

Independent Environmental Audit 2025

Snowy 2.0 Main Works

Prepared for:

Snowy Hydro, NSW

1 Monaro Highway, Cooma NSW 2630

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ACRONYMS

BCD	Biodiversity Conservation Division
BIM	Building Information Modelling
BMP	Biodiversity Management Plan
BRMP	Biosecurity Risk Management Plan
CCC	Community Consultative Committee
CCL	Consolidated Coal Lease
DCCEEW	Department of Climate Change, Energy, the Environment & Water
DPE	Department of Planning and the Environment (former department)
DPE-RR	Department of Planning and Environment – Resources Regulator
DPHI	Department of Planning, Housing and Infrastructure
EMS	Environmental Management Strategy
EPA	Environmental Protection Authority
EPL	Environment Protection License
ESCP	Erosion and Sediment Control Plan
FGJV	Future Generation Joint Venture
HMP	Heritage Management Plan
IEA	Independent Environmental Audit
IMA	Integrated Environmental Management Australia
IPARS	Independent Audit Post Approval Requirements
NRAR	Natural Resources Access Regulator
OSOM	Oversize and Over Mass
PIRMP	Pollution Incident Response Plan
RFMP	Recreational Fishing Management Plan
RMP	Rehabilitation Management Plan
SMP	Spoil Management Plan
TBM	Tunnel Boring Machine
TFMP	Threatened Fish Management Plan
VMP	Vehicle Management Plan
WAL	Water Access License
WMP	Water Management Plan

EXECUTIVE SUMMARY

This Independent Environmental Audit (IEA) has been prepared by Integrated Environmental Management Australia (IEMA) for the Snowy 2.0 Main Works. Snowy 2.0 is a major renewable energy project that will provide reliable power and long-term storage for future generations. Snowy 2.0 operates under CSSI 9687 which requires an Independent Environmental Audit be conducted within one year of the commencement of construction, and every 3 years thereafter unless the Planning Secretary agrees or directs otherwise.

A revised IEA program was approved by DPHI on 19 September 2022; the audit schedule has now been set to occur every 18 months.

This IEA has been prepared to satisfy the requirements of:

- Schedule 4 Conditions 9-10 of CSSI 9687.
- *Independent Environmental Audit Guidelines (DPHI May 2020).*

The IEA will cover the 18-month period starting from 18 July 2023 to 28 March 2025 (final day of 2025 IEA inspection). DPHI endorsed the following IEA team in the letter dated 24 February 2025.

The IEMA audit team visited the Snowy 2.0 site from 24 to 28 March 2025, and comprised:

- Chris Jones - Lead Auditor.
- David Price – Assistant Auditor.

The IEA reviewed the:

- CSSI.
- Environmental Management Plan commitments.
- The status of previous IEA recommendations (see **Section 4.1** for more information).

The CSSI did not have a statement of commitments attached hence IEMA reviewed compliance against the mitigation measures tables within the key management plans. The CSSI condition requiring an IEA (Schedule 4 Condition 9) did not mention the Environment Protection Licence or Federal consent, hence they have not been included in the IEA scope.

A summary of the IEA outcomes is provided in **Table A** below.

Table A – IEA Compliance Summary

Compliance Status	CSSI-9687	Key Management Plan Commitments (Key mitigation measure tables)	Total
Compliant	44	289	333
Not Triggered	17	91	108
Non-Compliant	33	17	50
Total	94	397	491

The IEA did identify a high number of non-compliances and an increase since the last IEA. The increase in the number of non-compliances was partly due to the fact the previous 2023 IEA grouped non-compliances by aspect.

It is important to acknowledge the complex nature of the Snowy 2.0 project. The project's scale, the remote and challenging environmental setting, and the detailed and extensive CSSI conditions make this a difficult project to manage. In addition, the project is subject to many commitments across multiple management plans, requiring significant coordination and oversight.

These factors collectively elevate the risk of non-compliance, despite the proponent's ongoing management efforts.

Key findings from the Audit included:

Strengths

- The as built erosion and sediment controls were generally of a high standard. Evidence of design, construction and engineer certification.
- The site was well kept during the site inspection.
- There were many records for the incident management process from FGJV.
- There was a large amount of experience at Snowy Hydro and FGJV on the Project. Some staff and contractors have been at the site for the entire project.
- The site had a very well-established GIS system.
- Based on site records complaints were managed well.
- There was a large amount of consultation with the community.

Non – Compliance/Areas of Improvement Themes

General themes associated with non-compliances are as follows:

- Management Plan approval timeframes.
- Administrative and reporting conditions.
- Weed management.
- Spoil management.
- Biodiversity.
- Biosecurity.
- Water management.
- Hydrocarbon storage.
- Heritage reporting.
- Waste management.
- Non-compliance reporting.

General themes associated with Improvement Recommendations are as follows:

- Administration and document tracking.
- Weed management.
- Spoil management.
- Rehabilitation (noting this will become more of a management aspect in next IEA period).

- Biodiversity.
- Water management.
- Emergency management.

Following Snowy Hydro's submission of this IEA, Snowy Hydro received formal feedback from DPHI (see **Appendix G**). DPHI requested revisions to the report to ensure it meets the requirements of the project approval, the audit team endorsement letter, and the Independent Audit Post Approval Requirements (IPARS). The Audit Team also updated some findings based on additional evidence provided by Snowy Hydro.

1. INTRODUCTION

1.1. Background

Snowy 2.0 is a significant expansion of Australia's Snowy Scheme, aiming to provide 2,200 megawatts of on-demand power and approximately 350,000 megawatt-hours of large-scale energy storage. The project involves connecting the Tantangara and Talbingo dams via 27 kilometres of tunnels and constructing a new underground power station. This system will pump water to the upper reservoir during periods of excess renewable energy and release it to generate electricity when demand is high, effectively creating a closed-loop system that recycles water. Snowy 2.0 is expected to support Australia's transition to a low-carbon future by enhancing grid stability and maximizing the use of renewable energy sources.

Snowy 2.0 operates under CSSI 9687, with Schedule 4 Condition 9 requiring an Independent Environmental Audit (IEA) within one year of construction commencement and every three years thereafter unless directed otherwise. Earlier in the project, IEAs were completed every 6 months. A revised IEA program, approved by DPHI on 19 September 2022, now schedules audits every 18 months, with the next IEA expected in late February or early March 2025.

The site management plans outline the Snowy 2.0 project. Construction of the Snowy 2.0 Main Works project includes, but is not limited to:

- Pre-construction preparatory activities including dilapidation studies, survey, investigations, access etc.
- An underground pumped hydro-electric power station complex.
- Water intake structures at Tantangara and Talbingo reservoirs.
- Power waterway tunnels, chambers and shafts.
- Access tunnels.
- New and upgraded roads to allow ongoing access and maintenance.
- Power, water and communication infrastructure, including:
 - A cable yard to facilitate connection between the NEM electricity transmission network and Snowy 2.0.
 - Permanent auxiliary power connection.
 - Permanent communication cables.
 - Permanent water supply to the underground power station.
- Post-construction revegetation and rehabilitation.

The Snowy 2.0 Main Works construction program is summarised in the figures below.

1.2. IEA Scope

IEMA was engaged to prepare this Independent Environmental Audit (IEA) for Snowy Hydro to address the requirements of Schedule 4 Conditions 9-10 of CSSI 9687.

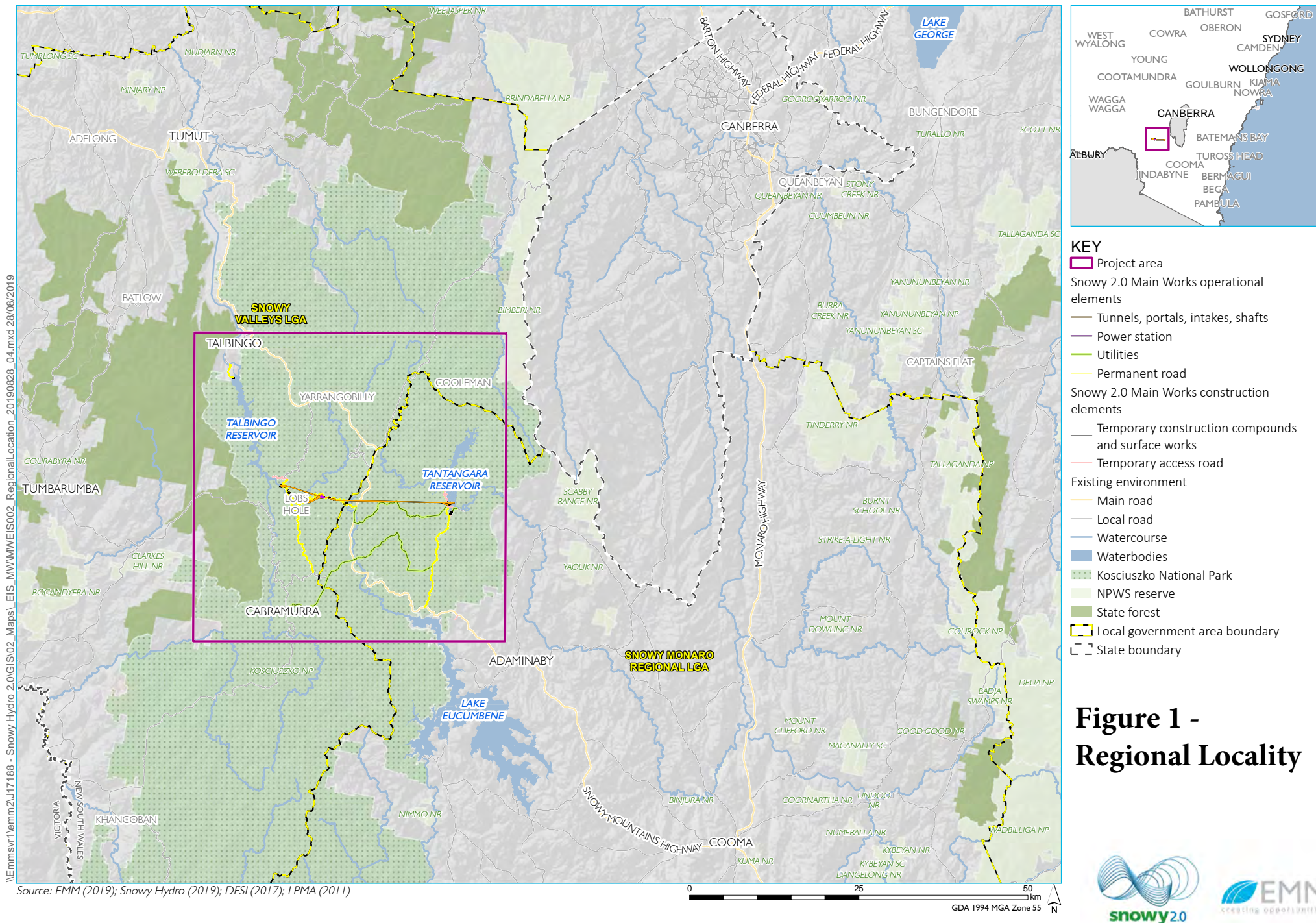
The IEA will cover the 18-month period starting from 18 July 2023 to 28 March 2025 (final day of 2025 IEA inspection). DPHI endorsed the following IEA team in the letter dated 24 February 2025 (**Appendix D**):

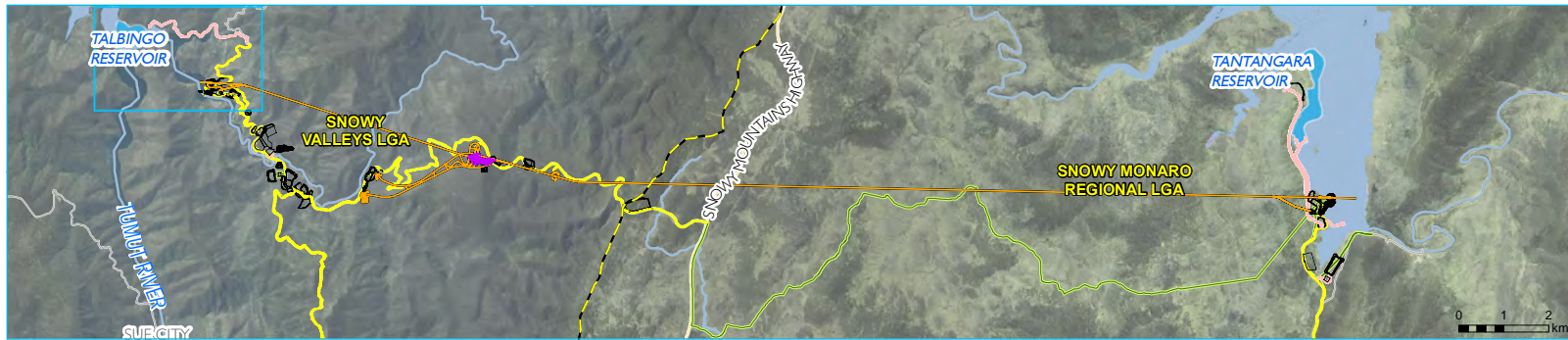
- Chris Jones (Principal Environmental Consultant – IEMA) Lead Auditor.
- David Price (Environmental Consultant – IEMA) Auditor.

The IEA reviewed the:

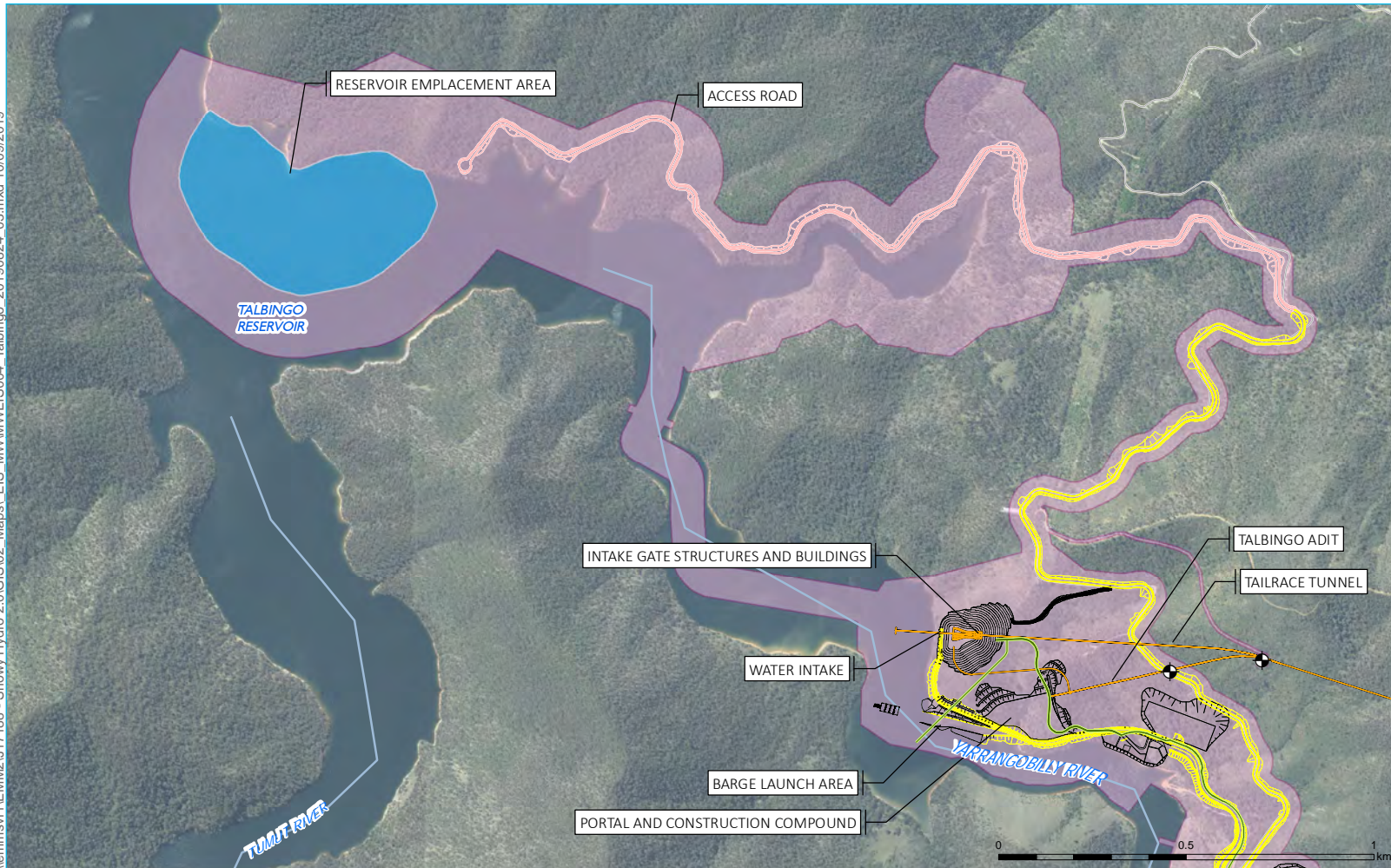
- CSSI.
- The key Environmental Management Plan commitments.
- The status of previous IEA recommendations (see **Section 4.1** for more information).

The CSSI did not have a statement of commitments attached hence IEMA reviewed compliance against the mitigation measures tables within the key management plans. The CSSI condition requiring an IEA (Schedule 4 Condition 9) did not mention the Environment Protection Licence or Federal consent, hence they have not been included in the IEA scope.





- KEY**
- Existing environment
- Main road
 - Local road
 - Watercourse
 - Waterbodies
 - Local government area boundary
- Snowy 2.0 Main Works operational elements
- Tunnels, portals, intakes, shafts
 - Power station
 - Utilities
 - Permanent road
- Snowy 2.0 Main Works construction elements
- Temporary construction compounds and surface works
 - Temporary access road
 - Geotechnical investigation
 - Indicative rock emplacement area
 - Disturbance area*

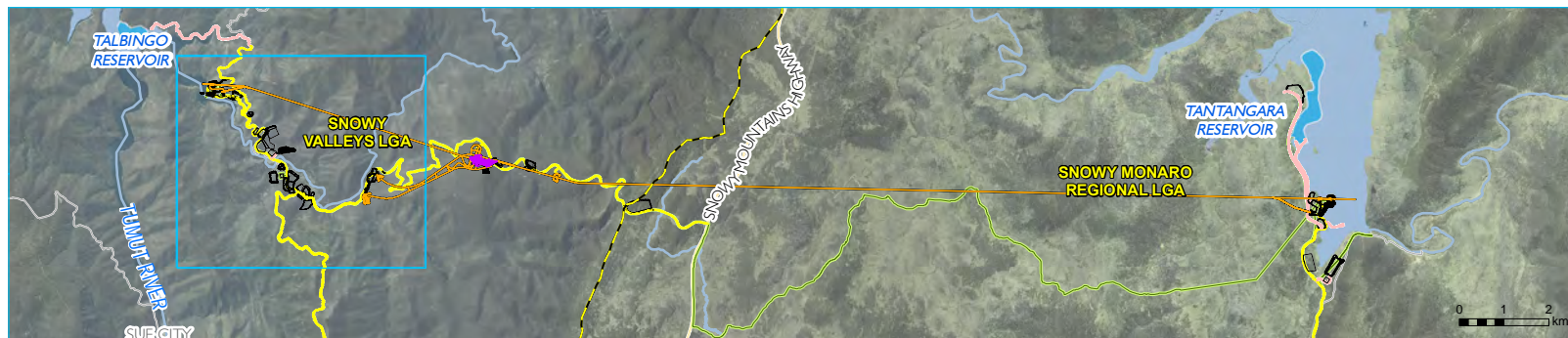


Note: the disturbance area is the extent of construction works required to build Snowy 2.0. It has been identified to allow an assessment of impacts for the EIS, and represents a defined maximum extent where construction works will be carried out. The area will be minimised as much as possible during detailed design.

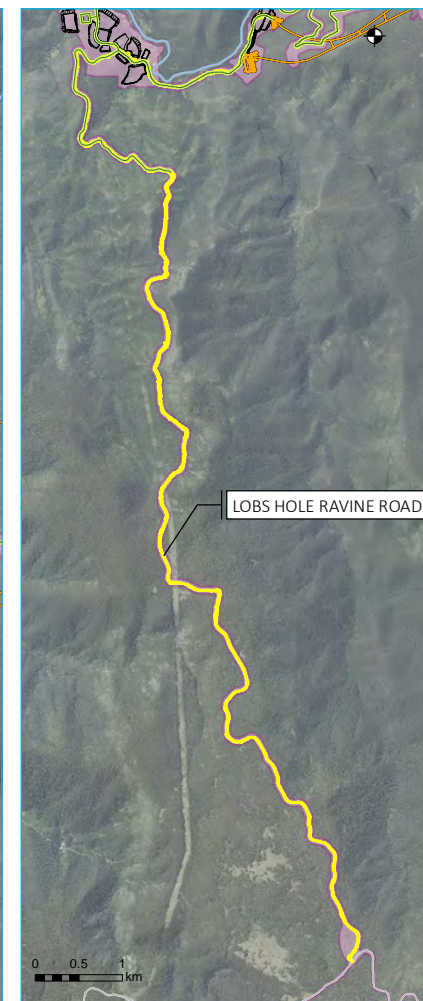
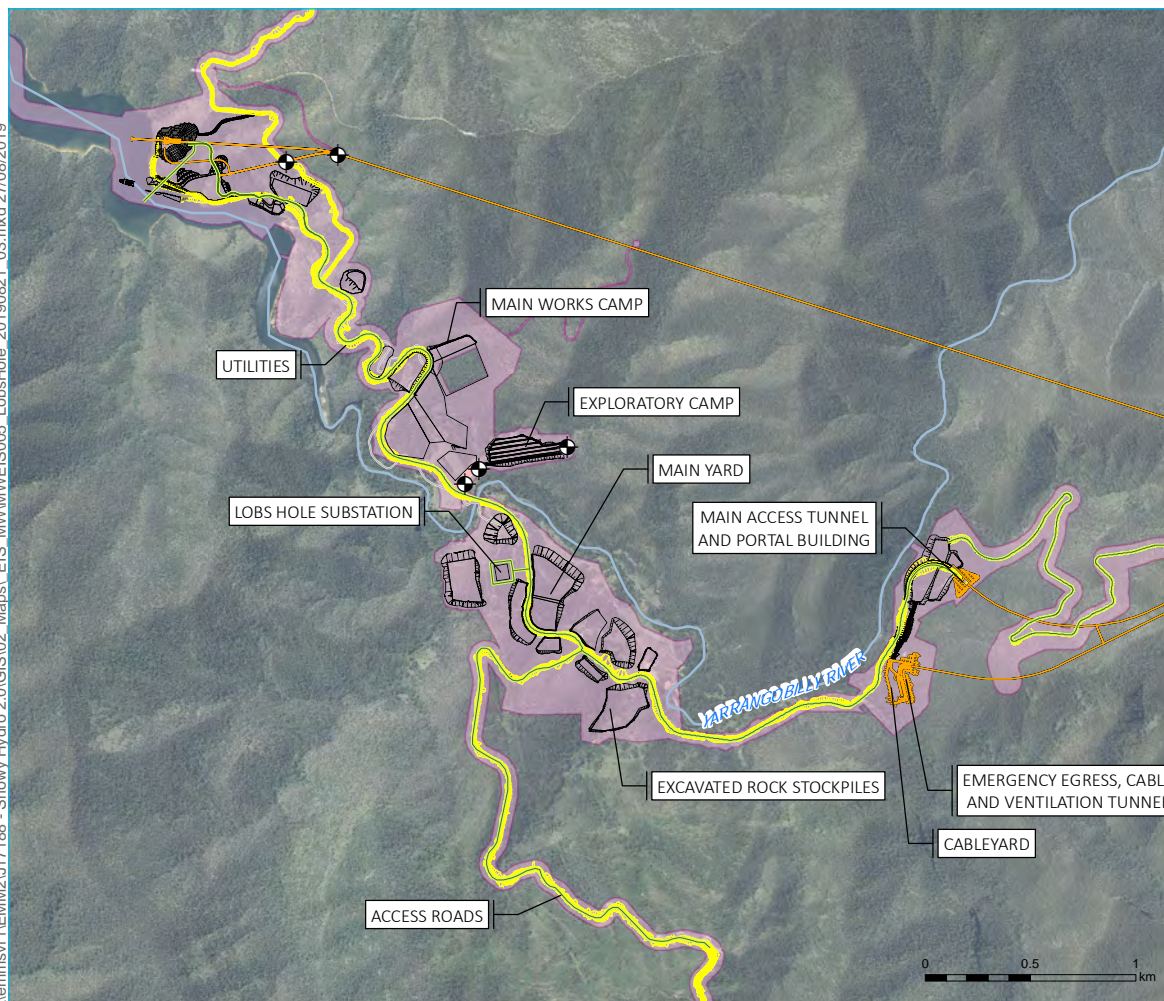
Figure 2 - Site Overview - Talbingo Reservoir

Source: EMM (2019); Snowy Hydro (2019); DFSI (2017); LPMA (2011)





- KEY**
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 - Main road
 - Local road
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 - Snowy 2.0 Main Works operational elements
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 - Power station
 - Utilities
 - Permanent road
 - Snowy 2.0 Main Works construction elements
 - Temporary construction compounds and surface works
 - Temporary access road
 - Geotechnical investigation
 - Indicative rock emplacement area
 - Disturbance area*



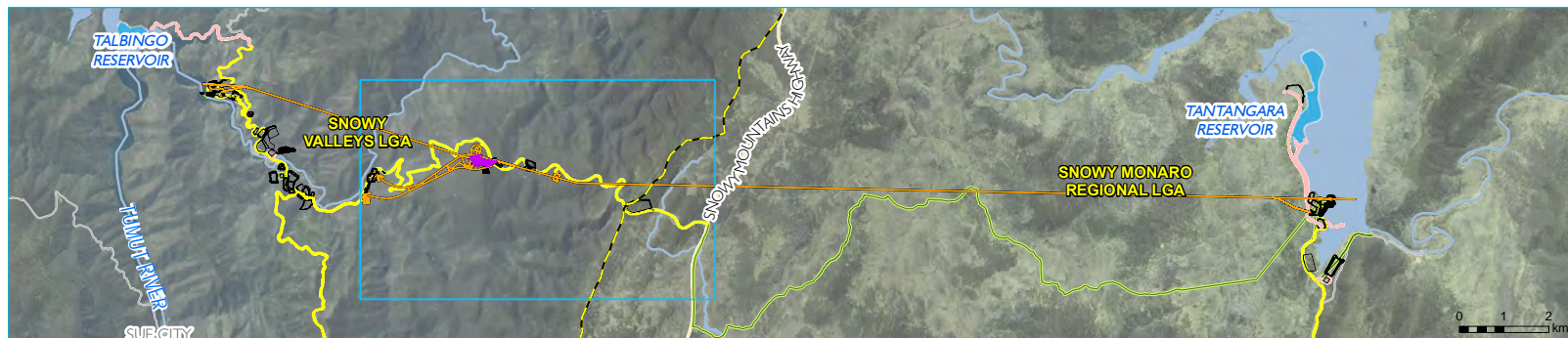
Note: the disturbance area is the extent of construction works required to build Snowy 2.0. It has been identified to allow an assessment of impacts for the EIS, and represents a defined maximum extent where construction works will be carried out. The area will be minimised as much as possible during detailed design.

Figure 3 - Site Overview - Lobs Hole

Source: EMM (2019); Snowy Hydro (2019); DFSI (2017); LPMA (2011)

GDA 1994 MGA Zone 55





- KEY**
- Existing environment
 - Main road
 - Local road
 - Watercourse
 - Waterbodies
 - Local government area boundary
 - Snowy 2.0 Main Works operational elements
 - Tunnels, portals, intakes, shafts
 - Power station
 - Utilities
 - Permanent road
 - Snowy 2.0 Main Works construction elements
 - Temporary construction compounds and surface works
 - Temporary access road
 - Geotechnical investigation
 - Indicative rock emplacement area
 - Disturbance area*



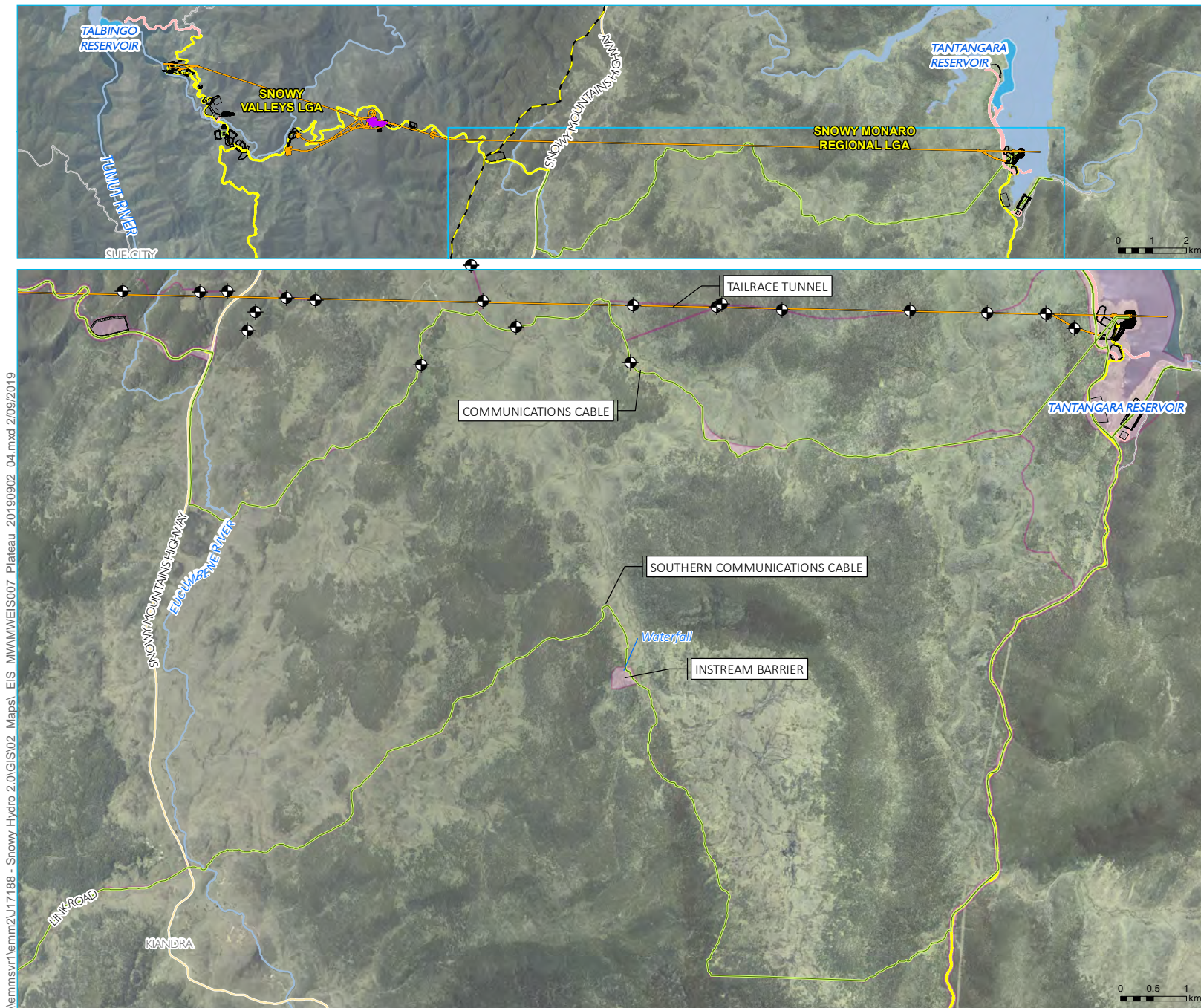
Note: the disturbance area is the extent of construction works required to build Snowy 2.0. It has been identified to allow an assessment of impacts for the EIS, and represents a defined maximum extent where construction works will be carried out. The area will be minimised as much as possible during detailed design.

Figure 4 - Site Overview - Marica

Source: EMM (2019); Snowy Hydro (2019); DFSI (2017); LPMA (2011)

GDA 1994 MGA Zone 55





- KEY**
- Existing environment
- Main road
 - Local road
 - Watercourse
 - Waterbodies
 - Local government area boundary
- Snowy 2.0 Main Works operational elements
- Tunnels, portals, intakes, shafts
 - Power station
 - Utilities
 - Permanent road
- Snowy 2.0 Main Works construction elements
- Temporary construction compounds and surface works
 - Temporary access road
 - ◆ Geotechnical investigation
 - Indicative rock emplacement area
 - Disturbance area*

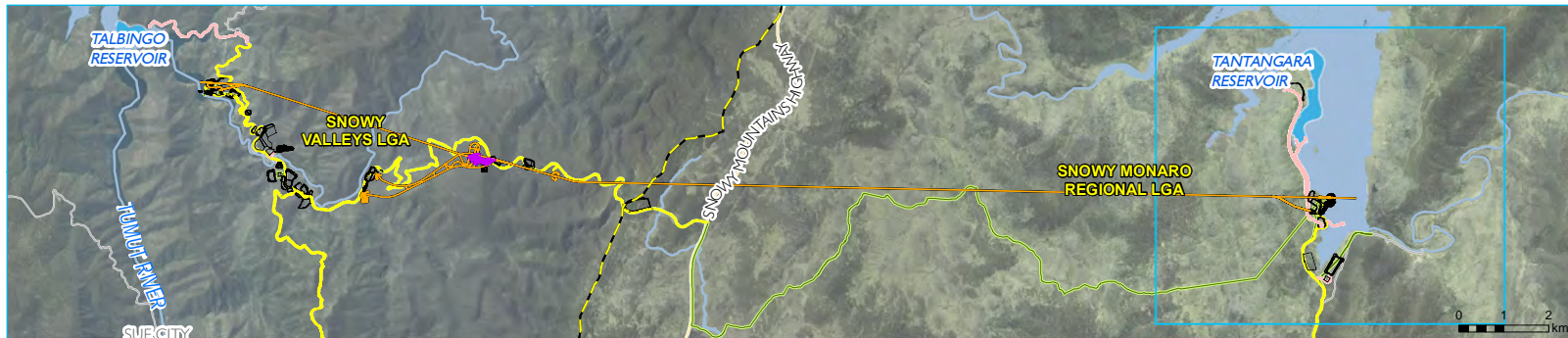
Note: the disturbance area is the extent of construction works required to build Snowy 2.0. It has been identified to allow an assessment of impacts for the EIS, and represents a defined maximum extent where construction works will be carried out. The area will be minimised as much as possible during detailed design.

Figure 5 - Site Overview - Plateau

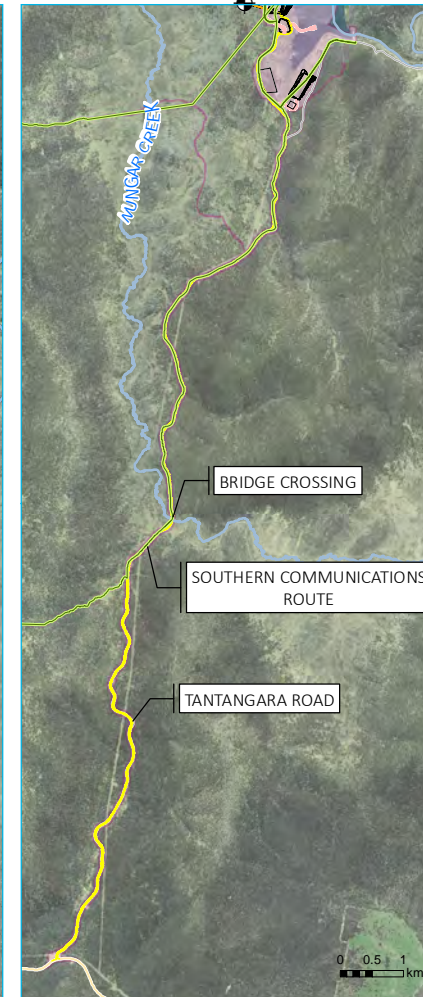
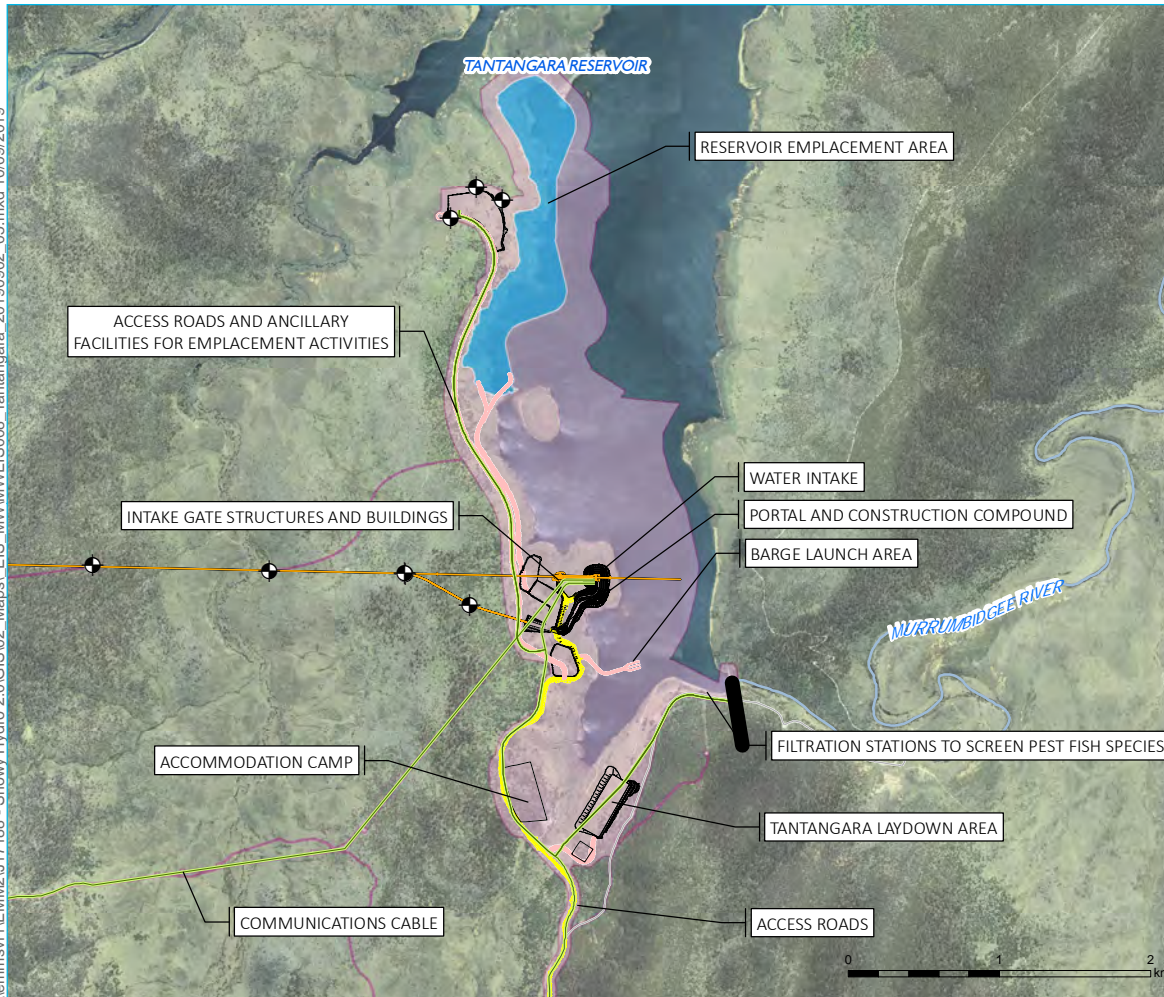
Source: EMM (2019); Snowy Hydro (2019); DFSI (2017); LPMA (2011)

GDA 1994 MGA Zone 55





- KEY**
- Existing environment
 - Main road
 - Local road
 - Watercourse
 - Waterbodies
 - Local government area boundary
 - Snowy 2.0 Main Works operational elements
 - Tunnels, portals, intakes, shafts
 - Power station
 - Utilities
 - Permanent road
 - Snowy 2.0 Main Works construction elements
 - Temporary construction compounds and surface works
 - Temporary access road
 - Geotechnical investigation
 - Indicative rock emplacement area
 - Disturbance area*



Note: the disturbance area is the extent of construction works required to build Snowy 2.0. It has been identified to allow an assessment of impacts for the EIS, and represents a defined maximum extent where construction works will be carried out. The area will be minimised as much as possible during detailed design.

Figure 6 - Site Overview - Tantangara Reservoir

Source: EMM (2019); Snowy Hydro (2019); DFSI (2017); LPMA (2011)

GDA 1994 MGA Zone 55



\\lemmsvr1\emm2\j17188 - Snowy Hydro 2.0\GIS\02 Maps\ EIS_MMMWEIS012_RockForest_20190824_03.mxd 27/08/2019



Source: EMM (2019); Snowy Hydro (2019); DFSI (2017); LPMA (2011)



GDA 1994 MGA Zone 55

- KEY**
- Existing environment
 - Main road
 - Local road
 - Watercourse
 - Snowy 2.0 Main Works operational elements
 - Tunnels, portals, intakes, shafts
 - Utilities
 - Permanent road
 - Snowy 2.0 Main Works construction elements
 - Temporary construction compounds and surface works
 - Temporary access road
 - Geotechnical investigation
 - Disturbance area*

Note: the disturbance area is the extent of construction works required to build Snowy 2.0. It has been identified to allow an assessment of impacts for the EIS, and represents a defined maximum extent where construction works will be carried out. The area will be minimised as much as possible during detailed design.

Figure 7 - Site Overview - Rock Forest



1.3. Key Site Contacts

The main IEA contacts for this IEA are outlined in **Table 1**. This table also includes details of the principal contractor, Future Generation Joint Venture (FGJV).

Table 1 - Key Contacts for the IEA

Name and position	Contact details
Snowy Hydro Main Contacts	
Peter Cowper – Environmental Manager	Email: info@snowyhydro.com.au
Christine Edwards – HSE Systems and Change Manager	
Jordan Chenery – Environmental Coordinator	
Maja Heath - Environmental Graduate	
FGJV Main Contacts	
Ellen Porter - FGJV - Environmental Manager	Email: info@snowyhydro.com.au
Nathan Jones - FGJV – Deputy Environmental Manager	
Carolina Pedraza – Environmental Approvals Coordinator	

1.4. IEA Methodology

The IEA has been completed as per the Independent Audit Post Approval Requirements (DPHI May 2020).

The components of the audit were discussed via MS Teams meeting with key site personnel on 10 February 2025. Chris Jones (Lead Auditor) and David Price (Auditor) visited the site on 24 to 28 March 2025 to complete a site inspection and verify field components of the IEA. Information was provided by Snowy Hydro prior to, during, and following the IEA site visit. The IEA Team also sourced information from the Snowy 2.0 website.

The IEA team are independent of Snowy 2.0 as defined under Section 3.1 of the Department of Planning, Housing and Infrastructure's (DPHI) Independent Audit Post Approval Requirements (May 2020). The endorsement of this IEA team by DPHI is attached in **Appendix D**. The methodology for the IEA consisted of the following key steps:

- Reviewing key documents provided by Snowy Hydro prior to the Audit.
- Consultation with relevant government and stakeholder agencies as per the IEA Guideline requirements prior to the site component.
- An MS Teams meeting with key Snowy 2.0 personnel to discuss the desktop components of the audit.
- Site component of the IEA including a field inspection.
- Following the IEA field component there were several rounds of RFI's with this mostly relating to the implementation of management plans.

- Photographs taken during the site inspection are included in **Appendix A**. A large amount of evidence was viewed and collected as part of the IEA, including monitoring records, reports, and correspondence. While this key evidence has been referenced in **Section 2**, it has not been attached to this IEA report.
- Two rounds of client review (excel audit sheet and IEA word document) were received on the draft IEA report, prior to finalisation.

1.4.1. Key Meetings and Attendees

An opening meeting and closeout meeting were both held at the Snowy Hydro office during the site visit component. There are also other meetings which have been noted in **Table 2** below.

Table 2 – Meeting Attendees

Name	Role and Company
Opening Meeting - 24 March 2025	
Chris Jones	HEMA - Lead Auditor
David Price	HEMA - Assistant Auditor
Peter Cowper	Snowy Hydro – Environmental Manager
Christine Edwards	Snowy Hydro – HSE Systems and Change Manager
Jordan Chenery	Snowy Hydro – Environmental Coordinator
Maja Heath	Snowy Hydro – Environmental Graduate
Ellen Porter	FGJV - Environmental Manager
Nicholas Bernardini	FGJV – Spoil Manager
Carolina Pedraza	FGJV – Environmental Approvals Coordinator
Site Inspection Closeout Meeting – 28 March 2025	
Chris Jones	HEMA - Lead Auditor
David Price	HEMA - Assistant Auditor
Peter Cowper	Snowy Hydro – Environmental Manager
Carolina Pedraza	FGJV – Environmental Approvals Coordinator
Scott Lang	FGJV – Environmental Coordinator
Spoil Management Plan Commitments MS Teams Meeting – 23 April 2025	
Chris Jones	HEMA - Lead Auditor
David Price	HEMA - Assistant Auditor
Christine Edwards	Snowy Hydro – HSE Systems and Change Manager
Maja Heath	Snowy Hydro – Environmental Graduate
Ellen Porter	FGJV - Environmental Manager

Name	Role and Company
Nicholas Bernardini	FGJV – Spoil Manager
Management Plan Review MS Teams Meeting – 20 May 2025	
Chris Jones	HEMA - Lead Auditor
David Price	HEMA - Assistant Auditor
Peter Cowper	Snowy Hydro – Environmental Manager
Maja Heath	Snowy Hydro – Environmental Graduate
Jordan Chenery	Snowy Hydro – Environmental Coordinator
Ellen Porter	FGJV - Environmental Manager
Nathan Jones	FGJV - Environmental Deputy Manager

HEMA also had meetings with NPWS (21 May 2025) and DPHI (26 May 2025) to discuss the formal feedback that was provided. Feedback and follow ups are required as part of section 3.2 of the *Independent Audit Post Approval Requirements (DPHI May 2020)*.

1.4.2. Field Inspection

Chris Jones (Lead Auditor) and David Price (Auditor) visited the site on 24 to 28 March 2025 to complete a site inspection and verify field components of the audit. Areas visited from 24 – 26 March included:

- Tantangara (Day 1).
- Lobs Hole (Day 2).
- Marica (Day 3).
- Rock Forest (Day 3).

Comments relating to the specific areas are included in the recommendations in **Section 5** and **Section 6**. We believe Lobs Hole is the site which has the highest level of potential environmental risk due to its size, location and ongoing water management requirements.

1.5. Consultation Requirements for this IEA

1.5.1. Pre Audit Consultation

Table 3 outlines the stakeholder consultation completed for the IEA, undertaken in accordance with the IEA Guidelines. The responses have been provided as **Appendix E**.

Table 3 – Stakeholder Consultation for the IEA

Regulator	Contact Details	Comment from IEA Team/Stakeholder	IEA Team Response
Department of Planning, Housing and Infrastructure (DPHI)	Michael Wood Michael.Wood@environment.nsw.gov.au	<p>In addition to standard audit focus areas, compliance with the following areas would be of particular interest to the department:</p> <ul style="list-style-type: none"> • Management Plan reviews. • Incident and non-compliance reporting. • Emergency Management Plan, in particular Bush Fire Risk assessment and access to firefighting equipment. • Heritage Management Plan and annual reporting. • Weed Management Plan. • Feral animal controls. • Closing off previous IEA actions. • Recent clearing activities and management at Marica i.e. compliance with boundary limits. • Any rehabilitation activities e.g. Trunk Services on Gooandra trail. • Waste monitoring. • Stockpile emplacement location, monitoring and management. • Compare EA predictions vs actual. • Surface water and groundwater monitoring compliance. • Compliance with all relevant conditions relating to the recent MOD 3. 	Noted. The IEA focused on all these areas through a review of CSSI conditions and the implementation of management plans.
Planning NSW	David Way David.Way@planning.nsw.gov.au	No written feedback provided.	No response required
Department of Climate Change, Energy, the	Rob Brownbill	No written feedback provided.	No response required

Regulator	Contact Details	Comment from IEA Team/Stakeholder	IEA Team Response
Environment and Water (DECCEEW) (NSW)	rob.brownbill@dpie.nsw.gov.au		
NSW National Parks and Wildlife Service	Kelsey Boreham kelsey.boreham@environment.nsw.gov.au Bernadette Zanet Bernadette.Zanet@environment.nsw.gov.au	<p>We understand that the scope of your request is related to actual or potential non-compliances with the conditions of CSSI-9687 (i.e. Snowy 2.0 Project Main Works) and management plan commitments made under that approval. While it would have been preferable for IEA#5 agency feedback to be sought prior to a site audit, we are nonetheless grateful for the opportunity to provide feedback now.</p> <p>NPWS feedback for the purposes of IEA#5 is set out in Attachment 1 to this letter. That Attachment includes a list of what we consider to be the actual or potential non-compliances with CSSI-9687 conditions and commitments (including a reference) along with our description of the issue. If you require further information on, or examples of, the issues listed then please let us know.</p>	Please see the table below for a full description of NPWS feedback as well as IEMA's response to NPWS feedback.
Environmental Protection Authority (EPA)	Andreas Stricker Andreas.Stricker@epa.nsw.gov.au	<p>In response to your request for feedback in relation to the 2025 Independent Environmental Audit (Audit) for the Snowy 2.0 Project (CSSI-9687), the EPA notes that over the audit period the Snowy 2.0 project has had a number of preventable failures in leachate, sediment and erosion controls that have led to discharges and water quality impacts in the relevant receiving environments.</p> <p>In this regard, the EPA considers a focus on leachate, sediment and erosion controls in line with conditions 29 and 30 of the CSSI would be appropriate for the Audit. With particular focus on basin management and overtopping events that have been attributed to control failures (i.e. leaks and construction material), limited basin capacity, resourcing issues and operational failures (e.g. over application of reuse water).</p>	<p>IEMA has spent a large amount of time reviewing the management of spoil, leachate water and sediment water.</p> <p>Issues relating to this area are included in the recommendations in Section 5 and Section 6.</p>
Brungle Tumut Local Aboriginal Land Council	btlaic.ceo@bigpond.com	No written feedback provided.	No response required

Regulator	Contact Details	Comment from IEA Team/Stakeholder	IEA Team Response
Merrimans Local Aboriginal Land Council	ceo@merrimanslalc.org.au	No written feedback provided.	No response required
Bega Local Aboriginal Land Council	ceo@begalalc.org.au	No written feedback provided.	No response required
NSW Department of Primary Industries (DPI) - Fisheries	Cameron Lay cameron.lay@dpi.nsw.gov.au	No written feedback provided.	No response required
Department of Climate Change, Energy, the Environment and Water (DECCEEW) (Federal)	Ali Strous Ali.Strous@dcceew.gov.au	No written feedback provided.	No response required
Snowy Monaro Regional Council (SMRC)	John Gargett john.gargett@snowymonaro.nsw.gov.au	No written feedback provided.	No response required
Transport for New South Wales (TfNSW)	Alexandra Power Alexandra.Power@transport.nsw.gov.au	No written feedback provided.	No response required

Table 4 NPWS feedback with IEA Team's response

Issue	CSSI-9687 condition and/or management plan reference	Description	IEA Team/Snowy Hydro Response
Road Maintenance and site management			
Insufficient maintenance and dust suppression on Tantangara Road	CSSI-9687 Schedule 3, conditions 38(a) & 45(k) Transport Management Plan, section 7.2	<p>Tantangara Road is not being monitored and maintained as per the commitments in the Transport Management Plan. Accordingly, there is increased potential for vehicle incidents with members of the public and environmental damage resulting from dust settlement on vegetation and entering waterways.</p> <p>Tantangara Road has a dual purpose, as a public access route and a key haulage road for the Snowy 2.0 Project. The road is unsealed and requires a scheduled inspection and maintenance regime supported by the implementation of a program of works. Irregular dust suppression causes dust settlement on the roadside vegetation and creates poor visibility for all road users. Road defects (corrugations, loose gravel, narrow choke points) are contributing to vehicle accidents and increase the potential for danger to other road users. Heavy vehicle accidents involving Snowy 2.0 Project vehicles occurred on the road during the IEA#5 period in November 2024 and March 2025. Recent MOD3 commitments in the Transport Management Plan require road upgrades to be completed prior to haulage from Marica to Tantangara, however, the current use of the road is impacting the surrounding environment and endangers the safety of all road users (including members of the public).</p>	See improvement recommendations relating to these areas. It should be noted the roads were well maintained at the time of the IEA inspection.
Poor drainage design and insufficient maintenance on site emergency exit (Lobs Hole North Road/Ravine Road North)	CSSI-9687 Schedule 3, conditions 44(b) & 61 Transport Management Plan, sections 5.1 & 6.1 (Tables 5-1 & 6- 1) Natural Hazard Management Plan, section 4.1	<p>Lobs Hole North Road/Ravine Road North is the designated emergency egress from the Lobs Hole project area. Recent inspections indicate it is subject to washouts at multiple locations due to poor stormwater design, with erosion gullies and sediment impacting areas of Kosciuszko National Park outside the project boundary. Vegetation and fallen timber is also encroaching on the road.</p> <p>It is currently questionable whether the road could carry heavy emergency vehicles (e.g. Category 1 tankers) and buses that would be necessary to respond to bushfire emergencies and evacuate personnel. A redesign of stormwater arrangements for the road is required, along with routine inspection and maintenance (including vegetation maintenance). Erosion and sediment control impacts within and beyond the project boundary must be rectified with further authorisation from NPWS.</p>	As per the above comments.

