Schedule 3, Condition 28	IMP REC 18	Update WMP and Water Usage Report so that Licence numbers align i.e. RO13-19-093 (WAL43328), RO1-19-092 (WAL43229) and Specific Purpose Access Licence (WAL43544).	Snowy Hydro acknowledges this recommendation	25/09/2026
		IMP REC 19	Liaise with WaterNSW to arrange consolidation of WAL42408, WAL42960, WAL43328 as the Snowy Hydro - Water Usage 2023-2024 WaterNSW Report states 'WAL42408, WAL42960, WAL43328 should be consolidated.	Snowy Hydro acknowledges this recommendation	25/09/2026
	Schedule 3, Condition 32	IMP REC 21	IEMA supports the development into the report by Rick Van Dam in relation to water quality objectives. This report should be provided to EPA, DPHI and NPWS for comment and could be used to develop scientific and workable water quality objectives.	Snowy Hydro acknowledges this recommendation and will continue to consult with regulators	25/09/2026
		IMP REC 22	Complete a risk assessment for high risk dams onsite in terms of discharge and look at options for telemetry on these dams. These would likely include leachate dams as well as higher risk sediment dams (e.g. Not captured by a sediment structure if they overtop).	Snowy Hydro acknowledges this recommendation and will continue to explore opportunities for telemetry on basins.	25/09/2026
		IMP REC 23	Installation of wheel wash at Rock Forest. Commitment TRA 04 in the Transport Management Plan stated: installation of rumble grids or wheel washes where necessary (e.g. wheel washes at Polo Flat and Rock Forest).	Snowy Hydro acknowledges this recommendation	25/09/2026
		IMP REC 24	Liaise with TransGrid to request consultation of when when they discharge from adjacent to the Snowy 2.0 Project land as this water can flow into the sediment dams at Lobs Hole. This enables the site to understand if water from TransGrid contributes to discharges from Lobs Hole.	Snowy Hydro acknowledges this recommendation	25/09/2026
		IMP REC 25	Liaise with engineers regarding the sediment fencing installed at the bottom of a drain at Rock Forest. It is currently in an area of concentrated flow. Alternate options such as small rock checks could be used to slow water in the drain prior to leaving site. See the other side of the road for an example.	Snowy Hydro acknowledges this recommendation	25/09/2026

		IMP REC 26	Repair erosion damage at two locations being adjacent to the Ravine Bay Permanent Spoil Emplacement Area and batter between Permanent Spoil Emplacement Area (Ravine Bay and Leachate Pond (SB01). Obtain the advice of a site engineer as the area is steep and additional controls may be required. See Photos 26 and 27 in Appendix A.	Snowy Hydro acknowledges this recommendation	25/09/2026
		IMP REC 27	Liaise with NPWS regarding final design of spillway at the bottom of the Ravine Bay Permanent Spoil Emplacement Area. Options could include additional rocks or revegetation.	Snowy Hydro acknowledges this recommendation	25/09/2026
		IMP REC 28	Sediment basins to have markers for heights as per section 6.3.5 of Managing Urban Stormwater: Soils and Construction: Volume 1 (Landcom 2004) and Volume 2D (DECC 2008).	Snowy Hydro acknowledges this recommendation	25/09/2026
		IMP REC 29	Additional information should be put in the Bi Annual Water Monitoring Reports. This should include: <ul style="list-style-type: none"> • Self assessment against management plan commitments. This includes GDE's and assessment of predicted (from EIS) vs actual impacts for surface water and groundwater. • Summary of actions following triggers and actions during the period. If no actions undertaken then note this. • A discussion on whether site contributions have caused exceedances. This is currently limited to one paragraph within the Biannual Monitoring Report. This would include a comparison between upstream and downstream results (surface water), comparison between upgrade and downgrade results (groundwater). The discussion section needs to be sufficiently detailed. 	Snowy Hydro acknowledges this recommendation	25/09/2026
Waste	Schedule 3, Condition 52	IMP REC 30	Clean up spills that are under the used coolant waste bin. See earlier recommendation regarding storage.	Snowy Hydro acknowledges this recommendation and will provide assurance on this	25/09/2026
Noise	Schedule 3, Condition 57	IMP REC 31	Update the Construction Noise Management Plan and implement the plan. Develop internal triggers for noise management at Rock Forest based on real time noise monitoring and include it in the management plan update.	Snowy Hydro acknowledges this recommendation	25/09/2026
Emergency Management	Schedule 3, Condition 61	IMP REC 32	Investigate stormwater design and erosion and sediment controls at Lobs Hole North Road/Ravine Road North to stop any sediment exiting the project boundary. This is to be completed in consultation with the NPWS.	Snowy Hydro acknowledges this recommendation and will consult with NPWS	25/09/2026
		IMP REC 33	Remove any fallen trees and vegetation that is encroaching the emergency exit (Lobs Hole North Road/Ravine Road North).	Snowy Hydro acknowledges this recommendation	25/09/2026

		IMP REC 34	Undertake an investigation/assessment of Lobs Hole North Road/Ravine Road North to ensure that it is capable of accommodating heavy emergency vehicles and site buses that would be necessary to respond to bushfire emergencies and evacuate personnel.	Snowy Hydro acknowledges this recommendation and have initiated this process with NPWS consultation	25/09/2026
Management Plan Commitments					
Water	SW15	IMP REC 37	Complete an assessment against this condition requiring 'sprinkler irrigation systems shall be installed at each basin, on the spoil emplacement pads, in areas of rehabilitation and at the crushing and screening plant'. Some of these controls may not always be practical or beneficial. Complete a memo reviewing whether further controls can be put in place to further use water. This should also review the amount of water being used in the watering of haul roads and whether additional water could be used on the longer material hauls.	Snowy Hydro acknowledges this recommendation	25/09/2026
	SW39	IMP REC 38	Review whether there is an option to capture rainfall roof runoff from the larger buildings onsite. FGJV have noted they have been looking into this.	Snowy Hydro acknowledges this recommendation	25/09/2026
	SW49	IMP REC 39	Look into systems to capture runoff water from roofs and direct it to water storage tanks. Look into ways of reusing this water onsite.	Snowy Hydro acknowledges this recommendation	25/09/2026
Biodiversity	BM21	IMP REC 40	In the next update to the Water MP, update the Groundwater Management Plan to provide more detail on what GDE monitoring entails (method of assessment of GDE's, analysis of impacts, reporting).	Snowy Hydro acknowledges this recommendation and will assess opportunities to include this information	25/09/2026
	BM21	IMP REC 41	Provide details of GDE monitoring in the Annual Biodiversity Monitoring Report and whether triggers were enacted.	Snowy Hydro acknowledges this recommendation	25/09/2026