Issue	CSSI-9687 condition and/or management plan reference	Description	IEA Team/Snowy Hydro Response
Presence of discarded building materials and rubbish	CSSI-9687 Schedule 3, conditions 52(d) & (e) Waste Management Plan, sections 4.6, 4.8 & Table 4-4	On various occasions, NPWS has observed uncontained litter and construction waste discarded across project areas and outside the project boundary. The most notable recent example is in the sensitive and publicly visible Plateau area (Gooandra Trail) where wheelie bins and construction materials have been left uncontained and untended for months.	IEMA did not sight these issues at the time of the inspection. However, we have some minor waste recommendations in the report relating to lids on bins that was identified during the site inspection.
Biodiversity, biosecurity and heritage management			
Pest (feral animal) and weed monitoring and control measures across the Snowy 2.0 Project are minimal and ad hoc.	CSSI-9687 Schedule 2, condition 13(c) & Schedule 3, conditions 17(i) & 20(a) Biodiversity Management Plan, section 5.1 Transport Management Plan, Section 2.3 (ECO2)	<p>There is no targeted and consistently applied weed or pest management control programs being implemented for project areas. Control efforts lack associated monitoring and adaptive management arrangements.</p> <p>This issue has been reflected in past IEAs. While we understand that contractors have now been engaged, control programs remain ad hoc and lacking in the forward planning and consistent application required to make them effective.</p> <p>This is a particular matter of concern for NPWS given the potential for it to impact areas of Kosciuszko National Park outside the project boundary, impede the effectiveness of other construction environmental management measures (e.g. rabbit burrows in ERSED controls and leachate basin batters), and impede the future rehabilitation obligations of the proponent under CSSI-9687 (e.g. through the long-term accumulation of weed seeds in soil).</p>	IEMA have provided numerous recommendations in the report around biodiversity/biosecurity based on our site inspection and document reviews.
Biosecurity (pathogen and weed) control protocols are inconsistently applied across the Snowy 2.0 Project.	CSSI-9687 Schedule 2, condition 13(c); Schedule 3, conditions 17(i) & 20(a) Biodiversity Management Plan, section 5.1 Transport	<p>Biosecurity protocols are inconsistently applied across the project. Examples include:</p> <ul style="list-style-type: none"> Wheel washes out-of-commission or removed from active project area access routes (e.g. Marica Trail, Gooandra Trail); and Inconsistent hygiene and containment protocols for weed species of concern (e.g. diligent protocols for Ox-eye Daisy are being applied at Marica, but are absent in other areas where this weed species occurs such as Gooandra Trail and Tantangara). 	

Issue	CSSI-9687 condition and/or management plan reference	Description	IEA Team/Snowy Hydro Response
	Management Plan, Section 2.3 (ECO2)		
Implementation of threatened fauna impact mitigation measures following MOD3	CSSI-9687 Schedule 2, condition 1, and Schedule 3, conditions 17(d) & (e). Biodiversity Management Plan, section 5.1 & Appendix G.	Measures such as relocated and upgraded fauna crossings to mitigate the impacts of CSSI-9687 Modification 3 related vegetation clearing on threatened and other native fauna have not yet been implemented. Impacts have preceded mitigation measures, with clearing works beginning in December 2024 at Marica and largely complete by January 2025. Substantial earthworks are now in progress. By contrast, we understand that business case and procurement processes are still in progress for the installation and upgrading of fauna crossings.	IEMA's site inspection and review of documentation has led to a recommendation to install fauna crossings.
Monitoring commitments for natural heritage are not being implemented	CSSI-9687 Schedule 3, conditions 33 & 36 Heritage Management Plan, section 6.1	Natural heritage monitoring of geodiversity features does not appear to have occurred.	IEMA identified this non-compliance during the audit review of documentation and has provided recommendations.
Failure to apply unexpected finds protocol	CSSI-9687 Schedule 3, condition 17(d) Biodiversity Management Plan, section 5 & Appendix D	We understand that <i>Pimelea bracteata</i> was identified at the Tantangara project area in 2020 and 2024. This is a critically endangered threatened plant species listed under both Commonwealth and State environmental legislation. Despite recommendations from agencies at the time to report, assess and manage the find in accordance with the unexpected finds protocol specified in the Biodiversity Management Plan, it remains unclear whether this has occurred.	Evidence provided from site indicates that Snowy Hydro has begun the process of implementing the unexpected finds procedure. See Schedule 3, Condition 17(d) of Appendix B (Compliance Spreadsheet). <u>Snowy Hydro Response (Draft Report comment dated 9 July 2025)</u> <i>SHL do not agree with NPWS conclusion. UFP completed in 2020 prior to it being listed under EPBC act. UFP triggered in 2025 to address NSW requirements inclusive of consideration of EPBC act.</i>

Issue	CSSI-9687 condition and/or management plan reference	Description	IEA Team/Snowy Hydro Response
Rehabilitation			
Failure to progressively plan for and implement rehabilitation for project areas	CSSI-9687 Schedule 3, conditions 9(a), 11, and 17(i) & (j). Rehabilitation Management Plan and associated site specific plans (e.g. Plateau boreholes and Gooandra Trail).	<p>There is no evidence of planning for, or implementing, progressive rehabilitation for project areas. This is of particular concern in areas such as Gooandra Trail where works are complete or inactive, an approved site specific rehabilitation plan exists, and the site has not been left in an erosion or weed resistant state. It is also a highly visible location of significant environmental sensitivity.</p> <p>Given the scale of the permanent spoil emplacement rehabilitation obligations which will apply to the proponent under Schedule 3 conditions 9 to 11 of CSSI-9687, there is little evidence of forward planning, consultation with agencies, trials, or seed collection and propagation etc. in preparation for this task.</p>	<p>We have a series of improvement recommendations regarding rehabilitation as it will become an even more important aspect in the next IEA period.</p>
Failure to implement rehabilitation plan for Tantangara surface depression	CSSI-9687 Schedule 3, conditions 11B and 66 Snowy 2.0 - Tantangara Surface Depression Rehabilitation Plan Rev 2.	<p>Although tunnelling has recommenced, the works outlined in the rehabilitation plan remain incomplete. Ground consolidation and initial erosion controls have been implemented at the site but there appears to be no revegetation or weed control occurring.</p> <p>An Independent Environmental Audit of the Subsidence Management Plan has not occurred (as per CSSI-9687 Schedule 3, condition 66).</p>	<p><u>Snowy Hydro Response (Draft Report comment dated 9 July 2025)</u></p> <p><i>NPWS inference that weed control and rehabilitation was not being implemented is not supported by the evidence.</i></p> <p>IEMA did not view the issues that NPWS noted. During the site inspection component of the audit, the area was observed to have a significant ground cover of native grass and minimal weed infestation.</p> <p>IEMA does however have a recommendation concerning undertaking the Independent Environmental Audit of the Subsidence Management Plan.</p>
Water management			

Issue	CSSI-9687 condition and/or management plan reference	Description	IEA Team/Snowy Hydro Response
Poor surface water management across project areas	CSSI-9687 Schedule 3, conditions 4(i), 6, 17(j), 29, 30(f), 30(m) & 32 Water Management Plan, sections 4.1 & 6.2, and Appendix A	During the IEA#5 period, there have been a significant number of sediment, leachate and process water basin over-toppings, including following rain events within the design capacity of those basins. These have principally occurred in the Lobs Hole project area, but also in other locations. We understand that other agencies such as the NSW Environment Protection Authority and NSW Department of Planning Housing and Infrastructure will provide you with specific details of these incidents and comments on water management improvements required across project areas. NPWS is supportive of any feedback those agencies provide to you on this issue.	IEMA identified the water management issues faced by Snowy Hydro during the site inspection and review of documentation. There are a series of recommendations around water and leachate management provided in this report.
Lack of follow-up on groundwater drawdown actions	CSSI-9687 Schedule 3, conditions 15 & 32 Water Management Plan, sections 4.1 & 6.2, and Appendix B	During the IEA#5 period, there was one groundwater drawdown event near Nungar Creek that was notified to agencies. While an investigation report was provided to agencies, it is not clear what further work occurred to implement the recommendations of that report, and neither are we aware of the current status of the drawdown.	Noted. There is a general recommendation around continual liaison with key agencies.
Administration of approvals and management plans			
Disturbance area reporting (for final offset payment calculation)	CSSI-9687 Schedule 3, condition 13 Biodiversity Management Plan, section 1.4	Assessment and reporting on the final disturbance area for the Snowy 2.0 Project has not occurred. This reporting was due on 21 October 2023 and is a prerequisite for calculation and payment of final biodiversity related offset funds.	Snowy Hydro has provided evidence of a letter addressed to DPHI (dated 8 November 2024) that states <i>'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.'</i> IEMA has provided a non-compliance recommendation (NC REC 6).
Review and updating of management plans (responding to	CSSI-9687 Schedule 2, condition 1; Schedule 3, conditions 17(d) &	Following incidents, changes in project scope/phasing and/or based on monitoring outcomes, management plans have not been reviewed and updated to implement principles of adaptive management and minimise environmental harm. Examples include: failure to adapt the Water Management Plan (and subsidiary Surface Water Management Plan) in response to frequent overtopping incidents, and failure to	We have a general recommendation around reviewing if necessary, updating management plans after this IEA.

Issue	CSSI-9687 condition and/or management plan reference	Description	IEA Team/Snowy Hydro Response
incidents, changes in project scope etc)	(e) and 30(f) & (m); Schedule 4, conditions 19 & 20 Impacted management plans during the IEA#5 period, include the Biodiversity Management Plan and Water Management Plan	update the Biodiversity Management Plan (and subsidiary Fauna Strike Policy) based on Biodiversity Monitoring Program data and in advance of CSSI-9687 Modification 3 vegetation clearance impacts on threatened and other fauna. We acknowledge that updating of the Biodiversity Management Plan has now occurred, albeit after clearing was completed.	
Lack of follow-up in response to non-compliance works authorisation conditioning	Various NPWS email authorisations in response to CSSI-9687 non-compliances	Where non-compliance with CSSI-9687 conditions and commitments result in impacts outside the project area, NPWS assesses and authorises investigation and rectification works under the National Parks and Wildlife Regulation 2019. Examples include remediating boundary encroachments, investigation of stormwater and erosion impacts beyond the boundary etc., with conditioning requiring provision of photographs or a report to close out the issue. We consider that this conditioning must be tracked and complied with as if it were a commitment made under CSSI-9687, particularly given it is relevant to compliance with both the national parks and planning legislation.	<p><u>Snowy Hydro Response (email dated 26 May 2025)</u></p> <p><i>While it is important to note that providing photos or formal reports for issue close-out is not a specific condition of our construction approval, Snowy Hydro, through our principal contractor FGJV, has consistently endeavored to maintain transparency and communication with NPWS regarding environmental matters. Snowy Hydro approach to issue close-out has been as follows:</i></p> <p><i>1. On-Site Verification: FGJV, acting on behalf of Snowy Hydro, has always made a concerted effort to show NPWS representatives the locations of issues or impacts outside the construction envelope. This has been a regular practice during both Joint Agencies inspections and private inspections, allowing for direct visual confirmation and discussion of the issue's status.</i></p> <p><i>2. Email-Based Progress and Close-out Updates: Updates on the progression and eventual close-out of issues or incidents have been consistently provided via email. These emails, which we can provide as evidence (I have attached 2 recent</i></p>

Issue	CSSI-9687 condition and/or management plan reference	Description	IEA Team/Snowy Hydro Response
			<p><i>examples), detail the steps taken to address the issue and confirm its resolution. We have considered these email communications as our primary method of documenting the close-out process.</i></p> <p><i>3. Lack of Prior Feedback on Documentation: To date, we have received no formal consultation or informal feedback from NPWS indicating dissatisfaction with this method of close-out documentation. Had there been any concerns regarding the sufficiency of our reporting or photo provision, we would have been responsive to adapting our procedures.</i></p> <p><i>Snowy Hydro is committed to maintaining a strong working relationship with NPWS and ensuring environmental compliance. Snowy Hydro believes current practices have effectively demonstrated the resolution of issues and impacts.</i></p>

1.5.2. Post Audit Consultation with DPHI

Following Snowy Hydro's submission of this IEA, Snowy Hydro received formal feedback from DPHI. DPHI requested revisions to the report to ensure it meets the requirements of the project approval, the audit team endorsement letter, and the Independent Audit Post Approval Requirements (IPARS).

A copy of the letter from DPHI is attached as **Appendix G**.

Additionally, to improve clarity and comply with the IPARS, IEMA have included a separate column in **Appendix B** and **Table** and assigned a unique identifier to each non-compliance.

Table 5 below provides details of how IEMA have addressed the feedback letter from DPHI.

Table 5 Amendments Requested by DPHI

Amendments Requested by DPHI	How IEMA have Addressed DPHI's Amendments	Where IEMA have Addressed DPHI Amendments
Include a section that includes "a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period;" (as required by section 4.2.3 of the IPARS).	On 26 Sep 2025 (after the audit period) IEMA were provided by Snowy Hydro with a full list of notices issued by DPHI, DCCEEW and EPA which either resulted in a penalty or official infringement. The notices covered the audit period from 26/01/2024 to 26/08/2025. The notices which are relevant to the audit period have been summarised and provided in Section 4.6 .	Section 4.6
Ensure that the report reflects transparency and independence of the audit team (i.e.: references to agreeing with National Parks and Wildlife's (NPWS) opinion of non-compliance/s).	IEMA have reviewed the Audit Compliance Spreadsheet and Audit Report and have updated wording around conditions relating to NPWS consultation.	Section 5 and Appendix B
Ensure that all non-compliances identified are supported with adequate evidence regarding the non-compliance and relevant recommendations (if relevant) to resolve the non-compliance are identified and articulated.	IEMA have amended the IEA findings to include a statement to accompany each non-compliance. The accompanying statement is either a non-compliance recommendation, or where no non-compliance recommendation is provided, the reasoning for no recommendation.	Section 5 and Appendix B.

1.6. Changes made to the IEA in September 2025 Revision based on Snowy Hydro Additional Information

As outlined above the DPHI provided feedback on the IEA on 5 September 2025. As part of this update Snowy Hydro were also able to provide additional information to IEMA in relation to audit findings. **Table 6** below outlines the information provided to IEMA by Snowy Hydro and our response.

Table 6 Information provided by Snowy Hydro in the September 2025 Revision

Condition	Information provided by Snowy Hydro	IEMA Response
Schedule 2, Condition 4(a)	<p>Snowy Hydro provided additional evidence in the form of consultation records, DPHI approval letter and a contention statement.</p> <p>The contention statement detailed a request for further consideration to be given to the finding of non-compliance regarding the submission of Stage 1 and Stage 2 of the Biosecurity Risk Management Plan. Snowy Hydro stated that factors beyond Snowy Hydro's control as reasoning for not gaining approval of the Biosecurity Risk Management Plan within the required timeframes set by DPHI.</p>	<p>No change to compliance status of Schedule 2, Condition 4(a)</p> <p><u>Biosecurity Risk Management Plan Stage 1</u></p> <p>IEMA understands that there were factors for the delayed approval of Stage 1. However, an official extension should have been requested from DPHI.</p> <p><u>Biosecurity Risk Management Plan Stage 2</u></p> <p>IEMA notes that Section 1.5.1 of the Biosecurity Risk Management Plan states '<i>Stage 2 of the BRMP is to be approved prior to the commencement of construction of the fish screens at Tantangara</i>'. 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.</p>
Schedule 2, Condition 13(c)	<p>Snowy Hydro provided additional evidence in the form of a contention statement.</p> <p>The contention statement related to the finding of non-compliance concerning the wheel wash facility. Snowy believes that the finding of the audit was influenced by feedback provided by NPWS during the consultation phase of the IEA. The non-compliance relates to an incident where the Marica wheel wash was out of commission.</p>	<p>No change to compliance status of Schedule 2, Condition 13(c).</p> <p>IEMA have removed statements of being in agreeance with NPWS on matters identified by NPWS and not sighted by IEMA during the site inspection component of this IEA.</p> <p>Although the out of commission wheel wash was not sighted during the site inspection by IEMA. IEMA was still provided with Incident Reports relating to the event that state '<i>As a result, the wheel wash remained out of service for approximately ten hours. During this time, 46 light vehicles (LVs) and 8 heavy vehicles (HVs) entered through the Marica gatehouse. Because the Security Team at the Marica gatehouse does not record actual vehicle registrations, it could not be determined where the vehicles originated. As such, the risk of weed entry is unknown.</i>'</p>
Schedule 3, Condition 17(i)	<p>Snowy Hydro provided additional evidence in the form of an Assessment of Significance for <i>Pimelea Bracteata</i> at Tantangara (August 2025), email correspondence with DCCEEW relating to translocation of <i>Pimelea Bracteata</i> (dated 18 Feb 2025), email correspondence between Snowy Hydro and FGJV relating to the unexpected finds procedure (dated 15 Apr 2025) and a contention statement.</p>	<p>Assessment of Significance for <i>Pimelea Bracteata</i> at Tantangara (August 2025) and email correspondence between Snowy Hydro and FGJV relating to the unexpected finds procedure (dated 15 Apr 2025) both developed after the audit period. Therefore, not assessed as part of this IEA.</p> <p>IEMA agrees that the unexpected finds procedure for <i>Pimelea bracteate</i> has been enacted as is shown in evidence provided. As a result, IEMA have removed the non-compliance</p>

Condition	Information provided by Snowy Hydro	IEMA Response
	<p>The contention statement related to further consideration being given to the audit's conclusion regarding a failure to follow the Unexpected Finds Procedure (UFP).</p> <p>The UFP process for this matter remains in progress as Snowy Hydro is currently reviewing the assessment report provided by FGJV.</p>	<p>recommendation relating to unexpected finds procedure. However, Schedule 3, Condition 17 remains non-compliant due to other aspects. See Appendix B for further details.</p>
Schedule 3, Condition 20(a)	<p>Snowy Hydro provided additional evidence in the form of Biodiversity Monitoring Programs (Years 1 to 4) and a contention statement.</p> <p>The contention statement related to requesting that the assertion that Snowy Hydro <i>"has not implemented the commitments made... relating to Pathogen Monitoring"</i> be given further consideration. Considering documentary evidence provided confirming that Phytophthora presence/absence monitoring has been conducted annually since the start of construction. This includes reports for Years 1, 2, 3, and 4.</p>	<p>IEMA agrees that there is sufficient evidence to show that Phytophthora presence/absence monitoring has been conducted annually since the start of construction. Compliance status has been changed from non-compliant to compliant.</p> <p>However, as per Section 9.3, Appendix B, Biodiversity Management Plan, Snowy Hydro was unable to provide evidence of Monitoring data (laboratory results) for each monitoring location being kept in a spreadsheet with additional results added after each monitoring program. See NC REC 9.</p>
Schedule 3, Condition 52(d,e)	<p>Snowy Hydro provided additional evidence in the form of an email relating to close out of Joint Agency Actions (dated 29 Apr 2025) and a contention statement.</p> <p>The contention statement related to Snowy Hydro believing that the finding of the audit was influenced by feedback provided by NPWS during the consultation phase of the IEA. The feedback provided by NPWS was in relation to construction waste being left off site and wheelie bins and construction material at Gooandra Trail.</p>	<p>Email relating to close out of Joint Agency Actions (dated 29 Apr 2025) developed after the audit period. Therefore, not assessed as part of this IEA.</p> <p>Agreed, IEMA have removed statements of being in agreeance with NPWS on matters identified by NPWS and not sighted by IEMA during the site inspection component of this IEA. However, Schedule 3, Condition 52 remains non-compliant due to other aspects (see Appendix B for further details).</p>
Schedule 3, Condition 67	<p>Snowy Hydro provided additional evidence in the form of a contention statement.</p> <p>The contention statement related to requesting that the finding of non-compliance with Condition 67 be reconsidered as this Condition has not yet been triggered.</p> <p>The condition requires the submission of the audit report within 12 weeks of the audit's commissioning, not within a fixed timeframe. While a delay in commissioning the audit is acknowledged as a separate issue, the time for the lodgement of the report cannot commence until the audit report has been commissioned.</p>	<p>Agreed, IEMA have changed the compliance status of both Schedule 3, Condition 67 and Condition 68 to 'Not Triggered'.</p>

1.7. Statement of Independence

We can confirm independence based on the *Independent Audit Post Approval Requirements (DPHI May 2020)*. This includes:

- No one from the IEA team is related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child.
- No one from the IEA team has any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the Audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child.
- No one from the IEA team have provided services (not including independent reviews or auditing) to the current project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit.
- No one from the IEA team is an Environmental Representative for the Project.
- No one from the proposed IEA team can or has accepted any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

2. DOCUMENTS REVIEWED AND REFERENCED

Key documentation reviewed as part of the IEA includes:

- Consolidated Approval CSSI 9687 (including associated Management Plans).
- Status of previous IEA recommendations.
- Training and Induction records.
- Monitoring results for meteorological, noise, air, and water – including real time results.
- Consultation evidence from regulators, including approval letters and responses to exceedances/non-compliances.
- Complaints log.
- Rehabilitation documentation.
- Maintenance and calibration records.
- Incident Reports and Registers.
- Environmental Inspections.
- Weed control documentation.
- Subsidence monitoring reports.
- Clearing Permits.
- Biodiversity monitoring reports.
- Pre and Post Clearing Reports.
- Meeting minutes and PowerPoint presentations.
- Threatened Fish Management Plan Annual Reports and Annual Plans.
- Threatened fish studies.
- Water Reports.
- Dewatering Permits.
- As Built Certificates.
- Erosion and Sediment Control Plans.
- Environmental Water Reports.
- Unexpected Finds Reports.
- Sensitive Area Plans.
- Spoil registers and reports.
- Vehicle permits and movement logs.
- Waste Register.
- Daily Shift Reports.
- Previous IEAs.

3. ASSESSMENT OF COMPLIANCE

The terms used in the IEA to describe the level of compliance of the site with the relevant approval documentation are outlined in **Table 7**. These are the requirements of the DPHI's *Independent Environmental Audit Guidelines (May 2020)*.

Table 7 Compliance Assessment Criteria

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

4. APPROVALS AND DOCUMENTATION

4.1. Previous IEA Recommendations

During the IEA, Snowy Hydro provided an update on outstanding 2023 IEA #4 actions. The previous 2023 audit identified 12 non-compliances relating to a number of separate consent conditions, EPBC conditions, Management Plan commitments and EPL conditions. The 12 non-compliances identified during the 2023 IEA related to 37 separate recommendations of which 26 have been completed and closed off, 4 are ongoing, 6 are Work In Progress (WIP), and 1 is Incomplete (**Table 8**). The previous 2023 IEA grouped non-compliances by aspect, whereas our 2025 IEA just reviewed compliance against each condition (i.e. no grouping of themes).

The previous non-compliances related to aspects such as administrative requirements, water management and biodiversity management. These are similar themes to the 2025 IEA recommendations.

Table 8 - Non-Compliance Findings and Action Status from Previous IEA Report

2023 IEA Non-Compliant Rec Number	Schedule and Condition Number	Aspect	2023 IEA Non-Compliant Recommendation	Current Status of 2023 IEA Non-Compliant/Improvement Recommendations (Wording by Snowy Hydro)
1	Sch 2 Cond 8 Sch 2 Cond 9	Recreation Management Plan	Once the Main Works Recreation Management Plan has been approved (a prerequisite for surrender), surrender the Exploratory Works Approval.	Ongoing as of March 2025
2	Sch 3, Cond 22 EPBC Cond 12, 13, 14, 15 and 31	Agency consultation	Continue to consult with the relevant agencies including agreement on peer reviewer and submit for final review as soon as possible, and in line with dates committed to in fortnightly meetings with DPE (1 Dec 2023).	Completed
	Sch 3 Cond 26	Agency consultation	Continue to consult with the relevant agencies and submit for final review as soon as possible, and in line with dates committed to in fortnightly meetings with DPE (1 Nov 2023).	Completed
	Sch 3 Cond 10	RMP consultation	Continue to consult on the RMP with relevant stakeholders and make progress on the staging strategy for the RMP.	Completed
	Sch 3 Cond 50	Agency consultation	Continue to consult with NPWS and submit for final review as soon as possible, and in line with dates committed to in fortnightly	Completed

2023 IEA Non-Compliant Rec Number	Schedule and Condition Number	Aspect	2023 IEA Non-Compliant Recommendation	Current Status of 2023 IEA Non-Compliant/Improvement Recommendations (Wording by Snowy Hydro)
			meetings with DPE (1 Nov 2023).	
	Sch 3 Cond 51	Agency consultation	Consult with TfNSW on the development of the Long-Term Road Strategy.	Completed
3	Sch 3 Cond 24 EPBC Cond 12 and 31	Agency consultation	Continue to work with DPE and other agencies to finalise and submit these Management Plans in line with dates committed to in fortnightly meetings with DPE (1 Nov 2023).	Completed
		Updates	Continue to provide regular updates to DPE on progress.	Completed
	Sch 3 Cond 2	Agency consultation	Continue to consult with NPWS and submit the Digital Strategy on 01 November 2023 as per the DPE fortnightly update 21/07/202.	Completed
	Sch 3 Cond 39	Agency consultation	Continue to consult with NPWS and submit the Stage 1 of the Recreation Management Plan on 01 October 2023 as per the DPE fortnightly update 21/07/2023.	Completed
	Sch 3 Cond 54	Agency consultation	Completed Action: The VIMP was submitted to DPE on 13 July 2023 by FGJV for approval following consultation with agencies and the incorporation of comments by NPWS and DPE. No further action required.	Completed
4	Sch 2, Cond 13(c) Sch 3, Cond 17(i) and 19 Biodiversity Management Plan Section 5.1	Weed management	Review the effectiveness of the current weed, seed and pathogen protocols and facilities once the other corrective actions have been undertaken (by and ecologist with input by Snowy Hydro).	Completed
		Risk	Depending on the outcome of the risk assessment the following will be conducted Close out: 1st November 2023.	Completed
		Wheel wash	Fully implement the Wheel Wash Operating and Management Procedure.	Completed
		Risk	Investigate the root causes of this failure including the potential consequences and	Completed

2023 IEA Non-Compliant Rec Number	Schedule and Condition Number	Aspect	2023 IEA Non-Compliant Recommendation	Current Status of 2023 IEA Non-Compliant/Improvement Recommendations (Wording by Snowy Hydro)
			take relevant action to address root causes.	
		Risk	Undertake a risk assessment on the operation of the wheel washes – implement outcomes.	Work in progress
		Biodiversity Management Plan	Review the Biodiversity Management Plan and update to reflect any changes / improvements.	Work in progress
		Wheel wash	Completed Actions: Formal communication of latest version of Wheel Wash Operation Procedure (done 4 Aug 23).	Completed
5	Sch 3 Cond 19 Biodiversity Management Plan – Section 6.5	Biodiversity reporting	Make the 2020-2021 report available to NPWS, DCCEEW and BCD.	Completed
	Biodiversity Management Program - App B Sect 10 to Biodiversity Management Plan)	Biodiversity reporting	Make report 2021-2022 and all future reports available to NPWS, DCCEEW and BCD.	Completed
6	Sch 3 Cond 29 and 30(f) EPL 20266 - cond. L1.1	Water reporting	No specific actions detailed in this report. Agreed actions to be determined in consultation with EPA.	Completed
7	Schedule 3, Cond 30 (p) EPBC Cond 17 EPL 20266 Cond O1 (a)	Hydrocarbons and chemicals.	Further strategies need to be determined and implemented to address this issue, particularly in regard to storage of bulk liquids with potential incompatibilities as it appears that previous strategies have not been effective. Given the large quantities of chemicals involved, this issue needs to be urgently addressed, as it is a safety as well as environmental issue.	Incomplete
			Review the content of the chemical training and the personnel who receive it to ensure training is appropriately targeted.	Complete
			Review may include a high-level review with potential	Work in progress

2023 IEA Non-Compliant Rec Number	Schedule and Condition Number	Aspect	2023 IEA Non-Compliant Recommendation	Current Status of 2023 IEA Non-Compliant/Improvement Recommendations (Wording by Snowy Hydro)
			engagement of an SME to develop and implement.	
8	Sch 4 Cond 6 EMS Sect 7.2.1 EMS App A5 – Environmental Incident Process / “Guideline Document to improve external incident classification and reporting” (Feb 2023 version)	Incident register	A joint incident / event register to be developed and shared by SHL and FGJV to ensure that the actual notification details can be entered accurately into the register. (was in early phase of development at the time of the audit).	Completed
		Incident/ non – compliance management	Additional fields in the register need to be developed to capture whether event is an Incident, a Non-compliance or both, and to which agency it was reported.	Completed
		Incident/ non – compliance management	Maintain records of all notifications to the relevant agencies in a dedicated file to provide evidence of ongoing compliance with notification requirements.	Completed
		Incident/ non – compliance management	Provide resources / specific role responsibilities to ensure all relevant events are appropriately notified, and accurate records are maintained to reflect the status of reports and notifications.	Work in progress
		Incident/ non – compliance management	It is recommended that the EMS be further reviewed and revised to clearly define the circumstances in which incidents are to be notified to DCCEEW.	Work in progress
		Incident/ non – compliance management	Ensure incident / non-compliance reporting in future is in accordance with the approved, updated EMS.	Ongoing
9	EPL 20266 Cond L2.1- 2.4	Reporting	Ensure all non-compliances with the EPL are reported to the EPA in a timely manner.	Ongoing
	EPL Cond R2.2 and R4.1	Reporting	Include non-compliance in the next Annual Return.	Work in progress
10	Sch 4 Cond 7	Incident/ non – compliance management	Same actions as NC8 on Sch 4 Cond 6 above and OBS under Sch 4 Cond 7.	Completed

2023 IEA Non-Compliant Rec Number	Schedule and Condition Number	Aspect	2023 IEA Non-Compliant Recommendation	Current Status of 2023 IEA Non-Compliant/Improvement Recommendations (Wording by Snowy Hydro)
11	Sch 4 Cond 8 Sch 3 Cond 7(f) Sch 3, Cond 8 Sch 3 Cond 12 (a) Spoil Management Plan (SMP) Section 9.5 and Table 9-4	Spoil management	Upload Summary Spoil Reports to the project website.	Completed
12	Biodiversity Management Plan App F, 5.2.2, BM32 and BM33 Yr 1 and Yr 2 Biodiversity Monitoring Report Appendix F 5.3.2	Biodiversity management	Review options for suitable professionals or programs for engagement.	Completed
		Biodiversity management	Consult with NPWS as part of the development of the program.	Completed
		Biodiversity management	Implement a feral predator control program using an experienced and qualified pest control contractor as required by the BMP and the adaptive management trigger.	Ongoing

4.2. Project Approval

The IEA assessed the Development Consent CSSI 9687 (Main Works). The Exploration Consent was not reviewed.

Recommendations relating to the Project Approval are outlined in **Section 5** and **Section 6** of this IEA Report.

4.3. Management Plans and Programs

Snowy 2.0 operates under several different management plans. The approved management plans that were reviewed as part of this IEA, and their approval status are summarised in **Table 9** below.

Table 9 - Approved Management Plans

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
Schedule 3, Condition 7-8	Spoil Management Plan	June 2022	<p>The purpose of the Spoil Management Plan (SMP) is to describe how the project proposes to minimise and manage construction impacts during the handling, transport and emplacement of spoil. Key aspects of this plan include:</p> <p><u>Spoil Characterisation and Classification</u></p> <ul style="list-style-type: none"> Spoil is tested for geochemical properties (e.g. acid-forming potential, asbestos presence, contamination). This informs appropriate reuse, encapsulation, or offsite disposal pathways. <p><u>Minimisation and Beneficial Reuse</u></p> <ul style="list-style-type: none"> Strategies prioritise the use of non-reactive spoil in construction works (e.g. pads, roads) and temporary infrastructure. Up to 40,000 m³ of spoil may be reused for NPWS road upgrades within Kosciuszko National Park. <p><u>Designated Emplacement Areas with Engineering Controls</u></p> <ul style="list-style-type: none"> Spoil is placed in approved locations such as Ravine Bay, GF01, Lobs Hole, Tantangara, and Rock Forest. Reactive and NOA spoil are isolated in encapsulated, engineered cells to prevent environmental harm. <p><u>Monitoring, Reporting, and Trigger Action Response Plans</u></p> <ul style="list-style-type: none"> Regular monitoring of groundwater, surface water, and air (e.g. asbestos dust) is conducted. 	<p><u>Nitrogen and leachate:</u></p> <p>Non-compliant for implementation of the Spoil Management Plan due to the nitrogen issues. The issue of leachate and Nitrogen does not appear to be well understood in the EIS process.</p> <p>The process of blasting has led to increased levels of nitrogen in the spoil. The Leachate dams at the base of the spoil areas have detected high levels of nitrogen.</p> <p><u>Topsoil Storage</u></p> <p>The site was also non-compliant for implementation of the Management Plan due to topsoil storage. This was mostly to do with topsoil stockpile heights, topsoil stockpiles not being seeded and topsoil stockpiles containing weeds. There was also a large topsoil stockpile area at Lobs Hole where a hardstand had been built on top of the topsoil stockpile.</p>

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
			<ul style="list-style-type: none"> Trigger Action Response Plans (TARPs) are implemented if spoil handling exceeds thresholds or incidents occur 	
Schedule 3, Condition 10-11	Rehabilitation Management Plan	16 May 2024	<p>The RMP provides the overarching rehabilitation strategy and methodologies to be implemented across the entire Main Works project. The RMP has been prepared and updated on a staged basis to include rehabilitation requirements as the project progresses and additional areas become available for rehabilitation. Staging has also been used to ensure consistency with the Recreation management plan, Long Term Road Strategy and the Spoil management plan. Site specific rehabilitation management plans will be prepared. The site-specific rehabilitation management plans by location and the appropriate staging are as follows:</p> <ul style="list-style-type: none"> Stage 1 - Marica, Plateau, Tantangara and Rock Forest Stage 2 – Talbingo Reservoir and Lobs Hole. <p>The current approved RMP addresses Stage 1.</p>	<p>The Rehabilitation Management Plan was not prepared to the satisfaction of the Planning Secretary by 31 Dec 2023. Therefore, Snowy Hydro is non-compliant with this condition.</p> <p>Implementation requirement is Not Triggered. The Rehabilitation Management Plan satisfies the requirements of the consent. As there has been no final rehabilitation we have deemed this condition not triggered.</p> <p>We still have a number of recommendations relating to spoil management and final rehabilitation as the site has some challenges ahead.</p>
Schedule 3, Condition 18-19	Biodiversity Management Plan	March 2025	<p>The key objective of the BMP is to detail management measures and inform site procedures for implementation so that biodiversity impacts are avoided, minimised and within the scope permitted by the Infrastructure Approval.</p> <p>The main aspects of this plan include:</p> <p><u>Monitoring</u></p> <p>Targets: Threatened species (e.g., Smoky Mouse, Alpine Tree Frog), weed and pest presence, and Groundwater Dependent Ecosystems (GDEs).</p> <p><u>Pre-Clearing and Clearing Procedures</u></p> <ul style="list-style-type: none"> Surveys: Pre-disturbance assessments to identify habitat features and threatened species. 	<p>A large amount of evidence was shown for GIS tracking.</p> <p>Non-compliant for implementation of the BMP due to Clearing (Land Disturbance) Permits not being completed in full and issues with wheel washes.</p> <p>Despite these non-compliances, we did not see any material harm incidents relating to biodiversity.</p>

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
			<ul style="list-style-type: none"> Controls: Flagging and fencing of exclusion zones; staged clearing process. Fauna Handling: Relocation protocols for animals found during clearing. <p><u>Fauna Strike Mitigation</u></p> <ul style="list-style-type: none"> Speed Management: Reduced speed limits on roads, especially at night. Underpasses: Use of fauna underpasses in key areas (Appendix G). <p><u>Vegetation and Habitat Management</u></p> <ul style="list-style-type: none"> Disturbance Limits: Maximum 504 ha for Main Works Habitat Retention: Salvaging topsoil, logs, and native vegetation for reuse in rehabilitation. <p><u>Weed, Pest, and Pathogen Management</u></p> <ul style="list-style-type: none"> Protocols: Hygiene and washdown procedures to prevent spread. Control Programs: Regular chemical weed spraying and feral animal management. 	
Schedule 3, Condition 22-23	Biosecurity Risk Management Plan	20 May 2024	<p>The Biosecurity Risk Management Plan (BRMP) and the Screens and Barrier described within the document, represent the key measures for Snowy Hydro to minimise the biosecurity risks associated with the development, including the movement and/or spread of weeds, pests and pathogens.</p> <p>It is also a key measure to minimise the impact of the development on threatened fish species and their habitat, particularly the Macquarie</p>	<p>Non-compliant for preparation due to timing of approval of Biosecurity Risk Management Plan Stage 1 and Stage 2.</p> <p>Non-compliant for implementation of the Biosecurity Risk Management Plan due to issues noted around weed and pathogen management.</p>

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
			Perch (<i>Macquaria australasica</i>), and Stocky Galaxias (<i>Galaxias tantangara</i>) and minimise the impact of the development on recreational fishing in Lake Eucumbene.	
Schedule 3, Condition 24-25	Threatened Fish Management Plan	19 September 2023	<p>The Threatened Fish Management Plan (TFMP) describes the detailed measures that will be implemented to minimise the impact of the Snowy 2.0 development on threatened fish species and their habitat, particularly the Macquarie Perch (<i>Macquaria australasica</i>), Stocky Galaxias (<i>Galaxias tantangara</i>) and Murray Crayfish (<i>Euastacus armatus</i>).</p> <p>The consent conditions of the Snowy 2.0 Main Works approval require the TFMP to 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. The Plan also includes monitoring and management measures associated with minimising the impact of Snowy 2.0 on Murray Crayfish in Talbingo Reservoir.</p>	<p>Non-compliant for preparation of the TFMP due to approval of the Plan by DPHI being outside the required timeframe.</p> <p>Compliant with the implementation of the TFMP based on current operations.</p>
Schedule 3, Condition 26-27	Recreational Fishing Management Plan	31 October 2023	<p>The Recreational Fishing Management Plan (RFMP) has been developed to minimise the impact of the development on recreational fishing in Tantangara Reservoir and Lake Eucumbene. The RFMP also describes the detailed measures that are implemented to comply with the consent, including:</p> <ul style="list-style-type: none"> A program involving the spending of \$5 million over 5 years from the commencement of the program to develop the capability to restock and 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, response plan for the continuation of the restocking of Tantangara Reservoir and/or Lake Eucumbene salmonid fish 	<p>Non-compliant for preparation of the RFMP due to approval of the Plan by DPHI being outside the required timeframe of within 12 months of the commencement of construction.</p> <p>Compliance with the implementation of the RFMP based on current operations.</p>

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
Schedule 3, Condition 31-32	Water Management Plan	19 October 2020	<p>The Water management Plan has been developed to outline monitoring and mitigation measures. It's linked to other key plans as well. Key components of the plan include:</p> <p><u>Surface Water and Groundwater Monitoring</u></p> <p>Comprehensive monitoring programs are implemented to track water quality and quantity in both surface and groundwater systems. Monitoring includes treatment plants, sediment basins, and receiving waters, ensuring that any impacts from construction are identified early.</p> <p><u>Capture, Treatment, and Reuse of Water</u></p> <p>Construction, process, and wastewater are captured, treated, and reused on-site where possible to minimise discharge to natural waterways. This includes managing runoff from spoil emplacement areas and stockpiles.</p> <p><u>Trigger Action Response Plans (TARPs)</u></p> <p>TARPs are activated when water quality monitoring identifies non-conformances (e.g. turbidity, hydrocarbons, sedimentation). They provide a structured process for identifying issues, investigating sources, implementing corrective measures, and reporting outcomes.</p> <p><u>Leachate Detection and Management</u></p> <p>Leachate from spoil emplacement areas is monitored and managed through dedicated detection procedures. Any leachate is collected in basins, tested, and either reused (e.g. for dust suppression) or treated before disposal if reuse is not viable.</p>	<p>Compliant for preparation requirements.</p> <p><u>Non-compliant</u> for implementation issues.</p> <p>The main issues related to uncontrolled discharges and the leachate management from spoil areas.</p> <p>The Water Management Plan has been the most difficult plan to implement due to strict water discharge conditions, with the site making efforts to adhere to these conditions, including re-using as much water as possible through the construction process and dust suppression activities.</p>

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
Schedule 3, Condition 35-36	Heritage Management Plan	March 2025	<p>Key components of the Heritage Management Plan are outlined below.</p> <p><u>Focusses on both Aboriginal and Historic Heritage</u></p> <p>The plan consists of two core sub-documents:</p> <ul style="list-style-type: none"> Aboriginal Heritage Management Plan (Appendix B3). Historic and Natural Heritage Management Plan (Appendix B4). <p>Each addresses the identification, assessment, and management of heritage items potentially impacted by the project</p> <p><u>Avoidance and Mitigation of Impacts</u></p> <ul style="list-style-type: none"> Strategies include modifying construction footprints, fencing off heritage sites, and using exclusion zones. Where impacts are unavoidable, management options include salvage excavation or detailed recording in consultation with registered Aboriginal parties or heritage agencies. <p><u>Monitoring During Construction</u></p> <p>Spot-checking and monitoring by qualified heritage advisors and Aboriginal stakeholders is conducted during ground disturbance, particularly in areas flagged during heritage assessments.</p> <p><u>Unexpected Finds Protocol</u></p> <ul style="list-style-type: none"> A stop-work protocol is in place if previously unidentified heritage items are discovered. Procedures ensure the area is secured and assessed by a qualified heritage specialist before works can resume. 	<p>Snowy Hydro is compliant for preparation components and non-compliant for implementation of the HMP.</p> <p>Snowy Hydro missed the annual reporting of geoheritage (required by Section 6.1 of the Heritage Management Plan) 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.'</p> <p>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).</p>

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
			<u>Stakeholder Consultation and Reporting</u> <ul style="list-style-type: none"> The plan includes engagement with Aboriginal stakeholders, the NSW Heritage Council, and the Department of Planning and Environment. Regular reporting obligations ensure compliance with statutory approvals and facilitate transparent communication with authorities. 	
Schedule 3, Condition 39-40	Recreation Management Plan	26 September 2024	<p>The key components of this management plan are discussed below.</p> <p><u>Safe Public Access Design</u></p> <p>Gradients and landforms near dam waterlines are shaped for safe recreational use (e.g. boating, shoreline access).</p> <p><u>Recreational Facilities Compatibility</u></p> <p>All proposed recreational use and facilities must align with the approved Recreation Management Plan during and after construction.</p> <p><u>Water Quality Protection</u></p> <p>Landforms are designed to minimise sediment dispersion and maintain water quality in reservoirs like Tantangara and Talbingo.</p> <p><u>Monitoring and Remediation</u></p> <p>Monthly monitoring of water quality is undertaken; if exceedances are detected, Trigger Action Response Plans are implemented.</p> <p><u>Integration with Rehabilitation</u></p>	<p>The Recreation Management Plan - Stage 1 was not prepared to the satisfaction of the Planning Secretary by 31 May 2024. Stage 1 was approved in a letter from DPHI dated 24 Oct 2024. This was after the required date set by DPHI. Therefore, Snowy Hydro is non-compliant with this condition.</p> <p>Compliant for implementation. We acknowledge the letter from NPWS and met on 21/5/2025 to discuss the letter. 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.</p>

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
			Final revegetation and landform design are coordinated with the Recreation and Rehabilitation Management Plans to ensure usability and environmental performance.	
Schedule 3, Condition 46 and 49	Transport Management Plan	28 August 2020	<p>Key aspects of the Transport Management Plan are described below.</p> <p><u>Vehicle Management Plans (VMPs)</u></p> <p>Detail internal haulage routes, vehicle types, and traffic controls for safe and efficient movement across the project.</p> <p><u>Public Road Use and Access</u></p> <p>Includes upgrades like the Snowy Mountains Hwy / Rock Forest intersection, and traffic measures like speed reductions, covered loads, and rumble grids.</p> <p><u>Heavy and Oversize Load Management</u></p> <p>Managed through Driver Code of Conduct, OSOM protocols, Snow/Ice Traffic Plan, and Heavy Vehicle Salvage Plan.</p> <p><u>Scheduling and Spacing</u></p> <p>Vehicle movements are timed and spaced to reduce congestion and improve safety; VMS boards reinforce truck spacing.</p> <p><u>Community Communication</u></p> <p>Stakeholders are informed of traffic impacts via the Transport Communications Strategy, including periodic updates on access issues.</p>	<p>We deemed this as a compliant. A large amount of evidence was provided for vehicle tracking. There are some improvements noted to internal roads with these covered under the Emergency Management Plan (Schedule 3 Condition 61).</p> <p>Where transportation issues were noted, there was evidence of rectification.</p>

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
Schedule 3, Condition 54-55	Visual Impact Management Plan	August 2024	<p>Key components of the Visual Management Plan are outlined below. It relates to construction as well as the permanent structures for the project.</p> <p><u>Minimising Visibility from Key Viewpoints</u></p> <p>Visual mitigation measures are designed to reduce the impact of construction works when seen from important public areas, including roads, lookouts, and recreational spots</p> <p><u>Landform Shaping and Vegetation Screening</u></p> <p>Earthworks are integrated into natural contours, and progressive rehabilitation includes planting of native vegetation to visually soften disturbed areas and spoil emplacements.</p> <p><u>Design Integration with Surroundings</u></p> <p>Infrastructure design considers colour, material, and form to harmonise with the alpine landscape and reduce contrast against the natural environment.</p>	<p>Non-compliant for preparation of the Visual Impact Management Plan due to approval of both Stage1 and Stage 2 of the VIMP by DPPI being outside the required timeframe set by DPPI in a letter dated 21/12/2023.</p> <p>No final structures are in place. No evidence of complaints for lighting or visual under Main Works CSSI.</p>
Schedule 3, Condition 57-58	Construction Noise Management Plan – Rock Forest	March 2025	<p>Key components of this management plan are outlined below.</p> <p><u>Monitoring</u></p> <p>Ongoing noise monitoring is carried out throughout the development of the Rock Forest Permanent Spoil Emplacement (PSE) to ensure compliance with noise criteria and to detect any exceedances impacting sensitive receivers.</p> <p><u>Mitigation</u></p> <p>Spoil emplacement activities (haulage, placement, landforming) are restricted to standard daytime construction hours due to proximity to</p>	<p>No issues noted with preparation or implementation.</p>

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
			sensitive receptors. However, the logistics area may operate 24/7 with controls in place to limit impacts.	
Schedule 3, Condition 61	Emergency Management Plan (Natural Hazard Management Plan)	21 August 2020	<p>The key components of this management plan include:</p> <p><u>Monitoring</u></p> <p>The plan includes continuous risk assessments and inspections for bushfire, landslides, floods, and other natural hazards. It integrates early warning systems and weather surveillance to detect threats in real time.</p> <p><u>Mitigation</u></p> <p>Site-specific emergency procedures are in place including evacuation protocols, bushfire control zones, slope stabilisation, and flood drainage controls. These are coordinated with the Bushfire Emergency Plan and broader Environmental Management Strategy.</p>	Some improvements were noted to internal roads with these covered under the Emergency Management Plan (Schedule 3 Condition 61).
Schedule 3, Condition 64-65	Subsidence Management Plan	5 December 2023	<p>The Subsidence Management Plan was developed in response to potential ground movement caused by tunnelling activities during construction. The Subsidence Management Plan for Snowy 2.0 was developed in response to observed surface cracking near the Main Access Tunnel portal at Lobs Hole.</p> <p><u>Monitoring</u></p> <p>Subsurface ground behavior is tracked using geotechnical instruments like extensometers, inclinometers, and surface survey markers to detect any movement or settlement in real time.</p> <p><u>Mitigation</u></p> <p>Tunnelling methodologies (e.g. TBM vs D&B), alignment refinements, and tunnel support systems are tailored to site-specific geotechnical</p>	The subsidence repair works have been completed. There were some issues, however, relating to reporting and not undertaking the Independent Environmental Audit of the Subsidence Management Plan.

Development Consent Condition	Management Plan	Document Date	Summary of Management Plan	Compliance Assessment
			conditions. Adaptive construction responses are in place if movement thresholds are exceeded.	
Schedule 3, Condition 2-3	Digital Strategy	11 June 2024	The Digital Strategy for Snowy 2.0 supports the integration of advanced digital engineering tools and platforms across the project lifecycle. It aims to enhance design coordination, data-driven decision-making, and long-term asset management by leveraging BIM (Building Information Modelling) and other digital technologies.	The Digital Strategy was not prepared to the satisfaction of the Planning Secretary within 6 months of commencement of construction. Therefore, Snowy Hydro is non-compliant with this condition. No issues noted with the digital strategy noting phase 2 is currently being developed.
Schedule 3, Condition 50-51	Long-Term Road Strategy – Kosciuszko National Park	25 October 2024	The strategy supports long-term access, safety, and sustainability of roads within KNP following Snowy 2.0 construction, ensuring that upgrades are consistent with environmental values and usage demands. It includes collaborative planning with NPWS, aligning road upgrades, closures, and rehabilitation with conservation priorities, recreation access, and future operational needs of Snowy Hydro infrastructure.	The Long-Term Road Strategy – Kosciuszko National Park - Stage 1 was not prepared to the satisfaction of the Planning Secretary by 31 Mar 2024 as set out in the staging letter provided by DPHI (dated 21/12/2023). Therefore, Snowy Hydro is non-compliant with this condition. No issues determined with implementation at this point in time.
Schedule 4, Condition 1 and 18	Environmental Management Strategy	February 2025	The EMS provides the overarching framework that governs environmental planning, implementation, monitoring, and continual improvement across all environmental management plans (e.g. Biodiversity, Water, Heritage, Spoil, Noise) under the project. It is embedded within the broader Project Management System and ensures all environmental controls, procedures, and reporting obligations align with approval conditions, licence requirements, and FGJV and Snowy Hydro standards	Compliant for preparation of the EMS. Non-compliant for implementation. 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 sometimes times when this did not occur, hence the non-compliance.

4.4. Complaints

Complaints are outlined on the Snowy 2.0 website. Complaints have generally been related to transport which is understandable considering the huge amount of transportation for the project. Evidence has been provided through the implementation of the Transport Management Plan.

It should be noted that as of 10 June 2025, the Complaints Summary is only up to date till January 2025.

<https://www.snowyhydro.com.au/wp-content/uploads/2025/02/Formatted-Snowy-2.0-Complaints-for-SHL-Website.pdf>

4.5. Key Environment, Community and Heritage Aspects

Section 4.3 gives a high-level discussion on the management plan and implementation. This following section provides some more specific detail on aspects.

4.5.1. Water Management

Water management is required under the Water Management Plan (Schedule 3 Condition 31) and specific conditions under the CSSI and EPL (outside of audit scope). The Water Management Plan (approved version dated 15 October 2020) also includes appendices for Surface Water Management Plan and Groundwater Management Plan.

This section should be read in conjunction with **Section 4.5.2** (Leachate Management).

4.5.1.1. Water Streams

The main water streams are summarised in Section 4.1 of the Water Management Plan.

Stormwater - This refers to surface water runoff from areas disturbed by construction and surface runoff around construction areas (i.e. clean water diversions).

Process water - This refers to the water supply system for construction activities on the surface and in the tunnel and includes the:

- Extraction of water from groundwater wells (not completed at site based on site discussions).
- Extraction of water from reservoirs.
- Reuse of intercepted groundwater.
- Discharge of excess water to the reservoirs.

Wastewater - This refers to sewage and grey water generated from the accommodation camps and other amenities.

Potable water - This refers to water that has been treated to a potable water standard (i.e. drinking water).

4.5.1.2. Water Reuse

A key mechanism that has been designed is the reuse of process water as much as practicable in order to avoid release into the surrounding water environments.

During tunnelling, intercepted groundwater will be the primary water supply source (i.e. process water) for construction activities. Intercepted groundwater will be pumped to a process water treatment plant and treated. FGJV aims to reuse the water from the process water treatment plants in the fire water tanks and the industrial water tank which will be located within the portal / tunnel. This tank is utilised for in-tunnel activities such as cooling the tunnel boring machine, dust suppression and washing equipment.

Any water that is not able to be reused within the portals / tunnels is sent to surface tanks for reuse on site. Surface reuse opportunities under the investigation include:

- Use in dust suppression on roads.
- Wheel wash sites.
- Use in compaction of soils.
- Use in the emplacement areas.
- General washdown of equipment.
- Concreting.
- Establishment of landscaping and rehabilitation.

In addition to process water reuse, stormwater is harvested from sediment basins wherever practicable and re-used via water carts.

4.5.1.3. Monitoring Program

The website monitoring reporting includes:

- Summary of EPL Water Monitoring Results for 2022 – 2024.
- Quarterly EPL monitoring reports 2022 to August 2024.
- Biannual Environmental Monitoring Reports June 2024 to November 2024. IEMA notes that there is a Biannual Environmental Monitoring Report (December 2024 to May 2025). However, the December 2024 to May 2025 Report was produced after the audit period and has not been assessed as part of this IEA.

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).

Below is a small example of being above relevant triggers for groundwater sampling at GF01 (June to November 2024 Biannual Monitoring Report).

Generally, Laboratory analytes were less than, or within, relevant water quality trigger values except for:

- Ammonia as N.
- Nitrogen (total).
- Nitrite + Nitrate.
- Iron.
- Reactive and total phosphorus.
- Aluminium.
- Arsenic.
- Chromium.
- Copper.
- Lead.
- Nickel.
- Silver.
- Zinc.

Exceedances of Nitrogen, Ammonia, and a number of metals were observed upstream and downstream from emplacement locations as well as nutrients. The most elevated nutrients were observed to correlate to rainfall events and down gradient locations, indicating a relationship with leachate migration following rainfall events.

High levels of nutrients observed are currently under investigation with extraction and treatment of impacted water in place to minimise migration of impacted water while appropriate treatment options are implemented.

Below is a small example of being above relevant water quality objectives for surface water sampling in the Lobs Hole area (June to November 2024 Biannual Monitoring Report). Generally, analytical results within the reporting period were less than, or within, relevant water quality objectives values except for:

- Total Phosphorus.
- Nitrite + Nitrate as N.
- Ammonia.
- Nitrogen (total).
- Arsenic (dissolved).
- Aluminium (dissolved).
- Chromium (dissolved).
- Copper (dissolved).
- Iron (dissolved).
- Lead (dissolved).
- Nickel (dissolved).
- Zinc (dissolved).

Appendix D of the June to November 2024 Biannual Monitoring Report outlines the exceedance map of monitoring locations (**Figure 8**). It indicates a large number of exceedances and IEMA is questioning the validity of the water quality objectives 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.

We understand that work is currently being completed for more specific water quality objectives for the project.



Figure 8 Snippet of exceedance Map (Source: June to November 2024 Biannual Monitoring Report)

4.5.1.4. Key water Management Aspects Noted for Audit Period

The field inspection noted:

- Drains and sediment basins onsite generally had minimal erosion. Being a construction site, upgrades were constant throughout the period with there being a series of improvement recommendations. There was a large amount of information provided relating to design, installation and management of erosion and sediment control structures. There was evidence of regular inspections.
- Water is used from sediment basins for dust suppression and through irrigation dewatering. 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 there being difficulties to undertake controlled water releases this means the site cannot achieve the blue book requirements of dewatering sediment basins and leachate dams. The water management system is under constant pressure due to these difficulties with dewatering. This has been a contributing factor to the numerous sediment basin overtopping events.

See **Section 4.6 – 4.8** for government notices and incidents and overtopping events.

See **Section 5** and **Section 6** for recommendations relating to risk ranking basins, options to reduce sediment in basins, minor site-specific improvements and recommendations relating to reporting.

Leachate management is discussed in the section below.

4.5.2. Spoil and Leachate Management

The sections below outline the spoil and leachate management process. See **Section 5** and **Section 6** for further recommendations.

4.5.2.1. Spoil Management Process

Details of spoil management are included in the Spoil Management Plan (September 2022). The plan provides details on the excavation and tunnelling process, drill and blasting, spoil transport, spoil characterisation and designated spoil emplacement areas.

Schedule 3 Condition 5 of the CSSI states: the Proponent must ensure that all the spoil generated by the development is disposed of in the following emplacement areas:

- (a) Ravine Bay;
- (b) GF01;
- (c) Lobs Hole;
- (d) Tantangara; or
- (e) Rock Forest.

We noted emplacement in areas a) – d) and Rock Forest is currently being constructed to allow for spoil disposal.

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.

The data and information gathered during monitoring will be fed 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.

4.5.2.2. Spoil Management Interview

Evidence was provided for the spoil characterisation process and leachate monitoring. There is now a dedicated FGJV Spoil Manager and associated team, for the site and this has led to an improved tracking and management system.

Some things to note:

- Spoil testing and basin water quality testing (leachate basins) 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. The leachate issue was not discovered until after emplacement had commenced at GF01, which preceded spoiling at all other locations
- Evidence of third-party Construction Quality Assurance for Tantangara and Lobs Hole Spoil Disposal Area.

- Evidence of water testing in creeks and leachate basins. 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.

4.5.2.3. Spoil and Leachate Monitoring Program

There are known issues relating to spoil and leachate with interactions with the EPA discussed in **Section 4.7** (EPA Show Cause Summary). In December 2023, the NSW EPA issued a Clean-Up Notice to Snowy Hydro Limited after elevated nitrate levels were detected in surface and groundwater near spoil storage areas.

The contamination was attributed to residual explosive materials in the drill and blast spoil, which led to nitrate leaching into the environment.

We understand Snowy Hydro and FGJV have worked together with updated measures including conducting spoil coring to identify contamination hotspots, enhancing water sampling protocols, installing additional groundwater bores, and treating leachate water through onsite treatment plants. Furthermore, a Nitrogen Management Plan has been developed and implemented

Even with water treatment we understand the site has struggled to meet the nitrate levels required for regular discharge under the EPL licenced discharge points. Without meeting those criteria, the site cannot discharge from LDP's putting pressure on capacity from the water management system.

Below is a selection of leachate reporting.

Monthly Report Summary - January 2024 EPL Sampling Results

There are exceedances in Nutrients such as Ammonia, Nitrite, and Phosphorus at GF01 which are being investigated. There are exceedances in nutrients, to a lesser extent, at Tantangara and Marica, upgradient as well as down gradient in January 2024, similarly to December 2023. The water from the leachate basins is taken to the water treatment plants for treatment. Water from EPL55, downstream from GF01, is pumped to the leachate basin at GF01 when there is flow and is taken for treatment. Spoil emplacement areas are heavily monitored for changes in water quality due to the construction of the area and constant moving of spoil. Comprehensive sampling is conducted weekly to monitor the changes in water quality. EPL59-67 and EPL76-79 are not yet active.

June to November 2024 Biannual Monitoring Report

As previously outlined, Appendix D of the June to November 2024 Biannual Monitoring Report outlines the exceedance map of monitoring locations, with some of these relating leachate issues. The discussion section of this report states:

Laboratory analytical results include increasing nutrient loads within areas of proximity to, or down gradient of permanent spoil emplacement areas. Within this focus area, water collected from leachate infrastructure is treated and reused when appropriate analytical concentrations dictate. Analytical concentrations were observed to have some correlation to those locations within above gradient positions to the permanent spoil emplacement areas on site. For example, Tantangara above gradient location EPL70 consistently exceeded the adopted WQO's in line with down gradient LDP locations throughout the reporting period.

EPL70 is a groundwater monitoring location.

4.5.3. Biodiversity Management

4.5.3.1. Biodiversity Management Process

Details of biodiversity management are outlined in the Biodiversity Management Plan (current version dated 7 October 2020).

The main aspects of this plan relate to monitoring, pre-clearing and clearing procedures, fauna strike mitigation, vegetation and habitat management weed, pest, and pathogen management.

The clearance management process has been a key part of the IEA period and includes:

- Defined limits for native vegetation clearing (425 ha) and disturbance areas (504 ha).
- Pre-clearing surveys and two-stage clearing implemented to minimise impacts.
- Exclusion zones and fencing around retained vegetation and sensitive habitat.
- Salvage and reuse of topsoil, seed, hollow logs, and other habitat features.
- Focused design refinements to avoid or minimise impacts to threatened flora and fauna.
- Management measures targeting key threatened species (e.g. Smoky Mouse, Alpine Tree Frog, Alpine She-oak Skink).
- Implementation of a Fauna Handling and Rescue Procedure.
- Construction of underpasses and vehicle speed limits to reduce fauna strike risk.
- Targeted pre-construction surveys in high-risk areas (e.g. Plateau and Peninsula).

IEMA were provided records such as:

- Biodiversity Monitoring Reports for 2022/23 and Quarterly reports.
- Clearing Tracker Access.
- Clearing Permit for Marica (29 Jan 2025).
- Clearing Permit for Tantangara (9 Nov 2024).
- Clearing Permit for Pads 2, 4 and 5 - 6.72 ha (5/12/2024).
- Predicted Clearing Report Marica Adit Pad 1 (16 Dec 2024).
- Marica Adit Pad 1 and 3 Clearing Sensitive Area Plan (dated 15 Dec 2024).
- Copy of Narla Environmental Pre-clearing survey report (Dec 2024).
- MAP Boundary PAD1 and Lined Spoil Pad kml file.
- Erosion and Sediment Control Plan for Marica Spoil Pads and Laydown Areas (18/12/2024).
- Snowy Hydro 2.0: Seed Change of Custody.
- Snowy Hydro 2.0: Seed Change of Custody (20/10/2024).
- Pre-clearing Survey Report Marica Pad 1 and Spoil Pad - December 2024 (Narla Environmental).
- Selection of Weed Control - Daily Spray Records.

4.5.3.2. Biodiversity issues noted by NPWS

NPWS provide a letter to IEMA as part of IEA consultation (EM - NPWS to IEMA - Snowy 2.0 Main Works - NPWS feedback for IEA#5 - 17 Apr 2025). Biodiversity issues within that letter were noted as:

- *'Following incidents, changes in project scope/phasing and/or based on monitoring outcomes, management plans have not been reviewed and updated to implement principles of adaptive management and minimise environmental harm. Examples include: failure to adapt the Water Management Plan (and subsidiary Surface Water Management Plan) in response to frequent overtopping incidents, and failure to update the Biodiversity Management Plan (and subsidiary Fauna Strike Policy) based on Biodiversity Monitoring Program data and in advance of CSSI-9687 Modification 3 vegetation clearance impacts on threatened and other fauna. We acknowledge that updating of the Biodiversity Management Plan has now occurred, albeit after clearing was completed.'*
- *'Measures such as relocated and upgraded fauna crossings to mitigate the impacts of CSSI-9687 Modification 3 related vegetation clearing on threatened and other native fauna have not yet been implemented. Impacts have preceded mitigation measures, with clearing works beginning in December 2024 at Marica and largely complete by January 2025. Substantial earthworks are now in progress. By contrast, we understand that business case and procurement processes are still in progress for the installation and upgrading of fauna crossings.'*
- *There is no targeted and consistently applied weed or pest management control programs being implemented for project areas. Control efforts lack associated monitoring and adaptive management arrangements.*
- *This issue has been reflected in past IEAs. While we understand that contractors have now been engaged, control programs remain ad hoc and lacking in the forward planning and consistent application required to make them effective.*
- *This is a particular matter of concern for NPWS given the potential for it to impact areas of Kosciuszko National Park outside the project boundary, impede the effectiveness of other construction environmental management measures (e.g. rabbit burrows in ERSER controls and leachate basin batters), and impede the future rehabilitation obligations of the proponent under CSSI-9687 (e.g. through the long-term accumulation of weed seeds in soil).*
- *Biosecurity protocols are inconsistently applied across the project. Examples include:*
 - *Wheel washes out-of-commission or removed from active project area access routes (e.g. Marica Trail, Gooandra Trail); and*
 - *Inconsistent hygiene and containment protocols for weed species of concern (e.g. diligent protocols for Ox-eye Daisy are being applied at Marica, but are absent in other areas where this weed species occurs such as Gooandra Trail and Tantangara).*

HEMA met with the NPWS to discuss this consultation on 21 May 2025. A response to these key points in the letter is outlined in **Section 1.5** of this IEA.

4.5.3.3. Biodiversity Monitoring Program

2022/23 Annual Report Summary

HEMA has reviewed the most recent annual ecological monitoring report for the project dated March 2024. It covers the November 2022 and November 2023 period. After discussions with Snowy Hydro the next report is currently being prepared. We have a recommendation to have the reports completed more efficiently after fieldwork as its currently taking over six months from the completion of a reporting period. We were provided quarterly reports, but they were quite basic and didn't give much information around trends or comparison to the Biodiversity Management Plan requirements.

The Year 3 biodiversity monitoring program included a comprehensive suite of field-based surveys designed to assess both the direct and indirect ecological impacts of construction activities. Fourteen field events were conducted across 200 days, involving over 2,000 person-hours and 183 sites, spanning impact and control locations. The monitoring types encompassed a diverse range of taxa and ecological indicators including threatened flora; small terrestrial mammals (occupancy and habitat); Alpine Tree Frog and Booroolong Frog (occupancy and habitat); Alpine She-oak Skink; feral animal presence and abundance; weed presence/absence; and presence of the pathogen *Phytophthora cinnamomi*. These programs were structured to align with the Biodiversity Monitoring Program (BMP), which forms part of the project's approved environmental framework.

The annual report stated that feral animals were detected widely, with occupancy and abundance levels sufficient to trigger pest control responses under the Weed, Pest and Pathogen Management Plan. Key pest species included feral cats, rabbits, foxes, and deer. The detection of *Phytophthora cinnamomi* at site PS03 also triggered adaptive management due to its potential to devastate native plant communities. While weed monitoring did not prompt immediate adaptive measures, several new records and the spread of some priority weeds were noted.

The annual report concludes that, while many biodiversity values remain stable or show only limited variation compared to baseline conditions, there are instances where thresholds set out in the BMP have been exceeded. These include the presence/absence of key species and declines in habitat condition. The monitoring results are compared against pre-established threshold triggers for adaptive management as defined in the BMP.

Summary of Triggers from Annual Report

Based on the 2022/23 Annual Ecological Monitoring Report, the following components of the Biodiversity Monitoring Program (BMP) exceeded threshold criteria established for adaptive management response. These thresholds relate to the presence/absence of target species or habitat degradation, as outlined in the BMP framework (Appendix B of the Biodiversity Management Plan):

Eastern Pygmy Possum (*Cercartetus nanus*) – Presence/Absence Monitoring

- **Sites triggered:** SM07 and SM18
- **Issue:** Species not recorded during Year 3 despite being observed during baseline (Year 1) surveys.
- **Date range:** Monitoring conducted quarterly between **November 2022 and November 2023**.
- **Action:** These two sites remained in trigger status from previous years. Other sites where absence was recorded did not meet trigger status as they had no prior records of the species.

Small Mammal Habitat Condition

- **Sites triggered:** SM18, SM35, SM36
- **Issue:** Observed degradation in habitat structure, including reduced native vegetation cover and complexity, coupled with absence of target species.
- **Monitoring timeline:** Habitat structure was measured across all quarterly survey periods during Year 3.
- **Action:** Triggered need for review and possible habitat enhancement at these sites. Specific actions are not detailed but would align with BMP's adaptive response protocols.

Feral Animals

- **Sites triggered:** Various locations near known Smoky Mouse (*Pseudomys fumeus*) habitat
- **Issue:** Feral animals (cats, foxes, deer) observed in proximity to conservation-significant fauna habitats.
- **Date:** Triggers confirmed during Year 3 events; exact timing varies by species (e.g. fox and feral cat recorded on remote cameras in Q1 and Q3).
- **Action:** Initiated pest control response in line with the Weed, Pest and Pathogen Management Plan (FGJV 2020).

Phytophthora cinnamomi – Pathogen Monitoring

- **Site triggered:** PS03
- **Issue:** Positive detection of *Phytophthora cinnamomi*, a pathogenic soil fungus affecting native plant communities.
- **Date of detection:** Positive sample collected during third or fourth quarter of 2022/2023 monitoring year.
- **Action:** Triggered adaptive management under the BMP, likely including hygiene protocol reinforcement and possible containment strategies

The report does not identify any breaches or non-compliances with the Biodiversity Management Plan. Due to the complexity of the area, an assessment against the performance conditions in the consent and monitoring could be discussed in future monitoring reports.

4.5.3.4. Biodiversity Summary

We also observed the issues that NPWS raised and noticed the same issues related around weed, pest management and biosecurity. We also noted as part of the Clearing (Land Disturbance) Permit we were provided there was no evidence of completion of Part F - Approval and Acceptance of Conditions (Plant Operators and field staff) and Part G Disturbance/Clearing Close Out.

We have a series of recommendations relating to biodiversity within **Section 5** and **Section 6**.

4.5.4. Heritage Management

Government Liaison

NPWS have stated in the consultation letter (EM - NPWS to IEMA - Snowy 2.0 Main Works - NPWS feedback for IEA#5 - 17 Apr 2025)

'Natural heritage monitoring of geodiversity features does not appear to have occurred.'

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).

Assessment of Site Records

Site has stated in the RFI that:

'No incidents - only one unexpected European item; the unexpected finds procedure was followed, the Heritage specialist deemed the item of no historical value.'

Reporting – Snowy Hydro 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.

Section 6.1 of the HMP states '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'. Site has stated in the RFI that "This is the current subject of a 'Notice to Produce' with DPHI". Further evidence in the form of a letter from DPHI (dated 09/03/2025) acknowledging the missed reporting and stating, 'NSW Planning will be investigating this matter'. Therefore, site is non-compliant with implementation of the HMP.

IEA Site Inspection Notes:

The exclusion zone around the Washington Hotel ruin was observed during the site inspection. We did not note any specific issues relating to Aboriginal and cultural heritage.

4.5.5. Other Aspects

Air

This appears to be managed well by using water carts and the lack of air quality complaints. Additional water trucks could be used on haul roads to use up water, however this is not specifically a dust issue. We did note that NPWS stated the site was dusty (letter dated 17 April 2025), however we did not note any major issues at the site of the inspection.

Noise

No issues noted through complaints process. Transportation and noise are linked however this is covered under the Transport Management Plan.

Visual

No specific visual issues were noted in the field inspection.

Traffic

Site records were provided as well as discussions with the Transport Manager. This includes:

- IBMS (vehicle monitoring system) in all trucks. Location, speed, driver.
- Discussion on internal audit processes for buses coming up. Review records of speeds.
- Evidence of Heavy Vehicle Permits being obtained.
- 95% of haulage occurs through Cooma.
- Transport updates through the WhatsApp Group.
- Material checks for products coming into site, at leaving pt e.g. quarry and once the truck arrives at site (site to review quarry rock).
- Evidence of hygiene declaration form.
- Evidence of daily look ahead form.

There were complaints associated with transport that would be expected from such a large project.

Subsidence

There was no evidence of subsidence activities during the IEA period. The previous subsidence area at Tantangara was inspected after remediation and rehabilitation was completed in a previous IEA

period. The site seemed stable and vegetated with grass. There is a requirement in the CSSI (Schedule 3, Conditions 66-68) to undertake an Independent Environmental Audit of the Subsidence Management Plan. This has not been completed and there is a recommendation as part of this IEA.

Rehabilitation

Permanent rehabilitation was completed along the batters of some access roads, and this was of a high quality. These occurred after roads were sealed, with rehabilitation completed to become clean water catchments.

Some other small rehabilitation occurred at fauna crossings and bridge/culvert works.

Seed collection occurred during the audit period at Marica. 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 have no recommendation regarding seed supply. The fires also caused a large loss to felled trees and logs that would be used in rehabilitation.

There are lots of exposed batters and surfaces that require hydromulching at site. Hydromulching has been used periodically. Despite limited areas of hydromulching there is minimal erosion on batters and other erosion and sediment control structures. FGJV have stated *'a significant number of batters that appear to require hydromulch, due to seasonal timing, may have been stabilised with a clear polymer product (stone wall) which we spray onto batters to maintain stabilisation and reduce sediment mobilisation. This product once dry cannot be seen.'*

Rehabilitation will be a key management aspect in subsequent years as areas become more available. We have a series of improvement recommendations within **Section 6**.

4.6. Key DPHI Consultation During Audit Period

As outlined in **Section 1.5.2**, DPHI provided feedback on this IEA on 5 September 2025. As part of this update Snowy Hydro were also able to provide additional information to IEMA in relation to audit findings. As part of this additional information, Snowy Hydro provided a word document listing all notices issued by DPHI, DCCEEW and the EPA which resulted in a penalty or official infringement in relation to the consent. A summary of notices which resulted in a penalty or official infringement from the agencies (DPHI, EPA, and DCCEEW) is provided below. Based on the evidence provided by Snowy Hydro, the only notices that were issued during the audit period which resulted in a penalty or official infringement were issued by DPHI.

Three (3) Official Cautions issued to Snowy Hydro Limited (SSI-9687) Snowy Monaro Regional LGA

On 19 September 2023, NSW Planning issued three Official Cautions to Snowy Hydro Limited for failing to submit the Long-Term Road Strategy, Recreational Fishing Management Plan and Recreation Management Plan for the Snowy 2.0 Main Works project to the satisfaction of the relevant agencies by the timeframes required by the relevant condition of approval. The Recreational Fishing Management Plan has subsequently been approved by the NSW DPI Director General and Snowy Hydro Limited continues to liaise with the relevant agencies and stakeholders in developing the documents. Snowy Hydro has submitted a request to the Planning Secretary in accordance with the conditions of approval, to stage the Long-term Road Strategy and Recreation Management Plan.

Four (4) Penalty Notices Snowy Hydro Limited (SSI-9687) Snowy Monaro Regional LGA

On 19 September 2023, NSW Planning issued four \$15,000 Penalty Notices to Snowy Hydro Limited for failing to submit the Rehabilitation Management Plan, Biosecurity Risk Management Plan, Threatened Fish Management Plan and Digital Strategy to the satisfaction of the relevant agencies by the required timeframes of the relevant condition of approval. The Threatened Fish Management Plan has subsequently been approved by the NSW DPI Director General. Snowy Hydro Limited continue to liaise with the relevant agencies and stakeholders in developing the documents and has submitted a

request to the Planning Secretary in accordance with the conditions of approval to stage the remaining plans and strategies.

Enforceable Undertaking – Snowy Hydro Limited (CSSI-9687) Snowy Monaro LGA

On 16 January 2024, NSW Planning accepted an Enforceable Undertaking from Snowy Hydro Limited, for the formation of a surface depression in the Kosciuszko National Park (KNP) during tunnelling activities for the Snowy 2.0 project. Snowy Hydro Limited has undertaken to pay \$300,000 to the National Parks and Wildlife Service (NPWS) Alpine Hut Rebuilding Programme. Additionally, Snowy Hydro Limited have had approved an application to facilitate the rehabilitation of the surface depression.

4.7. EPA Notices during the Audit Period

There were EPA notices issued to Snowy Hydro during the audit period relating to groundwater and surface water contamination. These notices have not been discussed in this IEA as this is an IEA of CSSI 9687, and not the Environmental Protection Licence. The notices are publicly available at:

<https://app.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=21266&id=21266&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued>

4.8. Environmental Incidents Reported by Snowy Hydro

4.8.1. Definitions of Incident and Non – Compliance

The definitions within the CSSI include the following:

Incident - *An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.*

Material harm is defined as:

Unauthorised harm that:

- *involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or*
- *results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).*

Non-compliance - *An occurrence, set of circumstances or development that is a breach of this approval.*

4.8.1.1. Key Incident/ Non-Compliance Reporting CSSI Conditions

The CSSI has two key conditions relating to incident and non-compliance reporting.

Schedule 4 Condition 6 Incident Reporting

The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.

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.

4.8.2. Summary of Incidents by Type

Reportable incidents during the IEA period were outlined in the Annual Reviews, EPL Annual Returns as well as site records of investigation and reporting. Note additional information was provided to IEMA in September 2025 from Snowy Hydro regarding DPHI notices, orders, penalty notices or prosecutions. This section of the report has not been updated in September 2025 as it relates to incident notification.

IEMA were provided with the following incident records:

- Incident Types and Occurrence July 23 – March 25 (Reportable Incident Register PDF) – Shared Snowy Hydro and FGJV.
- Environmental Incident Records – spreadsheet (2023 – 2025).
- Incident Types and Occurrence (Publicly Available Incidents).
- Incident Reports – selection of 10 internal incident reports.
- EPA Warning letters.

Reportable Incident Register PDF included the following:

- The document lists incidents that occurred between 7 July 2019 – 27 Feb 2025.
- Of the 79 incidents reported during the audit period (18 July 2023 – 28 March 2025), 4 were listed as not being a non-compliance (3 overtopping events and 1 identification of fireweed), 5 were TBA (Grey coloured water observed, sediment laden water reported, groundwater trigger notification, Talbingo Wedge pit material placed in Pad 50, gully sump A leaking) and 1 had no information (sediment leachate laden water entering water body).
- The details of the incidents in the Reportable Incident Register pdf are generally one line which has made it difficult to understand the details. Noting FGJV has more detail in its program.
- The table below summarises the incident types and occurrences in the Reportable Incident Register for July 2023 – March 2025.

A summary of the reportable incidents is provided in the table below.

Table 10 - Incident Types and Occurrence July 23 – March 25 (Reportable Incident Register PDF) – FGJV and Snowy Hydro Records

Incident Type	Occurrences July 2023 – March 2025
Dirty Runoff/non-compliant water entering water ways	4
Grey-coloured water observed flowing	2
Wallace's Creek Trail damaged due to bogged truck	1
Elevated Nutrient levels	5
High Concentration/exceedance of Nitrogen	3
Elevated nitrates and total nitrogen	2
Sediment Laden Water Entering water ways	11
Sediment leachate laden water entering water ways	3
Sediment and leachate laden water entering water way	1

Incident Type	Occurrences July 2023 – March 2025
Sediment Basin Overtopping event	31
Missing Sample	1
EPL Sampling Non-Conformance	1
Fireweed identified on Ravine Road	1
Fracking Incident	1
Turbid water at surface water monitoring point	1
Elevated faecal coliform concentration	1
Groundwater Trigger Notification	1
Talbingo Wedge-pit Material Placed in Pad 50	1
GF01 Gully Sump A leaking	1
Improper Waste Management	1
Breach of Construction Envelope	1
Exceedance in BOD Analyte	1
EPL69 Analytical Exceedance	1
EIS boundary encroachment from rock and fill material	1
Treated process water reporting to Yarrangobilly River	1
Wheel wash at Marica Gatehouse out of service	1
Total Number of Incidents (FGJV and Snowy Hydro records)	79

4.8.3. Incidents and Non – Compliance Meeting Notes

Below is a summary of the incidents and non-compliance meeting minutes from Snowy/FGJV/IEMA – 01/05/2025.

Initial Incident Notification

- Incident identified by FGJV.
- WhatsApp group used to notify Snowy Hydro of the incident.
- Snowy Hydro environmental personnel notify EPA via the Pollution Hotline.
- Notification email sent to agencies (EPA, DCCEE, DPHI, etc.).
- Previously, no notification was provided through the Planning Portal because other agencies were not notified during the portal notification. Snowy Hydro has recently received agency feedback during the audit period that requires all externally reportable incidents to be submitted through the Major Projects Portal going forward.

7-day Report

- Report template completed by Snowy Hydro with details being provided by FGJV.

- 7-day Report sent to all regulatory agencies via a joint email address.
- 7-day Report also sent to DPHI via the Planning Portal.
- 7-day report states which condition of the consent the site is non-compliant against.
- Snowy Hydro usually meets the 7-day timeframe for submission of the 7-day report. However, Snowy Hydro have stated that there have been times when the 7-day timeframe for submission has not been met. On the occasion that the 7-day timeframe is not met, there are mitigating factors/circumstances for not achieving the required timeframe.
- Snowy Hydro and FGJV both have access to and use INX system which is used to store all incident related information.

4.8.3.1. Overall Assessment of Incident/ Non-Compliance Records

Overall, we believe the incident investigation process is working generally well.

There has been some contradicting information provided for incident records between the internal and external website records. The website external records do not contain all the incidents within the internal records pdf. Snowy Hydro have stated that the inconsistency between the internal records and external website records *'is a result of Snowy Hydros internal process and the lag in updating the register, not a differing determination from the contractor.'*

4.9. Comparison Against EIS Predictions

HEMA have completed a high-level review of environmental monitoring reports during the audit period. With such a huge amount of data it has been difficult to give a definitive understanding on actual vs predicted impacts.

We have a recommendation in this audit around providing more of a comparison of environmental monitoring records against EIS predictions.

Water and Leachate

The main issue that has been a greater impact than predicted in the EIS has been the leachate issues caused by blasting practices. This has resulted in elevated levels of nitrogen in leachate basins, and some detected within surrounding surface water and groundwater locations. There has been extensive consultation with the EPA and other agencies of leachate and sediment water management.

There also have been additional sediment basin discharges compared to predicted in the EIS due to the difficulty in managing basins as per the Blue Book. Flocculation is not used; hence controlled discharges cannot occur.

Heritage

We have not been provided any evidence of heritage impacts occurring above EIS predictions.

Biodiversity

Most impacts have remained within approved clearing limits, with offset payments made and fauna mitigation structures effective.

Traffic

Traffic impacts have closely aligned with EIS predictions. It appears the volume of construction traffic on local and park roads has remained within the expected ranges, with no exceedance of road capacity or major congestion issues reported. There has been consultation with agencies during the period regarding road maintenance and safety management which would be expected for a project of this scale.

Subsidence

Subsidence impacts in the previous audit period exceeded what was anticipated in the EIS, which did not predict or assess the risk of ground collapse from tunnel boring. No evidence of exceedance during the IEA period. We did note evidence of subsidence remediation.

5. IEA FINDINGS – SUMMARY OF NON-COMPLIANCES

Table 11 outlines the summary of non-compliances and proposed recommendations relating to the key approvals.

Note, throughout **Table 11**, condition descriptions and details have been reduced to only include parts of the condition that Snowy Hydro is non-complaint for. Please review **Appendix B** for the entire CSSI approval and key management plan commitments.

Each non-compliance has been allocated a unique NC identifier (e.g. NC identifier – 1). Not every non-compliance has a corresponding recommendation. However, where a recommendation has been made by the audit team, a non-compliance recommendation identifier has been allocated (e.g. NC REC 1).

Table 11 - Summary of Non-Compliances

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
CSSI 9687				
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.	We have deemed the site non-compliant based on the letters from DPHI (including 7 August 2023). This states: <i>'The Department of Planning and Environment (the department's) 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.'</i> This is a high level condition and recommendations are covered elsewhere in the compliance table.	No non-compliance recommendation	NC Identifier - 1
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 Oct 2024) from DPHI states that Snowy Hydro can stage the submission of the BRMP. 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 BRMP 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. Snowy Hydro has stated in Snowy 2.0 Fish Management Plans Update - Monthly Working Group Meeting with DPIRD (3 March 2025) that the Stage 2 BRMP submission is targeted for June 2025. The submission of Stage 2 is outside the approved timeframe set by DPHI therefore site 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, 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 Management Plan 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 (<i>'In accordance with Schedule 4 condition 12 of the approval, please ensure this report is uploaded to the Snowy 2.0 website.'</i>). Snowy Hydro has not complied with the direction of these letters and is therefore non-compliant with 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.	No non-compliance recommendation	NC Identifier - 2
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.	NC Identifier - 3
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	The process is underway with Snowy Hydro working through the process of surrender.	No non-compliance recommendation	NC Identifier - 4

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
	approved management plans for the Exploratory Works to the satisfaction of the Planning Secretary.	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 NC REC.		
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.	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 Non-compliant for this condition due to the non-compliance bullet points below: <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). 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). 	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 sites and recording vehicle registrations and where the vehicles originated from.	NC Identifier - 5
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.	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.	No non-compliance recommendation	NC Identifier - 6
Schedule 3, Condition 4	The Proponent must: (d) develop and implement suitable procedures for handling, storing and disposing of any: <ul style="list-style-type: none"> potentially acid forming material; asbestiform mineral fibres; contaminated material (i) minimise the water quality impacts of the temporary and permanent emplacement areas;	(d) 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. The Leachate basins at the base of the spoil areas have detected high levels of nitrogen. We have therefore classified this material as contaminated. (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 Recommendation which is assigned to S3, C32.	No non-compliance recommendation	NC Identifier - 7
Schedule 3, Condition 8	The Proponent must implement the approved Spoil Management Plan for the development	Non-compliant for spoil management due to the nitrogen issues. The process of blasting has led to increased levels of nitrogen in the spoil. The Leachate basins at the base of the spoil areas have detected high levels of nitrogen. At Lobs Hole there is evidence that not all runoff is captured in the leachate basins, with elevated nitrogen levels at some surface water and groundwater locations. No non-compliance recommendation allocated to this non-compliance as it is addressed in NC Recommendation which is assigned to S3, C32. Non -compliance topsoil - there were issues at site in regard to topsoil storage. This was mostly to do with topsoil heights (above 2.5 m height), topsoils not being seeded. Some top-soil stockpiles also contained weeds. There was also a large top-soil area at Lobs Hole where a hardstand had been built on top of the top-soil stockpile. This is obviously not best practice. 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 Recommendations.	NC REC 3: Remove the hardstand area that has been constructed on top of the topsoil stockpiles at Lobs Hole. 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.	NC Identifier - 8
Schedule 3, Condition 10	Rehabilitation Management Plan 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.	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.	NC REC 5: Submit the RMP – Stage 2 to DPHI for approval	NC Identifier - 9

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
		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 Recommendation.		
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: <ol style="list-style-type: none"> identifies the final disturbance area of the Main Works; calculates the difference between the maximum disturbance area and the final disturbance area of the Main Works; and calculates the value of the outstanding biodiversity offset payment on a proportionate basis 	The report required by Schedule 3 Condition 13 was not provided to DPHI within the required timeframe of 21 October 2023. Therefore, the site is non-compliant with this condition. See NC Recommendation.	NC REC 6: Establish the final disturbance area and submit the additional report to DPHI in relation to the biodiversity offset payment.	NC Identifier - 10
Schedule 3, Condition 17	Biodiversity Management Requirements The Proponent must: <ol style="list-style-type: none"> 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; 	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.	No non-compliance recommendation.	NC Identifier - 11
Schedule 3, Condition 19	The Proponent must implement the approved Biodiversity Management Plan for the development.	<p>Some of the Clearing (Land Disturbance) Permits 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 Recommendation.</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> 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 Management Plan 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 the implementation of the Biodiversity Management Plan. See Schedule 2 Condition 13 for the recommendation.</p>	<p>NC REC 7: Ensure the Clearing (Land Disturbance) Permit has 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 details need 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, 	NC Identifier - 12

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
			<ul style="list-style-type: none"> 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>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>	
Schedule 3, Condition 22	<p>Biosecurity Risk Management Plan</p> <p>Within 2 years of the commencement of construction, the Proponent must prepare a Biosecurity Risk Management Plan for the development to the satisfaction of the Director-General of NSW DPI. This plan must:</p>	<p>Appendix A to the Biosecurity MP (Independent Peer Review Report) states '<i>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.</i>' 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>	NC REC 10: Submit the Biosecurity MP Stage 2 to DPHI for approval.	NC Identifier - 13
Schedule 3, Condition 24	<p>Threatened Fish Management Plan</p> <p>Within 12 months of the commencement of construction, the Proponent must prepare a Threatened Fish Management Plan for the development to the satisfaction of the Director-General of NSW DPI.</p>	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.	No non-compliance recommendation	NC Identifier - 14
Schedule 3, Condition 26	<p>Recreational Fishing Management Plan</p> <p>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:</p>	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.	No non-compliance recommendation	NC Identifier - 15
Schedule 3, Condition 29	<p>Water Pollution</p> <p>Unless an environment protection licence authorises otherwise, the Proponent must comply with Section 120 of the POEO Act.</p>	<p>Definitions:</p> <p>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.</p> <p>"pollute" means to introduce, directly or indirectly, into the waters any matter that results in pollution.</p> <p>"pollution" means—</p> <p><i>(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</i></p>	No non-compliance recommendation	NC Identifier - 16

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
		<p><i>(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.</i></p> <p>According to the records provided by Snowy Hydro/FGJV, the Incidents relating to water included, but are not limited to:</p> <ul style="list-style-type: none"> Sediment basin overtopping events (15 instances during audit period, as per website incident spreadsheet). Sediment-laden water entering waterway (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). <p>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.</p>		
Schedule 3, Condition 30	<p>Water Management Requirements</p> <p>The Proponent must:</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>(p) store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards.</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 basins 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>(p) SWMP - Section 5.4, Table 5-3: SW41, Annexure C (Spill Response Procedure).</p> <p>Site generally manages hydrocarbons well. However, there were 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</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.	NC Identifier - 17
Schedule 3, Condition 32	The Proponent must implement the approved Water Management Plan for the development	<p>Refer to Appendix B of this report for the 2025 Management Plan 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 – Complying with Section 120 of the POEO Act. See NC Recommendation. SW11 – Stockpile management. No non-compliance recommendation allocated to this commitment as it is addressed in recommendations which are assigned to S3, C8. SW15 – Sprinkler irrigation systems. No non-compliance recommendation allocated to this commitment as it is addressed in recommendations which are assigned to Appendix B, SW15. SW25 – Hydrocarbon storage and handling. No non-compliance recommendation allocated to this commitment as it is addressed in NC REC assigned to S3, C52. SW41 – Hydrocarbon storage and handling. No non-compliance recommendation allocated to this commitment as it is addressed in S3, C30 and Schedule 3 Condition 52. 	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.	NC Identifier - 18

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
		<ul style="list-style-type: none"> GW07 – Hydrocarbon storage and handling. No non-compliance recommendation allocated to this commitment as it is addressed in S3, C30 and Schedule 3 Condition 52. 		
Schedule 3, Condition 33	Protection of Heritage Items The Proponent must ensure that the development does not affect: (e) the tufa deposits outside the construction envelope (see the figures in Appendix 3).	(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 for damage to heritage items. No non-compliance recommendation allocated to this condition as it is addressed in NC REC assigned to S3, C36.	No non-compliance recommendation	NC Identifier - 19
Schedule 3, Condition 36	The Proponent must implement the approved Heritage Management Plan for the development.	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 the implementation of the HMP. See Recommendation.	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).	NC Identifier - 20
Schedule 3, Condition 39	Recreation Management Plan 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:	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. 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 is non-compliant. No non-compliance recommendation as the RecMP Stage - 1 has since been approved.	No non-compliance recommendation	NC Identifier - 21
Schedule 3, Condition 50	Long-Term Road Strategy – Kosciuszko National Park 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:	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. 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.	No non-compliance recommendation	NC Identifier - 22
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.	<ul style="list-style-type: none"> 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 Recommendation. 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 bunded with 110% capacity. Therefore, non-compliant. See photos in Appendix A for evidence. See NC Recommendation. In addition to the non-compliances identified by the audit team, IEMA has assessed Snowy Hydro as non-compliant for Schedule 3, Conditions 52(d) and 52(e) as a result of the statement by NPWS. We did not note any significant waste issues in the IEA inspection. 	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.	NC Identifier - 23
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.	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.	NC REC 16: Submit the Visual Impact Management Plan Stage 2 to DPHI for approval.	NC Identifier - 24

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
Schedule 3, Condition 65	The Proponent must implement the Subsidence Management Plan as approved by the Planning Secretary	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 Recommendation.	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.	NC Identifier - 25
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.	As stated in the Fortnightly Advance and Monitoring Report, <i>'The first advance, being advance 75, of TBM Florence in closed (slurry) mode occurred on 6 December 2023.'</i> 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 for conditions 66-68.	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.	NC Identifier - 26
Schedule 4, Condition 18	The Proponent must implement the approved Environmental Management Strategy.	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 instances when this did not occur, hence the non-compliance. No non-compliance recommendation allocated to this condition as it is addressed in recommendations which are assigned to S4, C7.	No non-compliance recommendation	NC Identifier – 27
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.	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. 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. 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.	No non-compliance recommendation	NC Identifier - 28
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;	(d) 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	NC REC 19: Following this IEA and other triggers under Schedule 4 Condition 20, review and if necessary, update site management plans.	NC Identifier - 29

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
	(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.	the Secretary for approval by COB 1 December 2023. Therefore, site is non-compliant under Part (a) of this condition. See Recommendation.		
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 with specific dates when Snowy Hydro did not meet the 7-day reports for non-compliance events. See Recommendations.	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 timeframe of becoming aware of any non-compliance.	NC Identifier - 30
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	NC Identifier - 31
Schedule 4, Condition 11	The Proponent must implement any approved audit action plan for the development.	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	NC Identifier - 32
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: <ul style="list-style-type: none"> 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.	(a) <ul style="list-style-type: none"> - 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 are 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 are 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 	No non-compliance recommendation	NC Identifier - 33

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
		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		
Management Plan Commitments				
SW02	Unless authorised otherwise by an environment protection licence the requirements of Section 120 of the POEO Act will be complied with.	Due to water incidents where discharges occurred, the site is non-compliant with this condition. When results have been above EPL criteria (whether discharge occurs from an LDP or another source e.g. 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.	No non-compliance recommendation	NC Identifier - 34
SW11	Stockpiles will be managed in accordance with the Spoil Management Plan (S2-FGJV-ENV-PLN-0019).	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 Recommendations which are assigned to S3, C8.	No non-compliance recommendation	NC Identifier - 35
SW15	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 to overly water these areas due to leachate production from spoil stockpiles. Therefore, site is non-compliant with this commitment.	No non-compliance recommendation	NC Identifier - 36
SW25	Where practical, the storage and handling of chemicals that have potential to contaminate the process water system will be undertaken in bunded areas.	Issues were noted in the contractor area on site, particularly around hydrocarbon and chemical storage. Some material was not stored as per AS 1940. This material, if it did leak, could 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 Recommendation which is assigned to S3, C52.	No non-compliance recommendation	NC Identifier - 37
SW41	Fuels and chemicals will be stored in bunded areas to prevent chemical spills or leakages in accordance with the relevant Australian Standards including: <ul style="list-style-type: none"> • 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. 	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	NC Identifier - 38
GW07	Storage and handling of chemicals, fuels and oils will be as per manufacturers' instructions in bunded, storage areas.	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	NC Identifier - 39
GW09	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. 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 Recommendation which is assigned to S3, C32.	No non-compliance recommendation	NC Identifier - 40

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
ECO2	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 <i>P.cinnamomi</i> .	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 recommendation which is assigned to S2, C13.	No non-compliance recommendation	NC Identifier - 41
BDAR-14	Construction of washdown 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 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 - Where light vehicles move between the sites, they will be required to use wheel washes at entry and exit points.</p> <p>Note this doesn't mention heavy vehicles. We also note this wording in Appendix F of the Biodiversity Management Plan - 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.</p> <p>We were not provided with evidence 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	NC Identifier - 42
BDAR-16	Design and implementation of a weed and pathogen monitoring program.	Weeds are mentioned in reporting, but we have not seen a detailed weed and pathogen monitoring program being implemented. Therefore non-compliant. No recommendation allocated to this commitment as it is addressed in recommendation which is assigned to S2, C13.	No non-compliance recommendation	NC Identifier - 43
BM32	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>	No non-compliance recommendation	NC Identifier - 44
BM34	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. 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	NC Identifier - 45
BM35	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>	No non-compliance recommendation	NC Identifier - 46

Schedule and Condition Number/ MP Ref Number	Non-Compliant Part of Condition	Details	Recommendations	Unique NC Identifier
		<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 with evidence 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>		
BM36	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 recommendation which is assigned to S2, C13.</p>	No non-compliance recommendation	NC Identifier - 47
SOIL02	<p>Development and implementation of soil management measures to assist in the preservation of the quantity and quality of the soil resource including:</p> <ul style="list-style-type: none"> an inventory of soils to be stripped, including depths and volumes; and topsoil management measures including stripping and stockpiling procedure. 	<p>Non-compliant for topsoil - there were issues at site in regard to topsoil storage. This was mostly to do with topsoil heights, topsoils not being seeded and 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 obviously not best practice, both Snowy Hydro and FGJV are aware of the issue. No non-compliance recommendation allocated to this commitment as it is addressed in recommendations which is assigned to S3, C8.</p>	No non-compliance recommendation	NC Identifier - 48
SM24	The Surface Water Management Plan (S2-FGJV-ENV-PLN-0011) will be implemented to ensure impacts on surface waters as a result of spoil handling and placement are minimised.	<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 recommendation which is assigned to S3, C32.</p>	No non-compliance recommendation	NC Identifier - 49
HER18	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. Therefore, non-compliant. No non-compliance recommendation allocated to this commitment as it is addressed in recommendation which is assigned to S3, C36.</p>	No non-compliance recommendation	NC Identifier - 50

6. ADDITIONAL RECOMMENDED ACTIONS

Additional recommendations relating to compliant conditions or aspects identified in the field are outlined within **Table 12**. It should be noted that sometimes there are non-compliant conditions that have an improvement recommendation. This occurs when an improvement has been identified by the Audit team, but it doesn't specifically relate to the non – compliant part of the condition.

Table 12 - Additional Recommendations

Aspect	Condition/Management Plan Commitment Reference	Improvement REC Number	Recommendations
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.
Operation of plant and equipment	Schedule 2, Condition 13	IMP REC 2	Ensure all Hygiene Declaration Forms are completed in full.
		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.
Administrative	Schedule 3, Condition 1	IMP REC 4	Liaise with DPHI about what this condition means by single, open-source database. Is it linked to Schedule 3 Condition 2 and 3?
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 basins. 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.
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.
		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.
	Schedule 3, Condition 11	IMP REC 8	Site specific RMP's should be developed and sent to the regulator for comments. The update

Aspect	Condition/Management Plan Commitment Reference	Improvement REC Number	Recommendations
			<p>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>
		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).
		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.
		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.
		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.
		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.
	Schedule 3, Condition 11A	IMP REC 14	Make the Tantangara Surface Depression Rehabilitation Plan publicly available on the Snowy Hydro Website.
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

Aspect	Condition/Management Plan Commitment Reference	Improvement REC Number	Recommendations
			3.1.2 of Appendix G to the Biodiversity Management Plan.
		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.
		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.
Water	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).
		IMP REC 19	Liaise with WaterNSW to arrange consolidation of WAL42408, WAL42960 and WAL43328 as the Snowy Hydro - Water Usage 2023-2024 WaterNSW Report states 'WAL42408, WAL42960 and WAL43328 should be consolidated.'
	Schedule 3, Condition 32	IMP REC 20	IEMA supports the development into the report by Rick Van Dam in relation to water quality triggers. This report should be provided to EPA, DPHI and NPWS for comment and could be used to develop scientific and workable triggers.
		IMP REC 21	Complete a risk assessment for high-risk basins onsite in terms of discharge and look at options for telemetry on these basins. These would likely include leachate basins as well as higher risk sediment basins (e.g. Not captured by a sediment structure if they overtop).
		IMP REC 22	Installation of wheel wash at Rock Forest. Commitment TRA 04 in the Transport Management Plan stated, ' <i>installation of rumble grids or wheel washes where necessary (e.g. wheel washes at Polo Flat and Rock Forest).</i> '
		IMP REC 23	Liaise with TransGrid to request consultation of when they discharge from adjacent to the Snowy 2.0 Project land as this water can flow into the sediment basins at Lobs Hole. This enables the site to understand if water from TransGrid contributes to discharges from Lobs Hole.
		IMP REC 24	Liaise with CPESC regarding the sediment fencing installed at the bottom of a drain at Rock Forest. It is currently in an area of concentrated

Aspect	Condition/Management Plan Commitment Reference	Improvement REC Number	Recommendations
			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.
		IMP REC 25	Repair erosion damage at two locations being adjacent to the Ravine Bay Permanent Spoil Emplacement Area and the 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.
		IMP REC 26	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.
		IMP REC 27	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).
		IMP REC 28	Additional information should be put in the Biannual 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 are 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.
Waste	Schedule 3, Condition 52	IMP REC 29	Clean up spills that are under the used coolant waste bin. See earlier recommendation regarding storage.
Noise	Schedule 3, Condition 57	IMP REC 30	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.
Emergency Management	Schedule 3, Condition 61	IMP REC 31	Investigate stormwater design and erosion and sediment controls at Lobs Hole North Road/Ravine Road North to stop any sediment

Aspect	Condition/Management Plan Commitment Reference	Improvement REC Number	Recommendations
			exiting the project boundary. This is to be completed in consultation with the NPWS.
		IMP REC 32	Remove any fallen trees and vegetation that is encroaching the emergency exit (Lobs Hole North Road/Ravine Road North).
		IMP REC 33	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.
Update of strategies, Plans or Programs	Schedule 3, Condition 20	IMP REC 34	Snowy Hydro to consider an update to the management plan review process that eliminates complexity where possible. ie. repetition, potential streamlining.
Access to information	Schedule 4, Condition 12	IMP REC 35	The incidents and non-compliances register needs to be more regularly updated as it is currently out of date. Consolidate previous years into the one register.
		IMP REC 36	Update website to include the most recent Consent and latest Biodiversity Monitoring Program Report.
		IMP REC 37	Update website to include all previous IEAs, IEA Responses and IEA audit action plans. Audit 1 and 2 are not currently on the website.
		IMP REC 38	Update website to include all Main Works – Tunnel Boring Machine (TBM) Florence Monitoring Reports.
Management Plan Commitments			
Water	SW15	IMP REC 39	Complete an assessment against this condition requiring ' <i>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</i> '. 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.
	SW39	IMP REC 40	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.

Aspect	Condition/Management Plan Commitment Reference	Improvement REC Number	Recommendations
	SW49	IMP REC 41	Look into systems to capture runoff water from roofs and direct it to water storage tanks. Look into ways of reusing this water onsite.
Biodiversity	BM21	IMP REC 42	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).
		IMP REC 43	Provide details of GDE monitoring in the Annual Biodiversity Monitoring Report and whether triggers were enacted.

7. CONCLUSION

The IEA did identify a high number of non-compliances and an increase since the last IEA. The increase in the number of non-compliances was partly due to the fact the previous 2023 IEA grouped non-compliances by aspect.

While these have been documented, it is important to acknowledge the complex nature of the Snowy 2.0 project. The project's scale, the remote and challenging environmental setting, and the detailed and extensive CSSI conditions make this a difficult project to manage. In addition, the project is subject to many commitments across multiple management plans, requiring significant coordination and oversight

Table 13 - IEA Compliance Summary

Compliance Status	SSI-9687	Key Management Plan Commitments (Key mitigation measure tables)	Total
Compliant	44	289	333
Not Triggered	17	91	108
Non-Compliant	33	17	50
Total	94	397	491

APPENDIX A. PHOTOGRAPHS

Tantangara - 24 Mar 2025



Photo 01 – Plant fitted with water tank and sprayer.



Photo 02 – Tantangara Intake Tunnel.



Photo 03 – Tantangara sink hole rehabilitation has been completed.



Photo 04 – Quarry Trail Road with water truck.



Photo 05 – Speed limits on Quarry Trail Road.



Photo 06 – Exposed soil along roadside at Tantangara Sewerage Treatment Plant.



Photo 07 – Tintangara Sewerage Treatment Plant.



Photo 08 – Quarry Road diversion drains are stable with well vegetated areas.



Photo 09 – Hydrocarbon storage at Dewatering/Reverse Osmosis area. Meeting AS 1940.



Photo 10 – Water cart standpipe at Dewatering/Reverse Osmosis area.



Photo 11 – Tantangara fuel up area.



Photo 12 – Bulk hydrocarbon storage at Tantangara meting AS 1940.



Photo 13 – Storage yard diversion drain flowing into sump. Sump was at capacity with sediment. Sediment fence behind sump is damaged.



Photo 14 – Site boundary at Tantangara Reservoir.



Photo 15 – Topsoil stockpile at Tintangara Permanent Spoil Laydown.



Photo 16 – Tintangara Permanent Spoil Laydown.



Photo 17 – Rock stockpiled at Permanent Spoil Laydown for future rehabilitation.



Photo 18 – Permanent Spoil Laydown boundary bund is dominated with weeds. See IMP Rec 3.



Photo 19 – Dust along haul road at permanent spoil laydown. Noting overall dust was managed well.



Photo 20 – Bund located at low point of permanent spoil laydown.



Photo 21 – Rabbit damage at permanent spoil laydown low point/project boundary. See IMP REC 17.



Photo 22 – Ineffective sediment fence and rabbit damage to permanent spoil laydown low point/project boundary. See IMP REC 17.

Lobs Hole – 25 Mar 2025



Photo 23 – Wheel wash station at Lobs Hole Gate House.



Photo 24 – Leachate basin (SB01) below the permanent spoil emplacement (Ravine Bay).



Photo 25 - Leachate basin (SB01) spill way.



Photo 26 – Erosion on batter between Permanent Spoil Emplacement (Ravine Bay) and Leachate basin (SB01). See IMP REC 25.



Photo 27 – Minor erosion along drain at Permanent Spoil Emplacement (Ravine Bay). See IMP REC 25.



Photo 28 – Jute mesh used on batter between leachate basin (SB01) and Talbingo Reservoir. See IMP REC 13 about completion of the works.



Photo 29 – Concrete stockpiled at Lobs Hole Permanent Spoil Emplacement (Ravine Bay).



Photo 30 – Construction of Permanent Spoil Emplacement (Ravine Bay) diversion drain.



Photo 31 –The Talbingo Intake (entrance of the Tailrace Tunnel).



Photo 32 – GF01 Leachate basin.



Photo 33 – GF01 clean/dirty diversion drain.



Photo 34 – Topsoil stockpile at GF01 Leachate basin. Topsoil mixed with non-topsoil material, weeds present and no signage. See NC REC 4.



Photo 35 – Topsoil stockpile dominated by weeds at GF01. See NC REC 4.

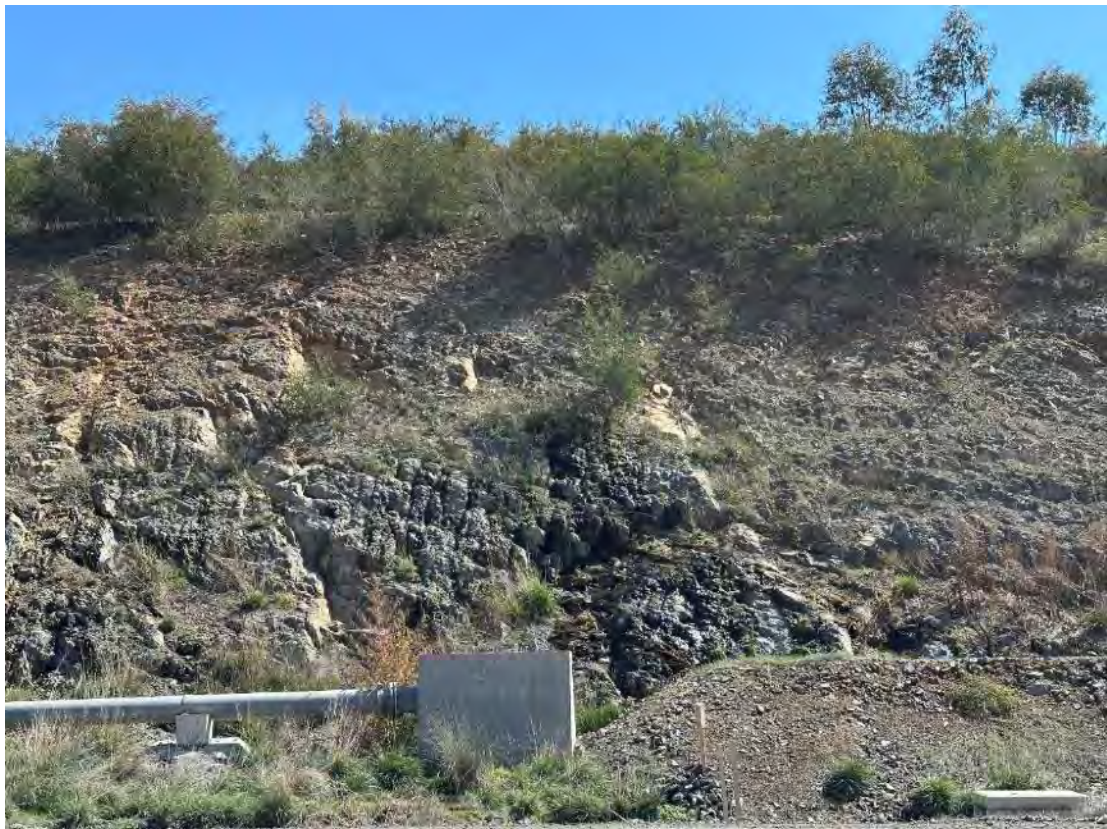


Photo 36 – Water leaching at Basin F10.5. See NC REC 12.



Photo 37 – F10.5 Leachate basin. See NC REC 12.



Photo 38 – Topsoil Pad F9 with laydown area built on top. See NC REC 3.



Photo 39 – Contractor yard (Main Yard) workshop without drip trays/bunding. See NC REC 11.



Photo 40 – Contractor yard (Main Yard) hydrocarbons incorrectly stored and not as per AS 1940. See NC REC 14.



Photo 41 – Contractor yard (Main Yard) hydrocarbons incorrectly stored. See NC REC 14.



Photo 42 – Contractor yard (Main Yard) hydrocarbons incorrectly stored. See NC REC 14.



Photo 43 – General waste bin in contractor yard (Main Yard). Note no bin lid covering with loose waste material. See NC REC 15.



Photo 44 –Spill at coolant waste coolant bin in contractor yard (Main Yard). Note high capacity and not stored as per requirements. See IMP REC 29.



Photo 45 – Waste segregation in contractor yard (Main Yard).



Photo 46 – Contractor yard (Main Yard) waste hydrocarbons incorrectly stored. See NC REC 14.



Photo 47 - Contractor yard (Main Yard) hydrocarbons stored in bunding.



Photo 48 – Interface between UGL and Snowy Hydro. See IMP REC 23.



Photo 49 – View of Lobs Hole from Ravine Road South.



Photo 50 – Wood stockpile at Tumut Ponds Access Trail.

Marica 26 Mar 2025



Photo 51 – Boundary drain around the Marica Surge Shaft with sprinkler system fitted.



Photo 52 – Hydrocarbons incorrectly stored at Marica Surge Shaft.

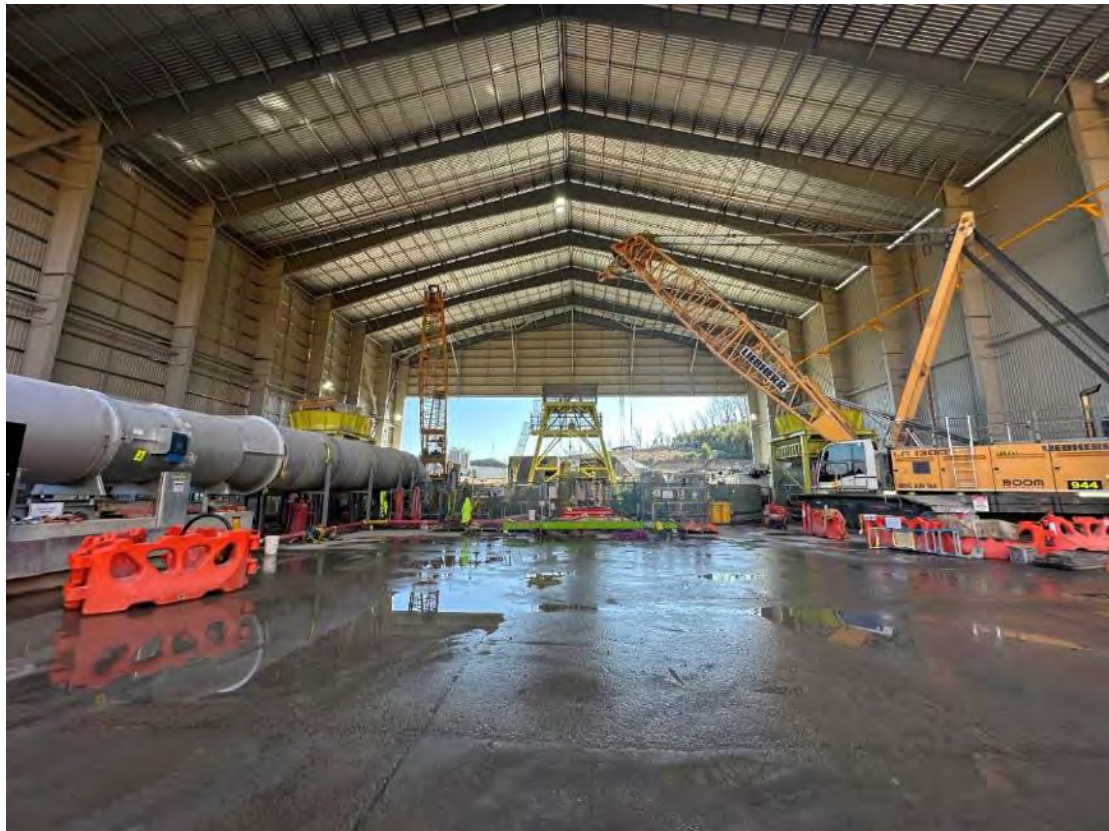


Photo 53 – Marica Surge Shaft.



Photo 54 – Waste bin with cover at Marica. Noting lid which is best practice.



Photo 55 – Blast rock stockpile at Marica West HDD Pad.



Photo 56 – Leachate basin at Marica West HDD Pad.



Photo 57 – Waste segregation on site at Marica.



Photo 58 – Recycling items placed into general waste bins.



Photo 59 – Culvert along Marica Trail with jute mesh used for ground stabilisation.

Rock Forest 26 Mar 2025



Photo 60 – Commencement of construction for the permanent Spoil Emplacement Area (Rock Forest) pad (no emplacement yet).



Photo 61 – Topsoil stockpile and effective sediment fencing (Rock Forest).



Photo 62 – Recent hydromulched area (Rock Forest).



Photo 63 – Sediment controls along roadside at Rock Forest. See IMP REC 24 about considering other controls.

APPENDIX B. COMPLIANCE SPREADSHEET

The IEA period is 18 July 2023 to 28 March 2025 (Day 5 of the 2025 IEA

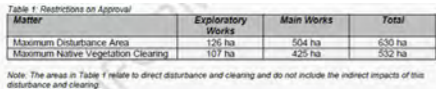
Construction for Snowy 2.0 officially commenced on 22 Oct 2020 (as referenced in the Snowy 2.0 Main Works Annual EPBC Compliance Reports).

Snowy 2.0 Main Works project (CSSI 9687) approved on 20 May 2020.


MOD 1 - 27 Jan 2022,

MOD 2 - 29 November 2023,

MOD 3 - 16 Dec 2024

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
SCHEDULE 2 - ADMINISTRATIVE CONDITIONS						
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT						
1	In meeting the conditions of this approval, the Proponent must implement all feasible and reasonable measures to prevent, and if prevention is not feasible or reasonable, minimise any material harm to the environment that may result from the construction, operation, decommissioning or rehabilitation of the development.	Compliant	Evidence provided from RFI 1. Records of environmental incidents 2. 3x Examples of environmental training, 1x list of relevant environmental trainings 3. Environmental Incident and Event Register Shared SHL & FGJV 4. 10x evidence of incident reports pulled from Shared SHL & FGJV Register in (3.) 5. FGJV Environmental Training Awareness Onboarding Presentation 6. Incident Report - 117331 7. 10x Responses to EPA Show Causes	CSSI 9687 defines material harm as: <i>Is unauthorised harm that:</i> • involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or • results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment). There have been some environmental incidents (See Section 4.8 of the IEA main document for detailed information). FG seem to have the majority of records. <u>Discussion with FGJV and Snowy Hydro:</u> We discussed the incident management process. FGJV and Snowy Hydro showed their record keeping system. <u>Water incidents</u> - FGJV discussed the key water management incidents at site and what constitutes a moderate incident. FGJV discussed the risk ranking process for determining incidents. All discharges are reported to agencies. NPWS noted issues related to incident management and mitigation in a letter dated 17 April 2025. See Section 1.5.1 for full details. <u>Summary</u> Despite the fact there have been uncontrolled discharges we see evidence of preventing material harm by implementing management plans. The Water Management Plan has been the most difficult plan to implement due to strict water discharge conditions, with the site making efforts to adhere to these conditions, including using as much water as possible through the construction process and through dust suppression. It has been noted that the site does not currently use flocculants due to the potential impacts of flocculants on the environment, hence TSS is difficult to reduce to allow controlled releases under the Blue Book. With difficulties to undertake controlled water releases this means the site can not achieve the blue book requirements of dewatering sediment basins and leachate dams. The site has attempted to minimise material harm through operational process and the incident management process. There are some improvements required for the incident management process with this covered under Schedule 4 Condition 6.	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.	
TERMS OF APPROVAL						
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.	Non Compliant	1. Master tracking clearing register 2. Clearing Permit Marica Adit Pad 4&5 Extension (dated 20/01/2025) 3. Clearing Permit Marica Pads 2, 4 & 5 (dated 5/12/2024) 4. GIS system - illustrates cleared areas	We have deemed this site non-compliant based on the letters from DPHI (including 7 August 2023). This states: <i>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.</i> 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.		NC Identifier - 1
3	If there is any inconsistency between the above documents, the most recent document will prevail to the extent of the inconsistency. However, the conditions of this approval must prevail to the extent of any inconsistency	Compliant		Noted. The above documents are the most recent. The Main Works EIS is the most relevant during the IEA period.		
4	The Proponent must comply with any requirements/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.	Non Compliant	1. Letter from DPHI regarding management plan updates (dated 19/09/2024) 2. Letter from DPE - Snowy 2.0 Main Works - Staging of Biosecurity Risk Management Plan (dated 25/10/2023) 3. 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) 4. Snowy 2.0 Presentation to DPIRD 5. Letters from DPHI - Snowy 2.0 - Main Works – Tunnel Boring Machine (TBM) Florence Monitoring Report (multiple letters from audit period) 6. Letter from DPE - Incident Notification regarding the elevated levels of nitrates and nitrites - GF01 (dated 12 October 2023)	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 DPHI in a letter dated 25 Oct 2023 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 Tantlangara’. 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 ‘In accordance with Schedule 2, condition 4 of the Approval, the Secretary directs SHL to review and revise the TARP’s 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 TARP’s 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.		NC Identifier - 2
LIMITS ON APPROVAL						
5	Restrictions on Disturbance Area and Native Vegetation Clearing The Proponent must comply with the restrictions in Table 1 below. 	Compliant	1. Master tracking clearing register 2. Clearing Permit Marica Adit Pad 4&5 Extension (dated 20/01/2025) 3. Clearing Permit Marica Pads 2, 4 & 5 (dated 5/12/2024) 4. GIS system - illustrates cleared areas	The site has been within these clearance total limits. See source of evidence.		
6	Staging The Proponent may construct, operate, and decommission the development in stages. When staging occurs, the Proponent is only required to comply with the conditions of this approval that are relevant to the specific stage’s.	Compliant		Noted. The site operates under this CSSI and the approved management plans. See approved management plans for further details.		
LAPSE OF APPROVAL						
7	This approval will lapse if the Proponent does not physically commence the development within 5 years of the date on which it is granted.	Compliant		Construction works commenced in October 2020 which is well within the 5-year timeframe.		
SURRENDER OF APPROVAL						
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.	Non Compliant		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.	NC Identifier - 3
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.	Non Compliant	Letter from Snowy Hydro to DPIE dated 17/08/2021: RE: Surrender of Exploratory Works Approval CSSI 9208 Email: Snowy 2.0 Exploratory Works - Surrender of Approval - Drafting of Notice for DPIE from Snowy Hydro to NPWS dated 12/01/2022 requesting a statement from NPWS consenting to the surrender.	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.		NC Identifier - 4
DEMOLITION						
10	The Proponent must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version	Not Triggered	Evidence provided from RFI 1. Written statement from site “No known demolition”	Based on site RFI response (written communication), not triggered. No reason to dispute this.		
STRUCTURAL ADEQUACY						

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
11	The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA; and where the BCA is not applicable, the relevant Australian Standard. Notes: • Under Part 6 of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the development. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	Not Triggered		No works are final for signoff. Still in construction phase.		
PROTECTION OF INFRASTRUCTURE						
12	Unless the Proponent and the applicable authority agree otherwise, the Proponent must: (a) repair, or pay the full cost associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full cost associated with relocating, any public infrastructure that needs to be relocated as a result of the development. Note: This condition does not apply to any damage to roads caused by the development.	Not Triggered	Site discussions Incident records	Based on site discussions, not triggered. No reason to dispute this.		
OPERATION OF PLANT AND EQUIPMENT						
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.	Non Compliant	1. Map of Tantangara Weed Spraying from Feb 2025 2. List of Tantangara Weed Spraying from Feb 2025 3. Example of weekly inspection check sheet for plant equipment (1250kva Generator - 04/07/2023) 4. Example of completed pre-start inspection (Lift Truck - 12 Jul 2023) 5. Plant delivery and quarterly inspection form (Blank form) 6. Selection of Light vehicle delivery and quarterly inspection forms 7. Articulated dump truck service report 8. Daily pre start checks. 9. Selection of five Hygiene Declaration forms 10. Selection of five Light Vehicle Delivery and Yearly Inspection Forms 11. Selection of five Pre start checklist forms for plant and equipment 12. Selection of five Plant Delivery and Quarterly Inspection Forms 13. Selection of five Weekly Service forms 14. 2025 Weed Spraying Contractor Schedule 15. Collated Weed Spray spreadsheet 16. Weed Maps 17. Marica Wheel Wash Incident Report	<u>Site records:</u> See files in RFI request. • 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. <u>Site Inspection:</u> 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. 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. 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. Through 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: • 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.	IMP REC 2: Ensure all Hygiene Declaration Forms are completed in full. 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. 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.	NC Identifier - 5
SCHEDULE 3 - SPECIFIC ENVIRONMENTAL CONDITIONS						
KOSCIUSZKO NATIONAL PARK – KNOWLEDGE & ENJOYMENT OF THE PARK						
1	The Proponent must: (a) consolidate all the information presented in the documents prepared for the Exploratory Works and Main Works (see definitions) in a single, open source database; (b) supplement this information over time with the information that must be gathered and made public under the conditions of this approval; (c) prepare a detailed archival record of all phases of the development; and (d) make this information publicly available.	Compliant	Snowy and FG websites	• Noting EIS is publicly available. • Website evidence of results and key management plans. The website provides some interactive GIS files. • The Digital Strategy has also been prepared (see below conditions) • This is an unusual condition and we are recommending Snowy Hydro seeks feedback from DPHI about the implementation requirements. (a) Snowy 2.0 website contains the Management Plans, approvals and monitoring reports that are required under specific conditions of CSSI 9687. (b) As management plans are updated and additional monitoring data is obtained, the website is being updated with most recent data. (c) Record keeping of construction process. (d) Website is accessible by the public.	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.	
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.	Non Compliant	1. Letter of approval for Digital Strategy (dated 25/6/2024) 2. Email for implementation of digital strategy - establishment of a Working Group (dated 12 Mar 2025) 3. Snowy 2.0 Digital Strategy (11 Jun 2024) 4. Digital Strategy - Working Group Initiation - Meeting Minutes (dated 20/02/2025) 5. Digital Strategy - Brief - Meeting Minutes (dated 18/03/2025)	<u>Preparation</u> 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 <u>non-compliant</u> with this condition. No non-compliance recommendation as the Digital Strategy has since been approved. Plan approved by DPHI in letter dated 25/06/2024 (a) Section 1.4 (Consultation) of the Digital Strategy provides consultation undertaken with NPWS (b) Sections 5.2 and 6.1 of the Digital Strategy address this condition (c) Sections 5.2 and 6.1 of the Digital Strategy address this condition		NC Identifier - 6
3	The Proponent must implement the approved Digital Strategy for the development.	Compliant		<u>Implementation</u> • In line with the Digital Strategy Phase 1 (Accessibility): - Snowy Hydro has established and is maintaining an open website. - The Snowy 2.0 project timeline currently available on the Snowy Hydro website has been updated to ensure that it tells the story of the Snowy 2.0 project construction. - During the RFI process Snowy Hydro were unable to provide any evidence of implementing any of the deliverable initiatives from Table 3 of the Digital Strategy. However, at the timing of this IEA, the timings for commencement of each of the initiatives had not yet been reached. • In line with Phase 2 (Innovation): - There is a working group between Snowy Hydro and NPWS to deliver the initiatives within 9 months from approval of the strategy. Digital Strategy Meeting minutes provided show that the Digital Strategy although in its early stages of implementation is underway. Compliant at this stage.		
SPOIL MANAGEMENT						
4	The Proponent must: (a) minimise the spoil generated by the development; (b) test and classify the relevant physical and chemical characteristics of the spoil; (c) manage, use or dispose of the spoil in accordance with its classification; (d) develop and implement suitable procedures for handling, storing and disposing of any: • potentially acid forming material; • asbestiform mineral fibres; • contaminated material; (e) only place non-reactive spoil, which has a low geochemical risk and is suitable for reuse, in the western emplacement area; (f) maximise the reuse of non-reactive spoil on site and in other parts of the Kosciuszko National Park;	Non Compliant	<u>Evidence from RFI</u> 1. Spoil reuse permit March 2025 2. Topsoil Stripping Procedure 3. Spoil Reuse Procedure (28/8/2019) 4. Bi-annual monitoring report June 2024 - November 2024 for surface and groundwater quality 5. Inspection and Test Plan - Handling and Characterisation Spoil Management 6. Spoil Sample Report February 2025 7. Example of weekly environmental inspection checklist for Tantangara (14/2/2025) 8. Example of weekly environmental inspection checklist for	<u>General Spoil and Leachate Dam Discussions</u> Section 6.12 of the Spoil Management Plan main document states: <i>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.</i> <i>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.</i> • We noted the defined spoil stockpile areas at Tantangara, Lobs Hole and Marica. 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> • The basins will be impermeable. • The spoil testing and water monitoring programs will be increased following learnings from GF01. • 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. <u>Other things to note:</u> • 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.		NC Identifier - 7

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
	(g) maximise the use of the permanent spoil emplacement areas; (h) minimise the spoil left at Lobs Hole and Marica for incorporation into the final landform; (i) minimise the water quality impacts of the temporary and permanent emplacement areas; (j) not place any spoil from the tunnel boring machines in the active storages or below the full supply level of either the Talingbo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary; and (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 Talingbo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary.		Marica (11/3/2025) 9. Example of weekly environmental inspection checklist for Lobs Hole (21/2/2024) 10. Tantangara Spoil Disposal Area - Construction Quality Assurance Report (19 Mar 2025) 11. Selection of pre and post blast reports 12. Quarterly Spoil Monitoring Report October - December 2024 (January 2025) 13. Spoil Sample Report Feb 2025 14. Spoil Volumes all Sites February 2025	<u>Assessment Against Condition</u> We have assessed the site as non-compliant with part d) and i). 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) • 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. 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. 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.		
5	Permanent Spoil Emplacement Areas Apart from the spoil that is provided to the NPWS for use in other parts of the Kosciuszko National Park, sent off-site, used to construct temporary or permanent infrastructure for the development or used to rehabilitate the site, the Proponent must ensure that all the spoil generated by the development is disposed of in the following emplacement areas: (a) Ravine Bay; (b) GFO 1; (c) Lobs Hole; (d) Tantangara; or (e) Rock Forest. Note: The location of these emplacement areas is shown in the figures in Appendix 2.	Compliant	<u>Evidence from RFI</u> 1. Monthly Spoil Volume and AMD results dashboard 2. Quarterly Spoil Reports 3x examples: 2023 Q4, 2024 Q2 and 2024 Q4 3. Discussions with spoil manager 4. Site inspection 5. Rock Forest Permanent Spoil Emplacement Clearing and Grubbing Extents with Proposed Stockpile Locations.	See source of evidence column. Spoil material dumped in areas a) to d). Note no emplacement has occurred at Rock Forest yet with the area being established. Other conditions relate to the operational performance of the stored spoil areas. Snowy Hydro has stated in the RFI 'No analogue soil testing has been completed for Rock Forest as the emplacement as it is a lined emplacement area, FGJV are not adopting a criteria, as the current design controls adequately address the risk of nutrient contamination.'		
6	Design Objectives for Permanent Spoil Emplacement Areas The Proponent must ensure the permanent spoil emplacement areas comply with the design objectives in Table 2.	Not Triggered		Following a review of Table 2 we have assessed these as design objectives to inform how permanent spoil emplacement areas. Ultimately spoil emplacement areas should be constructed and finalised to ensure they are safe, stable, and consistent with long-term land use and ecological goals — making them relevant to rehabilitation and closure and not relating to operational management. Operational spoil conditions are outlined in Schedule 3 Condition 4.5, 7 and 8. Currently there is a system in place to try to manage and capture the water runoff from the spoil emplacement areas by capturing in leachate ponds. This water is then treated in the different water treatment plants in attempt to meet water quality criteria prior to discharging. No discharge can occur without meeting this criteria. Snowy Hydro is well aware of the current management issue and is working with the relevant government agencies. The audit team discussed how the site will manage permanent spoil emplacement areas and leachate post closure. There has been a recent remediation group formed for Snowy Hydro and FGJV in attempt to look at longer term management during and post rehabilitation.	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.	
7	Spoil Management Plan Prior to the commencement of construction, the Proponent must prepare a Spoil Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, EPA, Water Group, NRAR, NSW DPI and TINSW; (b) provide an overarching framework for the management of all spoil generated on site - including the testing, classification, handling, temporary storage and disposal of spoil – that complies with the spoil management requirements in condition 4 above; (c) include a detailed plan for managing the temporary spoil stockpiles of the development, which includes suitable triggers for remedial measures (if necessary) and describes the contingency measures that would be implemented to address any water quality risks; (d) include a detailed plan for managing all the reactive or contaminated spoil generated on site, including the contingency measures that would be implemented if the volumes of this spoil are greater than expected and unsuitable for land disposal; (e) detailed plans for each of the permanent spoil emplacement areas that have been prepared using both analogue and erosional-based methods, these plans must: • describe how the development of each emplacement area would be co-ordinated with the rehabilitation of the site in accordance with the approved Rehabilitation Management Plan; • describe the measures that would be implemented to comply with the spoil management requirements in condition 4 above and the design objectives in Table 2; • include a topsoil strategy, outlining the measures that would be implemented to ensure the surface of the emplacement area will be suitable to sustain the target PCTs in the long term, having regard to the approved strategy in the Rehabilitation Management Plan; • identify the key risks for the successful completion of each emplacement area and the contingency measures that would be implemented to address these risks; and • include detailed completion criteria and performance indicators for each emplacement area, including criteria for triggering remedial action (if necessary); (f) include a program to monitor and publicly report on: • the management of spoil on site; • the implementation of each of the detailed plans, including the effectiveness of the proposed mitigation and contingency measures; and • progress against the detailed completion criteria and performance indicators of each permanent spoil emplacement area. Note: The Proponent may stage the preparation of the Spoil Management Plan, including the preparation of detailed plans for each permanent spoil emplacement area. However, the detailed plans must be approved prior to any construction occurring in the relevant emplacement area.	Compliant	Spoil Management Plan (September 2022) - Main document and most of the appendices. Appendix J - Rock Forest Emplacement Area (January 2025) <u>Evidence from RFI</u> Please refer to the Spoil Management Plan Appendices for Approval Letters (found on SHL website) 1. Spoil Management Plan Rock Forest Emplacement Area - Approval Letter (dated 23/01/2025) 2. Spoil Management Plan Ravine Bay Emplacement Area - Approval Letter (dated 05/04/2024) 3. Spoil Management Plan Tantangara Emplacement Area - Approval Letter (dated 13/09/2022) 4. Spoil Management Plan - Approval Letter (Dated 27/06/2022) 5. Spoil Management Plan - Approval Letter (Dated 14/08/2020)	<u>Preparation:</u> Spoil Management Plan (Rev G) approved in a letter from DPHI dated 14/08/2020. This was prior to the commencement of construction of the Main Works. Compliant for timing. a) Section 1.7 (Consultation) of the SMP states qualification and experience of Derek Low who prepared the SMP. Section 1.7.1 (consultation on Stage 1 of this plan) and Section 1.7.2 (consultation on future stages of this plan) provide the outcomes from consultation undertaken with NPWS, TINSW, EPA, NRAR, Water Group, DPI and DPE Fisheries. b) Sections 5-8 and Appendix A-F. Testing, classification, handling, temporary stockpiles and disposal of spoil addressed. c) Sections 6-9 and Appendix C. Management of temporary spoil stockpiles, triggers, and water quality contingency measures addressed in SMP. d) Sections 6, Appendix D and E. management of reactive or contaminated spoil and measures implemented for spoil that is greater than expected and unsuitable for disposal addressed in the SMP. e) Appendix F and G address these requirements. f) Section 9 addresses these requirements The SMP has been prepared in stages. There will be six stages over the duration of the Project. The current SMP addresses the requirements of Stage 1.		
8	The Proponent must implement the approved Spoil Management Plan for the development	Non Compliant	<u>Evidence from RFI</u> 1. Spoil reuse permit March 2025 2. Topsoil Stripping Procedure 3. Spoil Reuse Procedure (28/8/2019) 4. Bi-annual monitoring report June 2024 - November 2024 for surface and groundwater quality 5. Inspection and Test Plan - Handling and Characterisation Spoil Management 6. Spoil Sample Report February 2025 7. Example of weekly environmental inspection checklist for Tantangara (14/3/2025) 8. Example of weekly environmental inspection checklist for Marica (11/3/2025) 9. Example of weekly environmental inspection checklist for Lobs Hole (21/2/2024) 10. Quarterly Spoil Monitoring Report October to December 2024.	<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. Non-compliance for spoil management 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. There has been significant consultation with the EPA and other agencies about the nitrogen issue. • Non-compliance topsoil - 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. Site has stated in the RFI '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.' - See NC RECS.	NC REC 3: Remove the hardstand area that has been constructed on top of the topsoil stockpiles at Lobs Hole. 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.	NC Identifier - 8
REHABILITATION						
9	Rehabilitation Requirements The Proponent must: (a) rehabilitate all parts of the site within the Kosciuszko National Park to comply with the rehabilitation objectives in Table 3 and the ecological rehabilitation objectives in Table 4; (b) rehabilitate the Rock Forest site to comply with the rehabilitation objectives in Table 5; (c) complete the initial rehabilitation of the site - including the removal of all temporary infrastructure, creation of landforms, narrowing of roads - within 3 years of completing construction; (d) complete the ecological rehabilitation of the site, apart from the areas used for operations, within 20 years of completing construction; (e) complete the final rehabilitation of the site, including the removal of all remaining infrastructure, within 3 years of decommissioning the development; and (f) complete the ecological rehabilitation of the areas used for operations within 20 years of decommissioning the development 	Not Triggered	Site inspection	Not triggered as minimal final rehabilitation. The site is still a construction site there are few areas where final rehabilitation could be completed. The field inspection noted high quality erosion control and some temporary rehabilitation. <u>Government Liaison</u> NPWS noted issues related to rehabilitation in a letter dated 17 April 2025. See Section 1.5.1 for full details.	IMP REC 6: There is an opportunity to complete final seeding activities on the following areas: • Sediment basin decommissioning area at Eucumbene River. • Slopes that lead to the Tantangara Dam at Ravine Bay. IMP REC 7: Liaison is required between Snowy Hydro and FGJV regarding the Goandra trail and rehabilitation activities. NPWS should be made informed on planning and as executed rehabilitation activities.	

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
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 TNSW;</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">• Tabbingo 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:<ul style="list-style-type: none">- plant community types to be established; and- area of land to be established for each plant community type;• 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.	Non Compliant	<p>Rehabilitation Management Plan -Stage 1 (16 May 2024)</p> <p>Rehabilitation Management Plan -Stage 1 (16 May 2024)</p> <p>Approval letter from DPHI (dated 24/10/2024)</p> <p>DPHI Letter - Snowy 2.0 Main Works (SSI 9687) Approval of Management Plan Staging (dated 21/12/2023)</p> <p>Evidence from REF</p> <p>1. Evidence of Revegetation treatment /Hydromulching - Trunk Services Plateau</p>	<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.</p> <p>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 <u>non-compliant</u>. No non-compliance recommendation as the RMP Stage - 1 has since been approved.</p> <p>RMP - Stage 2 has not yet been approved and the required approval date set by DPHI has now lapsed. Therefore Snowy Hydro is <u>non-compliant</u>. 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, TNSW 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 '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.' Table 1-1 of the RMP states Marica and Plateau RMPs will be developed in Stage 1 and Tabbingo 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 'Additional detail will be included as required in the Site Specific RMPs (Appendices K to P).'</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>	NC REC 5 - Submit the RMP - Stage 2 to DPHI for approval.	NC Identifier - 9
11	<p>The Proponent must implement the approved Rehabilitation Management Plan for the development.</p>	Not Triggered	<p>Hydromulching register</p> <p>Pre clearance process</p> <p>Field inspection</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><u>IEA Site Inspection Notes:</u></p> <p>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 sections of the site are becoming available for final rehabilitation. Hence we have no compliance issue with this condition, but several recommendations.</p> <p><u>Government Liaison</u></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>IMP REC 8: 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, 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> <p>IMP REC 9: This RMP should review potential water management during initial rehabilitation (i.e. leachate dams) as well as whether leachate dams can be removed in the final landform (i.e. once rehabilitation has established and the area is classified as non - polluting).</p> <p>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.</p> <p>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 is a potential knowledge gap.</p> <p>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.</p> <p>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.</p>	
11A	<p>Prior to the commencement of surface works for rehabilitation described in MOD2, the Proponent must prepare a Rehabilitation Management Plan for MOD2 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 NPWS, BCD and EPA;</p> <p>(b) be consistent with the Spoil Management Plan;</p> <p>(c) include conceptual and detailed plans for the rehabilitation of the MOD2 disturbance area;</p> <p>(d) describe the measures for MOD 2 to address conditions 10(h) to 10(k) inclusive; and</p> <p>(e) include the screening, testing and validation procedures that would be implemented to assess the suitability of fill material, including a list of the pollutants that would be monitored for within fill material.</p>	Compliant	<p>1. Vegetation Monitoring Report from Narla Environmental, March 2023</p> <p>2. Photo evidence of sink hole rehabilitation works</p> <p>3. Backfilling Sinkhole - Compaction Test</p> <p>4. Tantangara Sink Hole Restoration - Construction Method Statement (May 2024)</p> <p>5. Concrete for Tantangara Sinkhole Remediation - Material Approval Request (April 2024)</p> <p>6. Boral Concrete Test Reports</p> <p>7. Tantangara Surface Depression Rehabilitation Management Plan - Approval Letter (dated 12/04/2024)</p>	<p>Tantangara Surface Depression Rehabilitation Plan (Approved in a letter from DPHI dated 12/04/2024). Evidence provided states that rehabilitation of the sink hole did not commence until April 2024 (after the Tantangara Surface Depression Rehabilitation Plan was approved)</p> <p>a) Document Control states who prepared the Tantangara Surface Depression Rehabilitation Plan as well as NPWS, BCD and EPA agencies which were consulted.</p> <p>b) Section 3.2 (Landform reshaping and backfill) and Section 3.4 (Topsoil/growth medium amendment and placement)</p> <p>c) The Tantangara Surface Depression Rehabilitation Plan</p> <p>d) Section 4 (Revegetation), Section 5 (Resource Specification) and Section 7 (Rehabilitation Monitoring)</p> <p>e) Appendix A - Material screening testing and validation procedure)</p> <p>Tantangara Surface Depression Rehabilitation Plan is not available on the Snowy Hydro website which is a requirement of DPHI stated in the Approval Letter (dated 12/04/2024). However this issue is covered in a later condition around website content.</p>	IMP REC 14: Make the Tantangara Surface Depression Rehabilitation Plan publicly available on the Snowy Hydro Website.	
11B	<p>The proponent must implement the Rehabilitation Management Plan for MOD 2 as approved by the Secretary.</p>	Compliant	<p>Site inspection</p> <p>ESCP - Tantangara Sink Hole Rehabilitation</p>	<p>Sinkhole rehabilitation works were reviewed in the site inspection and have been completed. Area appears safe and stable with mostly covered by grass. Minimal weeds were noted.</p>		
FLORA AND FAUNA						
12	<p>Biodiversity Offset Payments</p> <p>The Proponent must make the following payments to the NPWS to offset the residual biodiversity impacts of the Main Works:</p> <p>(a) \$14.76 million prior to the commencement of construction;</p> <p>(b) \$14.76 million within 1 year of the commencement of construction;</p> <p>(c) \$14.76 million within 2 years of the commencement of construction; and</p> <p>(d) \$14.76 million within 3 years of the commencement of construction.</p> <p>Notes:</p> <ul style="list-style-type: none">• This payment represents 80% of the Proponent's liability to offset the residual biodiversity impacts of the Main Works. These funds will augment the \$8,492,909 already paid to the NPWS to offset the residual biodiversity impacts of the Exploratory Works.• The NPWS will use these funds and any interest generated by these funds to enhance the biodiversity values of the Kosciuszko National Park. However, in the limited circumstances where it is not possible to address all of the residual biodiversity impacts of the development within the Kosciuszko National Park, the NPWS may use some of these funds to ensure suitable conservation actions are carried out outside the park.• To ensure accountability, the NPWS will:<ul style="list-style-type: none">- develop and implement a detailed program for the allocation of these funds to specific projects, focusing on the ecosystems and species affected by the development; and- monitor, evaluate and publicly report on the progress of the implementation of the detailed program and the effectiveness of the specific projects;• The NPWS will develop and implement a specific program in consultation with DAWE to carry out conservation actions to address the residual biodiversity impacts of the development on the following Commonwealth-listed species and communities:<ul style="list-style-type: none">- Alpine Sphagnum Bogs and Associated Fens;- Broad toothed Rat;- Smoky Mouse;- Alpine Tree Frog; and- Alpine She oak Skink.	Compliant	<p>1. Biodiversity Offset Payment Tax Invoice (dated 29/09/2023)</p>	<p>Tax invoice from DPHI (dated 29/09/2023) states that Snowy 2.0 Main Works Biodiversity Offset Payment 4 requires payment of \$14,760,000. Payment was due within 21 days of invoice date.</p>		

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
13	<p>Additional Biodiversity Offset Payment</p> <p>Within 3 years of the commencement of construction, the Proponent must submit a report via the Major Projects Portal that:</p> <p>a. identifies the final disturbance area of the Main Works;</p> <p>b. calculates the difference between the maximum disturbance area and the final disturbance area of the Main Works; and</p> <p>c. calculates the value of the outstanding biodiversity offset payment on a proportionate basis</p>	Non Compliant	<p>1. Snowy 2.0 letter to DPHI (dated 8 November 2024) Re: – Main Works (CSSI 9687) Additional Biodiversity Offset Payment Report</p> <p>2. Non-Compliance report (dated 21 Oct 2023)</p>	<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.	NC Identifier - 10
14	<p>Within 6 months of the Planning Secretary setting the value of the outstanding biodiversity offset payment, the Proponent must pay the funds to the NPWS.</p> <p>Notes:</p> <ul style="list-style-type: none">• These conditions relate to the remaining 20% of the Proponent's liability to offset the residual biodiversity impacts of the development.• They are intended to create an incentive for the Proponent to reduce the biodiversity impacts of the development by reducing the final disturbance area of the development during the final design of the project.• For instance, if the final disturbance area of the Main Works is only 87% of the maximum disturbance area of the Main Works then the Proponent will only have to pay 35% of the outstanding liability of \$14.76 million.• These funds will be added to the funds paid under condition 12 and managed in accordance with the notes under that condition.	Not Triggerred	<p>1. Snowy 2.0 letter to DPHI (dated 8 November 2024) Re: – Main Works (CSSI 9687) Additional Biodiversity Offset Payment Report</p>	<p>Due to the report required under Schedule 3 Condition 13 not yet being compiled, this condition is not triggered. Once the final disturbance area is established, the required outstanding biodiversity offset payment can be set by the Planning Secretary.</p>		
15	<p>Potential Additional Offsets – Alpine Sphagnum Bogs and Associated Fens</p> <p>The Proponent must ensure that the development does not cause any exceedances of the following performance measures in the Alpine Sphagnum Bogs and Associated Fens above the Goandra Volcanics and Kellys Plains Volcanics (see the figures in Appendix 2):</p> <p>(a) negligible change to the shallow groundwater regime supporting the bogs and associated fens when compared to a suitable control site; and</p> <p>(b) negligible change in the ecosystem functionality of the bogs and associated fens.</p>	Not Triggerred		<p>No impact to date based on site discussions. The TBM is not underneath these areas yet.</p>		
16	<p>If the Planning Secretary determines that the development has caused exceedances of the performance measures in condition 15 above, the Proponent must pay additional funds to the NPWS within 3 months of the determination to offset the groundwater-related impacts of the development on these Alpine Sphagnum Bogs and Associated Fens. The Planning Secretary will determine the amount of funds the Proponent must pay following consultation with the NPWS, DAWE and the Proponent; and having regard to:</p> <p>(a) the significance of the impacts on the bogs and associated fens;</p> <p>(b) the relevant values from the Biodiversity Offsets Payment Calculator; and</p> <p>(c) the likely cost of carrying out the conservation actions required to offset these impacts on the bogs and associated fens.</p> <p>Note: These funds will be added to the funds paid under condition 12 and managed in accordance with the notes under that condition.</p>	Not Triggerred		<p>No evidence of this being triggered.</p>		
17	<p>Biodiversity Management Requirements</p> <p>The Proponent must:</p> <p>(a) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance area;</p> <p>(b) minimise the clearing of native vegetation and habitat within the disturbance area;</p> <p>(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;</p> <p>(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:</p> <ul style="list-style-type: none">• 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 apicalis;• White bellied Sea eagle; <p>(e) minimise potential fauna strike in sensitive habitat areas on the road network within the site, including reducing speed limits between sunset and sunrise and constructing suitable underpasses;</p> <p>(f) undertake pre-clearance surveys;</p> <p>(g) maximise the salvage of resources within the disturbance area for reuse in the restoration of vegetation and habitat on site, including native vegetative material, hollows logs, ground timber, and topsoil containing vegetative matter and native seed bank;</p> <p>(h) collect seeds for use in the ecological rehabilitation of the site;</p> <p>(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;</p> <p>(j) minimise the generation and dispersion of sediment to watercourses, particularly Yarrangobilly River and Wallace Creek;</p> <p>(k) minimise the light spill from night works, including using directional and LED lighting; and</p> <p>(l) minimise bushfire risk.</p>	Non Compliant	<p>1. Biodiversity Monitoring Reports for Quarter 1,2,3,4</p> <p>2. Clearing Tracker Access</p> <p>3. Clearing Permit for Marica (29/ Jan 2025)</p> <p>4. Clearing Permit for Tantangara (9 Nov 2024)</p> <p>5. Clearing Permit for Pads 2, 4 and 5 - 6.72 ha (5/12/2024)</p> <p>6. Predicted Clearing Report Marica Adit Pad 1 (16 Dec 2024)</p> <p>7. Marica Adit Pad 1 and 3 Clearing Sensitive Area Plan (dated 15 Dec 2024)</p> <p>8. Copy of Narta Environmental Pre-clearing survey report (Dec 2024)</p> <p>9. MAP Boundary PAD1 and Lined Spoil Pad kmf file</p> <p>10. Erosion and Sed Control Plan for Marica Spoil Pads and Laydown Areas (18/12/2024)</p> <p>11. Snowy Hydro 2.0: Seed Change of Custody</p> <p>12. Snowy Hydro 2.0: Seed Change of Custody (20/10/2024)</p> <p>13. Pre - clearing Survey Report Marica Pad 1 and Spoil Pad - December 2024 (Narta Environmental)</p> <p>14. Selection of Weed Control - Daily Spray Records</p> <p>15. Pimelea Assessment Email (dated 12/05/2025)</p> <p>16. Aquatic Pre-Clearing Survey Report February 20254 (prepared by Narta Environmental)</p> <p>Bushfire Management Plan (Appendix A to the Natural Hazard Management Plan)</p>	<p>We have deemed this non-compliant for Part i) of this condition.</p> <p>Site has stated in writing that the <i>Biodiversity Monitoring Program: Year 4 Annual Monitoring Report (2023/2024)</i> 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.</p> <p>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> <ul style="list-style-type: none">• Plant and vehicles must complete Hygiene Declarations when arriving on site.• Selection of Weed Control - Daily Spray Records provided by site show that weed control is taking place across Tantangara, Marica, Goandra 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>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> <ul style="list-style-type: none">• During the site inspection, IEMA observed rabbit burrows in basin batters at Tantangara.• 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.		NC Identifier - 11
18	<p>Biodiversity Management Plan</p> <p>Prior to carrying out any construction, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity experts in consultation with the NPWS, BCD and DAWE;</p> <p>(b) describe the detailed measures that would be implemented to comply with the biodiversity mitigation requirements in condition 17 above;</p> <p>(c) include a strategy to address the requirements in condition 17(e), including:</p> <ul style="list-style-type: none">• a detailed risk assessment to identify the locations where underpasses would be built during the upgrade of the road network; and• a trigger, action and response plan for reducing speed limits on the road network on site to minimise fauna strike; <p>(d) include a program to monitor, evaluate and publicly report on:</p> <ul style="list-style-type: none">• the effectiveness of these measures; and• compliance against the performance measures in condition 15 above, including: <ul style="list-style-type: none">o establishing a suitable control site;o baseline monitoring of the condition of the relevant Alpine Sphagnum Bogs and Associated Fens;o detailed criteria for determining the impact of the development on the performance measures; ando program to monitor the impacts of the development against the detailed criteria.	Compliant	<p>Biodiversity Management Plan</p> <p>DPHI BMP Approval letter (dated 15/10/2020)</p>	<p>Preparation:</p> <p>Biodiversity Management Plan (BMP) approved by DPHI on 15/10/2020, this was before the commencement of construction on 22 October 2020. Meets timing requirement. BMP uses incorrect references throughout the doc. BMP using original CSSI 9687 conditions (Condition 18) when Mod 2 has BMP requirements as Condition 19.</p> <p>(a) BMP Section 1.7 lists suitably qualified and experienced personnel who developed the BMP. Section 1.8 provides a summary of the consultation undertaken with BCD, NPWS and DAWE. However, detailed consultation undertaken with agencies not provided in BMP.</p> <p>(b) Section 5 states the Management Measures</p> <p>(c) Table 5-1 (BM02 and BM03) and Appendix G</p> <p>(d)</p> <ul style="list-style-type: none">• Section 6.2 and Appendix B• Table 5-1 (BM20) and Appendix B• Reporting outlined in Section 6.5		

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
19	<p>The Proponent must implement the approved Biodiversity Management Plan for the development.</p>	Non Compliant	<p>Selection of Post Clearing Reports</p> <p>Selection of Pre Clearance Reports</p> <p>Selection of Hygiene Declaration Forms</p> <p>Map of Tantangara Weed Spraying from Feb 2025</p> <p>List of Tantangara Weed Spraying from Feb 2025</p> <p>Weed spraying records for Lobs Hole</p> <p>Year 3 Annual Monitoring Report (2022/2023)</p>	<p>Site Records</p> <p>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.• Hygiene declarations and inspections for plant and equipment transported to site. <p>Washdown stations</p> <p>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>Section 5.1.1.2 - 5.1.1.2 of the Weed, Pest and Pathogen MP states there is a requirement for '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. These locations include:</p> <ul style="list-style-type: none">• entry to Lobs Hole Ravine Road (near Link Road);• access to Tantangara (initially near Snowy Mountains Highway, to be relocated to Quarry trail post upgrade of Tantangara Road); and• access to Marica (near to junction of Snowy Mountains Highway); <p>Site has stated '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. Site has not implemented the commitment of washdown facilities.</p> <p>Government Liaison</p> <p>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.</p> <p>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.....'</p> <ul style="list-style-type: none">• 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 a 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:<ul style="list-style-type: none">• 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>The lack of the defined weed spraying program has led to a non-compliance. See early condition for details.</p> <p>Pathogen Monitoring</p> <p>Section 9.3, Appendix B, Biodiversity Management Plan states that sampling for Phytophthora 'Frequency will comprise one monitoring event per year during construction. Monitoring data (laboratory results) for each monitoring location to be kept in a spreadsheet with additional results added after each monitoring program.' Snowy Hydro has stated in the RFI 'Spreadsheet for Soil sampling undertaken for Phytophthora presence/absence: Not triggered - The identification and associated soil sampling predates audit assessment period.'</p> <p>Section 3.6.2 (Phytophthora presence/absence) of the Biodiversity Monitoring Program: Year 3 Annual Monitoring Report (2022/2023) shows that Phytophthora presence/absence monitoring is being undertaken. However, Snowy Hydro was unable to provide evidence of Monitoring data (laboratory results) for each monitoring location being kept in a spreadsheet with additional results added after each monitoring program. Therefore, non-compliant. See NC REC.</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>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.</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>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.</p> <p>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 to current batter slopes and future final rehabilitation areas.</p> <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>	NC Identifier - 12
BIOSECURITY AND FISH						
20	<p>Biosecurity and Fish Management Requirements</p> <p>The Proponent must:</p> <p>(a) minimise the development-related biosecurity risks, including the movement and spread of weeds, pests and pathogens;</p> <p>(b) minimise the impact of the development on threatened fish species and their habitat, particularly the Macquarie Perch, Stocky Galaxias and Murray Crayfish; and</p> <p>(c) minimise the impact of the development on recreational fishing in Tantangara Reservoir and Lake Eucumbene.</p>	Compliant	<p>1. Monthly working group meetings: 3x examples of presentations October 2023, July 2024, March 2025</p> <p>2. Stocky Galaxias Salvage Procedure (24 Jan 2025)</p> <p>3. Stocky Galaxia Clearance Letter</p> <p>4. Appendix F (Weed, Pest and Pathogen MP) of the Biodiversity MP</p> <p>5. 2023/2024 Annual Report - Snowy 2.0 TFMP</p>	<p>(a) This condition relates to spread of aquatic weeds, pests and pathogens. Terrestrial weeds, pests and pathogens are addressed in earlier conditions.</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.		
21	<p>Fish Screens and Barrier</p> <p>Prior to the commencement of commissioning, the Proponent must install:</p> <p>(a) a fish barrier on Tantangara Creek to prevent so far as is reasonably practicable Climbing Galaxias reaching the existing population of Stocky Galaxias in the upper reaches of the creek; and</p> <p>(b) fish screens at the southern end of the Tantangara Reservoir to prevent so far as is reasonably practicable the movement of pest fish (n all its forms: eggs, larvae, juveniles and adults) and spread of disease to the mid-Murrumbidgee River and Lake Eucumbene.</p>	Compliant	<p>1. PowerPoint - Contractor's Progress Review Meeting - Tantangara Creek Fish Weir-Overall Financial Performance and Site Enablers (12 March 2025)</p> <p>2. PowerPoint - Snowy 2.0 Presentation to DPIRD (03 March 2025)</p>	<p>(a) Evidence of fish barrier construction underway.</p> <p>(b) Evidence of Fish Screen Design underway.</p>		
22	<p>Biosecurity Risk Management Plan</p> <p>Within 2 years of the commencement of construction, the Proponent must prepare a Biosecurity Risk Management Plan for the development to the satisfaction of the Director-General of NSW DPI. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person in consultation with DPIE, NPWS and DAWE;</p> <p>(b) include a detailed biosecurity risk management framework for minimising the ongoing biosecurity risks of the development required in condition 20(a) above, including:</p> <ul style="list-style-type: none">• 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:<ul style="list-style-type: none">• 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:<ul style="list-style-type: none">• carrying out monitoring using epidemiologically designed surveys; and• conducting fish, disease and eDNA surveys.	Non Compliant	<p>1. Biosecurity Risk Management Plan Consultation Letter (17 Jan 2025)</p> <p>2. Approval letter DPIRD endorsement of Biosecurity Risk Management Plan in line with conditions of consent (25 Oct 2024)</p> <p>3. Copy of 'Right to Start' Presentation (16 Jan 2025)</p> <p>4. Fish Collection Data 2025</p> <p>5. Fish Catch Data 2025</p> <p>6. Chain of custody documents for Disease (EHNv) Fish Collection and Analysis - example from 17 Feb 2025</p> <p>7. Interim Laboratory Results for Disease (EHNv) Fish Collection and Analysis from Feb 2025</p> <p>8. Snowy 2.0 Fish Management Plans Update - Monthly Working Group Meeting with DPIRD (3 March 2025)</p>	<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, DCCCEW 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	<p>NC REC 10: Submit or seek an updated due date from the DPHI for the Biosecurity MP Stage 2.</p>	NC Identifier - 13
23	<p>The Proponent must implement the approved Biosecurity Risk Management Plan for the development.</p>	Compliant	<p>1. Annual Monitoring Reports developed by EMM</p> <p>2. Snowy 2.0 Fish Management Plans Update - Monthly Working Group Meeting with DPIRD (3 March 2025)</p>	<p>Site Records</p> <ul style="list-style-type: none">• Annual Monitoring Reports developed by EMM <p>Government Liaison</p> <ul style="list-style-type: none">• Snowy keeps DPIRD updated on the fish screen and weir with Monthly Working Group meetings. <p>IEA Site Inspection Notes:</p> <p>This MP relates to aquatic management, Fish Screen and Fish Weir. These were either not sighted or not yet established during the site inspection.</p>		

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
24	<p>Threatened Fish Management Plan</p> <p>Within 12 months of the commencement of construction, the Proponent must prepare a Threatened Fish Management Plan for the development to the satisfaction of the Director-General of NSW DPI. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person in consultation with DPIE and DAWE;</p> <p>(b) include the establishment and use of an expert advisory committee to provide advice to the proponent on the implementation of the plan;</p> <p>(c) describe the detailed measures that would be implemented to comply with condition 20(b) above;</p> <p>(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:</p> <ul style="list-style-type: none">• 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 <p>(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;</p> <p>(f) include a program to minimise the impacts of the development on the Murray Crayfish in Talbingo Reservoir, including:</p> <ul style="list-style-type: none">• 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 <p>(g) include a program to monitor and publicly report on the progress of each program/plan and the effectiveness of these measures.</p>	Non Compliant	<p>1. 2023/2024 Annual Report Snowy 2.0 Threatened Fish Management Plan</p> <p>2. 2024/2025 Annual Implementation Plan Snowy 2.0 Threatened Fish Management Plan</p> <p>3. Threatened Fish Management Plan Consultation with DPE 26/10/23</p> <p>4. Minutes and agenda for Expert Advisory Committee Meetings from July 2024 and January 2025</p> <p>5. 2024 Crayfish monitoring report</p>	<p>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.</p> <p>(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.</p> <p>(b) Section 2.2 Outlines the role of the Expert Advisory Committee.</p> <p>(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.</p> <p>(d) Section 3.3 outlines the captive breeding program for Stocky Galaxias and Section 4.3 outlines the captive breeding program for Macquarie Perch.</p> <p>(e) Section 5 outlines the review of the captive breeding program and provides the TARP for the extension of the captive breeding program.</p> <p>(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.</p> <p>(g) Section 2.4 outlines the Annual Reporting requirements of the TFMP</p>		NC Identifier - 14
25	<p>The Proponent must implement the approved Threatened Fish Management Plan for the development.</p>	Compliant	<p>1. 2023/2024 Annual Report Snowy 2.0 Threatened Fish Management Plan</p> <p>2. Minutes and agenda for Expert Advisory Committee Meetings from July 2024 and January 2025</p> <p>3. 2024/2025 Annual Implementation Plan Snowy 2.0 Threatened Fish Management Plan</p>	<p><u>Site Records</u></p> <ul style="list-style-type: none">• 2023/24 Annual Reporting being undertaken and published on the Snowy website.• Annual Implementation Plan developed by NSW DPIRD outlines the activities and deliverables that will occur under the Threatened Fish Management Plan program. <p><u>Government Liaison</u></p> <ul style="list-style-type: none">• Threatened Fish Management Plan Expert Advisory Committee meeting minutes provides evidence of ongoing consultation with DPI in relation with implementation of the TFMP. <p><u>IEA Site Inspection Notes:</u></p> <p>This MP relates to captive breeding programs and the monitoring and management measures associated with the Talbingo Reservoir. These aspects are either not yet developed or were not able to be assessed during the site inspection component. Compliant for activities so far.</p>		
26	<p>Recreational Fishing Management Plan</p> <p>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:</p> <p>(a) be prepared by a suitably qualified and experienced person in consultation with DPIE, NPWS and relevant recreational fishing groups;</p> <p>(b) describe the detailed measures that would be implemented to comply with condition 20(c) above, including:</p> <ul style="list-style-type: none">• 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; <p>(c) include a program to monitor and publicly report on the effectiveness of these measures.</p>	Non Compliant	<p>1. Concept Design: Gaden Hatchery Augmentation Investigations & Findings (29 May 2023)</p> <p>2. Email for Gaden update from NSW Fisheries (12 Mar 2025)</p> <p>3. Recreational Fish Monitoring RFP (13 Nov 2024)</p> <p>4. Snowy 2.0 Recreational Fishing Management Plan (31 Oct 2023)</p>	<p><u>Preparation condition:</u></p> <p>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.</p> <p>(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 DCCEEW.</p> <p>(b)</p> <ul style="list-style-type: none">• 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. <p>(c) Section 4 outlines the requirement to publicly report on the RFMP.</p>		NC Identifier - 15
27	<p>The Proponent must implement the approved Recreational Fishing Management Plan for the development.</p>	Compliant	<p>1. Concept Design: Gaden Hatchery Augmentation Investigations & Findings (29 May 2023)</p> <p>2. Email for Gaden update from NSW Fisheries (12 Mar 2025)</p>	<p><u>Site Records</u></p> <ul style="list-style-type: none">• Evidence of restocking program underway through the Snowy 2.0 Gaden Hatchery Augmentation Investigations and Findings (29 May 2023). An email from DPI dated 12 Mar 2025 estimate that the Gaden Trout Hatchery works will commence in Spring 2025.• The RFMP commitment to undertake Access Point Surveys (APS) is underway with a Request for Proposal (RFP) developed on 13 Nov 2024. <p><u>Government Liaison</u></p> <ul style="list-style-type: none">• Evidence of ongoing consultation with DPI regarding the works undertaken at Gaden Trout Hatchery. <p><u>IEA Site Inspection Notes:</u></p> <p>The RFMP details requirements that relate to the restocking program and Access Point Surveys. Due to these requirements only being developed during the audit period, there are no physical areas to assess during the audit period. The next audit period should see great implementation of the RFMP.</p>		
WATER						
28	<p>Water Supply</p> <p>The Proponent must ensure it has sufficient water for each stage of the development; and if necessary, adjust the scale of development on site to match its available water supply.</p> <p>Note: Under the Water Management Act 2000, the Proponent must obtain the necessary water licences for the development.</p>	Compliant	<p>Snowy Hydro - Water Usage 2023-2024 WaterNSW Report (31 Jul 2023 - 30 Jun 2024)</p>	<p>No water supply issues identified during the site visit or stated by Snowy Hydro.</p> <p>The 2024/2025 water year has not yet concluded, so no Water Usage 2024/2025 report exists yet.</p> <p>WAL42407 - 183 ML annual take against WAL42407 (227ML).</p> <p>WAL42408 - Site has stated in the RFI <i>WAL42408 was set up for ease of purchasing additional water shares. It still has an entitlement of OML and does not need to be increased.</i> WAL42408 is still included in the Snowy Hydro - Water Usage 2023-2024 WaterNSW Report however does not provide the annual water take for this licence. If the share (ML) is OML, it should state that on the Report.</p> <p>WAL42960 - 21ML annual take against (354ML)</p> <p>RO13-19-093 (WAL43328) - 522ML annual take against (3375ML)</p> <p>RO1-19-092 (WAL43229) - 0ML annual take against (1722ML)</p> <p>WAL43544 - 57ML annual take against (532ML). This licence is not referenced in the WMP. This is the Licence in the WMP Table 2-5 listed as <i>'Specific Purpose Access Licence (under application)'</i>. Site has stated <i>'SPAL WAL43544 (linked to 40MW416855), is an entitlement for extraction from the Tantangara water source, which was allocated on 25/01/2021.'</i></p> <p>The Snowy Hydro - Water Usage 2023-2024 WaterNSW Report states <i>'WAL42408, WAL42960, WAL43328 (to be consolidated)'</i></p>	<p>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).</p> <p>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.</p>	
29	<p>Water Pollution</p> <p>Unless an environment protection licence authorises otherwise, the Proponent must comply with Section 120 of the POEO Act.</p> <p>Note: Section 120 of the POEO Act makes it an offence to pollute any waters.</p>	Non Compliant	<p>Snowy 2.0 - Externally Reported Environmental Incidents and Non-Compliances Register</p>	<p>Definitions:</p> <p>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.</p> <p>"pollute" means to introduce, directly or indirectly, into the waters any matter that results in pollution.</p> <p>"pollution" means—</p> <p>(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</p> <p>(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.</p> <p>According to the records provided by Snowy Hydro/FGJV, the incidents relating to water included, but not limited to:</p> <ul style="list-style-type: none">• 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.) <p>Due to these uncontrolled discharge events the site is non-compliant with this condition due to water pollution. Due to issues relating to not being able to flocculate this has resulted in sediment water releases. No recommendation allocated to this condition as it is addressed in S3, C32.</p> <p><u>Government Liaison</u></p> <p>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>		NC Identifier - 16

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
30	<p>Water Management Requirements</p> <p>The Proponent must:</p> <ul style="list-style-type: none">(a) maximise the recycling and reuse of water on site;(b) maximise the diversion of clean water runoff around the disturbance areas;(c) minimise the flow rates and velocities of any clean water runoff diversions to adjoining watercourses;(d) minimise the flooding impacts of the development;(e) minimise groundwater take from the Goandra 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 Goandra Creek and the headwaters of the Eucumbene River;(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;(g) design all instream works, particularly the inlet and outlet works, to minimise scour and erosion;(h) unless permitted by this approval, avoid carrying out of any development within 40 metres of any watercourse;(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;(j) treat all wastewater and surplus process water prior to discharging it at the approved discharge points at the Talbingo Reservoir or Tantangara Reservoir;(k) reduce the number of diffuser points for low velocity discharges to the Talbingo Reservoir or Tantangara Reservoir;(l) not discharge any surplus process water to the stormwater basins on site; <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 Yarragobilly 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;(n) minimise the risk of spills or leaks on site, and clean up any spills or leaks as quickly as possible;(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) store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards.	Non Compliant	<ol style="list-style-type: none">Evidence of Water Take Load Sheet Jan 2023Example of During/Post Rainfall inspection checklist (11 Feb 2025)Example of during/post rainfall inspection checklist (11 March 2025)Example of pre rainfall inspection checklist (15 March 2025)Erosion Sediment Control Plan - Marica Spoil Pads and Laydown Areas (6/2/2025)Example of a CAR (20/3/2025)Environmental Training and Awareness Attendance SheetsEvidence of internal Chemical Audit for TantangaraPre-rainfall inspection checklist Marica (19 March 2025)Erosion Sediment Control Plan - MAT Portal & HDD Pad (5 Nov 2024)Evidence of Water take load sheet Dec 2024Pre, during and post rainfall inspections for Lobs HolePre and post rainfall inspections for MaricaPre, during and post rainfall inspections for TantangaraHydraulic Oil spill Incident 116947 - Incident ReportDewatering Permits for Lobs Hole, Marica and TantangaraTantangara PESCPSoil Conservationist Inspections for Lobs HoleWater Take Load SheetsMat Portal ESCPFGJV Flocculation Trial PowerPoint (2022)Ravine Bay ESCP	<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><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>	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.	NC Identifier - 17
31	<p>Water Management Plan</p> <p>Prior to the commencement of construction, the Proponent must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none">(a) be prepared by a suitably qualified and experienced person in consultation with the EPA, NPWS, the Water Group, NRAR and NSW DPI;(b) include a Site Water Balance for the development with a program to review and update this water balance each calendar year;(c) include a Surface Water Management Plan, containing detailed plans for the Talbingo Reservoir, Lobs Hole, Marica, Plateau, Tantangara Reservoir, and Rock Forest sites, with:<ul style="list-style-type: none">• detailed baseline data on surface water flows and quality in the watercourses that could be affected by the development, and a program to augment this baseline data over time;• detailed criteria for determining the surface water impacts of the development (flows, quality and flooding), including criteria for triggering remedial action (if necessary);• a description of the measures that would be implemented to minimise the surface water impacts of the development and comply with the relevant water management requirements in conditions 4, 6 and 30 above, including specific plans covering:<ul style="list-style-type: none">- the temporary or permanent emplacement of spoil;- dredging, channel extraction and underwater blasting in the Talbingo Reservoir and Tantangara Reservoir;- operation of the discharge points;- the design of the inlets and outlets; and- dewatering of the tailrace tunnel during operations;• identify the key risks to the successful implementation of these measures, and describe the contingency measures that would be implemented to address these risks;• a program to monitor and publicly report on the surface water impacts of the development; <p>(d) include a Groundwater Management Plan with:</p> <ul style="list-style-type: none">• detailed baseline data of groundwater levels, yield and quality on the aquifers that could be affected by the development, and a program to augment this baseline data over time;• a program to validate and calibrate the groundwater model for the development as new information is collected;• detailed criteria for determining the groundwater impacts of the development, including criteria for triggering remedial action (if necessary);• a description of the measures that would be implemented to comply with the water management requirements in condition 30 above;• a program to monitor and publicly report on:<ul style="list-style-type: none">- groundwater inflows to the tunnel;- water take from the groundwater bores and connected water sources;- the impacts of the development on:<ul style="list-style-type: none">o regional and local (including alluvial) aquifers;o base flow to surface water sources. <p>Note: The Proponent may stage the preparation of the Water Management Plan, including the preparation of each of the detailed plans required under the Surface Water Management Plan. However, the detailed plans must be approved prior to any construction occurring on the relevant site.</p>	Compliant	<p>Water Management Plan (September 2022)</p> <p>Approval Letter from DPIE (dated 19 Oct 2020)</p> <p>Alpine Bogs and Fens Groundwater Hydrographs</p> <p>Standpipe Groundwater Hydrographs</p> <p>VWV Groundwater Hydrograph</p> <p>BH8106 TIR Outcome (Email dated 14 Aug 2023)</p> <p>Trigger Exceedance Report - BH2101 (Dec 2024)</p> <p>ALS CoA - (ES2506116)</p>	<p>Water MP approved by DPHI in letter dated 19 Oct 2020. Construction on the Project began 22 October 2020. Therefore Site is Compliant with this condition. Approval letter states that the WMP was developed to the satisfaction of the Planning Secretary.</p> <p>(a) Section 1.9 outlines the consultation undertaken with EPA, NPWS, Water Group, DPI Fisheries, NRAR, DAWE and BCD. Section 1.8 states that the plan was prepared by suitably qualified and experienced personnel. The names of personnel who prepared the WMP are provided in Section 1.8.</p> <p>(b) Section 5 outlines details of the site water balance including annual review of the Balance.</p> <p>(c) SWMP included as Appendix A of the WMP.</p> <ul style="list-style-type: none">• Section 3.9 (Existing Water Quality) and Attachment B (Baseline Water Quality Data and Streamflow)• Section 2 (Performance Criteria) of Annexure A (Surface Water Monitoring Program), Section 6.4 (Trigger Action Response Plan) of the SWMP and Annexure B (Trigger Action Response Plan) of SWMP• Section 5.13 (Management Measures Summary) of the SWMP• Section 5.14 (Risk and Contingency) of the SWMP• Section 6.7 (Reporting) of the SWMP, Section 3 (Monitoring Program Details) and Section 7 (Reporting) of Annexure A <p>(d) GWMP included as Appendix B of the WMP.</p> <ul style="list-style-type: none">• Attachment A (Baseline Levels and Groundwater Quality) of Appendix B (Groundwater Management Plan) of the Water Management Plan.• Section 8 (Review and Improvement) and Table 5-1 (Groundwater Management Measures): GW12• Section 6.4 (Trigger Levels and Methodology)• Section 5 (Groundwater Management Measures) and Table 5-1 (Groundwater Management Measures)• Section 6.8 (Reporting) and Section 2 (Groundwater Monitoring Principles and Design) of Annexure A (Groundwater Monitoring Program)		
32			<p>1. Monitoring results for groundwater data</p> <p>➤ Third Party Trainer Exceedance Report (Dec 2024)</p>	<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>IMP REC 20: 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.</p> <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.</p> <p>IMP REC 21: 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).</p> <p>IMP REC 22: Installation of wheel wash at Rock Forest. Commitment TRA 04 in the Transport Management Plan stated: <i>(installation of rumble grids or wheel washes where necessary (e.g. wheel washes at Polo Flat and Rock Forest).</i></p> <p>IMP REC 23: 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.</p>	

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
	The Proponent must implement the approved Water Management Plan for the development	Non Compliant	3. Quarterly groundwater quality sampling results for BH2101 and surrounding bores (ALS Certificate dated 11 Mar 2025) 4. Evidence of training staff for Hydroterra Groundwater Sampling Training 5. Data from weekly sampling frequency post TARP	<p>Monitoring Data Summary: 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: •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> <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>	<p>IMP REC 24: 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.</p> <p>IMP REC 25: 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.</p> <p>IMP REC 26: 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.</p> <p>IMP REC 27: 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).</p> <p>IMP REC 28: Additional information should be put in the Bi Annual Water Monitoring Reports. This should include: • 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.</p>	NC Identifier - 18
HERITAGE						
33	<p>Protection of Heritage Items</p> <p>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>	Non Compliant	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)	<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>		NC Identifier - 19
34	<p>Heritage Management Requirements</p> <p>The Proponent must: (a) undertake archival recording, test excavation and/or salvage of the Aboriginal heritage items listed in Table 4-3 in Appendix 4 if these items will be affected by the development; (b) undertake archival recording, test excavation and/or salvage of the historic items listed in Table 4-1 in Appendix 4 if these items are to be affected by the development; (c) prepare a detailed archival record of the history of settlement and mining in the Lobs Hole Ravine area; and (d) minimise the impacts of the development on the boulder streams and fossiliferous beds along Lobs Hole Ravine Road (see the figures in Appendix 3).</p>	Compliant	<p>Snowy Hydro Community Meeting Email (dated 26 Feb 2025)</p> <p>Discover of a Historic Heritage in Lick Hole Gully (Unexpected finds report from New South Wales Archaeology (dated 28 Feb 2025))</p>	<p>(a) and (b) Site have stated in the RFI that no archival recording, test excavation and/or salvage of Aboriginal and Historic items took place within the audit period. (c) Site have stated in the RFI that Archival record of the history of settlement and mining in the Lobs Hole Ravine area did not take place within the audit period. (d) No evidence of impacts.</p> <p>Despite the issues noted in Schedule 3 Condition 36, we believe the site meets these requirements.</p>		
35	<p>Heritage Management Plan</p> <p>Prior to carrying out any development for the Main Works that could affect the heritage items listed in Appendix 3 and 4, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, BCD, Heritage Council, RAPs, Yala Ngurumbang Yindjamarra Executive Advisory Committee and Southern Snowy Mountains Aboriginal Community MOU Group; (b) describe the measures that would be implemented to: • protect the heritage items identified in condition 33 above; • comply with the heritage management requirements in condition 34 above, including the display of removable heritage items in consultation with the NPWS and BCD; • relocate moveable historic heritage items within the disturbance area; • manage the discovery of human remains or previously unidentified heritage items; • provide for ongoing consultation with key stakeholders during the implementation of the plan; • involve key stakeholders in the management of heritage items on site; • allow Aboriginal stakeholders to visit significant cultural heritage sites on site, provided this can be carried out safely without compromising the construction of the development; and • ensure workers receive suitable training and inductions on the heritage management requirements on site; (c) include a program to monitor and report on the effectiveness of these measures; and (d) include a program to publish: • any detailed archival records required under the conditions of this approval; and • the findings of any excavations and salvage works.</p>	Compliant	<p>Heritage Management Plan (Mar 2025)</p> <p>HMP Approval Letter (dated 11/03/2025)</p> <p>HMP Approval Letter (dated 14/08/2020)</p>	<p>Revision G Approved by DPHI in a letter dated 14/08/2020. Construction on the Project began 22 October 2020. Therefore Site is Compliant with this condition.</p> <p>(a) Section 1.8 states that the 'HMP has been prepared by suitably qualified and experienced personnel'. Section 1.8 also includes the names of personnel who prepared the plan. Section 1.9 provides a list of agencies consulted with and the outcomes of the consultation. Consultation undertaken with NPWS, DPIE, Heritage NSW, Yala Ngurumbang Yindjamarra Executive Advisory Committee and the Southern Snowy Mountains Aboriginal Community MOU Group.</p> <p>(b) • Section 5.1.1 provides management measures for heritage items outside the construction envelope. • Section 5 details the management requirements and Section 1.9.3 details the ongoing consultation relating to moveable heritage items. • Section 5.3.8 outlines the procedure for salvaging moveable heritage items. • Appendix E is the unexpected finds procedure for discovery of human remains or previously unidentified heritage items. • Section 1.9.3 details the ongoing consultation with stakeholders throughout construction. • Section 1.9.3 states the requirement for consultation to allow Aboriginal stakeholders to visit site. • Section 6.2 details the site induction training for all workers which includes Aboriginal heritage, historic heritage and natural heritage.</p> <p>(c) Section 6.1 details the monitoring program and requirement to report non-compliances.</p> <p>(d) Section 6.5 describes the reporting requirements relating to archival records and findings of any excavation and salvage works.</p>		
36	The Proponent must implement the approved Heritage Management Plan for the development.	Non Compliant	<p>1. Heritage Management Plan Approval letter (dated 11/03/25) 2. 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) 3. Sensitive Area Plans 4. Environmental Awareness Training (includes heritage aspects) 5. Weekly Environmental Inspection Checklists</p>	<p><u>Site Records</u> 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. 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)</p> <p><u>IEA Site Inspection Notes:</u> Exclusion zone around the Washington Hotel ruin observed during the site inspection.</p>	<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).</p>	NC Identifier - 20
RECREATION						
37	<p>Offset</p> <p>Prior to the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must pay the NPWS \$1,995,000 to offset the recreational impacts of the Main Works on the Kosciuszko National Park.</p> <p>Notes: • These funds will augment the \$4,962,777 already paid to the NPWS to offset the conservation and recreational impacts of the Exploratory Works on the Kosciuszko National Park. • The NPWS will use these funds and any interest generated by these funds to enhance the recreational facilities in the Kosciuszko National Park, particularly in the areas surrounding the Tabingo Reservoir, Lobs Hole and Tantangara Reservoir sites. • To ensure accountability, the NPWS will: - develop a detailed program for the allocation of these funds to specific projects; and - monitor, evaluate and publicly report on the implementation of the detailed program and the effectiveness of the specific projects.</p>	Not Triggered	Snowy 2.0 IEA #4 (2023)	<p>This condition was deemed compliant at Audit #1 - invoice sighted - 8/10/2020 - one off requirement. Not triggered at this audit</p>		

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
38	<p>Recreation Management Requirements</p> <p>The Proponent must:</p> <p>(a) keep Tantangara Road open to the public once it has been upgraded for the development, and have suitable procedures in place to ensure it is safe for unrestricted use and to respond promptly to any temporary public safety risks;</p> <p>(b) minimise the impacts of the development on users of the Kosciuszko National Park both within and in the vicinity of the construction envelope;</p> <p>(c) minimise any disruption to the use of the Talbingo Boat Ramp;</p> <p>(d) minimise the dust and noise impacts of the development on the Wares Yards campground;</p> <p>(e) control the recreational activities of the workers staying in the accommodation camp to minimise the impacts of the development outside the approved disturbance area;</p> <p>(f) progressively reopen those areas of the Kosciuszko National Park that are closed to the public during construction as soon as possible following the completion of construction;</p> <p>(g) keep the community informed about the temporary closure of areas or any recreational facilities within the Kosciuszko National Park.</p>	Compliant		It appears Tantangara road has remained operational for the period. There were issues noted by NPWS however this is more applicable to Schedule 3 Condition 38a). We were provided evidence of water truck usage and sighted in in the inspection.		
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 TINSW;</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>	Non Compliant	<p>Approval Letter from DPHI (dated 24/10/2024)</p> <p>Snowy 2.0 Recreation Management Plan (Stage 1) (26 Sep 2024)</p> <p>DPHI Letter - Snowy 2.0 Main Works (SSI 9687) Approval of Management Plan Staging (dated 21/12/2023)</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 <u>non-compliant</u>. 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 TINSW</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(e) Section 3.5 addresses this condition(f) Section 3.6.4 addresses this condition		NC Identifier - 21
40	<p>The Proponent must implement the approved Recreation Management Plan for the development.</p>	Compliant	<p>Snowy 2.0 Recreation Management Plan (Stage 1) (26 Sep 2024)</p>	<p><u>Government Liaison</u></p> <p>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><u>IEMA comment to NPWS</u></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.		
TRANSPORT						
41	<p>Road Upgrades</p> <p>The Proponent must carry out the road and intersection upgrades in Tables 5-1 and 5-2 in Appendix 5 in accordance with any specified timeframes to the satisfaction of the relevant roads authority.</p>	Compliant	<p>Site discussions</p> <p>Works occurred prior to the audit team.</p>	Completed prior to the audit period. Intersection upgrades.		
42	<p>Maintenance – Link Road and Tantangara Road</p> <p>The Proponent must:</p> <p>(a) prepare a dilapidation survey of Link Road between the Snowy Mountains Highway and Goat Ridge Road and Tantangara Road in accordance with the relevant Austroads standards and guidelines:</p> <ul style="list-style-type: none">• prior to the commencement of construction and/or the decommissioning of the development; and• within 2 months of the completion of construction and/or the decommissioning of the development; <p>(b) rehabilitate and/or make good any development-related damage to Link Road between the Snowy Mountains Highway and Goat Ridge Road and Tantangara Road;</p> <ul style="list-style-type: none">• identified during the construction and/or decommissioning works if it could endanger road safety, as soon as possible after it is identified but within 7 days at the latest, unless the NPWS agrees otherwise; and• identified in any dilapidation survey completed after the construction and/or decommissioning works within 2 months of the completion of the survey to the satisfaction of the NPWS. <p>If there is a dispute about the scope of any remedial works or the implementation of these works, then either party may refer the matter to the Planning Secretary for resolution.</p>	Not Triggered	<p><u>Evidence from RFI</u></p> <p>1. Monthly Maintenance Inspection Report - Tantangara Roads Jan 2025</p> <p>2. Monthly Maintenance Inspection Report - Lobs Hole Feb 2025</p> <p>3. Soil Conservationist inspection report Lobs Hole (6 Feb 2025)</p> <p>4. Roads and basins maintenance schedule</p> <p>5. Snowy 2.0 IEA #4 (2023)</p>	<p>(a) This was a requirement that was triggered prior to construction commencing and will not be triggered again until decommissioning of the Project. Not triggered at this audit</p> <p>It was noted at the previous audits that a dilapidation survey was conducted for Link Road.</p> <p>(b) Site has stated in the RFI that this has not been triggered. IEMA has no evidence to dispute this claim.</p>		
43	<p>Vehicle Restrictions</p> <p>All heavy vehicles associated with the development must travel to and from the site via the:</p> <p>(a) Snowy Mountains Highway, Miles Franklin Drive and Spillway Road;</p> <p>(b) Snowy Mountains Highway, Link Road and Lobs Hole Ravine Road;</p> <p>(c) Snowy Mountains Highway, Coppermine Trail and Wallaces Creek Trail;</p> <p>(d) Snowy Mountains Highway, Marica Trail;</p> <p>(e) Snowy Mountains Highway, Tantangara Road and Quarry Trail; or</p> <p>(f) Elliott Way and Link Road (but only following the written approval of the Planning Secretary).</p> <p>Note: The Proponent must obtain permits under the Heavy Vehicle National Law (NSW) for the use of any OSOM vehicles on the public road network.</p>	Compliant	<p><u>Evidence from RFI</u></p> <p>Six OSOM permits from July 2023 to present</p> <p>Hygiene declaration form.</p> <p>Induction process</p> <p>Daily look a head form</p> <p>Sample of 5 National Heavy Vehicle Register Permits</p>	<ul style="list-style-type: none">• IBMS (vehicle monitoring system) in all trucks. Location, speed, driver.• Discussion on internal audit processes for buses coming up. Review records of speeds.• Evidence of Heavy Vehicle Permits being obtained.• 95% of haulage occurs through Cooma.• Transport updates through the WhatsApp App Group.• Material checks for products coming into site, at leaving pt e.g. quarry and once the truck arrives at site (site to review quarry rock). <p>Evidence of hygiene declaration form.</p> <ul style="list-style-type: none">• Evidence of daily look ahead form. <p>No issues or incidents noted with this condition based on the records provided. No evidence of reporting any issues to DPHI.</p>		
44	<p>The Proponent must:</p> <p>(a) restrict vehicle speeds on the road network within the site to 30 km/h between sunset and sunrise, unless the Planning Secretary agrees otherwise;</p> <p>(b) restrict the use of Lobs Hole Ravine Road – North to:</p> <ul style="list-style-type: none">• access to and from the site during emergencies;• light vehicles at all other times with:- a maximum of 120 vehicle movements allowed a day (60 each way); and- an annual average maximum of 60 vehicle movements allowed a day (30 each way); and <p>(c) restrict vessel speeds on Tantangara Reservoir and Talbingo Reservoir to current TINSW speed limits; and</p> <p>(d) unless the Planning Secretary agrees otherwise, ensure that during construction and decommissioning:</p> <ul style="list-style-type: none">• between 7 AM and 9 AM during the months of June to August, heavy vehicles transferring spoil from Marica to Tantangara and/or Rock Forest does not generate more than 5 heavy vehicle movements in each direction per hour on the Snowy Mountains Highway between Marica Trail and Tantangara Road; and• between 7 AM and 9 AM during the months of September to May, heavy vehicles transferring spoil from Marica to Tantangara and/or Rock Forest does not generate more than 9 heavy vehicle movements in each direction per hour on the Snowy Mountains Highway between Marica Trail and Tantangara Road.	Compliant	<p><u>Evidence from RFI</u></p> <p>Heavy vehicle movement logs</p>	<p>a) '2025 FGJV Heavy Vehicle Driver Induction General Safety 2025' states that 'The speed limit within the worksite at night is 30 km per hour due to nocturnal fauna.'</p> <p>b) This is emergency access only.</p> <p>c) Vehicle signs and training for drivers.</p> <p>d) This condition has not triggered. Still called condition compliant for the other 3 parts.</p> <p><u>Government Liaison</u></p> <p>NPWS noted issues related to the emergency egress from the Lobs Hole project area in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p> <p>Please note, during the site visit by IEMA, Lobs Hole Ravine Road – North was not sighted by the audit team. We have called the site compliant for this condition, however see Schedule 3 Condition 61 for recommendation around emergency access. We do however have an improvement recommendation under Schedule 3 Condition 61 - Emergency Management Plan.</p>		

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
53	<p>Visual Impact Management Requirements</p> <p>The Proponent must:</p> <ul style="list-style-type: none">(a) minimise the visual impacts of the long-term temporary and permanent infrastructure of the development on the Kosciuszko National Park, including:• having regard to the NPWS Park Facilities Manual;• complying with the requirements in approved management plan under the conditions of this approval;• using suitable planting and screening;• ensuring the visual appearance of the infrastructure blends into the surrounding landscape as much as possible, including:- using appropriate colours and non-reflective paints on permanent buildings to reduce glare;- incorporating textures on large surfaces and using dark aggregates and oxides for exposed concrete surfaces;- using locally sourced stone to clad buildings or portals, such as the Lobs Hole substation building façade;• incorporating textured surfaces along the shoreline of the Ravine Bay and Talbingo spoil emplacement areas;• installing landscaping and/or suitable screening as soon as practicable along the Snowy Mountains Highway boundary of the Rock Forest site to screen the development on site from road users and nearby residences;(b) minimising the visual impacts of the development on the Rock Forest site on nearby residences during construction;(c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes;(d) minimise the lighting impacts of the development, including ensuring that all external lighting associated with the development:• is consistent with the good lighting design principles in the Dark Sky Planning Guideline, (DPE 2016), or its latest version; and• complies with Australian Standard AS4282 (NT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.	Compliant	<p><u>Evidence from REI</u></p> <ol style="list-style-type: none">1. Email chain outlining SHL obligation to review FGJV's designs / check against the Visual Impact Management Plan implementation (14 Mar 2025)2. Meeting invite for MAT Portal Completion Works (17 Mar 2025).3. Evidence of MAT portal email and visual management.	<ul style="list-style-type: none">a) No final structures are in place. The site is about to commence the first one. No evidence of complaints for lighting or visual under Main Works CSSI.b) No evidence of complaints for lighting or visual for Rock Forestc) During the site inspection, no advertising signs or logos were observed on site .d) No evidence of complaints for lighting or visual under Main Works CSSI.		
54	<p>Visual Impact Management Plan</p> <p>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:</p> <ul style="list-style-type: none">(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.	Non Compliant	<p>Visual Impact Management Plan (August 2024)</p> <p>Visual Management Plan approval letter (dated 20 Sep 2024)</p> <p>DPHI Letter - Snowy 2.0 Main Works (SSI 9687) Approval of Management Plan Staging (dated 21/12/2023)</p>	<p>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.</p> <p>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.</p> <p>VIMP - Stage 2 has not yet been approved and the required approval date set by DPHI has now lapsed. Therefore <u>non-compliant</u>. See NC REC.</p> <ul style="list-style-type: none">a) Section 1.6 Summarises the consultation undertaken with NPWSb) Section 5 describes the Visual Impact Management Measures to be undertakenc)• 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.	NC Identifier - 24
55	<p>The Proponent must implement the approved Visual Impact Management Plan for the development.</p>	Compliant	<p><u>Evidence from REI</u></p> <ol style="list-style-type: none">1. Email chain outlining SHL obligation to review FGJV's designs / check against the Visual Impact Management Plan implementation (14 Mar 2025)2. Meeting invite for MAT Portal Completion Works (17 Mar 2025)	No final structures are in place. The site is about to commence the first one. No evidence of complaints for lighting or visual under Main Works CSSI.		
NOISE						
56	<p>Minimise Noise</p> <p>The Proponent must minimise the noise generated by the construction, operation, and decommissioning of the development.</p>	Compliant		<ul style="list-style-type: none">• This is only a Rock Forest issue.• Ongoing unattended noise monitoring.• No complaints about noise during the reporting period.		
57	<p>Construction Noise Management Plan – Rock Forest</p> <p>Prior to the commencement of construction on the Rock Forest site, the Proponent must prepare a Construction Noise Management Plan for the development on site to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none">(a) be prepared by a suitably qualified and experienced person in consultation with the landowners of the nearby properties;(b) describe the measures that would be implemented to minimise the construction noise impacts of the development on the Rock Forest site, including:• minimising the use of the site during the evening and night-time periods;• implementing the best practice noise mitigation measures outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version; and,• potentially, the use of voluntary noise mitigation agreements with landowners to allow higher construction noise levels or longer construction hours(c) include a program to monitor and publicly report on the effectiveness of these measures	Compliant	<p>Construction Noise Management Plan - Rock Forest (Dec 2022)</p> <p>Approval letter</p> <p>Daily Rock Forest Day Works - Spreadsheet</p> <p>PowerPoint - results of real time noise monitoring.</p>	<p>Construction of the Rock Forest site commenced in June 2021. According to the document revision table the first draft of the Construction Noise Management Plan was prepared on 05 Jun 2020. The Construction Noise Management Plan was approved in a letter planning dated 20/12/2020 confirming Construction Noise MP - Rock Forest approval.</p> <p>Activities at Rock Forest commenced in June 2021 according to the Rock Forest Day Works Reports provided by Snowy Hydro.</p> <ul style="list-style-type: none">(a) Section 1.8 states name and qualification of person preparing the NMP. Section 1.7 describes the consultation undertaken with landowners and outcomes the of these consultations.(b)• Table 6-1 (NV09)• Table 6-1 (NV03)• Table 6-1 (NV12)(c) Section 7.1 describes the noise monitoring to be undertaken and Section 7.5 outlines the reporting requirements.	IMP REC 30: 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.	
58	<p>The Proponent must implement the approved Construction Noise Management Plan for the Rock Forest site.</p>	Compliant	<p>Rock Forest Laydown Weekly Environmental Monitoring Report (dated 28 June 2021)</p>	<p><u>Site Records</u></p> <p>Evidence of rock forest noise monitoring with real time noise monitor. Section 7.1 of the Construction Noise Management Plan stated:</p> <p><i>Attended noise monitoring during the initial stages of construction and monitoring in response to complaints, will be undertaken in accordance with this plan. All acoustic instrumentation used for monitoring under the noise monitoring program will have current NATA or manufacturer calibration certificates.</i></p> <p>The Rock Forest Laydown Weekly Environmental Monitoring Report (dated 28 June 2021) provides evidence of attended noise monitoring being undertaken between 13/05/2021 - 18/06/2021.</p> <p>Note: no evidence of complaints based on the activities.</p> <p><u>Government Liaison</u></p> <p>No specific government liaison other than approval of the management plan.</p> <p><u>IEA Site Inspection Notes:</u></p> <p>No activities were occurring at site at the time of the inspection. However activities have occurred in the audit period, with recent works including road construction, topsoil stripping, erosion and sediment control works, early works constructing a leachate cell.</p>		
AIR						
59	<p>The Proponent must:</p> <ul style="list-style-type: none">(a) minimise the dust, odour, fume, and blast emissions of the development; and(b) minimise the surface disturbance of the site.	Compliant	<p><u>Evidence from REI</u></p> <ol style="list-style-type: none">1. Evidence of Dust monitor dashboard for Tantangara and Lobs Hole2. Light vehicle delivery and quarterly inspection form (blank)3. FGJV Plant Safety Specifications and Requirements Matrix4. Evidence of water truck dust suppression records and volumes 20255. Selection of four pre blast Firing Checklists6. Selection of 13 Post Blast Records	<p>Recommendation as per Schedule 3 Condition 13 of the consent.</p> <ul style="list-style-type: none">a) No odour issues have been noted. No evidence of fume issues (surface blasts). Generally dust was managed well, however there were some areas at Ravine Road where additional water trucks could be used.b) disturbance has been minimised.		
EMERGENCY MANAGEMENT						
60	<p>Bushfire Requirements</p> <p>The Proponent must:</p> <ul style="list-style-type: none">(a) include suitable asset protection measures into the final design of the development in accordance with the Planning for Bushfire Protection (RFS 2018) guidelines, or its latest version;(b) ensure all buildings developed on site comply with the relevant requirements of the BAL-29 construction standards of Australian Standard AS 3959-2018: Construction of buildings in bushfire prone areas or the NASH Standard (1.7.14 updated) in National Standard Steel Framed Construction in Bushfire Areas – 2014; and(c) ensure any fire trails or asset protection zones associated with the development are wholly contained within the approved disturbance area.	Compliant	<p>Evidence of APZ figure.</p> <p>Site inspection</p>	<p>No specific issues noted in regard to this condition. See Schedule 3 Condition 61 for</p> <ul style="list-style-type: none">a) Final designs of permanent construction address bushfire managementb) Final buildings are still being constructedThere are APZs for construction areas. There have been no fires in the period.c) Evidence of APZ figure.		

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
61	<p>Emergency Management Plan</p> <p>Prior to the commencement of construction, the Proponent must prepare an Emergency Management Plan for the development to the satisfaction of the NPWS. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the NPWS;</p> <p>(b) be consistent with the Kosciuszko National Park Fire Management Strategy 2008-2013 (NPWS 2008), or its latest version;</p> <p>(c) include evacuation protocols for the site;</p> <p>(d) describe the measures that would be implemented to:</p> <ul style="list-style-type: none"> • minimise the risk of bushfires on site; • protect the assets on site from bushfires; • respond to any bushfires on or in the vicinity of the site; • minimise flood risks on site, including flooding response procedures; • minimise the risk of landslips on site, including landslide response procedures; and • evacuate the site in an emergency; and <p>(e) monitor and review the effectiveness of these measures</p>	Compliant	<p>Snowy 2.0 - Main Works Natural Hazard Management Plan (approved 21 Aug 2020)</p> <p>Evidence from RFI</p> <p>1. Copy of submission of revised Emergency Management Plan (Mod 3 update)</p> <p>2. Drill register for Lobs Hole 2024-2025</p>	<p>There is no implementation condition in this CSSI so we have assessed implementation under this condition. Emergency Management Plan (Natural Hazard Management Plan) approved by NPWS in a letter dated 21 Aug 2020. Main Works Construction began 22 October 2020. The EMP was approved prior to commencement of construction.</p> <p>(a) Section 1.7 (Plan Preparation)</p> <p>(b) Section 2.5 of Appendix A</p> <p>(c) 5.2.2, 5.2.3 and Appendix A</p> <p>(d)</p> <ul style="list-style-type: none"> • Sections 5.5, 6 and 7 of Appendix A • Section 5 of Appendix A • Section 4 and 6 of Appendix A • Sections 4.3, 5.2 and 6 • Sections 4.4 and 5.3 • 5.2.2, 5.2.3 and Section 8.6 of Appendix A <p>(e) Section 7</p> <p><u>Government Liaison</u></p> <p>NPWS noted issues related to designated emergency egress from the Lobs Hole project area in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p> <p>EMA have put some improvement recommendations. From discussions with Snowy Hydro some issues with erosion have been due to a requirement to have safety bunding along the Lobs Hole North Road/Ravine Road North.</p> <p><u>IEA Site Inspection Notes:</u></p> <p>No specific issues noted by the IEA team.</p>	<p>IMP REC 31: 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.</p> <p>IMP REC 32: Remove any fallen trees and vegetation that is encroaching the emergency exit (Lobs Hole North Road/Ravine Road North).</p> <p>IMP REC 33: 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 busses that would be necessary to respond to bushfire emergencies and evacuate personnel.</p>	
62	In the event that changes to emergency access and egress routes are proposed, the Proponent is to review the proposed changes and the Emergency Management Plan in consultation with RFS, NSW State Emergency Service and NPWS, and update the Emergency Management Plan to the satisfaction of NPWS prior to implementation of the changes.	Not Triggered	Site discussions	Based on site discussions this was reviewed in the MOD and no changes required. Not triggered.		
SUBSIDENCE						
63	<p>Performance Measures – Natural and Heritage Features</p> <p>The Proponent must ensure that any project related subsidence impacts do not cause greater than negligible environmental consequences on the National Park Estate, including but not limited to water, biodiversity and heritage values.</p>	Not Triggered		Newer MOD condition. Based on site discussions there has been no other subsidence since that event. None noted in the field.		
64	<p>Prior to recommending tunnelling using tunnel boring machine Florence as described in MOD 2 or commencing tunnelling for the Marica west adit as described in MOD3, the Proponent must prepare a Subsidence Management Plan in respect of the tunnelling works by tunnel boring machine Florence and the Marica west adit, to the satisfaction of the Planning Secretary and in consultation with NPWS. This plan must:</p> <p>(a) be prepared by a suitably qualified geotechnical expert;</p> <p>(b) include detailed measures and controls that would be implemented to ensure performance measure in condition 63 is met;</p> <p>(c) include a detailed description of subsidence monitoring prior to tunnelling recommending and ongoing monitoring at surface or within the tunnel;</p> <p>(d) include a risk assessment and trigger action response plan (TARP) to identify and manage settlement risk; and</p> <p>(e) include a contingency plan and adaptive management process.</p>	Compliant	<p>Evidence from RFI</p> <p>1. DPHI Approval Letter for Subsidence Management Plan 06/12/23</p> <p>2. TBM Florence - Fortnightly Advance and Monitoring Report (29/02/2024 to 14/03/2024)</p> <p>3. Subsidence Management Plan (5 Dec 2023)</p>	<p>Florence boring Tarrantara and recommenced after it was stuck.</p> <p>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.'</p> <p>The Subsidence MP was approved on 5 Dec 2023 in a letter from DPHI (dated 6 Dec 2023). Therefore, the Subsidence MP was approved prior to recommending tunnelling using tunnel boring machine Florence.</p> <p>a) Cover page of the SMP states that the SMP was prepared by B. Chapman (Lead Tunnel Engineer - Snowy 2.0) and D. Frontini (Geotechnical Lead - Snowy 2.0)</p> <p>b) Section 2 (Subsidence Instrumentation and Monitoring)</p> <p>c) Section 2 (Subsidence Instrumentation and Monitoring)</p> <p>d) Section 3 (Ground Subsidence Review) and Attachment 3 (Tarp Monitoring Triggers for TBM Excavation)</p> <p>e) Section 3 (Ground Subsidence Review)</p> <p>Marica - Not yet triggered.</p>		
65	The Proponent must implement the Subsidence Management Plan as approved by the Planning Secretary	Non Compliant	<p>1. TBM Florence - Fortnightly Advance and Monitoring Report: 06/12/2023 to 20/12/2023 - 21/12/2023 to 03/01/2024 - 04/01/2024 to 17/01/2024 - 18/01/2024 to 31/01/2024 - 1/02/2024 to 14/02/2024 - 15/02/2024 to 28/02/2024 - 29/02/2024 to 14/03/2024</p> <p>2. Fortnightly Advance and Monitoring Report acceptance letters from DPHI.</p>	<p>Section 4 (Ground Subsidence Reporting) states:</p> <p>'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:</p> <p>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</p> <p>2. A subsidence monitoring report will be submitted to the NSW Department of Planning & Environment on a fortnightly basis, and</p> <p>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.'</p> <p>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).</p> <p>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.'</p> <p>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.</p>	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.	NC Identifier - 25
66	<p>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:</p> <p>(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;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the development and whether it is complying with the requirements in conditions 63 and 64;</p> <p>(d) review the adequacy of the approved strategies, plans or programs for the development; and</p> <p>(e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any approved strategies, plans or programs.</p>	Non Compliant	No evidence provided.	<p>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.'</p> <p>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.</p> <p><u>Government Liaison</u></p> <p>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.</p>	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.	NC Identifier - 26
67	<p>Within 12 weeks of commissioning the audit required in condition 66, unless the Planning Secretary agrees otherwise, the Proponent must submit the following via the Major Projects Portal:</p> <p>(a) a copy of the audit report;</p> <p>(b) its response to the recommendations in the audit report; and</p> <p>(c) a copy of the proposed audit action plan to address the recommendations.</p>	Not Triggered	No evidence provided.	Not yet triggered as the Independent Environmental Audit of the Subsidence Management Plan has not yet been commissioned. Compliance changed from non-compliant to not triggered based on September 2025 feedback.		
68	The Proponent must implement any approved audit action plan for the development.	Not Triggered	No evidence provided.	Not yet triggered as the Independent Environmental Audit of the Subsidence Management Plan has not yet been commissioned. Compliance changed from non-compliant to not triggered based on September 2025 feedback.		
SCHEDULE 4 - ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING						
ENVIRONMENTAL MANAGEMENT						
1	<p>Prior to the commencement of the development of the Main Works, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <p>(a) provide the strategic framework for the environmental management of the development;</p> <p>(b) identify the statutory approvals that apply to the development;</p> <p>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; and</p> <p>(d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the progress of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the development; • respond to incidents and/or non-compliances; and • respond to any emergency. 	Compliant	<p>Environmental Management Strategy (Feb 2025)</p> <p>DPHI Approval Letter (dated 4 Apr 2025)</p> <p>DPHI Approval Letter (dated 14 Aug 2020)</p>	<p><u>Preparation</u></p> <p>EMS approved by DPHI on 14/08/2020 (EMS DPHI Approval Letter)</p> <p>EMS was prepared prior to the commencement of the development.</p> <p>(a) Sections 4, 4.1.3 and 4.1.4 outline the strategic framework for the EMS.</p> <p>(b) Sections 3.1, 3.4, Table 3-4 and Appendix A2 identify the statutory approvals.</p> <p>(c) Sections 4.2, 4.2.2, Table 4-6 list the role, responsibility, authority and accountability of key personnel.</p> <p>(d)</p> <ul style="list-style-type: none"> • Section 6.1.2 • Section 6.2 • Section 6.2.1 • Sections 7.2 and 8.4.1 • Section 7.3 		
18						

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
	The Proponent must implement the approved Environmental Management Strategy.	Non Compliant	<p><u>Evidence from RFI</u> Internal SHL audits: 1. Marica Leachate Basin Audit March 2024 2. Tantangara Leachate Basin Audit March 2024 3. Copy of FGJV audit schedule (2021 - 2022) 4. Environmental training and awareness attendance sheet for water cart training March 2025 5. Environmental training and awareness attendance sheet for water cart training 15 March 2025 6. Water Cart Operations Training Presentation 7. Hydroterra Groundwater Sampling Training attendance sheet 8. Environmental Training and Awareness Attendance Sheet for Erosion and Sediment Control - delivered by SEEC 9. Environmental Training and Awareness Attendance Sheet for Erosion and Sediment Control - delivered by SEEC 10. Environmental Training and Awareness Attendance sheet for ALS Compass - delivered by ALS 11. Environmental Training and Awareness Attendance sheet for Fundamentals of Erosion and Sediment Control - Lobs Hole, delivered by SEEC 10/8/23 12. Environmental Training and Awareness attendance sheet for Fundamentals of Erosion and Sediment Control - Lobs Hole, delivered by SEEC 11/8/23</p> <p>13. Snowy 2.0 Complaints for SHL website 14. MAT PORTAL. Spoil Management Workshop list of attendees Jan 2024 15. Erosion and sediment control training attendance sheet - Tantangara - Delivered by SEEC 16. Spoil Management Flowchart MAT PORTAL 17. Watercart Toolbox talk training attendance sheet Aug 2024 18. Environmental training and awareness attendance sheet - Water Sampling Procedure - June 2024</p>	<p><u>Implementation</u> Evidence of inspections and training records. See evidence column. Evidence of complaints management.</p> <p>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 <u>non-compliance</u>. No non-compliance recommendation allocated to this condition as it is addressed in NC RECs which are assigned to S4, C7.</p> <p>See Schedule 4 Condition 7 for more details of findings and recommendations.</p>		NC Identifier - 27
19	<p>Staging and Updating of Strategies, Plans or Programs</p> <p>With the agreement of the Planning Secretary, the Proponent may submit any strategy, plan or program required under this approval on a staged basis. The Proponent may also submit updates to approved strategies, plans or programs at any time.</p> <p>With the agreement of the Planning Secretary, the Proponent may prepare the staged or updated strategy, plan or program without undertaking all the consultation required under the applicable condition in this approval.</p> <p>Notes:</p> <ul style="list-style-type: none">• 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.	Non Compliant	<p><u>Evidence from RFI</u> 1. Approval letter for Management Plan Staging of Rehabilitation Management Plan, Recreation Management Plan, Long term Roads Strategy and Visual Impact Management Plan (dated 21/12/2023) 2. Approval letter for Management Plan Staging of Biosecurity Risk Management Plan (dated 25/10/2023) 3. DPHRD Approval Letter – DPHRD endorsement of Biosecurity Risk Management Plan in line with conditions of consent (dated 25 Oct 2024)</p>	<p>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 <u>non-compliant</u>. 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 <u>non-compliant</u>. 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 <u>non-compliant</u>. 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 <u>non-compliant</u>. 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 <u>non-compliant</u>. 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 <u>non-compliant</u>. No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S3, C54.</p> <p>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 DPHRD 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 <u>non-compliant</u>. No non-compliance recommendation allocated to this condition as it is addressed in NC REC which is assigned to S3, C22.</p> <p><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.</p>		NC Identifier - 28
20	<p>Update of Strategies, Plans or Programs</p> <p>Within 3 months of the following, unless the Planning Secretary agrees otherwise, the Proponent must review and (if necessary) update the approved strategies, plans and programs for the development to the satisfaction of the Planning Secretary:</p> <p>(a) the submission of an incident report under condition 6 below;</p> <p>(b) the submission of an independent environmental audit report under condition 10 below; and</p> <p>(c) any modification to the conditions of this approval; or</p> <p>(d) a direction of the Planning Secretary under condition 4 of schedule 2.</p> <p>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.</p>	Non Compliant	<p>Letter from DPE - Incident Notification regarding the elevated levels of nitrates and nitrites - GF01 (dated 12 October 2023)</p>	<p>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.</p> <p>(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 <u>non-compliant</u> under Part a) of this condition. See NC REC.</p> <p><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.</p>	<p>NC REC 19: Following this IEA and other triggers under Schedule 4 Condition 20 review and if necessary update site management plans.</p> <p>IMP REC 34: Snowy Hydro to consider an update to the management plan review process that eliminates complexity where possible. ie. repetition, potential streamlining.</p>	NC Identifier - 29
21	<p>Monitoring</p> <p>The Proponent may undertake monitoring outside the construction envelope of the development provided this monitoring is required under the conditions of this approval and authorised under an approved management plan.</p>	Compliant	<p>Snowy 2.0 Management Plans</p>	<p>Site has stated in the RFI <i>'There are many areas outside of the construction envelope that are control sites which are routinely monitored under the BMP, EPL, HMP, and RMP. No new areas have been added in the period that this audit pertains to.'</i></p> <p>IEMA agrees with this statement, there are areas outside of the construction envelope that Snowy Hydro must monitor in accordance with project management plans and consent.</p>		
REPORTING						
22	<p>Notification of Dates</p> <p>At least 1 week prior to the relevant notification date, the Proponent must notify the Department, NPWS and NSW DPI via the Major Projects Portal of the date of the:</p> <p>(a) commencement of the development of the Main Works;</p> <p>(b) commencement of development on the following sites under this approval:</p> <ul style="list-style-type: none">• Marica site;• Plateau site;• Tantangara site; and• Rock Forest site; <p>(c) commencement and completion of the required road upgrades;</p> <p>(d) commencement and completion of construction;</p> <p>(e) commencement of commissioning and testing the power station;</p> <p>(f) completion of the initial rehabilitation of the site following construction;</p> <p>(g) completion of the ecological rehabilitation of the site, apart from the areas used for operations;</p> <p>(h) commencement and completion of operations;</p> <p>(i) commencement of decommissioning the development;</p> <p>(j) completion of the final rehabilitation of the site; and</p> <p>(k) completion of the ecological rehabilitation of the areas used for operations.</p>	Not Triggered		<p>(c) Assessed as compliant at Audit #1 for commencement (one-off requirement) Commencement of road upgrades was assessed at Audit #1. Snowy Hydro has stated in the RFI that <i>'Required road upgrade works have not been completed.'</i></p>		

Condition Number	Condition	Compliance Status	Source of Evidence	Finding	Recommended Action	Unique NC Identifier
6	Incident Reporting The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.	Compliant	<u>Evidence from RFI</u> 1. 4x evidence of incident notifications to Major Projects Portal 2. Environmental Incident and Event Register Shared SHL & FGJV 3. 10x evidence of incident reports pulled from Shared SHL & FGJV Register in (3.)	See Section 4.7 for details on incident management, including definition of an incident - <i>Incident - An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.</i> Snowy Hydro appears to be conservative with reporting in case there is potential for material harm. Below is a summary of the incidents and non-compliance meeting minutes from Snowy/FGJV/IEMA – 01/05/2025. Initial Incident Notification •Incident identified by FGJV. •WhatsApp group used to notify Snowy Hydro of the incident. •FGJV site environmental personnel notify EPA via the Pollution Hotline. •Notification email sent to agencies (EPA, DCCEEW, DPHI, etc.). •No notification through the Planning Portal because other agencies are not notified during the portal notification. 7-day Report •Report template completed by Snowy Hydro with details being provided by FGJV •7-day Report sent to all regulatory agencies via a joint email address •7-day Report also sent to DPHI via the Planning Portal •7-day report states which condition of the consent the site is non-compliant against. •Snowy Hydro and FGJV both have access to and use INX system which is used to store all incident related information. Overall we believe the initial incident management, reporting and incident investigation process is working fine. There has been some contradicting information provided for incident records between the internal and external website records. The website external records do not contain all the incidents within the internal records pdf. This may be because of the way FGJV first identifies an incident vs how Snow Hydro defines and then reports an incident.		
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.	Non Compliant	<u>Evidence from RFI</u> 2. DPHI Post Approval Form - NC Notification	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.	NC Identifier - 30
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.	Non Compliant	Snowy 2.0 website	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.		NC Identifier - 31
INDEPENDENT ENVIRONMENTAL AUDIT						
9	Within one year of the commencement of construction, and every 3 years thereafter unless the Planning Secretary agrees otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the development. 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 this approval (including the requirements of any approved strategy, plan or program); (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.	Compliant	2023 IEA	In a revised audit program approved by DPHI, the audit schedule was re-set to occur every 18 months. The forth IEA was conducted in July 2023. <u>2023 IEA</u> (a) Section 1.4 (Auditor Credentials) of the 2023 IEA provides qualification of audit team. (b) Appendix E (Planning Secretary Audit Team Agreement) of the 2023 IEA. (c) Section 4 (Overview of Environmental Performance) of the 2023 IEA assesses the compliance status of the Consent. (d) Section 3.2 (Audit Findings, Actions and Recommendations) assesses the strategies, plans and programs of the consent. (e) Section 3.2 (Audit Findings, Actions and Recommendations) of the 2023 IEA provides Actions and Recommendations		
10	Within 12 weeks of commissioning this audit, unless the Planning Secretary agrees otherwise, the Proponent must submit the following via the Major Projects Portal: (a) a copy of the audit report; (b) its response to the recommendations in the audit report; and (c) a copy of the proposed audit action plan to address the recommendations.	Compliant	Submission letter sent to DPHI (dated 11 Sep 2023) <u>Evidence from RFI</u> 1. DPHI Post Approval Form from submission of 2023 IEA	<u>Previous Audit</u> Evidence of 2023 IEA being sent to DPHI via the Planning Portal. Submission letter from Snowy Hydro for the 2023 IEA found on the Planning Portal states that the IEA report and associated non-compliance summary table was submitted on 11 September 2023 which is within the 12 week timeframe. (a) Post Approval form for the 2023 IEA lists all attachments that were submitted to DPHI. This includes the Main Works IEA. (b) Snowy 2.0 IEA #4 Non-compliance table that was provided with submission letter lists the Agreed Actions and Responsibility of each NC identified during the 2023 IEA. (c) Snowy 2.0 IEA #4 Non-compliance table that was provided with submission letter lists the Agreed Actions and Responsibility of each NC identified during the 2023 IEA.		
11	The Proponent must implement any approved audit action plan for the development.	Non Compliant	<u>Evidence from RFI</u> 1. Copy of previous audit action plan including implementation 2. Copy of IEA #4 Action Plan (March update) Snowy 2023	<u>Implementation</u> 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 <u>non-compliant</u> 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.		NC Identifier - 32
ACCESS TO INFORMATION						
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.	Non Compliant	Snowy 2.0 website	<u>Exploratory Works Definition:</u> <i>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:</i> - <i>Submissions Report dated October 2018 and additional information provide to the Department on 17 October 2018, 19 November 2018 and 23 January 2019;</i> - <i>Modification Report dated 6 June 2019, associated Submissions Report dated 2 September 2019 and amendment letter dated 4 October 2019; and</i> - <i>Modification Report dated 17 October 2019 and associated Submissions Report dated 10 January 2020</i> <u>Main Works Definition:</u> <i>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:</i> - <i>Preferred Infrastructure Report and Response to Submissions – Snowy 2.0 Main Works, dated February 2020; and</i> - <i>Additional information provided to the Department by EMM on 24 March 2020 and 7 April 2020</i> (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 <u>Non-Compliant</u> . 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 <u>non-compliant</u> . 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, <u>non-compliant</u> . See NC REC. • Both 2022 and 2023 IEAs and Audit Responses located on website. Previous IEAs not on website, therefore <u>non-compliant</u> . See NC REC • The 2022 and 2023 IEA Responses contain an audit action list. Previous audits not on website, therefore <u>non-compliant</u> . 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 <u>non-compliant</u> . 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, <u>non-compliant</u> . See NC RECs	IMP REC 35: 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 36: Update website to include most recent Consent and latest Biodiversity Monitoring Program Report. IMP REC 37: Update website to include all previous IEAs, IEA Responses and IEA audit action plans. Audit 1 and 2 are not currently on the website. IMP REC 38: Update website to include all Main Works – Tunnel Boring Machine (TBM) Florence Monitoring Reports.	NC Identifier - 33

Audit Period:
The IEA period is 18 July 2023 to 28 March 2025 (Day 5 of the 2025 IEA)

Summaries:		
	44	Compliant
	33	Non Compliant
	17	Not Triggered
	94	Total

Modification History

Application Number	Determination Date	Decider	Modification Description
SSI-9687-Mod-1	27 January 2022	Director, Energy Assessments	MOD 1 - Main Access Tunnel to Marica Services Connection
SSI-9687-Mod-2	29 November 2023	Director, Energy Assessments	MOD 2 – Remediation and Ground Consolidation
SSI-9687-Mod-3	16 December 2024	A/Executive Director, Energy, Resource and Industry	MOD 3 – Additional addit

CSSI 9687 (Snowy 2.0 Main Works) - MP Commitments from Key MPs

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Water Management Plan (14 October 2020)							
Surface Water Management Plan							
General	WM01	Table 2-2: Main Works REMMS relevant to surface water management	A Water Management Plan will be developed for Snowy 2.0 Main Works that includes:	Compliant	Covered by overall Water Management Plan condition. This condition covers preparation requirements and implementation are covered by other commitments.		
			• proposed mitigation and management measures for all construction water management categories;	Compliant			
			• spill management and response;	Compliant			
			• a surface and groundwater monitoring program;	Compliant			
			• water quality trigger action response plan;	Compliant			
			• reporting requirements;	Compliant			
			• corrective actions;	Compliant			
			• contingencies; and	Compliant			
			• responsibilities for all management measures.	Compliant			
			The WMP will be prepared in consultation with DPIE, EPA, WaterNSW and key local stakeholders, and would consider concerns raised during the exhibition and approvals process for the project.	Compliant			
General	WM02	Table 2-2: Main Works REMMS relevant to surface water management	A water monitoring program will be developed as part of the water management plan to monitor quality and quantity impacts to surface water, groundwater and reservoirs. The water monitoring program will incorporate and update the existing monitoring network and detail monitoring frequencies and water quality constituents	Compliant	Evidence of water quality data and reporting. Evidence of water tracking - flow metres. Discharge from plant is covered.		
Water quality impacts from stormwater runoff	WM03	Table 2-2: Main Works REMMS relevant to surface water management	Where practical, clean water will be diverted around or through construction areas. Runoff from clean water areas that cannot be diverted will be accounted for in the design of water management systems.	Compliant	Evidence of well managed clean water system. There were some areas at Quarry Road where clean and dirty drains were tied into each other. This was completed after sealing of the road and once the area was stable and the road was sealed. The site makes all attempts to reduce cleanwater into site as the site has a water surplus. Evidence of inspections by CPESC engineers.		
Water quality impacts from stormwater runoff	WM04	Table 2-2: Main Works REMMS relevant to surface water management	An Erosion and Sediment Control Plan (ESCP) will be prepared for each construction area that will include relevant information presented in the water management report.	Compliant	Evidence of erosion and sediment control plans for different parts of the site. Evidence of MAT tunnel area plan and CPESC signoff. Designs review against the Blue Book Guidelines. Evidence of ESC registers for each site. Evidence of reviewing existing ESC structures and updates to the ESC system.		
Water quality impacts from stormwater runoff	WM05	Table 2-2: Main Works REMMS relevant to surface water management	A suitably qualified erosion and sediment control professional(s) will be engaged to: • oversee the development of ESCPs; • inspect and audit controls; • train relevant staff; and • provide advice regarding erosion and sediment control	Compliant	Operators complete Day 1 and full Blue Boom training which trained people to read and interpret ESC Plans. Engineer and environment team are involved design and implementation of the ESC process. Environmental team get an instruction from the engineers and project manage the ESC project. Evidence of several ESC's.		
Water supply	WM08	Table 2-2: Main Works REMMS relevant to surface water management	A water supply system will be established to supply water for potable water use and construction activities. The system will most likely source water from regional groundwater resources, but may also source water from either Tantangara or Talbingo Reservoirs provided licences are available. Extraction from watercourses will be avoided where practicable. The most suitable extraction locations and water sources will be established during detailed design	Compliant	There has been no extraction from water courses. Potable water is used on site as per the WMP. Volumes of potable water tracked. Tantangara PWTP data provided as evidence		
Reservoir water quality (wastewater management)	WM09	Table 2-2: Main Works REMMS relevant to surface water management	A wastewater management system will be established to manage effluent from construction compounds and accommodation camps. All wastewater will be treated to meet the water quality specifications provided in the water management report and will be discharged to reservoirs. Wastewater discharges to watercourses will be avoided.	Compliant	Evidence of waste water system and management. Evidence of filter cake products after treatment with this stored in designated bins for disposal.		
Reservoir water quality (process water management)	WM10	Table 2-2: Main Works REMMS relevant to surface water management	A process water management system will be established to manage water during construction; and to supply water to construction activities. All surplus process water will be treated to meet the water quality specifications provided in the water management report and will be discharged to reservoirs. Process water discharges to watercourses will be avoided.	Compliant	The site has been treating water with controlled discharges only occurring once water meets the strict parameters. Due to the difficulty in meeting parameters discharges have only occurred sporadically from the LDP's. Generally issues with water management have occurred during high rainfall events above Blue Book designs. Discharges have been avoided.		
Changes to reservoir water quality due to plug removal within the reservoirs	WM11	Table 2-2: Main Works REMMS relevant to surface water management	The specifications and locations of the proposed environmental measures will be determined as part of detailed design, including the installation of silt curtains. They will be designed such that water quality criteria is agreed with the regulators, with the application of a mixing zone if required.	Compliant	Overall water management design has been in accordance with the WMP and construction erosion and sediment control plans. Evidence of curtains in the reservoirs.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Reservoir bed sediments are disturbed by commissioning water flows	WM12	Table 2-2: Main Works REMMS relevant to surface water management	Investigations to minimise the disturbance of bed sediments due to water flows during commissioning will be undertaken as part of detailed design. Potential measures to minimise the disturbance of bed sediments include: <ul style="list-style-type: none">• investigate mitigated design measures;• dredging sediments from the potential disturbance zones and placing them in another part of the reservoir; and/or• armouring the sediments in the potential disturbance zones. These options are currently being assessed.	Compliant	There has been no dredging specifically within the reservoirs. Generally issues with water management have occurred during high rainfall events above Blue Book designs.		
Flooding	WM13	Table 2-2: Main Works REMMS relevant to surface water management	Further consideration of flooding conditions and impacts, including flood modelling where necessary, will be undertaken to support future detailed design of both temporary and permanent works.	Compliant	No evidence of flooding impacts.		
Flooding	WM14	Table 2-2: Main Works REMMS relevant to surface water management	Flood emergency response plans will be developed for both construction and operational phases	Compliant	Flooding is included in the overarching WMP.		
Impacts to aquatic habitats	AE02	Table 2-2: Main Works REMMS relevant to surface water management	Bridges or culverts would be designed and constructed in accordance with NSW DPI fish passage requirements for waterway crossings (Fairfull & Witheridge 2003) where practicable.	Compliant	Bridges or culverts are designed and constructed in accordance with NSW DPI fish passage requirements for waterway crossings (Fairfull & Witheridge 2003). Evidence in the form of Naria Environmental letter assessing whether design of the waterway crossing at Kelly's Plain Creek is consistent with the Fish Passage Requirements for Waterways Crossings		
Impacts to aquatic habitats	AE03	Table 2-2: Main Works REMMS relevant to surface water management	Construction works within the channel of a permanent waterway with type 1 or 2 key fish habitat would allow some flow to maintain fish passage at all times and be staged to minimise the total disturbance at any given time.	Compliant	Naria Environmental - Environmental Design Review has assessed the Kelly's Plain Creek and it meets the requirements of being ' <i>designed to avoid and minimise impacts on fish passage and general aquatic wildlife.</i> ' and is consistent with the requirements of <i>Fish Passage Requirements for Waterways Crossings (the 'guidelines'; NSW DPI (Fisheries) 2003).</i> '		
Soil erosion and sedimentation	SOIL03	Table 2-2: Main Works REMMS relevant to surface water management	Site-based Erosion and Sediment Control Plans (ESCPs) will be prepared or reviewed by a Certified Professional in Erosion and Sediment Control (CPESC) for the construction works.	Compliant	A selection of ESCPs provided by site. ESCPs Approved by CPESC (SEEC).		
General	SW01	Table 5-3: Surface water management measures	Training will be provided to all project personnel, including relevant subcontractors on surface water and soil management practices, and the requirements from this plan through inductions, toolboxes and targeted training.	Compliant	Evidence was provided of a selection of training. Including illustrating inductions and database of those inducted.		
General	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.	Non Compliant	<p><u>Definitions:</u></p> <p>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.</p> <p>"pollute" means to introduce, directly or indirectly, into the waters any matter that results in pollution.</p> <p>"pollution" means—</p> <p>(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</p> <p>(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.</p> <p><u>IEEMA Finding:</u></p> <p>Due to water incidents where discharge occurred the site is <u>non-compliant</u> 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 <u>non-compliant</u>.</p> <p>No non-compliance recommendation allocated to this commitment as it is addressed in the recommendations that are assigned to S3, C32.</p> <p>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.</p>	NC Identifier - 34	
Stormwater management	SW03	Table 5-3: Surface water management measures	Works will 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	Compliant	The site has efforts to minimise erosion and sediment issues by implementing the WMP and developing and implementing specific ESC's for different parts of the site. There are however further recommendations.		
Stormwater management	SW04	Table 5-3: Surface water management measures	An Erosion and Sediment Control Plan (ESCP) will be prepared for each construction area. Each ESCP will: <ul style="list-style-type: none">• apply the methods and principles provided in Managing Urban Stormwater: Soils and Construction;- Volume 1 – Soils and construction (Landcom 2004); and/or- Volume 2A – Installation of services (DECC 2008); and/or- Volume 2C – Unsealed roads (DECC 2008);	Compliant	A selection of ESCP's were provided for Tantangara Sink Hole, Tantangara Spoil Road, Quarry Road, Lobs Hole, Marica Spoil Pads and Laydown Areas, Mat Portal and HDD Pad areas at site. All ESCPs were prepared by SEEC.		
Stormwater management	SW05	Table 5-3: Surface water management measures	Suitably qualified erosion and sediment control professional(s) will be commissioned to: <ul style="list-style-type: none">• oversee the development of ESCPs;• inspect and audit controls;• train relevant staff; and• provide advice regarding erosion and sediment control.	Compliant	<p>A selection of ESCP's were provided for Tantangara Sink Hole, Tantangara Spoil Road, Quarry Road, Lobs Hole, Marica Spoil Pads and Laydown Areas, Mat Portal and HDD Pad areas at site. All ESCPs were prepared by SEEC.</p> <p>Inspection from CPESC undertaken at Lobs Hole on 10 Dec 2024 and 5 Feb 2025. Evidence of CPESC inspections provided.</p> <p>Evidence of training in the form of 'Fundamentals of Erosion and Sediment Control' provided by SEEC.</p>		
Stormwater management	SW06	Table 5-3: Surface water management measures	Stormwater management systems will be benchmarked to Main Works RTS predicted stormwater discharge quality characteristics.	Compliant	We note this condition.		
Stormwater management	SW07	Table 5-3: Surface water management measures	Where practical, clean water will be diverted around or through construction areas. Runoff from clean water areas that cannot be diverted will be accounted for in the design of surface water management systems.	Compliant	Generally site has completed this. Areas where clean water comes into site are very minor and only where it could not be redirected due to slope angles.		
Stormwater management	SW08	Table 5-3: Surface water management measures	Clean water diversions will be designed to minimise potential scour impacts in adjoining watercourses.	Compliant	No issues noted with cleanwater diversions.		
Stormwater management	SW09	Table 5-3: Surface water management measures	Works will be programmed to minimise the extent and duration of disturbance to vegetation where practicable. This will include minimising the time between clearing and site establishment earthworks, initial earthworks and commencement of subsequent ground stabilisation activities	Compliant	Clearing has been progressive and minimised where practical. We viewed evidence of the GIS system and clearing tracker (by vegetation type and time).		
Stormwater management	SW10	Table 5-3: Surface water management measures	All slopes that have been cut and/or filled as part of the construction works shall be appropriately stabilised in accordance with erosion and sediment control and other relevant sub plans. Stabilisation including rehabilitation will be undertaken progressively where practicable.	Compliant	Although there were lots of bare slopes there was minimal erosion. Some of these areas have been stabilised with polymer/soil binders. We have a previous recommendation around additional temporary stabilisation.		
Stormwater management	SW11	Table 5-3: Surface water management measures	Stockpiles will be managed in accordance with the Spoil Management Plan (S2-FGJV-ENV-PLN-0019)	Non Compliant	<p>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 <u>non-compliant</u>. No non-compliance recommendation allocated to this commitment as it is addressed in NC RECs which are assigned to S3, C8.</p> <p>The majority of topsoil storages had effective erosion and sediment controls such as sediment fencing at the base of topsoils.</p>		NC Identifier - 35
Stormwater management	SW12	Table 5-3: Surface water management measures	New landforms will maximise surface drainage to the natural environment	Not Triggered	There are no specific final landforms yet.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Stormwater management	SW13	Table 5-3: Surface water management measures	Sediment basins will be designed and constructed in accordance with the methods recommended in Managing Urban Stormwater: Soils and Construction: Volume 1 (Landcom 2004) and Volume 2D (DECC 2008). Sediment basins will have adequate capacity for at least a 5 day 85th percentile rainfall event. Consideration shall be given to increasing basin size at locations where sufficient space is available and / or topography does not constrain the basin size.	Compliant	ESCP's developed by CPESC from SEEC. ESCPs state the basin sizing and design requirements.		
Stormwater management	SW14	Table 5-3: Surface water management measures	The following dewatering hierarchy will be used when stormwater is captured in sediment basins: <ul style="list-style-type: none"> • maximise water reuse on site (e.g. dust suppression and material preparation) • irrigation dewatering methods to adjacent lands within the construction envelope • active discharge based on risk assessment, where reuse and irrigation options are not appropriate 	Compliant	The site inspection identified captured sediment basin water being used as dust suppression through the implementation of water carts and irrigation sprinklers. Due to stringent water criteria for sediment basin discharges, site has rarely had the opportunity to discharge sediment basin water and must rely on water cart and sprinkler systems		
Stormwater management	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	Non Compliant	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 <u>non-compliant</u> with this commitment. See IMP REC.	IMP REC 39: 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.	NC Identifier - 36
Stormwater management	SW16	Table 5-3: Surface water management measures	Standpipes will be considered at operational (wetland) basins; at long-term (>12 months) sediment basins; and at high-risk short-term sediment basins.	Compliant	Some have standpipes. Note this is an optional commitment. There seems to be plenty of water fill locations at site.		
Stormwater management	SW17	Table 5-3: Surface water management measures	Regular inspection and maintenance of (as required) erosion and sediment controls and chemical storage will be undertaken	Compliant	Evidence of a series of weekly inspections. Also CPESC ESC inspections.		
Flooding	SW18	Table 5-3: Surface water management measures	Further consideration of flooding conditions and impacts, including flood modelling where necessary, will be undertaken to support future detailed design of both temporary and permanent works.	Compliant	Flooding is included in the overarching WMP. Flooding reviews are a component of the specific ESCP's.		
Flooding	SW19	Table 5-3: Surface water management measures	Where possible, stockpiles will be located where they are not exposed to concentrated flood flow. Flood flow is defined as the 20% Annual Exceedance Probability (AEP) flood event.	Compliant	We assume this relates to topsoil stockpiles. This was not an issue from the site inspection.		
Flooding	SW20	Table 5-3: Surface water management measures	Emergency flood response will be managed in accordance with the Natural Hazard Management Plan (S2-FGJV-ENV-PLN-0090).	Compliant	Noted.		
Flooding	SW21	Table 5-3: Surface water management measures	Protocols will be developed for use and storage of plant, equipment and materials in flood prone areas commensurate with the frequency of inundation	Compliant	Noted. Weather forecasting is completed and FG meets to discuss upcoming rainfall events and actions required. Evidence of meeting discussions for likely rainfall on the weekend of the IEA.		
Process water management	SW22	Table 5-3: Surface water management measures	A process water management system will be established to manage water during construction; and to supply water to construction activities. All surplus process water will be treated to meet the water quality specifications in Annexure A of this Plan and unless an environmental protection licence authorises otherwise, in compliance with Section 120 of the POEO Act. Process water discharges to watercourses will be avoided.	Compliant	The site has been treating water with controlled discharges only occurring once water meets the strict parameters. Due to the difficulty in meeting parameters discharges have only occurred sporadically from the LDP's. Generally issues with water management have occurred during high rainfall events above Blue Book designs.		
Process water management	SW23	Table 5-3: Surface water management measures	A detailed design report and a commissioning report for the process water treatment plant will be submitted to the EPA in accordance with EPL 21266 Condition E1.	Compliant	Site Acceptance Tests (SAT) for Shaft Gate Construction Water Treatment Plant provided by site as well as Commissioning checklists. It is noted that EPL21266 has been revised since the last update of the Main Works Surface Water Management Plan. Consequently, Condition E1 no longer refers to the submission of a detailed design and commissioning report for the process water treatment plant. Instead, it now mandates that the licensee engage a suitably qualified and experienced person(s) to prepare a Mixing Zone Verification Program.		
Process water management	SW24	Table 5-3: Surface water management measures	The process water system will be designed and constructed to minimise stormwater ingress into the system to reduce the volume of water that requires management.	Compliant	The site has specific designs around sediment dams vs leachate dams. Leachate dams collect water from spoil areas, with this water reprocessed via the WTP's.		
Process water management	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.	Non Compliant	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 <u>non-compliant</u> . No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S3, C52.		NC Identifier - 37
Process water management	SW26	Table 5-3: Surface water management measures	The process water system will be designed to include the following system contingency measures: <ul style="list-style-type: none"> • water treatment plants will be designed to minimise the risk of complete failure by staging treatment plants (i.e. a treatment plant may include two or more treatment systems in parallel) and providing contingency storage. • water supply to TBMs will be temporarily decreased to reduce the volume of process water that is required to be dewatered from tunnel sumps. • where possible, process water will be transferred to a nearby treatment plant. • where practical and safe to do so, surplus process water will be stored in underground sumps. • the clean water storage tanks can be emptied and utilised to store untreated process water • process water treatment plants will be located at tunnel portals. Hence, only treated water will be recirculated to reservoirs. Any ruptures or leaks upstream of the water treatment plants will be captured in the tunnel portal water management system. 	Compliant	There are a series of WTP's and the site has been operating these in an attempt to meet criteria.		
Process water management	SW27	Table 5-3: Surface water management measures	All treated surplus process water will be discharged to Tantangara and Talingo reservoirs via diffuser arrangements. Low velocity discharges will be avoided. Discharges to watercourses will be avoided.	Compliant	WTP's are designed to discharge into these locations. Note commitment below about discharging into sediment dams.		
Process water management	SW28	Table 5-3: Surface water management measures	Surplus treated process water will not be discharged to the stormwater basins on site.	Compliant	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. If a leachate pond has an uncontrolled discharge, it will generally get collected in sediment basins. However based on site discussions there is no active pumping of leachate water or treated water to sediment dams.		
Process water management	SW29	Table 5-3: Surface water management measures	Where practical, plant and equipment washdown will be undertaken in designated washdown bays or areas. Washdown water will be captured, treated and reused to minimise or avoid discharge to reservoirs.	Compliant	Evidence of designated washdown areas. No issues noted.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Wastewater	SW30	Table 5-3: Surface water management measures	A wastewater management system will be established to manage effluent and grey water from construction compounds and accommodation camps. All wastewater will be treated to meet the water quality specifications provided in in Annexure A of this Plan and unless an environmental protection licence authorises otherwise, in compliance with Section 120 of the POEO Act. Wastewater discharges to watercourses will be avoided. The wastewater (sewage) system will include emergency storage of untreated wastewater. The storage volume will be calculated at detailed design based on analysis of response times from regional waste management contractors to provide emergency trucking and offsite disposal options. All wastewater treatment plants will be designed to operate during winter when sub-zero temperatures can persist for extended periods of time	Compliant	Each site has a WTP. There is a process to treat that water, with a biological filter cake removed from site. No evidence of issues from site records.		
Wastewater	SW31	Table 5-3: Surface water management measures	Detailed design report and a commissioning report for the wastewater treatment plant will be submitted to the EPA.	Compliant	EPL21266 has been revised since the last update of the Main Works Surface Water Management Plan. Consequently, Condition E1 no longer refers to the submission of a detailed design and commissioning report for the process water treatment plant. Instead, it now mandates that the licensee engage a suitably qualified and experienced person(s) to prepare a Mixing Zone Verification Program." Snowy Hydro recommends the removal of this non-compliance.		
Wastewater	SW32	Table 5-3: Surface water management measures	The sewer system will be designed to restrict stormwater ingress into the wastewater system.	Compliant	The system only manages water from camps.		
Wastewater	SW33	Table 5-3: Surface water management measures	All wastewater produced (i.e. from showers, kitchens, laundries and toilets) will be directed to a wastewater treatment plant. All reticulation and storages will be designed to restrict stormwater and groundwater ingress into the wastewater system	Compliant	A selection of Engineering plans for the Project sites provided by Snowy Hydro		
Wastewater	SW34	Table 5-3: Surface water management measures	Water efficient fittings will be used to minimise wastewater loads.	Compliant	No issues noted.		
Wastewater	SW35	Table 5-3: Surface water management measures	Treated wastewater will be discharged to Talbingo and Tantangara reservoirs via diffuser arrangements. Low velocity discharges will be avoided. Discharges to watercourses will be avoided.	Compliant	Discharges have been avoided. There have however been discharges with this covered by other conditions.		
Chemical control and spill management	SW36	Table 5-3: Surface water management measures	Emergency response to spills of oils and fuel etc will be managed in accordance with the Spill Response Procedure included in Annexure C of this plan.	Compliant	Although there were some issues with storage there we no moderate and major clean up issues. This is based on the incident reporting process.		
Chemical control and spill management	SW37	Table 5-3: Surface water management measures	Construction vehicles and mechanical plant will be regularly maintained and checked for leakage of fuel and/or oils.	Compliant	Evidence of vehicle maintenance system that FG manages. No issues determined in the field.		
Chemical control and spill management	SW38	Table 5-3: Surface water management measures	Where possible, refuelling and maintenance of vehicles and mechanical plant will be undertaken at least 50m away from watercourses. A risk assessment that outlines suitable controls will be undertaken in the event that refuelling or maintenance is constrained to within 50m from a watercourse.	Compliant	Refuelling areas at each site and more than 50m from creeks.		
Chemical control and spill management	SW39	Table 5-3: Surface water management measures	Where practical, activities that have potential to contaminate stormwater runoff will be isolated from the stormwater system by covering (i.e. by a building or roof) and/or bunding.	Compliant	Generally areas of chemical and hydrocarbon storage are covered by roofs. Noting this refers to contamination. Based on a site review and discussions most of the rain that contacts the roof of buildings (in particular Lobs Hole) drains to the sediment dam system, and is not captured by tanks.	IMP REC 40: 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.	
Chemical control and spill management	SW40	Table 5-3: Surface water management measures	Emergency spill kits will be kept onsite. The spill kit must be appropriately sized for the volume of substances in use. All staff would be made aware of the location of the spill kit and trained in its use.	Compliant	Spill kits were seen at all sites.		
Chemical control and spill management	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.	Non Compliant	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, <u>non-compliant</u> . See Schedule 3 Condition 30 and Schedule 3 Condition 52 for recommendations.		NC Identifier - 38
Access Roads	SW42	Table 5-3: Surface water management measures	Any existing access tracks that will no longer be required following the construction of the new access roads will be rehabilitated in accordance with the Rehabilitation Management Plan.	Not Triggered	Still construction site.		
Access Roads	SW43	Table 5-3: Surface water management measures	All cut and fill batters will be stabilised as soon as practical following construction.	Compliant	We have deemed the site compliant. Although there are exposed surfaces most of them appear to have been sprayed with a binder as there was very little erosion on batters. There is a recommendation around additional hydromulching.		
Access Roads	SW44	Table 5-3: Surface water management measures	Roads surfaces will be constructed and maintained with aggregate material to reduce soil loss rates and water quality risks. The use of material that presents elevated water quality risks relative to other material available for road construction and maintenance will be avoided where practicable.	Compliant	No issues determined with road construction. Evidence of cut off drains and erosion and sediment controls. Management of these areas is ongoing. Evidence of recent grading of haul roads.		
Access Roads	SW45	Table 5-3: Surface water management measures	Where practical access roads will grade to table drains that are designed and constructed to have non-erosive hydraulic capacity for the 10% AEP event. Transverse (or cross drainage) will be constructed to have the following nonerosive hydraulic capacities: • Primary roads – 1% AEP event; • Maintenance roads – 2% AEP event; and • Temporary access roads – 10% AEP event.	Compliant	Due to limited issues noted for erosion and sediment control around roads we have deemed this compliant. Regular engineering inspections and constants maintenance.		
Access Roads	SW46	Table 5-3: Surface water management measures	Temporary roads will be rehabilitated as soon as they are no longer needed.	Not Triggered	All roads are currently needed.		
Accommodation Camps	SW47	Table 5-3: Surface water management measures	Where practical, the following source controls for the accommodation camps will be applied: • the storage and handling of chemicals that have potential to contaminate the stormwater system will be undertaken in bunded areas. Any liquid waste stream will be disposed to an appropriate facility; • landscaped areas will be predominately vegetated with endemic native vegetation; and • runoff from road and other hardstand areas will be treated in vegetated swales.	Compliant	Camps have been constructed and are part of the construction site. Further works are required at end of constructions for rehabilitation.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Accommodation Camps	SW48	Table 5-3: Surface water management measures	Runoff from accommodation camps will be managed by drainage systems that have a 20% AEP capacity. Overland flow paths will be provided as required.	Compliant	Based on discussions see condition relating to rainfall capture. Overall areas have been designed for Blue Book.		
Accommodation Camps	SW49	Table 5-3: Surface water management measures	Runoff from accommodation camps will be treated in either sedimentation or bioretention basins (also referred to as raingardens). The most appropriate control will be established at detailed design with consideration of topography, soil conditions and other relevant factors.	Compliant	Runoff from camps (including buildings) does drain to sedimentation basins (this makes this compliant, however not best practice). Based on site discussions gutters do not drain to tanks. This puts additional volumes and pressure on the water management system. See recommendation.	IMP REC 41: Look into systems to capture runoff water from roofs and direct it to water storage tanks. Look into ways of reusing this water onsite.	
Accommodation Camps	SW50	Table 5-3: Surface water management measures	Low phosphorus products shall be used for washing activities controlled by site management (i.e. laundry services and mess hall) and encouraged (via training) for general use	Compliant	FGJV explained that the water treatment plants can not take the high phosphorus products. SDS's for products.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW51	Table 5-3: Surface water management measures	Unless permitted by this approval, avoid carrying out of any development within 40 metres of any watercourse	Compliant	The site has controlled activity approvals for operating within 40 metres. Also note the approved disturbance and EIS boundaries.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW52	Table 5-3: Surface water management measures	All instream works or development within 40 metres of any watercourse will be undertaken generally in accordance with the requirements in the Guidelines for Controlled Activities on Waterfront Land	Compliant	The site has controlled activity approvals for operating within 40 metres. Also note the approved disturbance and EIS boundaries.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW53	Table 5-3: Surface water management measures	The temporary bridges at Yarrangobilly River and Wallaces Creek where feasible and reasonable, will be consistent with the Guidelines for Controlled Activities Watercourse Crossings (NRAR, 2018), Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (Fairfull and Witheridge, 2003), Policy and Guidelines for Fish Friendly Waterway Crossings (NSW Fisheries, February 2004), and Policy and Guidelines for Fish Habitat Conservation and Management (DPI Fisheries, 2013). The permanent bridges at Yarrangobilly River and at Wallaces Creek will be designed and constructed to comply with the Policy and Guidelines for Fish Habitat Conservation - Update 2013 (DPI 2013) and Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (Fairfull and Witheridge 2003) and Guidelines for Controlled activities on Waterfront Land (NRAR, 2018).	Not Triggered	Not triggered as replaced with permanent bridges.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW54	Table 5-3: Surface water management measures	ESCPs are to dictate the specific controls to be used on waterfront land. Typical measures include: • monitoring weather forecasts and taking appropriate action prior; • minimising the extent of work and the amount of time disturbance where possible; • isolating work areas from natural flows where possible; • stockpiles to be located outside of the waterfront area; • use of temporary ground covers in areas of concentrated flow to minimise erosion of exposed soils during rainfall; and • completing and stabilising works as quickly as possible after works are complete.	Compliant	Works completed at reservoirs. Examples of ESC's have been provided. Work areas next to the river are also bunded.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW55	Table 5-3: Surface water management measures	The disturbance area and extent to which soil and vegetation within the riparian zone are disturbed will be minimised where practicable.	Compliant	Relating to middle creek bridge and talbingo reservoir. No issues noted.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW56	Table 5-3: Surface water management measures	Direct access to the rivers and creeks by construction vehicles and mechanical plant will be minimised and permitted only within the limits of clearing and designated areas of disturbance	Compliant	No issues determined through the site inspection process.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW57	Table 5-3: Surface water management measures	Erosion control matting or other practical methods will be used in the riparian zone to minimise sediment entering the river channel and provision of protection against scouring and erosion of the river bed	Compliant	Relating to middle creek bridge and talbingo reservoir. No issues noted.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW58	Table 5-3: Surface water management measures	Any watercourse that will be permanently diverted around permanent infrastructure will: • be a piped and/or surface drainage system; • be designed and constructed to have non-erosive hydraulic capacity and be structurally sound for the 1% AEP event; and • have adequate scour protection at the system inlets and outlets. A risk assessment will be undertaken to identify risks associated with by-pass flows that may occur as a result of system blockage or an event greater than the design event.	Not Triggered	The project team has stated this has not been triggered.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW59	Table 5-3: Surface water management measures	Where practical, any watercourse that will be temporarily diverted will: • be a piped and/or surface drainage system; • be designed and constructed to have non-erosive hydraulic capacity and be structurally sound for a design event (that will be established by a risk assessment); and • have adequate scour protection at the system inlets and outlets. A risk assessment will be undertaken to identify risks associated with by-pass flows that may occur as a result of system blockage or an event greater than the design event.	Not Triggered	The project team has stated this has not been triggered.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW60	Table 5-3: Surface water management measures	Where practical, temporary watercourse diversions will seek to avoid increasing flow rates in adjoining watercourses	Not Triggered	The project team has stated this has not been triggered.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW61	Table 5-3: Surface water management measures	Where practical, the permanent diversion of drainage lines or watercourses using contour drains will be avoided	Compliant	There are a series of clean and dirty water diversions onsite. With the site being in construction further works will be required.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW62	Table 5-3: Surface water management measures	All culverts, bridges and service crossings will be designed by a suitably qualified professional in accordance with the relevant Austroads Guidelines or best practice methods	Not Triggered	Designs completed prior to the audit period. Based on discussions with site.		
Works on waterfront land and instream works (watercourse diversions and crossings)	SW63	Table 5-3: Surface water management measures	Watercourses will be rehabilitated / reinstated in accordance with Rehabilitation Management Plan	Not Triggered	Based on discussions with site.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Stockpiling	SW64	Table 5-3: Surface water management measures	Temporary spoil stockpiles will be managed by ESCPs in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction guidance series and in accordance with the Stockpiling Procedure (Annexure C of the Spoil Management Plan)	Compliant	This refers to spoil and it appeared to have been located within defined areas. No evidence of temporary stockpiles.		
Design and construction of the intake structures	SW65	Table 5-3: Surface water management measures	This SWMP will be updated and submitted to DPIE prior to the construction of the intake structure.	Compliant	SWMP has had numerous iterations during the audit period, based on comments from key government agencies.		
Design and construction of the intake structures	SW66	Table 5-3: Surface water management measures	The specifications and locations of the proposed environmental measures for the plug removal within the reservoirs will be determined as part of detailed design, including the installation of silt curtains. They will be designed such that water quality criteria is agreed with the regulators, with the application of a mixing zone if required.	Not Triggered	There hasn't been plug removal yet.		
Design and construction of the intake structures	SW67	Table 5-3: Surface water management measures	Investigations to minimise the disturbance of bed sediments due to water flows during commissioning will be undertaken as part of detailed design. Potential measures to minimise the disturbance of bed sediments include: <ul style="list-style-type: none"> investigate mitigated design measures; dredging sediments from the potential disturbance zones and placing them in another part of the reservoir; and/or armouring the sediments in the potential disturbance zones. 	Not Triggered	There hasn't been plug removal yet.		
Monitoring	SW68	Table 5-3: Surface water management measures	A Surface Water Monitoring Program has been developed and is included in this plan. The Surface Water Monitoring Program (Annexure A) establishes monitoring requirements to assess the quality of discharge and receiving waters	Compliant	Section of the SWMP developed.		
Monitoring	SW69	Table 5-3: Surface water management measures	Surface water extraction will be monitored and tracked against water access licence limits.	Compliant	Potable water extraction is tracked.		
Monitoring	SW70	Table 5-3: Surface water management measures	Rainfall forecasts will be monitored daily and the works planned, and the site works managed to minimise the potential impact of heavy rainfall and flood events. Prior to heavy rain events erosion and sediment controls will be reviewed and improved where necessary to minimise impacts.	Compliant	Evidence of weather forecasting. Evidence of discussions for upcoming rainfall events, including an event proposed in the days after the site component of the IEA. Checklists and email discussions.		
Monitoring	SW71	Table 5-3: Surface water management measures	Erosion and sediment controls including clean water diversions will be inspected at least weekly (with maintenance and/or modifications made as necessary). Inspections and/or maintenance during wet-weather may be increased where necessary.	Compliant	Evidence of weekly inspections and post wet weather inspections.		
Monitoring	SW72	Table 5-3: Surface water management measures	A Trigger Action Response Plan provides detail of the response actions that will be implemented in the event of an exceedance. This plan will be implemented	Compliant	There is a TARP in the Water MP.		
Ground Water Management Plan							
General	GW01	Table 5-1: Groundwater management measures	Training will be provided to all project personnel, including relevant subcontractors on groundwater management through inductions, toolboxes and targeted training	Compliant	Evidence of general inductions and tool box talks. Evidence of Environmental Awareness Training for Main Works including spill management and response.		
Procedures and plans	GW02	Table 5-1: Groundwater management measures	Spills and emergency response will be managed in accordance with the Emergency spill response procedure included in the Surface Water Management Plan (Appendix A of the Water Management Plan)	Compliant	Spill response procedure included in Water MP - Annexure C.		
Groundwater management	GW03	Table 5-1: Groundwater management measures	Groundwater discharged to reservoirs will be in accordance with the Surface Water Management Plan and unless an environmental protection licence authorises otherwise, in compliance with Section 120 of the POEO Act.	Compliant	Groundwater from the tunnel boring operation is transferred to the surface and stored within designated dams. Discharges are then managed under the EPL requirements.		
Groundwater management	GW04	Table 5-1: Groundwater management measures	The construction program shall be planned such that the Goandra Volcanics region will be excavated late in the construction program.	Not Triggered	Area not hit yet.		
Groundwater management	GW05	Table 5-1: Groundwater management measures	Where discrete high flow features are intercepted such as the Goandra Volcanics and Kelly Plain Volcanics, pre-grouting and / or post-grouting will be undertaken to enable tunnel construction and minimise further ingress.	Not Triggered	Area not hit yet.		
Groundwater contamination	GW06	Table 5-1: Groundwater management measures	Emergency spill kits will be readily available at key construction sites across the project and workers trained in their use.	Compliant	Emergency spill kits are available onsite. Evidence of induction process. When viewing the contractors		
Groundwater contamination	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.	Non Compliant	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, <u>non-compliant</u> . See Schedule 3 Condition 30 and Schedule 3 Condition 52 for recommendations.		NC Identifier - 39
Groundwater contamination	GW08	Table 5-1: Groundwater management measures	During borehole drilling, slurries used will be of appropriate grade and composition such that it poses no threat to groundwater quality should it infiltrate intersected aquifers	Compliant	The Marica HDD: Drilling Fluid Management Plan(July 2022) has stated 'No bentonite or other rheology enhancing additives are proposed. Although there is little chance of fracturing out, rheology enhancing additives would be used in the drilling fluid to eliminate adverse effects should there be the possibility of loss of drilling fluids to the formation or through a preexisting fracture or fissure (as have been found drilling Geotech investigation holes), or when adding / subtracting drill pipes from the string.'		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Groundwater contamination	GW09	Table 5-1: Groundwater management measures	Temporary and permanent emplacement areas will be managed in accordance with the Spoil Management Plan	Non Compliant	<p>IEMA was provided with many records relating to implementing the Spoil Management Plan.</p> <p>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.</p> <p>No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S3, C32.</p>		NC Identifier - 40
Monitoring and model validation	GW10	Table 5-1: Groundwater management measures	Groundwater monitoring will be undertaken in accordance with the Groundwater monitoring program (Annexure A of this Groundwater Management Plan)	Compliant	This is a very detailed program. We have not seen any gaps with monitoring provided. Groundwater monitoring reports continue to be developed.		
Monitoring and model validation	GW11	Table 5-1: Groundwater management measures	Groundwater level monitoring will be undertaken in accordance with the Groundwater monitoring program (Annexure A of this Groundwater Management Plan) to provide early warning for impacts beyond those assessed for: <ul style="list-style-type: none">• baseflow connected waterways;• the local groundwater flow system;• local depressurisation of groundwater resources; and• groundwater dependant ecosystems. The trigger actions response plans (TARPs) will be initiated in the event that a trigger value banding is exceeded (refer to Section 7.2 of this Groundwater Management Plan)	Compliant	<p>See above wording.</p> <p>Evidence of Alpine Bogs and Fens Groundwater Hydrographs provided.</p> <p>EMM Bi-annual Environmental Water Reports provided</p> <p>EMM Trigger Exceedance Report - BH2101</p>		
Monitoring and model validation	GW12	Table 5-1: Groundwater management measures	The groundwater model developed for Snowy 2.0 Main Works will be validated and, if necessary, recalibrated to new groundwater monitoring data as the monitoring record increases throughout construction. Review will be undertaken annually during construction and include review of the monitoring data collection frequency, in consultation with NRAR and DPIE-Water Group	Compliant	Existing regional groundwater model is in the process of being re-contracted.		
Monitoring and model validation	GW13	Table 5-1: Groundwater management measures	Groundwater extraction will be monitored and tracked against water access licence limits.	Compliant	Water extraction from tunnelling is constantly reviewed.		
Monitoring and model validation	GW14	Table 5-1: Groundwater management measures	Adaptive management will be implemented for groundwater monitoring, including review, analysis and modification of mitigation measures if they are shown to be ineffective.	Compliant	This is referring to the TARP process under the Water MP.		
Biodiversity Management Plan (12 October 2020)							
Fauna strike to Smoky Mouse and Eastern Pygmy possum	ECO1	Table 2-3: Revised environmental management measures from Main Works RTS	Management measures to mitigate the potential impacts of fauna strike are currently being considered. These measures may include: <ul style="list-style-type: none">• reduced speed limit along Lobs Hole Ravine Road and Marica Trail at night, when fauna species are likely to be most active;• fencing of these roads to prevent access to the road surface; and• construction of fauna underpasses. The adopted measures will be agreed in consultation with DPIE.	Compliant	<p>Evidence seen of all of these aspects. We have noted lower speed limits.</p> <p>NPWS Feedback</p> <p>NPWS noted issues related to biodiversity in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p>		
Spread of weeds	ECO2	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.	Non Compliant	<p>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.</p> <p>NPWS Feedback</p> <p>NPWS noted issues related to biosecurity in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p>		NC Identifier - 41
Impacts to GDEs	ECO3	Table 2-3: Revised environmental management measures from Main Works RTS	A GDE monitoring program will be implemented to assess actual impacts against predicted. If actual impacts are greater than predicted, adaptive management will be implemented.	Compliant	<p>Live feed (telemetry) for groundwater levels. The site also completes drone flights of the GDE's</p> <p>Snowy 2.0 Memorandum - Alpine Bogs and Fens Shallow Groundwater Monitoring Record. No specific issues determined at the monitoring program which illustrates groundwater levels are being assessed.</p>		
Removal of native vegetation and threatened species habitat	ECO4	Table 2-3: Revised environmental management measures from Main Works RTS	A Biodiversity Management Plan will be prepared and implemented during construction. It will include the following measures:	Compliant	<p>Covered by overall Biodiversity Management Plan condition. We have seen evidence of pre - clearing process. If we were to assess only against the dot pts below, it meets those requirements. See main CSSI Schedule 3 Condition 19 for more details and recommendations.</p>		
			• establishment of exclusion zones where required around retained vegetation, including fencing and signage;	Compliant			
			• pre-clearing surveys conducted prior to clearing, including translocation of fauna into areas of retained vegetation;	Compliant			
			• vegetation clearing undertaken in accordance with the two-stage process;	Compliant			
			• mulching and stockpiling of cleared native vegetation for use during rehabilitation;	Compliant			
			• retention of hollows logs and limbs for placement within retained vegetation and reuse during rehabilitation where practicable;	Compliant			
			• collection of native seeds and alpine sod for propagation; and	Compliant			
			• establishment of native plant nursery and propagation of endemic native species for use in rehabilitation works.	Compliant			
Removal of native vegetation and threatened species habitat	ECO5	Table 2-3: Revised environmental management measures from Main Works RTS	A threatened species monitoring program will be designed and implemented to assess impacts arising from clearing.	Compliant	There is a monitoring program, however there are recommendations under Schedule 3 Condition 19.		
Removal of native vegetation and threatened species habitat.	BDAR-01	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Minimisation of clearing during construction, wherever possible.	Compliant	Clearing has been minimised for the project.		
Removal of native vegetation and threatened species habitat.	BDAR-02	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Establishment of exclusion zones around retained vegetation, including fencing and signage.	Compliant	Evidence of defined clearance zones, marking and GIS tracking system.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Removal of native vegetation and threatened species habitat.	BDAR-03	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Pre clearing surveys conducted prior to clearing, including translocation of fauna into areas of retained vegetation.	Compliant	Evidence of a selection of pre clearance surveys. Including this information: • Clearing Tracker Access • Clearing Permit for Marica (29/ Jan 2025) • Clearing Permit for Tantaranga (9 Nov 2024) • Predicted Clearing Report Marica Adit Pad 1 (16 Dec 2024) • Marica Adit Pad 1 and 3 Clearing Sensitive Area Plan (dated 15 Dec 2024).		
Removal of native vegetation and threatened species habitat.	BDAR-04	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Vegetation clearing undertaken in accordance with the two stage process	Compliant	Evidence of ecologist and 2 stage process. We have not seen any specific issues in the clearance process however have some recommendations under Schedule 3 Condition 19 of the CSSI.		
Removal of native vegetation and threatened species habitat.	BDAR-05	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Mulching and stockpiling of cleared native vegetation for use during rehabilitation.	Compliant	Vegetation was stockpiled onsite during initial clearing with the 2020 bushfire burning lots of this vegetation. There are areas of wooded stockpiles on the sites.		
Removal of native vegetation and threatened species habitat.	BDAR-06	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Retention of hollows logs and limbs for placement within retained vegetation and reuse during rehabilitation	Compliant	Evidence noted at Tantaranga and some areas at Lobs Hole		
Removal of native vegetation and threatened species habitat.	BDAR-07	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Design and implementation of a threatened species monitoring program to ensure impacts arising from clearing are within prediction.	Compliant	This is covered by App B - Biodiversity Monitoring Program (Section 4.2). Implementation discussed in quarterly ecological monitoring reports.		
Removal of native vegetation and threatened species habitat.	BDAR-08	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Underboring, rather than open trenching, of the southern communication route beneath Boggy Plain	Not Triggered	Based on site communications this isn't progressing.		
Removal of native vegetation and threatened species habitat.	BDAR-09	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Targeted surveys for Alpine Tree Frog to be completed prior to construction within sections of the Plateau and Peninsula.	Not Triggered	Snowy Hydro has stated in the RFI 'Targeted surveys were completed prior to the audit period'		
Removal of native vegetation and threatened species habitat.	BDAR-10	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Targeted surveys for flora species to be completed within sections of the Plateau, the Peninsula and Ravine Bay prior to construction.	Not Triggered	Snowy Hydro has stated in the RFI 'Targeted surveys were completed prior to the audit period'		
Increase in weeds and pathogens.	BDAR-11	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Weed control prior to construction works being undertaken, where possible.	Compliant	Weed controls prior to and during works. The issues we are noting relates to weed management during construction, not pre construction. Hence compliant.		
Increase in weeds and pathogens.	BDAR-12	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Appropriate disposal and management of weeds during clearing works.	Compliant			
Increase in weeds and pathogens.	BDAR-13	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Active weed control within 50 m of key infrastructure in areas where significant weeds occur, such as Tantaranga Reservoir.	Compliant			
Increase in weeds and pathogens.	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	Non Compliant	<p>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.'</p> <p>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.....'</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>		NC Identifier - 42
Increase in weeds and pathogens.	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.	Non Compliant	<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>		NC Identifier - 43
Increase in weeds and pathogens.	BDAR-17	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Re vegetation of cleared areas as quickly as possible following construction.	Not Triggered	Overall construction is ongoing and final rehabilitation has not been possible.		
Increase in predatory and pest species.	BDAR-18	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Design and implementation of a pest and predator monitoring program to ensure Main Works does not result in a significant increase in numbers of pest and predatory species and impacts to threatened species remain within prediction.	Compliant	See quarterly monitoring reports which illustrates status of pests.		
Light and noise pollution during night works.	BDAR-19	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Use of directional lighting to retain lighting within works areas as much as possible	Compliant	No complaints regarding lighting.		
Fragmentation, resulting in reduction in connectivity.	BDAR-20	Table 2-4: Management measures from the RTS BDAR which relate to construction activities	Implementation of measures to avoid fragmentation, such as underpasses	Compliant	No issues determined through the audit.		
TRAINING	BM01	Table 5-1: Biodiversity management measures	Training will be provided to all project personnel, including relevant sub-contractors on biodiversity management practices and the requirements from this plan through inductions, toolbox talks and activity specific training.	Compliant	Evidence of induction program, environmental onboarding.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
TRAINING	BM02	Table 5-1: Biodiversity management measures	Drivers will be informed of their requirements to manage speed and report fauna strike and near-miss incidents as specified in the Fauna Strike Mitigation Strategy in Appendix G of this Plan.	Compliant	Outlined in overall induction as well as Transport MP induction process.		
PRECLEARING AND CLEARING	BM03	Table 5-1: Biodiversity management measures	Implement the Fauna Strike Mitigation Strategy as detailed in Appendix G. This includes managing speed limits of vehicles on access roads and undertaking a risk assessment to identify locations for installing fauna underpasses for fauna if deemed necessary	Compliant	Noted and no issues determined.		
PRECLEARING AND CLEARING	BM04	Table 5-1: Biodiversity management measures	In the event that threatened species, active breeding habitat of threatened species or endangered ecological communities are unexpectedly identified during construction, the Unexpected Threatened Species Finds Procedure included in Appendix D will be followed.	Compliant	Evidence seen of all of these aspects.		
PRECLEARING AND CLEARING	BM05	Table 5-1: Biodiversity management measures	During the detailed design of the project, impacts to native vegetation and mapped threatened species habitats will be minimised where feasible and reasonable as detailed in section 5.2.	Compliant	Pre clearance permit process. No evidence of the site not meeting requirements. Evidence of GIS database. Evidence of boundary ropes. Pre clearance permit includes details of the ecologist present for activities. Key evidence for clearing includes: 1. Biodiversity Monitoring Reports for Quarter 1,2,3,4 2. Clearing Tracker Access 3. Clearing Permit for Marica (29/ Jan 2025) 4. Clearing Permit for Tantangara (9 Nov 2024) 5. Clearing Permit for Pads 2, 4 and 5 - 6.72 ha (5/12/2024) 6. Predicted Clearing Report Marica Adit Pad 1 (16 Dec 2024) 7. Marica Adit Pad 1 and 3 Clearing Sensitive Area Plan (dated 15 Dec 2024) 8. Copy of Narla Environmental Pre-clearing survey report (Dec 2024) 9. MAP Boundary PAD1 and Lined Spoil Pad kml file 10. Erosion and Sed Control Plan for Marica Spoil Pads and Laydown Areas (18/12/2024) 11. Snowy Hydro 2.0: Seed Change of Custody (20/10/2024) 12. Snowy Hydro 2.0: Seed Change of Custody (20/10/2024) 13. Pre - clearing Survey Report Marica Pad 1 and Spoil Pad - December 2024 (Narla Environmental)		
PRECLEARING AND CLEARING	BM06	Table 5-1: Biodiversity management measures	Exclusion zones will be established around areas of retained vegetation prior to clearing that particular area. Where required, these areas will be fenced using appropriate fencing materials and designated and signed as no go zones or environmentally sensitive areas	Compliant			
PRECLEARING AND CLEARING	BM07	Table 5-1: Biodiversity management measures	A pre-clearing survey will be undertaken prior to the commencement of clearing. The site inspection will: • flag key habitat features, and • identify nearby habitat suitable for the release of any that may be encountered during clearing works. Details of preclearing survey requirements are detailed in Appendix C.	Compliant			
PRECLEARING AND CLEARING	BM08	Table 5-1: Biodiversity management measures	Clearing limits/disturbance footprint will be delineated using highly visible, durable, continuous barrier such as safety flagging, UV stabilised rope, or other similarly robust and durable material. Delineation will be installed consistently where possible to reduce the risk of error or misinterpretation of boundaries. Where a continuous rope is impractical due to terrain and vegetation density, highly visible flagging will be placed on vegetation to maintain line of sight of the clearing boundary. "Environmental Protection Area" signs (or similar wording) will be placed in prominent positions along the exclusion fencing.	Compliant	Evidence of boundary ropes.		
PRECLEARING AND CLEARING	BM09	Table 5-1: Biodiversity management measures	The Pre-clearing and Clearing Procedure provided in Appendix C will be implemented during construction. This procedure includes two-stage clearing for fauna habitat features.	Compliant	Pre clearance permit includes details of the ecologist present for activities. We have some recommendations in the CSSI around updating the pre and post clearing form.		
PRECLEARING AND CLEARING	BM10	Table 5-1: Biodiversity management measures	Except where an approved design requires it, such as bridge crossings, all ground disturbance within mapped riparian avoidance areas is prohibited.	Compliant	No issues determined with major issues with clearance and boundaries. Clearance appears within the EIS and disturbance footprint.		
PRECLEARING AND CLEARING	BM11	Table 5-1: Biodiversity management measures	Pre-clearing inspections in locations within 50 metres of watercourses or reservoirs will include thorough searches for frogs	Compliant	Narla Environmental Pre-clearing Survey Report (July 2024) states pre-clearing surveys were conducted throughout 2021, 2022 and 2024 for habitat of all fauna including 'Caves, crevices and culverts (habitat for frogs, reptiles, small mammals and microbats);'		
PRECLEARING AND CLEARING	BM12	Table 5-1: Biodiversity management measures	Fauna detected during pre-clearing surveys will be relocated into areas of retained vegetation in accordance with the Preclearing and Clearing Procedure (Appendix C) and Fauna Handling and Rescue Procedure (Appendix E).	Compliant	Evidence of ecologist within pre clearance permits that we reviewed. These are trained as spotter catchers.		
PRECLEARING AND CLEARING	BM13	Table 5-1: Biodiversity management measures	Where manual relocation of frogs is required, the hygiene requirements outlined in the Fauna Handling and Rescue Procedure (Appendix E) will be implemented to prevent the spread of Chytrid fungus.	Not Triggered	Based on site communications not triggered. Noting there is the pre - clearance process.		
PRECLEARING AND CLEARING	BM14	Table 5-1: Biodiversity management measures	Habitat trees within areas to be cleared will be marked during the pre-clearing inspection by the Ecologist. GPS coordinates for all habitat trees identified will be recorded during the pre-clearing survey.	Compliant	Part D of the Future Gen Clearing (Land Disturbance) includes evidence of requirement to assess. We noted some habitat trees marked for future clearing at Tantangara. Many of the habitat trees were lost in the 2020 fires after clearing and vegetation stockpiling had occurred.		
PRECLEARING AND CLEARING	BM15	Table 5-1: Biodiversity management measures	Where a HBT is felled, the tree hollows will be salvaged, and the salvaged sections reused as hollow replacements for the rehabilitation of the site.	Compliant	Part D of the Future Gen Clearing (Land Disturbance) includes evidence of requirement to assess. This was noted in the permit for Clearing Permit for Pads 2, 4 and 5 - 6.72 ha (5/12/2024).		
PRECLEARING AND CLEARING	BM16	Table 5-1: Biodiversity management measures	Where dangerous trees, which are located adjacent to the disturbance area (but within the construction envelope), present a safety hazard that requires intervention, they will be managed/removed such that the impact to native vegetation is minimised. Where safe to do so, corrective pruning is preferable to tree removal and should be performed in accordance with Australian standard AS 4373:2007 Pruning of Amenity Trees. All clearing impacts associated with dangerous tree removal/management will be accounted for in the project wide clearing tracking.	Compliant	Noted. There has been regular consultation with NPWS and no issues were noted in the files provided to IEMA around dangerous trees.		
PRECLEARING AND CLEARING	BM17	Table 5-1: Biodiversity management measures	HBTs marked for removal will be checked by the Ecologist prior to felling/ disturbance and any animals found will be relocated to adjacent habitat. Ecologists will capture and/or remove fauna that have the potential to be disturbed as a result of clearing activities. To prevent injury and mortality of fauna, an ecologist will be present at the time of felling HBTs. Further details are provided in the Fauna Handling and Rescue Procedure included in Appendix E.	Compliant			
PRECLEARING AND CLEARING	BM18	Table 5-1: Biodiversity management measures	Targeted surveys for Alpine Tree Frog to be completed prior to construction within sections of the Plateau and Peninsula.	Compliant	Completed by ecological monitoring prior to construction.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
PRECLEARING AND CLEARING	BM19	Table 5-1: Biodiversity management measures	Targeted surveys for flora species will be completed within sections of the Plateau, the Peninsula and Ravine Bay prior to construction	Compliant	Completed by ecological monitoring prior to construction.		
MONITORING	BM20	Table 5-1: Biodiversity management measures	The clearing of native vegetation will be monitored so that impacts to mapped plant community types and threatened species habitats do not exceed those defined in the assessment reports and project approvals. Further detail included in section 5.2.2.	Compliant	Evidence of pre clearance process and ecological supervision. Key evidence relating to clearing is summarised in the BM05 response.		
MONITORING	BM21	Table 5-1: Biodiversity management measures	Monitor impacts on Groundwater Dependant Ecosystems as detailed within the Groundwater Management Plan. The GDE monitoring program will be implemented to assess actual impacts against predicted. If nonnegligible GDE impacts are reported, the follow-up actions specified in section 5.3 will be implemented.	Compliant	Live groundwater monitoring. Evidence of triggers in your water reporting. Drone surveys are also completed. <u>Requirement</u> Section 3.9 of the Groundwater Management Plan summarises the different types of GDE's. There isn't a lot of detail about what GDE monitoring entails and the reporting. Section 2.5.1 of the Groundwater Management Plan states: <i>Shallow groundwater levels in standpipes located at known GDEs will be compared to the 80th percentile between the months of May and October. If drawdown is identified beyond trigger levels in areas of these GDEs during this period, actions outlined in the Groundwater level Trigger Action Response Plan (TARP) will be initiated.</i> We note monitoring has occurred for groundwater levels, however we have an improvement recommendation about a better defined GDE monitoring program.	IMP REC 42: 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). IMP REC 43: Provide details of GDE monitoring in the Annual Biodiversity Monitoring Report and whether triggers were enacted.	
MONITORING	BM22	Table 5-1: Biodiversity management measures	Carry out threatened species, weed, pest and pathogen monitoring throughout the construction program as detailed in the Biodiversity Monitoring Program (Appendix B).	Compliant	See earlier comments about inspections and pre - clearance process.		
THREATENED SPECIES MANAGEMENT	BM23	Table 5-1: Biodiversity management measures	Where possible and safe to do so, construction lighting and resulting glare will be minimised. All lighting will be directed downward toward work activities, away from the night sky and away from known locations of light sensitive habitat.	Compliant	Current construction sites are difficult to see. No complaints noted in register about visual/lighting. Complaints generally relate to transportation.		
THREATENED SPECIES MANAGEMENT	BM24	Table 5-1: Biodiversity management measures	Where practicable, open trenches along the communications cable route, which have potential to trap fauna, will be inspected for trapped fauna daily for the duration that the trap-hazard remains in place. If trapped fauna are observed within the excavation, branches or other material can be provided to allow the fauna to self-rescue. If trapped fauna are unable to escape, the Project Ecologist or a person skilled in handling the fauna encountered will safely remove and release the animal in accordance with the approved Fauna Handling and Rescue Procedure (Appendix E). Where it may take time for the project ecologist or fauna handler to attend site, the project ecologist will be contacted and advice will be sought regarding the appropriate management of the fauna present within the trench. Should the project ecologist deem it to be more appropriate to remove the fauna in a timely manner (to reduce stress or exposure), removal will be undertaken in accordance with the recommendations of the project ecologist. Threatened species will be managed in accordance with the Unexpected Threatened Species Find Procedure	Compliant	No open trenches observed during site inspection.		
THREATENED SPECIES MANAGEMENT	BM25	Table 5-1: Biodiversity management measures	Where open trenches along the communications route are unable to be inspected daily (as per B M24), temporary provisions to assist trapped fauna in self-rescue will be provided in the trench. Such measures may include the placement of branches, soil ramps or other material which an animal could climb up to escape the trench	Compliant			
THREATENED SPECIES MANAGEMENT	BM26	Table 5-1: Biodiversity management measures	Where practicable, under-boring will be used beneath Boggy Plain rather than open trenching along the southern communication route.	Compliant			
THREATENED SPECIES MANAGEMENT	BM27	Table 5-1: Biodiversity management measures	Construction and removal of the temporary bridge at Yarrangobilly River will avoid or minimise in stream works during the migration time of Macquarie Perch (October to January) where possible.	Not Triggered	Outside of period. No longer relevant condition as closed out in previous IEA.		
HABITAT RETENTION AND RESTORATION	BM28	Table 5-1: Biodiversity management measures	A collection of indigenous native seed and alpine sods will be collected from areas identified to be disturbed, for propagation and use in the final rehabilitation works	Compliant	Evidence of seed collection. Evidence of records from Naria 2023 and 2024. Lots of potential seed has been lost in the 2020 fires.		
HABITAT RETENTION AND RESTORATION	BM29	Table 5-1: Biodiversity management measures	Native vegetative material and topsoil containing vegetative matter and native seed bank will be s salvaged and stored for beneficial reuse in the rehabilitation of the site.	Compliant	There was some evidence of storing of material, noting the previous issue with the bushfires. Evidence of pre clearance process and identifying storage areas. Topsoil storage and implementation is covered further in other conditions/commitments.		
HABITAT RETENTION AND RESTORATION	BM30	Table 5-1: Biodiversity management measures	Woody debris including felled trees, hollow logs, and mulch, and bush rock will be re-used on site for habitat improvement where possible	Not Triggered	We have called this not triggered. This was used very well along rehabilitated roads, but further works will be required closer to closure in the current active construction areas. Evidence of storage of this material at all sites.		
HABITAT RETENTION AND RESTORATION	BM31	Table 5-1: Biodiversity management measures	Where feasible and reasonable, trees to be retained within the construction envelope will be man aged in accordance with AS 4970-2009 Protection of trees on development sites.	Compliant	Noted, however limited opportunities to keep trees within the approved disturbance limit.		
WEED AND PATHOGEN MANAGEMENT	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.	Non Compliant	Evidence of some wheel washes. However, Wheel washes out-of-commission or removed from active project area access routes (e.g. Marica Trail, Goandra Trail). Snowy Hydro provided the audit team with incident reports including: Wheel wash out-of-commission for 10 hours on 27/02/2025 due to power failure. During that time period, 46 LVs and 9 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, <u>non-compliant</u> . No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S2, C13. Weed spraying improvements are noted. See earlier comments around the difference between wheel washes and washdown stations. NPWS noted issues related to biosecurity in a letter dated 17 April 2025. See Section 1.5.1 for full details.		NC Identifier - 44
WEED AND PATHOGEN MANAGEMENT	BM33	Table 5-1: Biodiversity management measures	Prior to disturbance of riparian areas along Kellys Plain Creek, soil testing for the presence of harmful Phytophthora sp. will be carried out to determine if existing pathogens are present at the site.	Compliant	Sampling completed, however completed pre audit period 21/1/2022		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
WEED AND PATHOGEN MANAGEMENT	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.	Non Compliant	<p>Evidence of some wheel washes. However, Wheel washes out-of-commission or removed from active project area access routes (e.g. Marica Trail, Goandra 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, <u>non-compliant</u>.</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>		NC Identifier - 45
WEED AND PATHOGEN MANAGEMENT	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).	Non Compliant	<p>See earlier comment.</p> <p>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.'</p> <p>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.....'</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 <u>non-compliant</u>.</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>		NC Identifier - 46
WEED AND PATHOGEN MANAGEMENT	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)	Non Compliant	<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 <u>non-compliant</u>.</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>		NC Identifier - 47
WEED AND PATHOGEN MANAGEMENT	BM37	Table 5-1: Biodiversity management measures	To minimise the establishment of weeds, cleared areas will be revegetated as soon as reasonable y practicable following construction	Not Triggered	There have been no limited opportunities for final rehabilitation at this point.		
PEST MANAGEMENT	BM38	Table 5-1: Biodiversity management measures	Implement controls on construction activities that mitigate against the spread of feral pests as detailed in the Weed, Pest and Pathogen Management Plan (Appendix F)	Compliant	Evidence of weed spraying records.		
PEST MANAGEMENT	BM39	Table 5-1: Biodiversity management measures	A vertebrate pest control program will be implemented for the duration of construction as detailed in the Weed, Pest and Pathogen Management Plan (Appendix F).	Compliant	<p>NPWS noted issues related to weed and pest management in a letter dated 17 April 2025. See Section 1.5.1 for full details.</p> <p>However Snowy Hydro has been liaising with a contractor for vertebrate pest management eg. rabbits. There are ongoing challenges around horse management. Despite NPWS stating there have been issues we believe the Project has been making a genuine attempt to look into issues and manage vertebrate pests.</p>		
Spoil Management Plan (27 June 2022)							
Rehabilitation	REHAB 01	Table 2-2: Management measures from the RTS relevant to spoil management	A Rehabilitation Management Plan will be prepared for the new landforms at Tantangara Reservoir, Lobs Hole and Talbingo Reservoir. The plan will:	Compliant	Preparation requirement. Covered by overall Rehabilitation Management Plan.		
			• include a detailed plan for rehabilitation of the site;	Compliant			
			• include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the sites, and triggering any remedial action (if necessary);	Compliant			
			• describe the measures that would be implemented to:	Compliant			
			– comply with the rehabilitation objectives and associated performance and completion criteria;	Compliant			
			– progressively rehabilitate the site;	Compliant			
			– include a program to monitor and report the effectiveness of these measures	Compliant			
Creation of new landforms	REHAB 02	Table 2-2: Management measures from the RTS relevant to spoil management	New landforms will:	Not Triggered	Final landforms are being established with construction ongoing.		
			• be safe, stable and non polluting;	Not Triggered	Final landforms are being established with construction ongoing.		
			• maximise surface drainage to the natural environment	Not Triggered	Final landforms are being established with construction ongoing.		
Assessment of surface disturbance and excavation areas	CONTAM01	Table 2-2: Management measures from the RTS relevant to spoil management	Targeted investigations will be undertaken prior to construction along the surface disturbance areas using a risk-based approach. The results of these targeted investigations will determine the level of management to be implemented.	Compliant	Managed via EIS and pre clearance process.		
Assessment of imported Virgin Excavated Natural Material (VENM)	CONTAM02	Table 2-2: Management measures from the RTS relevant to spoil management	Prior to the importation of any VENM during construction, the VENM source(s) will be identified and assessed against the definition of VENM in the Waste Classification Guidelines (NSW EPA, 2014) and the POEO Act. The VENM source(s) will be assessed by an appropriately qualified contaminated land consultant.	Compliant	<p>No VENM brought into site. Aggregates are brought into site under a different certification.</p> <p>Clay will likely be brought to site for Marika and Rock Forest.</p>		
Contaminated soil management during construction	CONTAM03	Table 2-2: Management measures from the RTS relevant to spoil management	Protocols for the management of contaminated soil during construction will be included in the CEMP or EMS.	Compliant	Covered by the Spoil Management Plan.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Excavated rock waste management and transport	CONTAM04	Table 2-2: Management measures from the RTS relevant to spoil management	Material which has been assessed as not suitable for reuse on land or for subaqueous disposal or cannot be reused will be classified in accordance with the Waste Classification Guidelines (NSW EPA 2014). Depending on the classification of the material, a licensed waste transport company will be used to transport material which is required to leave the project, to an appropriately licensed facility. Excavated material may be subject to treatment and application on site	Compliant	Material from spills are removed from site. Material moved offsite from the cleanup notice. Covered in quarterly spoil reports. Includes locations of the certified companies that accept material.		
Asbestos management	CONTAM05	Table 2-2: Management measures from the RTS relevant to spoil management	An Asbestos Management Plan (AMP) will be developed if areas and items are identified during pre construction investigations as containing Asbestos Containing Materials ACM (ACM), or areas are suspected of containing ACM (such as historical buildings). The AMP will address unexpected finds of ACM. Specifically, protocols will be stipulated for separation, monitoring, validation and clearance of asbestos	Compliant	Evidence of spoil material testing. EIS also noted likely NOA areas, with the site coming closer to these areas soon through the boring program. Further protocols will be required.		
Asbestos management	CONTAM06	Table 2-2: Management measures from the RTS relevant to spoil management	An Occupational Hygienist (Hygienist) will be on site for the duration of the excavation works where ACM has been identified from preconstruction or where unexpected finds of ACM are encountered	Not Triggered	This condition is based on ACM - not NOA. There is an occupational hygienist on site for silica management.		
PAF rock	CONTAM07	Table 2-2: Management measures from the RTS relevant to spoil management	An Excavated Rock Management Plan would be developed which would include measures identified in the Preliminary Site Investigation – Contamination (Table 9.1, Item 4 of Appendix N.1)	Compliant	Covered in Spoil Management Plan.		
PAF / NOA rock management	Table 9.1, Item 4 of Appendix N.1	Table 2-2: Management measures from the RTS relevant to spoil management	An Excavated Spoil Management Plan would be developed which would include: • Procedures for handling, geochemical sampling and testing, classification, storage and disposal/placement of excavated rock to ensure that excavated material is appropriately managed;	Compliant	All covered by the preparation of the Spoil Management Plan. We met with Nicholas Bernardini (FGJV) to discuss the spoil management process of testing, placement of material. Actual implementation of the plan is covered further in the specific CSSI conditions.		
		Table 2-2: Management measures from the RTS relevant to spoil management	• Monitoring required to mitigate potential impacts from placement of excavated rock material;	Compliant			
		Table 2-2: Management measures from the RTS relevant to spoil management	• A clear, effective and trackable mechanism for implementing mitigation measures;	Compliant			
		Table 2-2: Management measures from the RTS relevant to spoil management	• Allowances for the treatment and separate placement of some PAF/NOA material in dedicated permanent emplacements in accordance with excavated rock management strategies for the Project;	Compliant			
		Table 2-2: Management measures from the RTS relevant to spoil management	• Allowances for the treatment of tunnel drainage containing AMD components for excavations in Possible, Likely and Confirmed AMD hazard areas;	Compliant			
		Table 2-2: Management measures from the RTS relevant to spoil management	• A process for the identification/characterisation/quantification of PAF/NOA material and activity specific risk assessments;	Compliant			
		Table 2-2: Management measures from the RTS relevant to spoil management	• A continued excavated material characterisation program would be developed which will allow for adequate assessment of NOA, acid metalliferous drainage (AMD)/neutral metalliferous drainage (NMD)/saline drainage (SD) material, and reduce the risk of material being misclassified as 'benign' and being managed inappropriately, and may include:	Compliant			
		Table 2-2: Management measures from the RTS relevant to spoil management	– Geochemical kinetic testing of each key lithology or alteration type identified to have an actual PAF, Potentially acid-forming—low capacity (PAF-LC)), or potential (uncertain) AMD risk	Compliant			
		Table 2-2: Management measures from the RTS relevant to spoil management	– Sequential Net Acid-Generation (NAG) testing, where TS >1% is reported in any single addition NAG tests (even where classification of the sample indicates NAF)	Compliant			
		Table 2-2: Management measures from the RTS relevant to spoil management	– Chromium Reducing Sulfur (CRS) testing, where is reported equal to or greater than 0.3% in single addition NAG tests	Compliant			
		Table 2-2: Management measures from the RTS relevant to spoil management	– Creation of a graphical or statistical analysis of AMD sample distribution to identify any critical information gaps, and develop a block model for potentially AMD forming material in the Possible to Confirmed Criticality Assessment areas	Compliant			
		Table 2-2: Management measures from the RTS relevant to spoil management	– Any laboratory analysis be compared to/correlated with xray fluorescence (XRF) core scans conducted by CSIRO and previous laboratory x-ray diffraction (XRD), abscisic acid (ABA), and NAG tests and management responses to mitigate identified risks associated with potentially AMD forming material	Compliant			
Unexpected Finds	CONTAM08	Table 2-2: Management measures from the RTS relevant to spoil management	An unexpected finds procedure will be included in the CEMP. Workers will be trained to identify potential contamination that may be encountered during construction	Compliant	General induction process includes unexpected finds. The Quarterly Spoil Reports also include sections on unexpected finds.		
Alpine humus soils and peat bogs/fens	SOIL01	Table 2-2: Management measures from the RTS relevant to spoil management	Mitigations will be included in the Rehabilitation Management Plan to minimise impacts to Alpine humus soils and peat bogs/fens.	Compliant	Covered in Rehabilitation Management Plan. Also mentioned in the Biodiversity Management Plan.		
Loss of soil resource	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.	Non Compliant	Evidence of topsoil tracking including GIS. Evidence of Topsoil Stripping Procedure. Evidence of topsoil being recorded in clearance process. However this commitment also includes implementation. Issue also identified in S3, C8 of the CSSI relating to the Spoil Management Plan. <u>NC topsoil</u> - 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. No non-compliance recommendation allocated to this commitment as it is addressed in NC RECs which are assigned to S3, C8.		NC Identifier - 48
Soil erosion and sedimentation	SOIL03	Table 2-2: Management measures from the RTS relevant to spoil management	Site based Erosion and Sediment Control Plans (ESCPs) will be prepared by a suitably qualified erosion and sediment control specialist.	Compliant	Based on the selection of ESCPs prepared these have been prepared by specialists. Also note other inspections by CPESC engineers (third party reviews).		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Soil capability	SOIL04	Table 2-2: Management measures from the RTS relevant to spoil management	The Rehabilitation Management Plan (refer to REHAB01) will be implemented and will include measures to minimise: <ul style="list-style-type: none"> • loss of soil; • loss of organic matter and nutrient decline; • soil structural decline; and • compaction. 	Not Triggered	Not fully triggered yet. Document prepared, with construction works ongoing.		
		Table 2-2: Management measures from the RTS relevant to spoil management	Regular rehabilitation monitoring will be undertaken to identify any defects, such as slumping, erosion or poor vegetation establishment. Identified defects will be rectified.	Not Triggered			
General	SM01	Table 8-1: Spoil management measures	Training will be provided to all project personnel, including relevant sub-contractors on spoil management practices and the requirements from this plan through inductions, toolboxes and targeted training.	Compliant	Evidence of induction program, environmental onboarding. Also evidence of erosion and sediment control training by SEEC.		
General	SM02	Table 8-1: Spoil management measures	Management measures from this plan will be included in relevant site environmental documents including for example, Work Packs and/or Site Environmental Plans (SEPs).	Compliant	Noted.		
Characterisation	SM03	Table 8-1: Spoil management measures	The spoil characterisation program in Appendix A will be implemented. The program will enable adequate assessment of contaminated materials, NOA, acid metalliferous drainage (AMD)/neutral metalliferous drainage (NMD)/saline drainage (SD) material, and reduce the risk of material being misclassified as 'benign' and being managed inappropriately.	Compliant	The site has had PAF material. The material is then mixed with NAF material and material is tested. Based on site discussions there has been no NOA yet.		
Characterisation	SM04	Table 8-1: Spoil management measures	Targeted investigations will be undertaken prior to construction along the surface disturbance areas using a risk based approach. The results of these targeted investigations will determine the level of management to be implemented.	Compliant	Evidence of pre clearance process. Evidence of ESCP's.		
Characterisation	SM05	Table 8-1: Spoil management measures	Material which has been assessed as not suitable for reuse on land or for subaqueous disposal or cannot be reused will be classified in accordance with the Waste Classification Guidelines (NSW EPA 2014).	Compliant	Contaminated soil is taken offsite to a licenced facility. Material from spills are removed from site. Material moved offsite from the cleanup notice. Covered in quarterly spoil reports. Includes locations of the certified companies that accept material.		
Characterisation	SM06	Table 8-1: Spoil management measures	Prior to the importation of any VENM during construction, the VENM source(s) will be identified and assessed against the definition of VENM in the Waste Classification Guidelines (NSW EPA, 2014) and the POEO Act. The VENM source(s) will be assessed by an appropriately qualified contaminated land consultant.	Compliant	No VENM brought into site. Aggregates are brought into site under a different certification. Clay will likely be brought to site for Marika and Rock Forest, but not yet triggered.		
Spoil handling and management	SM07	Table 8-1: Spoil management measures	Spoil generation will be minimised through design optimisation and beneficial reuse as set out in Section 6.2 of this Plan.	Compliant	Tunnelling process has minimised the amount of spoil. Placement of spoil in defined emplacement areas.		
Spoil handling and management	SM08	Table 8-1: Spoil management measures	Spoil is to be only re-used, placed or disposed of in accordance with its classification as set out in Section 6.1 of this Plan.	Compliant	No issues noted with the placement of spoil.		
Spoil handling and management	SM09	Table 8-1: Spoil management measures	Apart from the spoil that is provided to the NPWS for use in other parts of the Kosciuszko National Park, sent off-site, used to construct temporary or permanent infrastructure for the development or used to rehabilitate the site, the Proponent must ensure that all the spoil generated by the development is disposed of in the following emplacement areas: <ul style="list-style-type: none"> • Ravine Bay; • GFO 1; • Lobs Hole; • Tantangara; or • Rock Forest. 	Compliant	No issues noted. Rock Forest is being set up as a spoil area.		
Spoil handling and management	SM10	Table 8-1: Spoil management measures	TBM spoil must not be placed in the active storages or below the full supply level of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary.	Compliant	No impacts noted in field inspection. No evidence of disturbance in the reservoirs.		
Spoil handling and management	SM11	Table 8-1: Spoil management measures	Spoil from dredging, channel excavation or underwater blasting must not be placed in the eastern and western emplacement areas, or in the active storages or below the full supply level of either the Talbingo Reservoir or Tantangara Reservoir without the approval of the Planning Secretary.	Compliant	No evidence of this occurring.		
Spoil handling and management	SM12	Table 8-1: Spoil management measures	The beneficial reuse of non-reactive spoil on the project will be maximised where possible.	Compliant	Spoil is only stored within designated spoil emplacement areas.		
Spoil handling and management	SM13	Table 8-1: Spoil management measures	The beneficial reuse of non-reactive spoil elsewhere in the KNP will be maximised where possible (as requested and approved by NPWS).	Compliant	Spoil is only stored within designated spoil emplacement areas.		
Spoil handling and management	SM14	Table 8-1: Spoil management measures	Off-site disposal of spoil will be minimised where possible. Surplus spoil will be directed to the permanent spoil emplacement areas as a priority over off-site disposal.	Compliant	Offsite disposal is minimised due to costs.		
Spoil handling and management	SM15	Table 8-1: Spoil management measures	Spoil left at Lobs Hole, Marica and Tantangara for incorporation into the final landform should be minimised.	Not Triggered	Still a construction site and this has not been triggered.		
Spoil handling and management	SM16	Table 8-1: Spoil management measures	The Exploratory Works western emplacement area must only receive non-reactive spoil, which has a low geochemical risk and is suitable for reuse. Reactive spoil must not be directed to the Exploratory Works western emplacement area.	Compliant	This has been filled in. Based on site discussions there have been no issues. Western emplacement area is known as Main Yard.		
Spoil handling and management	SM17	Table 8-1: Spoil management measures	The Contaminated Land Management Plan (S2-FGJV-ENV-PLN-0049) will be implemented to ensure appropriate management of contaminated material on site.	Compliant	Evidence of contamination being removed offsite. Evidence of incident reporting process.		
Spoil handling and management	SM18	Table 8-1: Spoil management measures	An unexpected finds procedure is included in the Contaminated Land Management Plan (S2-FGJV-ENV-PLN-0049). Workers will be trained to identify potential contamination that may be encountered during construction	Not Triggered	Based on site discussions this has not been triggered under contamination.		
Spoil handling and management	SM19	Table 8-1: Spoil management measures	The Naturally Occurring Asbestos Management Plan (Appendix D of this Plan) will be implemented to ensure appropriate management of Naturally Occurring Asbestos encountered during works	Not Triggered	NOA has not been encountered. There is a plan.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Spoil handling and management	SM20	Table 8-1: Spoil management measures	The Acid and Metaliferous Drainage Management Plan (Appendix E of this Plan) will be implemented to ensure appropriate management of AMD material encountered during works.	Compliant	AMD is assessed onsite through testing. Plan is implemented.		
Spoil handling and management	SM21	Table 8-1: Spoil management measures	The Waste Management Plan (S2-FGJV-ENV-PLN-0048) will be implemented to ensure appropriate classification, use and disposal of waste from the project	Compliant	No issues identified in regards to waste and spoil management.		
Spoil handling and management	SM22	Table 8-1: Spoil management measures	Material which is not suitable for reuse or placement or on onsite remediation, will be transported to a facility that is lawfully permitted to receive that material.	Compliant	There are three licenced disposal facilities. Site has provided examples of approved facilities.		
Spoil handling and management	SM23	Table 8-1: Spoil management measures	The Stockpile Procedure (Appendix C of this Plan) will be developed to ensure temporary stockpiling is appropriately managed and that any adverse impacts are controlled and rectified.	Compliant	Spoil is moved into the spoil emplacement areas. Based on site discussions it would be rare to have material stored in temporary areas.		
Spoil handling and management	SM24	Table 8-1: Spoil management measures	The Surface Water Management Plan (S2-FGJV-ENV-PLN-0011) will be implemented to ensure impacts on surface waters as a result of spoil handling and placement are minimised	Non Compliant	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. No non-compliance recommendation allocated to this commitment as it is addressed in NC REC which is assigned to S3, C32.		NC Identifier - 49
Spoil handling and management	SM25	Table 8-1: Spoil management measures	Site based Erosion and Sediment Control Plans (ESCPs) will be prepared by a suitably qualified erosion and sediment control specialist	Compliant	Rock Forest Pads, Spoil Area Test Pits and Access Road ESCP developed by SEEC		
Spoil handling and management	SM26	Table 8-1: Spoil management measures	A non-naturally occurring Asbestos Management Plan (S2-FGJV-HAS-PLN-0010) has been developed and will be implemented to manage Asbestos Containing Materials ACM (ACM), or areas are suspected of containing ACM (such as historical buildings). The AMP addresses unexpected finds of ACM. Specifically protocols will be stipulated for separation, monitoring, validation and clearance of asbestos	Compliant	Plan has been developed, it hasn't required implementation but.		
Spoil handling and management	SM27	Table 8-1: Spoil management measures	An Occupational Hygienist (Hygienist) will be on site for the duration of the excavation works where ACM has been identified from pre construction or where unexpected finds of ACM are encountered	Compliant	This condition is based on ACM - not NOA. There is an occupational hygienist on site for silica management.		
Spoil handling and management	SM28	Table 8-1: Spoil management measures	The process Water Treatment Plants will receive all tunnel drainage, including tunnel drainage containing AMD components for excavations in Possible, Likely and Confirmed AMD hazard areas. The water will be reused in the tunnelling process following treatment. Any discharge to the environment will only occur where the water is treated so as to comply with the criteria in EPL 21266	Compliant	No issues noted. Water is reused in tunnelling process. Also defined process of leachate dams picking up from spoil emplacement areas. Evidence of water treatment.		
Spoil handling and management	SM29	Table 8-1: Spoil management measures	The Topsoil Strategy (Appendix B of this Plan) will be implemented to ensure the surface of the emplacement areas will be suitable to sustain the target PCTs in the long term.	Not Triggered	Rehab and closure requirement.		
Spoil handling and management	SM30	Table 8-1: Spoil management measures	A hold point process will be established and implemented requiring approval by the Future Generation Environment Manager or Construction Manager prior to the placement of material generated from dredging, channel excavation or underwater blasting. This hold point process will note that this material cannot be placed in the Exploratory Works eastern and western emplacement areas without the approval of the Planning Secretary	Not Triggered	Based on site comms this has not been triggered.		
Spoil handling and management	SM31	Table 8-1: Spoil management measures	The western emplacement area will be used to store cuttings and other material that has a low geochemical risk. This landform will be built in a manner that limits compaction and will be top soiled and vegetated to stabilise the landform. To note, the Exploratory Works western emplacement area will be filled during Main Works for the purposes of constructing the Main Yard. Nevertheless only non-reactive spoil will be placed at this location.	Compliant	This has been filled in. Based on site discussions there have been no issues. Western emplacement area is known as Main Yard.		
Spoil handling and management	SM32	Table 8-1: Spoil management measures	Any remnant mine workings located within the eastern and western rock and soil emplacement areas will be rehabilitated (if necessary).	Compliant	FGJV is making attempts to avoid these areas in construction.		
Spoil handling and management	SM33	Table 8-1: Spoil management measures	The eastern emplacement area will be used to store any material generated during Exploratory Works that has higher geochemical risk. Excavated material will be geochemically characterised prior to placement. If any potentially acid forming material is encountered, it will be placed in a select area of the emplacement. The potential for acid rock drainage will be treated by placing and compacting layers of limestone (or other suitable AC material) between each rock and sediment layer as required. The volume of limestone (or other suitable AC material) in each layer will be determined stoichiometrically so that the maximum potential acidity from the overlying layer of rock and sediment is treated. This approach will neutralise AMD within the stockpile. Once design levels are reached, the landform will be top-soiled and vegetated. To note, the Exploratory Works eastern emplacement area will be filled during Main Works for the purposes of constructing the Main Yard. PAF material will be managed as set out in Appendix E of this Plan.	Not Triggered	Based on site comms this was not triggered.		
Spoil handling and management	SM34	Table 8-1: Spoil management measures	Runoff from Lick Hole Gully during Exploratory Works will be diverted around or through the eastern emplacement area. The diversion works will comprise a dam upstream of the diversion inlet and either a gravity or pump assisted diversion system. The diversion works will have a 1% AEP capacity. The dam upstream of the diversion inlet will be designed as a detention basin and will not permanently hold water. To note, the Exploratory Works eastern emplacement area will be filled during Main Works for the purposes of constructing the Main Yard and the final Lobs Hole emplacement area. Final design of the Lobs Hole emplacement area will be addressed in accordance with the staging specified in Section 1.6 and the Rehabilitation Management Plan. Operational controls that require ongoing management following completion of construction would be of no impost the NPWS.	Compliant	Works completed under this consent. There has been a low geochemical risk.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Spoil handling and management	SM35	Table 8-1: Spoil management measures	A high-flow diversion drain will be established to convey runoff from Lick Hole Gully around the emplacement area in a controlled manner, avoiding uncontrolled overflows through the emplacement area. This diversion drain will only be engaged if a flood greater than a 1%AEP event occurs. To note, the Exploratory Works eastern emplacement area will be filled during Main Works for the purposes of constructing the Main Yard and the final Lobs Hole emplacement area. Final design of the Lobs Hole emplacement area will be addressed in accordance with the staging specified in Section 1.6 and the Rehabilitation Management Plan. Operational controls that require ongoing management following completion of construction would be of no impost the NPWS	Compliant	There is a now a diversion for lick hole gully.		
Spoil handling and management	SM36	Table 8-1: Spoil management measures	Seepage from the eastern emplacement area will be collected in a water management dam. Collected water will either be irrigated to the emplacement (to promote evaporation) or treated in the process water treatment plant. Discharge of seepage water to the Yarrangobilly River will be avoided. To note, the Exploratory Works eastern emplacement area will be filled during Main Works for the purposes of constructing the Main Yard and the final Lobs Hole emplacement area. Final design of the Lobs Hole emplacement area will be addressed in accordance with the staging specified in Section 1.6 and the Rehabilitation Management Plan.	Compliant	There are some large dams near Main Yard that collect the runoff.		
Spoil handling and management	SM37	Table 8-1: Spoil management measures	The western emplacement will be designed to prevent the risk of emplacement material being entrained in flood waters during a 1 in 5000-year flood event. To note, the Exploratory Works eastern emplacement area will be filled during Main Works for the purposes of constructing the Main Yard and the final Lobs Hole emplacement area. Final design of the Lobs Hole emplacement area will be addressed in accordance with the staging specified in Section 1.6 and the Rehabilitation Management Plan.	Not Triggered	Based on site discussions the site is on temporary design. Not yet triggered.		
Spoil handling and management	SM38	Table 8-1: Spoil management measures	The monitoring in Section 9 of this Plan will be implemented to identify and track the performance of: <ul style="list-style-type: none"> the management of spoil on site; the implementation of each of the detailed plans, including the effectiveness of the proposed mitigation and contingency measures; and progress against the detailed completion criteria and performance indicators of each permanent spoil emplacement area 	Compliant	Evidence of spoil monitoring and management process. Quarterly reports cover requirements. FGJV compares back to key criteria including AMD.		
Spoil handling and management	SM39	Table 8-1: Spoil management measures	Monitoring measures to be included as part of the Surface and Groundwater Monitoring Program, to monitor potential impacts from the placement of spoil.	Compliant	Covered in Water MP		
Emplacement area design and rehabilitation	SM40	Table 8-1: Spoil management measures	The permanent spoil emplacement areas will be designed to comply with the design objectives in Table 2 (of the COA entitled Design Objectives for Permanent Spoil Emplacement Areas).	Not Triggered	See appendix of the Spoil Management Plan. Appendices F-J of the Spoil Management Plan state the Design objectives for the permanent Spoil emplacement areas. These are for final design and rehabilitation. As they are still operating they are not yet at final design.		
Emplacement area design and rehabilitation	SM41	Table 8-1: Spoil management measures	New landforms will: <ul style="list-style-type: none"> be safe, stable and non polluting; maximise surface drainage to the natural environment. 	Not Triggered	Not triggered as still operating.		
Emplacement area design and rehabilitation	SM42	Table 8-1: Spoil management measures	Detailed plans for each of the permanent spoil emplacement areas that have been prepared using both analogue and erosional-based methods will be developed for approval prior to commencement of construction of the applicable placement area. The plans will: <ul style="list-style-type: none"> describe how the development of each emplacement area would be co-ordinated with the rehabilitation of the site in accordance with the approved Rehabilitation Management Plan; describe the measures that would be implemented to comply with the spoil management requirements in condition 4 and the design objectives in Table 2 of the COA; include a topsoil strategy outlining measures the measures that would be implemented to ensure the surface pf the emplacement areas will be suitable to sustain the target PCTs in the long term, having regard to the approved strategy in the Rehabilitation Management Plan; identify the key risks for the successful completion of each emplacement area and the contingency measures that would be implemented to address these risks; and include detailed completion criteria and performance indicators for each emplacement area, including criteria for triggering remedial action (if necessary) 	Compliant	Appendix of the Spoil Management Plan. One for each of the Spoil Emplacement Areas.		
Heritage Management Plan (3 March 2025)							
Aboriginal Heritage							
Impact to known heritage sites and items	HER01	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	An Aboriginal Heritage Management Plan (AHMP) will be prepared and implemented to guide the process for management and mitigation of impacts to Aboriginal objects. The AHMP will:	Compliant	Prepared to meet these requirements. It meets these dot pts below, with implementation of the main plan covered under the CSSI.		
			<ul style="list-style-type: none"> be prepared in consultation with RAPs and DPH; 				
			<ul style="list-style-type: none"> describe survey units in which impacts are allowable; and 				
			<ul style="list-style-type: none"> include procedures relating to the conduct of additional archaeological assessment, if required. 				
Loss of Aboriginal cultural heritage	HER02	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	Specific management and mitigation measures are listed for each individual survey unit and Aboriginal object locale in Appendix P.1 and will be included in the AHMP or salvage strategy. Management measures to be included in the AHMP are: <ul style="list-style-type: none"> for survey units within the project disturbance footprint which are assessed to be of higher significance values, impact mitigation measures will be implemented. These would comprise salvage in the form of archaeological excavation and archaeological analysis prior to impacts. Salvage will be undertaken prior to impacts occurring to the relevant item and will be documented in a separate report; and 	Compliant	No issues noted with salvage works.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
			<ul style="list-style-type: none"> the AHMP is to include measures for the management of any Aboriginal objects that may be found during construction. 	Compliant	Covered in ACHMP		
			<ul style="list-style-type: none"> Areas within the project disturbance footprint that warrant further field assessment will be managed under the AHMP or salvage strategy after project approval. These areas are documented in the heritage addendum report (Appendix M) 	Compliant	No issues noted.		
Historic Heritage							
Loss of historic heritage	HER03	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	Salvage and/or archival recording of potential and known heritage items to be conducted in respect of certain items that warrant that level of impact mitigation.	Compliant	No issues noted with salvage works.		
Loss of historic heritage	HER04	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	Specific management and mitigation measures are listed for each individual heritage item in Appendix P.2 and will be included in a cultural heritage management plan (CHMP). A series of management recommendations will be presented. In some instances, no impact mitigation is required. For others a range of measures are recommended ranging from the establishment of no-go zones to ensure the protection of items, salvage of movable heritage to salvage excavation and archival recording. Salvage will be undertaken prior to impacts occurring and will be documented in a separate report.	Compliant	No issues noted with this condition.		
			Appropriate avoidance measures will be taken for Washington Hotel (site R20) and Ravine Cemetery (R118).	Compliant	Evidence of boundary rope.		
			A minimum 20 m project construction avoidance buffer will be applied to the Washington Hotel (site R20) structure.	Compliant	No issues noted.		
			No ground disturbance will occur within the Ravine Town Cemetery cadastral boundary as shown on Figure 6.20 in the EIS. Some non-ground invasive vegetation clearance will be required at the western and northern boundaries of the cadastral boundary of Ravine Cemetery (refer to bush fire risk and hazard assessment, Appendix T).	Compliant	No issues noted. Sighted in the distance.		
			Areas within the project disturbance footprint that warrant further field assessment will be managed under the HNHMP or salvage strategy after project approval. These areas are documented in the heritage addendum report (Appendix M).	Compliant	Noted, no issues determined.		
Natural Heritage							
Geodiversity – Ravine block streams	GE01	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	Design principles identified in the Cenozoic Geodiversity Report will be implemented to minimise impacts to the Ravine block streams during detailed design.	Not Triggered	This relates to boulder streams on Ravine Road. Nothing has been enacted in this period as the road has been finished. Closed out previously.		
Geodiversity – Ravine block streams	GE02	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	Design principles identified in the Cenozoic Geodiversity Report will be implemented to minimise impacts to the Ravine tufa during detailed design	Not Triggered	This relates to boulder streams on Ravine Road. Nothing has been enacted in this period as the road has been finished. Closed out previously.		
Geodiversity – Lick Hole Formation fossil locality	GE03	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	Final road design will consider incorporating interpretive signage and safe stopping space within the proposed road and disturbance footprint where practical.	Not Triggered			
Geodiversity – Kellys Plain Volcanics Type Locality	GE04	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	During construction, ensure that the former Traces Knob quarry is not in-filled.	Not Triggered			
Geodiversity – Kellys Plain Volcanics agglomeratic porphyry	GE05	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	Identify outcrops of agglomeratic porphyry prior to construction at Tantangara portal. Excavated rock placement should leave some of the best examples of the agglomeratic porphyry uncovered where reasonable and feasible to do so	Not Triggered			
Geodiversity	GE06	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	A management plan will be prepared that includes measures that minimise impacts to known geodiversity sites and potential undocumented geodiversity sites identified in accordance with the recommendation in the Cenozoic and Palaeozoic Geodiversity reports.	Compliant	Covered under Heritage Management Plan.		
Geodiversity	GE07	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to heritage	Consult with NPWS regarding opportunities to enhance the geotourism potential of impacted geodiversity sites through the development of the masterplan for recreational use.	Compliant	There is a recreational management plan that continues to be updated.		
Rocks and Landform		Table 2-5: KNP POM management objectives relevant to Snowy 2.0 Main Works	<p>Management Objective:</p> <p>6.3.1 The rocks, landforms and geological processes of the park are protected and, where necessary, managed within the bounds of acceptable limits of disturbance.</p> <p>Policies and Actions:</p> <p>1. Provide maximum protection to rocks, landforms and geological processes that are of national significance and sensitive to disturbance by current human activities. This will include items listed in Schedule 1. Such places will not be publicised or promoted unless management regimes are in place to protect them from likely damage associated with increased visitation.</p>	Compliant	No issues determined from site inspection. Rocks for habitat in rehabilitation have been stockpiled.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Rocks and Landform		Table 2-5: KNP POM management objectives relevant to Snowy 2.0 Main Works	<p>Management Objective: 6.3.2 Rehabilitation and construction works are undertaken in ways that protect significant rocks, landforms and geological processes.</p> <p>Policies and Actions: 1. Prohibit developments likely to significantly impact on the integrity of geodiversity features of national significance. 2. Assess potential impacts on geodiversity values as part of the approval process for proposed developments or activities, including restoration works. 3. Undertake the rehabilitation of disturbed sites in accordance with Section 11.2 (of the KNP POM).</p>	Not Triggered	Construction works meet the requirement but there has been limited opportunities for final rehabilitation.		
Karst		Table 2-5: KNP POM management objectives relevant to Snowy 2.0 Main Works	<p>Management Objective: 6.4.1 The quality and quantity of air and water movement through the surface and subterranean environments of karst areas are maintained within the bounds of natural variability.</p> <p>Policies and Actions: 1. Minimise the use of earth-moving machinery in karst catchments. 2. Minimise surface and groundwater pollution within karst catchments.</p>	Not Triggered	The site has stated they have not hit any areas of Karst.		
Karst		Table 2-5: KNP POM management objectives relevant to Snowy 2.0 Main Works	<p>Management Objective: 6.4.2 Impacts associated with visitation to karst areas and features are managed within acceptable limits of disturbance.</p> <p>Policies and Actions: 1. Minimise adverse impacts of road drainage structures and materials used for roadworks and car parks in karst areas.</p>	Not Triggered	The site has stated they have not hit any areas of Karst.		
Historic Heritage		Table 2-5: KNP POM management objectives relevant to Snowy 2.0 Main Works	<p>Management Objective: 6.4.2 Impacts associated with visitation to karst areas and features are managed within acceptable limits of disturbance.</p> <p>Policies and Actions: 1. Conserve the cultural values of the park in accordance with the Australia ICOMOS (International Council on Monuments and Sites) Charter for the Conservation of Places of Cultural Significance (Burra Charter) and its guidelines. 2. Ensure the relative levels of significance are the overriding consideration in the management of particular cultural landscapes, places or objects and in resolving conflicts between the protection of cultural, natural, recreational and other values. 3. Acknowledge the inseparability of natural and cultural values and recognise that landscapes have been influenced by human activities to varying degrees.</p>	Not Triggered	The site has stated they have not hit any areas of Karst.		
			<p>4. Ensure cultural heritage management in the park considers, and where relevant, is consistent with:</p> <ul style="list-style-type: none"> • The provisions of relevant Commonwealth and State legislation; • The provisions of Service policies, guidelines and cultural heritage management strategies; • Conservation policies in approved conservation management plans, heritage action statements and related reports prepared for places and objects within the park; and • The protection of all significant cultural heritage features listed in Schedule 1. <p>5. Manage heritage places with shared histories across different phases of human land use and between different communities to ensure that:</p> <ul style="list-style-type: none"> • All aspects of the history of a place are identified, recorded and assessed; • Both Aboriginal and non-Aboriginal cultural values are acknowledged at places where they co-exist; • Management of the remaining physical evidence of one historical theme or story is not at the expense of that of another; and • Visitor interpretation covers all aspects of the layered histories of such places. 	Not Triggered	The site has stated they have not hit any areas of Karst.		
			<p>6. Lessees will be responsible for the assessment, management and maintenance of the cultural values located within their lease areas in accordance with the management strategies prescribed in this plan, the Snowy Management Plan (for Snowy Hydro Limited) and the Alpine Resorts Environmental Planning Instrument (for alpine resort areas)</p>	Not Triggered	The site has stated they have not hit any areas of Karst.		
General	HER01	Table 5-1: Heritage management measures	<p>Training will be provided to all project personnel, including relevant sub-contractors on heritage requirements from this HMP through inductions, toolboxes and targeted training. Training will describe the heritage values of the project area and the procedures to be followed in the event of the discovery of features, artefacts or bones (potential human remains), as well as procedures in the event of an incident (i.e. damage to a heritage item or geodiversity feature).</p> <p>Training will include details of the likely presence of unrecorded historical heritage (due to thick vegetation cover), historical unmarked graves and potential natural heritage along Tantangara Road, Marica Road and Marica Road West. Training will include reference to the protection of heritage located within and outside of the approved disturbance areas.</p>	Compliant	Evidence of induction process.		
General	HER02	Table 5-1: Heritage management measures	All known heritage located outside the construction envelope will be protected from direct impact by project boundary delineation and site induction training in relation to heritage. Known heritage items will be marked on sensitive area plans.	Compliant	<p>No moderate/ larger issues determined with boundaries and clearance. Evidence of GIS files for clearing and boundaries. Evidence of boundary fencing.</p> <p><u>Sensitive Area Plans</u> Sensitive Area Plans marked with known heritage items as per Section 3.3.1 of the HMP.</p>		
General	HER03	Table 5-1: Heritage management measures	The Unexpected Finds Procedure included within Appendix E will be followed in the event that any items of potential Aboriginal, historic, archaeological or natural (geodiversity) significance including human remains are discovered during construction.	Compliant	Site has stated in the RFI 'only one unexpected European item; the unexpected finds procedure was followed, the Heritage specialist deemed the item of no historical value.'		
General	HER04	Table 5-1: Heritage management measures	Impacts to ground surfaces should be kept to an absolute minimum, where feasible and reasonable	Compliant	No moderate/ larger issues determined with boundaries and clearance. Evidence of GIS files for clearing and boundaries. Evidence of boundary fencing.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Aboriginal Heritage	HER05	Table 5-1: Heritage management measures	A riparian exclusion zone adjacent to the Yarrangobilly River measuring 50 m wide (except for nominated river and creek crossings and areas approved as part of the Snowy2.0 Main Works Approval) will be established and appropriately demarcated prior to construction. The exclusion zone will be: <ul style="list-style-type: none"> • designated as an exclusion zone and identified on the Sensitive Area Plans; and • marked in the field with temporary barriers and signage denoting a "no go" area. 	Compliant	Roped edges of construction zone. No issues determined.		
Aboriginal Heritage	HER06	Table 5-1: Heritage management measures	If any part of the project is located in a survey area which is not identified in Appendix A of the HMP an assessment by a suitably qualified archaeologist will be undertaken before that part of the project proceeds	Compliant	Roped edges of construction zone. No issues determined.		
Aboriginal Heritage	HER07	Table 5-1: Heritage management measures	Further investigation (i.e. test excavation) is to be undertaken in Survey Unit TSU14b prior to construction activities in that Survey Unit. Test excavation shall be conducted in accordance with Requirement 16a Test excavations, Requirement 16b – Objects recovered during test excavations and Requirement 17 – When to stop test excavations, as outlined in the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (NSW DECCW 2010a). The assessment of the significance will be determined by a suitably qualified archaeologist. If archaeological deposits of high significance are found, consultation with DPHI will occur to confirm the management approach. It is noted that if archaeological deposits of moderate or high significance are found, salvage excavations are likely be required before construction <i>Note: if archaeological deposits of moderate or high significance are found, salvage excavations would be required in accordance with salvage methodology included in Appendix A.</i>	Compliant	Roped edges of construction zone. No issues determined.		
Aboriginal Heritage	HER08	Table 5-1: Heritage management measures	Salvage excavations are to be undertaken in the following Survey Units if in the disturbance area: <ul style="list-style-type: none"> • RSU2, RU5, RSU6, RSU7, RSU10, RSU12, RSU29 • MSU2, MSU4 • TSU2, TSU3, TSU4, TSU11, TSU14, TSU15 • CCSU17 Salvage excavations will be undertaken in accordance with the salvage methodology included in Appendix B.	Not Triggered	Based on site communications archaeological work was completed pre this period.		
Aboriginal Heritage	HER09	Table 5-1: Heritage management measures	The salvage excavation methodology within Appendix B includes both hand and mechanical excavation processes with supervision provided by an archaeologist. Prior to commencement of mechanical excavation, DPHI will be advised of the intent to commence this process. DPHI, NPWS and Heritage NSW will be invited to attend site during the mechanical excavation works. During the works an early progress report will be prepared in writing detailing the outcomes of this approach. The early progress report will be issued within one month of the commencement of mechanical excavation.	Not Triggered	Based on site communications archaeological work was completed pre this period.		
Historic Heritage	HER10	Table 5-1: Heritage management measures	FGJV will consult with the Surveyor General to determine appropriate approval and management pathways for the removal of trigonometrical markers adjacent to existing roadways impacted by the Main Works project.	Not Triggered	Based on site communications		
Historic Heritage	HER11	Table 5-1: Heritage management measures	Exclusion zones will be installed: <ul style="list-style-type: none"> • around the Washington Hotel ruin (R20) with a minimum 20m avoidance buffer; • around the Ravine Town Cemetery cadastral boundary (R118); and • for heritage items inside the disturbance area that require salvage or archival recording. Flagging will remain in place until such time as the relevant mitigation measures have been implemented and heritage clearance certificate issued. 	Compliant	No issues determined. Roping of defined boundaries.		
Historic Heritage	HER12	Table 5-1: Heritage management measures	The historic heritage management measures identified in Appendix C for individual heritage items shall be implemented. <i>Note: historic heritage management measures descriptions are discussed in Section 5.3 of this Plan.</i>	Compliant	No issues noted.		
Historic Heritage	HER13	Table 5-1: Heritage management measures	All archival recording will be undertaken in accordance with the guideline <i>How to Prepare Archival Recording of Heritage Items (Heritage Branch 1998)</i> and <i>Photographic recording of heritage items using film or digital capture (Heritage Branch 2006)</i> .	Not Triggered	Completed pre period.		
Historic Heritage	HER14	Table 5-1: Heritage management measures	Salvage excavation and/or systematic collection of artefacts which are required to undergo salvage excavation will be undertaken in accordance with the archaeological research design in Appendix D.	Not Triggered	Completed pre audit period.		
Historic Heritage	HER15	Table 5-1: Heritage management measures	The location of at least 16 graves of people listed as buried at Lobs Hole is unknown. Unexpected find of skeletal remains will be managed in accordance with Appendix E.	Not Triggered	No issues noted from site discussions. Covered in cemetery area.		
Historic Heritage	HER16	Table 5-1: Heritage management measures	Vegetation clearing will be supervised and monitored by the project archaeologist at Lobs Hole within 100m of the former alignment of Struggle Street and / or within 30m of an identified heritage item. If required, salvage excavations and/or archival recording shall be undertaken for any heritage items identified. Any archival recording and/or excavations will be undertaken in accordance with Appendix D.	Not Triggered	Completed many yrs ago according to site discussions.		
Historic Heritage	HER17	Table 5-1: Heritage management measures	A detailed archival record of the history of settlement and mining in the lobs hole ravine area will be provided to Snowy Hydro, Department of Planning, Industry and Environment (DPHI), NPWS and Heritage NSW within two years of completion of the salvage.	Not Triggered	We do not believe this is triggered yet. Snowy Hydro has stated in the RFI 'In relation to evidence for MP reference number HER17, we have been advised that it is not within the audit period. '		
Natural Heritage	HER18	Table 5-1: Heritage management measures	Natural heritage monitoring will be undertaken in accordance with Section 6.1.	Non Compliant	A report is required annually as part of the project. This has not been completed. Recommendation within the CSSI.		NC Identifier - 50

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Natural Heritage	HER19	Table 5-1: Heritage management measures	Design principles will be implemented to minimise impacts to the Ravine block streams in accordance with Exploratory Works condition 37 and condition 37A.	Not Triggered			
Natural Heritage	HER20	Table 5-1: Heritage management measures	Prior to disturbing the block streams impacted on Lobs Hole Ravine Road for upgrade works detailed mapping of the block stream extents and morphology and a detailed archival record of the block streams will be undertaken.	Not Triggered			
Natural Heritage	HER21	Table 5-1: Heritage management measures	Rocks and boulders that are removed from the block streams during the road widening works should be stockpiled separately from other surplus soil and rubble to enable their potential use at a later date by NPWS in off-site interpretations (e.g., displays at visitor information centres) or in the construction of park infrastructure as a feature, rather than being disposed of as land fill or in reservoirs.	Not Triggered			
Natural Heritage	HER22	Table 5-1: Heritage management measures	Where practicable and in consultation with NPWS, educational signage should be provided in a nearby suitably widened area to provide information on the periglacial rock stream geoheritage features.	Not Triggered			
Natural Heritage	HER23	Table 5-1: Heritage management measures	Design principles will be implemented to minimise impacts to the Ravine tufa deposits during construction.	Not Triggered			
Natural Heritage	HER24	Table 5-1: Heritage management measures	Design principles will be implemented to minimise impacts to the Lick Hole Formation fossil sites during construction.	Not Triggered			
Natural Heritage	HER25	Table 5-1: Heritage management measures	For the fossiliferous rock, a representative excavated spoil is to be preserved off site so that palaeontologists (from educational research bodies and institutions such as: Geoscience Australia in Canberra, ANU also in Canberra, the Geological Survey of NSW based in Sydney and Maitland, and the Australian Museum in Sydney) could look through the fresh material and collect fossil specimens for scientific research and curation in their respective collections. The methodology for engaging these institutions will be via letter informing them of the availability of the material from the Project. In case of no uptake from these letters, Snowy Hydro, in consultation with NPWS, will store the excavated material in a suitable container for 1 year after excavation to be made available for any institutions or research bodies or Agencies if required.	Not Triggered	This is closed. Fossils have been provided to units.		
Natural Heritage	HER26	Table 5-1: Heritage management measures	The following measures will be implemented to prevent infilling on the former Traces Quarry site: • the area will be marked on sensitive area maps and included in work packs; • no go fencing, flagging or markers will be installed; • site induction with elements related to historic heritage management; and • targeted training in the form of toolbox talks or pre-start briefs will be conducted.	Not Triggered	Boundary fencing. Defined limits and outside area. Construction is not near this area.		
Natural Heritage	HER27	Table 5-1: Heritage management measures	Prior to construction, the geoheritage specialist will identify the agglomeratic porphyry outcrops and ensure that the best examples are not covered by the excavated rock emplacement. Following identification, the following measures will be implemented: • the identified best examples shall be marked on sensitive area maps and included in work packs; • no go fencing, flagging or markers will be installed at the location of best examples; • site induction with elements related to historic heritage management; and • targeted training in the form of toolbox talks or pre-start briefs.	Not Triggered	Old pre construction condition.		
Noise Management Plan - Rock Forest (2 December 2022)							
Construction impacts amenity	NV01	Table 2-2: Revised management measures relevant to this plan	Prepare a construction noise and vibration management plan (CNMP) that will address noise and vibration management and mitigation options (where required). The CNMP will include as a minimum: • identification of nearby residences and sensitive land uses; • a description of approved hours of work and what work will be undertaken; • a description of what work practices will be applied to minimise construction noise, in particular how construction noise levels will be managed where predicted noise levels above the NMLs have been identified; • a description of what work practices will be applied to minimise vibration; • a description of the complaints handling process; and • a description of monitoring that is required.	Compliant	See Construction Noise Management Plan - Rock Forest December 2022.		
Exceedance of day and nighttime criteria at assessment location	NV02	Table 2-2: Revised management measures relevant to this plan	Affected landholders should be consulted prior to and during construction and should be notified of proposed mitigation measures that will be used to manage construction noise levels to below Interim Construction Noise Guideline (EPA 2009) NMLs where practicable.	Compliant	Discussions with FGJV and Snowy Hydro relating to consulting with nearby neighbours. Pre construction component is outside the period.		
General	NV01	Table 6-1: Noise management measures	Training will be provided to all project personnel, including relevant sub-contractors on noise management practices including the out of hours work procedure and the requirements of this plan through inductions, toolboxes and targeted training.	Compliant	Tool boxes with key team members. During clearing permit process. Further training will be completed when works commence again.		
General	NV02	Table 6-1: Noise management measures	Noise management measures from this plan will be included in site environmental documents including for example Work Packs and/or Site Environmental Plans (SEPs).	Compliant	Noise MP is the main document. When site engages sub contractors the conditions of the relevant MP's are noted.		
General	NV03	Table 6-1: Noise management measures	Noise mitigation measures will be implemented as per the best practice noise mitigation measures as outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version.	Compliant	Based on site discussions there have been no noise complaints within the audit period.		
Plant and equipment	NV04	Table 6-1: Noise management measures	Where feasible and reasonable noisy equipment and/or construction processes will be substituted by alternative low noise emitting equipment and/or construction process.1	Compliant	The main control is undertaking work within defined day hours. Noting no complaints. Noting real time noise monitoring. Idling of engines is reduced at Rock Forest is sometimes a holding area in winter.		
Plant and equipment	NV05	Table 6-1: Noise management measures	Plant and machinery based at Rock Forest will be fitted with non-tal reversing alarms (this does not include site light vehicles). Where possible this will include site heavy vehicles.	Not Triggered	FGJV provides information in contracts. This is normal activity and does not require a recommendation for this activity.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Plant and equipment	NV06	Table 6-1: Noise management measures	All construction plant and equipment used on the site will be, in addition to other relevant requirements be: <ul style="list-style-type: none"> • maintained in an efficient condition; • operated in a proper and efficient manner; and • fitted with properly maintained noise suppression devices (i.e. mufflers, silencers) where manufacturer's specifications require. 	Compliant	Maintenance records are kept for the project. This will need to continue during further construction and operations.		
Design	NV07	Table 6-1: Noise management measures	The Rock Forest site will be designed and configured so that the internal road network limits reversing of plant and heavy vehicles	Not Triggered	Noted, Works are still ongoing, hence not triggered.		
Working hours	NV08	Table 6-1: Noise management measures	Site setup (Phase 1), decommissioning (Phase 3) and spoil emplacement (part Phase 2) works at the Rock Forest site will be undertaken during standard daytime construction hours: <ul style="list-style-type: none"> • 7:00am to 6:00pm Monday to Saturday; and • 8:00am to 6:00pm Sundays and NSW Public Holidays 	Compliant	Phase 2 and 3 not triggered. Phase 1 - Rock Forest - Dayworks Time sheet (spreadsheet) show that works are not being undertaken for longer than 11 hours each day.		
Working hours	NV09	Table 6-1: Noise management measures	Works outside of the hours described in NV08, will only be undertaken in the following circumstances: <ul style="list-style-type: none"> • for delivery of materials required outside these hours by the Police or other authorities for safety reasons; or • where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; and • works approved under an Out-of-Hours Work Procedure (refer to Appendix B). 	Not Triggered			
Working hours	NV10	Table 6-1: Noise management measures	Ongoing use of the logistics area during Phase 2 will be undertaken 24 hours 7 days per week throughout the life of the Project. Spoil emplacement works at the Rock Forest site will be undertaken during standard daytime construction hours (NV08). Where possible, Phase 2 logistic area works will be undertaken in standard day-time hours. During evening and night-time, high noise works will be minimised including but not limited to: <ul style="list-style-type: none"> • loading and unloading of deliveries; and • dropping materials from a height. 	Not Triggered			
Consultation and complaints management	NV11	Table 6-1: Noise management measures	Sensitive receivers will be notified of construction activities that are likely to affect their noise amenity. Information provided will include: <ul style="list-style-type: none"> • the types of activities to be undertaken; • the timing of activities including expected start and finish; • the location of activities; and • details of the community information line and how to make an enquiry and / or complaint. 	Compliant	General consultation with neighbours.		
Consultation and complaints management	NV12	Table 6-1: Noise management measures	Specific consultation to be undertaken with the owner/occupier of residences R6 and R19 for works at the Rock Forest site	Compliant	There has been a large amount of consultation completed.		
Consultation and complaints management	NV13	Table 6-1: Noise management measures	Should monitoring or assessment identify noise levels above NMLs or predicted noise levels, and ongoing noise complaints are received the source of the noise will be investigated and best practice mitigation implemented. If exceedances cannot be avoided or complaints are not resolved, the use of voluntary noise mitigation agreements will be considered.	Compliant	Based on the Rock Forest noise monitoring summary report - monitoring is completed by a realtime system for guidance. The document stated they have not received a noise event that exceeds the highly noise affected noise management level of 75dB.		
Monitoring and reporting	NV14	Table 6-1: Noise management measures	At the Rock Forest site attended noise monitoring will be carried out during the initial stages of construction to inform site management.	Not Triggered	Snowy Hydro has stated in the RFI: <ul style="list-style-type: none"> - The timing of the attended noise monitoring is outside of the audit period. - SHL commenced attended noise monitoring in June 2021 until the cessation of the initial pad construction at Rock Forest.' <p>The 'Rock Forest Laydown Weekly Environmental Monitoring Report' developed by EMM provides results of attended noise monitoring undertaken at Rock Forest between 13 May to 18 June 2021.</p> <p>IEMA agrees with the statement made by Snowy Hydro and has assessed this commitment as being Not triggered in this IEA period.</p>		
Monitoring and reporting	NV15	Table 6-1: Noise management measures	If noise complaints are received during construction, a review of noise management measures will be undertaken to determine if additional noise management controls are required.	Compliant	None noted in the Snowy complaints summary.		
Environmental Management Strategy (January 2024)							
Contaminated soil management during construction	CONTAM 03	Table 3-2: Revised environmental management measures relevant to the EMS – Main Works	Protocols for the management of contaminated soil during construction will be included in the CEMP or EMS.	Compliant	Included in Spoil Management Plan.		
Unexpected finds	CONTAM 08	Table 3-2: Revised environmental management measures relevant to the EMS – Main Works	An unexpected finds procedure will be included in the CEMP. Workers will be trained to identify potential contamination that may be encountered during construction.	Compliant	Covered under Heritage Management Plan.		
Natural Hazards Management Plan (August 2020)							
	WM14	Table 2-2: Main Works (CSSI 9687) management measures relevant to natural hazards	Flood emergency response plans will be developed for both construction and operational phases	Compliant	Noting the Water MP includes some details on flood management. Emergency MP has flooding appendices.		
Bushfire Management Plan (August 2020)							
	HAZ02	Table 2-3: Main Works (CSSI 9687) management measures relevant to bush fire	Vegetation is managed within operational APZs in perpetuity.	Compliant	Evidence of Natural Hazard Management Plan (Emergency Management Plan). No issues noted. Evidence of 06.11.2024 file for Lobs Hole PAD HDD - APZ Clearance Area.		
	HAZ04	Table 2-3: Main Works (CSSI 9687) management measures relevant to bush fire	All On site Refuge buildings will be within each Snowy 2.0 Main Works Accommodation site, constructed to BAL 29 construction standard, be of appropriate capacity, signposted and mapped.	Compliant	No issues noted with buildings.		
	HAZ05	Table 2-3: Main Works (CSSI 9687) management measures relevant to bush fire	Primary and secondary access is maintained, upgraded and/or constructed to comply where possible with performance criteria and/or acceptable solution requirements of PBP 2019 and NSWRFPS Fire Trail Standards (NSWRFS 2019). Consultation with the NSW RFS will be undertaken where compliance is constrained.	Compliant	We have called this compliant however there is a recommendation in the CSSI around the secondary access road.		
	HAZ06	Table 2-3: Main Works (CSSI 9687) management measures relevant to bush fire	Water supply requirements for firefighting, including the provision of hydrants and hose reels, is designed, constructed in accordance with the relevant Standards and PBP 2019.	Compliant	Covered under Bushfire MP. Site discussions - hose reels on buildings, sprinkler systems. Site has dams and water supply across the site. There is also electric and diesel back up pumps. Camps have large tanks as well.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
	HAZ08	Table 2-3: Main Works (CSSI 9687) management measures relevant to bush fire	A Bushfire Emergency Management Plan is prepared for the project area and includes responsibilities associated with and details of:	Compliant	Plan has been prepared to meet those requirements.		
			• site specific hazards and risk at each Snowy 2.0 Main Works site;				
			• procedures to maintain bushfire awareness;				
			• bushfire mitigation measures;				
			• fire preparedness actions;				
			• fire response actions including responses to Emergency Alerts issued by emergency services; and				
			• bushfire recovery requirements.				
	HAZ09	Table 2-3: Main Works (CSSI 9687) management measures relevant to bush fire	Each main works accommodation camp shall have a full time, onsite Emergency Response Team (ERT), with an appropriate level of training and equipment to respond to potential bushfire and initial structural fire events.	Compliant	Based on site communications this has been covered. Defined people.		
Threatened Fish Management Plan (19 September 2023)							
	AE01	Table 3: Main Works environmental management measures relevant to Aquatic Threatened Species in included in the RiS and AEA	An Aquatic Habitat Management Plan will be prepared and implemented to guide management of impacts to aquatic habitat. The plan will: <ul style="list-style-type: none">• be prepared in consultation with NPWS and DPI-Fisheries;• include a description of measures that would be implemented to:<ul style="list-style-type: none">– minimise impacts to aquatic habitat outside the approved disturbance areas;– minimise the loss of key aquatic habitat;– minimise the impacts of the development on threatened fauna species;– minimise the impact of the development on fish habitat;– relocate Murray crayfish from the shallower parts of the approved disturbance area in Talbingo Reservoir prior to disturbing these areas– notify DPI-Fisheries of any fish kills;• include a trigger action and response plan for the Murray crayfish, which would be implemented if monitoring shows the development is adversely affecting the species;• include a program to restore and enhance the aquatic habitat of the approved disturbance area except for the intakes and their approach areas as soon as practicable following the completion of development in these areas;• include a program to monitor and report on the effectiveness of these measures.	Compliant	See Threatened Fish Management Plan dated 19.09.2023. Preparation meets these requirements. See below for implementation.		
	AE02	Table 3: Main Works environmental management measures relevant to Aquatic Threatened Species in included in the RiS and AEA	Bridges or culverts would be designed and constructed in accordance with NSW DPI fish passage requirements for waterway crossings (Fairfull & Witheridge 2003) where practicable.	Compliant	Evidence of design and construction. No issues noted.		
	AE03	Table 3: Main Works environmental management measures relevant to Aquatic Threatened Species in included in the RiS and AEA	Construction works within the channel of a permanent waterway with type 1 or 2 key fish habitat would allow some flow to maintain fish passage at all times and be staged to minimise the total disturbance at any given time.	Compliant	Covered outside of the audit period.		
	AE04	Table 3: Main Works environmental management measures relevant to Aquatic Threatened Species in included in the RiS and AEA	A Weed, Pest and Pathogen Management Plan will be prepared and implemented to minimise and manage the spread of weeds, pest fish and pathogens. The plan will: <ul style="list-style-type: none">• be prepared in consultation with NPWS and DPI-Fisheries;• include a description of measures that would be implemented to:<ul style="list-style-type: none">– minimise the spread of weeds and pest via vehicle and plant movements;– remove aquatic macrophytes appropriately where required to do so to enable construction activities;• include a program to monitor and report distribution of pest fish within the project area;• include a surveillance plan for EHHNV in key locations within the project area.	Not Triggered	This relates to works 'in water'. Not yet triggered.		
	AE05	Table 3: Main Works environmental management measures relevant to Aquatic Threatened Species in included in the RiS and AEA	Designated blast limits and other management measures to minimise impacts to aquatic ecology will be outlined in the Blast Management Plan.	Not Triggered	No blasting in the period.		
	AE06	Table 3: Main Works environmental management measures relevant to Aquatic Threatened Species in included in the RiS and AEA	Install the following: <ul style="list-style-type: none">• fish barrier on Tantangara Creek designed to prevent upstream migration of Climbing galaxias; and• fine mesh screens to prevent transfer of key species through releases from the Tantangara Dam River Outlet Works and the Murrumbidgee- Eucombene tunnel	Not Triggered	Not triggered as its currently being constructed. Not sighted yet.		
Rehabilitation Management Plan – Stage 1 (16 May 2024)							
Rehabilitation	REHAB01	Table 1-3 Revised Environmental Management Measures	A Rehabilitation Management Plan will be prepared for the new landforms at Tantangara Reservoir, Lobs Hole and Talbingo Reservoir. The plan will: <ul style="list-style-type: none">- include a detailed plan for rehabilitation of the site;- include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the sites, and triggering any remedial action (if necessary);- describe the measures that would be implemented to:<ul style="list-style-type: none">– comply with the rehabilitation objectives and associated performance and completion criteria;– progressively rehabilitate the site;– include a program to monitor and report the effectiveness of these measures.	Not Triggered	Plan is compliant for preparation but minimal can be triggered at this point.		
Creation of new landforms	REHAB02	Table 1-3 Revised Environmental Management Measures	New landforms will: <ul style="list-style-type: none">- Be safe, stable and non-polluting- Maximise surface drainage to the natural environment	Not Triggered	No final landforms		
Alpine humus soils and peat bogs/fens	SOIL01	Table 1-3 Revised Environmental Management Measures	Mitigations will be included in the Rehabilitation Management Plan to minimise impacts to Alpine humus soils and peat bogs/fens.	Not Triggered	Included in document but not triggered yet.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Loss of soil resource	SOIL02	Table 1-3 Revised Environmental Management Measures	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 procedures	Not Triggered			
Soil capability	SOIL04	Table 1-3 Revised Environmental Management Measures	The Rehabilitation Management Plan (refer to REHAB01) will be implemented and will include measures to minimise: <ul style="list-style-type: none"> - loss of soil; - loss of organic matter and nutrient decline; - soil structural decline; and - compaction. Regular rehabilitation monitoring will be undertaken to identify any defects, such as slumping, erosion or poor vegetation establishment. Identified defects will be rectified.	Not Triggered			
Visual and landscape impacts resulting from permanent placement of excavated material	LCV01	Table 1-3 Revised Environmental Management Measures	The placement of excavated material in Talbingo, Lobs Hole and Tantangara Reservoir will be rehabilitated as guided by the this document and in consultation with NPWS.	Not Triggered			
Visual and landscape impacts resulting from permanent infrastructure	LCV02	Table 1-3 Revised Environmental Management Measures	Detailed design is to consider: <ul style="list-style-type: none"> - materials and finishes that complement or where possible recede into the surrounding landscape; - the use of vegetation to screen project elements and re-vegetation of disturbed areas in line with the Rehabilitation Strategy; and lighting to avoid spill that might affect sensitive areas or receivers 	Not Triggered			
Transport Management Plan (3 August 2020)							
Speed limit reductions	TRA01	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to traffic, transport and access.	At locations where minimum sight distances cannot be achieved, due to the existing road alignments, the posted speed limits adjacent to the intersections will be reduced to satisfy the sight distance requirements and maintain safe manoeuvring conditions for motorists. These intersections and the proposed speeds are: <ul style="list-style-type: none"> • Snowy Mountains Highway / Tantangara Road – 60 km/hr • Snowy Mountains Highway / Rock Forest – 80 km/hr • Link Road / Lobs Hole Ravine Road – 60 km/hr • Link Road / Snowy Mountains Highway – 80 km/hr Based on feedback from community consultation speed limit reductions are also being considered for Snowy Mountains Highway through the township of Adaminaby to 60 km/h. Any speed limit changes will be discussed with the relevant roads authority and documented in the construction traffic management plan as required.	Compliant	The audit team met with Mick Courtney from FGJV to discuss transport management. Evidence of inductions, training and heavy vehicle movement logs. Speed limit tracking is completed. FGJV have removed drivers from the system if they do not adhere to the code of conduct.		
Intersection upgrades	TRA02	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to traffic, transport and access.	Based on the consideration of construction activities as well as intersection capacity assessment following intersections will be upgraded: <ul style="list-style-type: none"> • Snowy Mountains Highway / Marica access establish new construction access (Basic Right turn (BAR) / Basic Left turn (BAL)); and • Snowy Mountains Highway /Rock Forest access establish new construction access (Basic Right turn (BAR) / Basic Left turn (BAL)). 	Compliant	Completed prior to audit period.		
OSOM vehicle movements	TRA03	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to traffic, transport and access.	The TMPs will be prepared, submitted and approved by the RMS under permit, prior to the commencement of any deliveries considered 'high risk' OSOM movements in accordance with RMS guidelines.	Compliant	Evidence of overarching Transport MP which includes a series of sub plans. Most recent version dated January 2023.		
Road Maintenance	TRA04	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to traffic, transport and access.	Road maintenance will be managed through the following measures: <ul style="list-style-type: none"> • a Road Diliapidation Report will be prepared and approved prior to and following Snowy 2.0 Main Works; • routine defect identification and rectification of the internal road network will be managed during construction as part of the project maintenance procedure; and • internal access roads will be designed in accordance with the relevant vehicle loading requirements. 	Compliant	Evidence of Road Condition Survey 29 April 2019. By SMEC for Snowy Hydro. Maintenance works were discussed and appear to be completed. Evidence of maintenance discussions with Transport for NSW. <u>NPWS Feedback</u> <i>Tantangara Road is not being monitored and maintained as per the commitments in the Transport Management Plan. Accordingly, there is increased potential for vehicle incidents with members of the public and environmental damage resulting from dust settlement on vegetation and entering waterways.</i> <i>Tantangara Road has a dual purpose, as a public access route and a key haulage road for the Snowy 2.0 Project. The road is unsealed and requires a scheduled inspection and maintenance regime supported by the implementation of a program of works. Irregular dust suppression causes dust settlement on the roadside vegetation and creates poor visibility for all road users. Road defects (corrugations, loose gravel, narrow choke points) are contributing to vehicle accidents and increase the potential for danger to other road users. Heavy vehicle accidents involving Snowy 2.0 Project vehicles occurred on the road during the IEA#5 period in November 2024 and March 2025. Recent MOD3 commitments in the Transport Management Plan require road upgrades to be completed prior to haulage from Marica to Tantangara, however, the current use of the road is impacting the surrounding environment and endangers the safety of all road users (including members of the public).</i> We note these issues identified however we believe these are not necessarily a non - compliance rather improvements required under an improvement recommendations. See key CSSI conditions.		
Traffic Control	TRA05	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to traffic, transport and access.	Road works associated with pavement widening, such as those associated with intersection upgrades, that require temporary occupation of traffic lanes or working adjacent to the road, a Traffic Control Plan (TCP) will be prepared identifying the traffic control measures.	Not Triggered	Not completed in this audit period.		
Construction traffic management	TRA06	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to traffic, transport and access.	A Construction Transport Management Plan will be prepared and will include guidelines, general requirements and procedures to be used when construction activities have a potential impact on existing traffic arrangements.	Compliant	Evidence of overarching Transport MP which includes a series of sub plans. Most recent version dated January 2023.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Marine transport	NAV01	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to traffic, transport and access.	The following measures will be implemented to manage interactions between marine transport and public boating activities during construction: <ul style="list-style-type: none"> • public exclusion zones will be established around all in reservoir construction areas; • an aquatic licence will be obtained from RMS for in reservoir construction activities and exclusion zones in accordance with Section 12 and 18 of the Marine Safety Act 1998; • all work vessels will be limited to 4 knots; [*this REMM is inconsistent with CoA 44 (c). Vessel speeds will be in accordance with current TNSW limits] • all vessels and barges will be fitted with Automatic Identification System and comply with all licensing requirements of Australian Maritime Safety Authority and Roads and Maritime Services including specific requirements for Alpine Waters; • any fixed obstruction such as marker buoys and moorings will comply with Roads and Maritime Services requirements and are adequately lit at night; and • notification signs advising of the works and public closures at: <ul style="list-style-type: none"> – the intersection of Snowy Mountains Highway and Tantangara Road; – the intersection of Snowy Mountains Highway and Long Plain Road; and Tantangara Boat Ramp. 	Not Triggered	Site communications. There are exclusion zones that are relevant, but there have been no activities.		
Weed Management	ECO2	Table 2-2: Main Works (CSSI 9687) revised environmental management measures relevant to traffic, transport and access.	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.cimmamomi.	Compliant	Note this relates to road verges. Some spraying was completed and found the weed management along road verges generally adequate.		
Temporary speed limit reductions	TRA01	Table 5-1: Transport management measures	Posted speed limits adjacent to the below intersections will be reduced to satisfy the sight distance requirements and maintain safe manoeuvring conditions for motorists. These intersections and the proposed speeds are: <ul style="list-style-type: none"> • Snowy Mountains Highway/ Tantangara Road – 60 km/hr; • Snowy Mountains Highway/ Rock forest – 80 km/hr; • Link Road / Lobs Hole Ravine Road – 60 km/hr; • Link Road / Snowy Mountains Highway – 80 km/hr; • Monaro Highway / Yalakool Road – 60 km/hr; and • Monaro Highway / Polo Flat Road – 60 km/hr 	Compliant	Based on site discussions this seems compliant. Also noted speed signs in the field.		
Community notification	TRA02	Table 5-1: Transport management measures	Affected communities, visitors and emergency services will be notified in advance of any disruptions to traffic and restriction of access to areas of KNP impacted by project activities. Updates will be provided across a number of platforms so as to inform all demographics and provide ample warning of upcoming or changes in access restrictions.	Compliant	Evidence of consultation through the discussions with Mick Courtney from FGJV to discuss transport management.		
Construction traffic management	TRA03	Table 5-1: Transport management measures	A Construction Transport Management Plan will be prepared and will include guidelines, general requirements and procedures to be used when construction activities have a potential impact on existing traffic arrangements.	Compliant	Evidence of overarching Transport MP which includes a series of sub plans. Most recent version dated January 2023.		
Dust and Mud tracking	TRA04	Table 5-1: Transport management measures	In order to minimise dust and the tracking of mud from the project area onto public sealed roads, management measures will be implemented, including but not limited to: <ul style="list-style-type: none"> • implementing progressive erosion sediment control plans (ESCP) to minimise on-site mud; • installation of stabilised site access points as required by the ESCP; • installation of rumble grids or wheel washes where necessary (e.g. wheel washes at Polo Flat and Rock Forest); • where weather warrants, inspections to monitor the condition of public sealed roads will be undertaken by the traffic and logistics team; • covering of heavy vehicle loads; and • where necessary public sealed roads will be maintained. 	Compliant	Although NPWS has raised wheel wash comments, there have been no evidence of issues provided to the IEA team. Note large areas have been bitumen lined.		
IVMS	TRA05	Table 5-1: Transport management measures	To internally monitor compliance, In-Vehicle Monitoring Systems (IVMS) will be installed in project light vehicles to monitor vehicle usage and speed. IVMS performance will be internally monitored on a monthly basis.	Compliant	Evidence shown in meeting with FGJV.		
Rock Forest	TRA06	Table 5-1: Transport management measures	The 'Rock Forest' site, outside the boundaries of the KNP near Adaminaby will be utilised for heavy vehicle lay-up, logistics, staging and stockpiling of tunnel spoil during construction.	Compliant	Noted with this being constructed.		
Heavy Vehicle National Law	TRA07	Table 5-1: Transport management measures	Persons involved in the loading of vehicles for road transport must ensure that the vehicle is not overloaded. It is noted that the recent changes to Chain of Responsibility provisions within the Heavy Vehicle National Law (HVNL) make all persons who may influence the mass of a vehicle or its load responsible for compliance with the HVNL.	Compliant	Noted and outlined in the code of conducts and induction process.		
Vehicle restrictions	TRA08	Table 5-1: Transport management measures	Vehicle speeds will be restricted to 30 km/h within the site, between sunset and sunrise, unless the Planning Secretary agrees otherwise.	Compliant	No reason to dispute this with vehicle tracking completed. Included on signs and induction.		
Vehicle restrictions	TRA09	Table 5-1: Transport management measures	The use of Lobs Hole Ravine Road – North will be restricted to: <ul style="list-style-type: none"> • access to and from the site during emergencies; • light vehicles at all other times with: <ul style="list-style-type: none"> – a maximum of 120 vehicle movements allowed a day (60 each way); and – an annual average maximum of 60 vehicle movements allowed a day (30 each way) Vehicle movements along Lobs Hole Ravine Road – North will be tracked and recorded by site traffic management and / or IVMS in order to monitor and restrict daily traffic movements.	Compliant	No reason to dispute this. Vehicle tracking completed. No reported <u>non - compliances</u> .		
Parking	TRA10	Table 5-1: Transport management measures	Sufficient parking will be provided on site for all vehicles, vehicles associated with the development will not be permitted to park on the public road network	Compliant	Parking is limited however no issues noted.		
Plant and equipment	TRA11	Table 5-1: Transport management measures	All plant and equipment on the site must be maintained and operated in a proper and efficient manner, including regular serving as per manufactures instructions	Compliant	Evidence of maintenance process for plant and equipment.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
Lobs Hole Road	TRA12	Table 5-1: Transport management measures	Within 3 months of completing the upgrade of Lobs Hole Road (unless the Planning Secretary agrees otherwise) sections of Lobs Hole Road that are no longer required will be closed and rehabilitated to the satisfaction of the NPWS.	Not Triggered	We have been advised this is not triggered, with final works ongoing.		
APPENDIX C – MARINE TRANSPORT MANAGEMENT PLAN							
General	NAV01	Table 5-1: Marine transport management measures	The project shall establish 'Exclusion Zones' around marine construction works as declared by NSW Maritime to ensure the safety of vessel traffic and to establish safe working zone/s. An appropriate licence from TINSW will be sought for the exclusion zones. Exclusion zones will change with activities being undertaken. Further detail provided in Section 5.2.1.	Not Triggered	Site communications.		
General	NAV02	Table 5-1: Marine transport management measures	The community will be notified of the marine construction works and any potential effects to recreation vessels. This will include public notices and signage at boat ramps and potential launch sites around Talbingo Reservoir (Talbingo Boat Ramp and O'Hares Boat Ramp) and Tantangara Reservoir (at Tantangara Boat Ramp and on access roads at the intersections of the Snowy Mountains Highway with Tantangara Road & Long Plain Road	Compliant	Signage in key areas.		
General	NAV03	Table 5-1: Marine transport management measures	Specific Maritime Traffic Control Plans (MTCPs) will be developed as part of the construction planning process for all construction activities that affect maritime traffic conditions and the safety of waterway users on the Talbingo Reservoir.	Not Triggered			
General	NAV04	Table 5-1: Marine transport management measures	All work vessels will be fitted with an Automatic Identification System and comply with all licensing requirements of AMSA and RMS under the acts and regulations including specific requirements for Alpine Waters.	Compliant	Some small vessels are taken out for sampling and are certified.		
General	NAV05	Table 5-1: Marine transport management measures	All work vessels will be limited to existing posted (TINSW speed) limit vessel speeds on Tantangara Reservoir and Talbingo Reservoir.	Compliant	No issues noted.		
General	NAV06	Table 5-1: Marine transport management measures	Vessel and structures must display appropriate shapes and lights in accordance with the Marine Safety (Domestic Commercial Vessel) National Law Act 2012.	Compliant	Vehicles are certified. No issues noted.		
General	NAV07	Table 5-1: Marine transport management measures	All vessel will display an all-round white whilst at anchor light between the hours of sunset and sunrise	Compliant	Vehicles are certified. No issues noted. Daylight operations only.		
General	NAV08	Table 5-1: Marine transport management measures	All mooring and anchor buoys will be life in accordance with the Marine Safety (Domestic Commercial Vessel) National Law Act 2012.	Compliant	Mooring buoys noted.		
General	NAV09	Table 5-1: Marine transport management measures	All operators and vessels used must comply with the Marine Safety (Domestic Commercial Vessel) National Law Act 2012, and that no agent shall be exempted from the provisions of the Marine Safety Act 1998 and relevant subordinate legislation.	Compliant	No issued determined.		
General	NAV10	Table 5-1: Marine transport management measures	All water-related infrastructure will be maintained in a safe and serviceable condition.	Compliant	Maintenance of equipment.		
General	NAV11	Table 5-1: Marine transport management measures	No recreational vessels owned by Future Generation workers will be authorised to operate within the declared exclusion zone.	Not Triggered	Nothing triggered.		
General	NAV12	Table 5-1: Marine transport management measures	Any moorings established which are outside of the declared exclusion zone must be regulated in accordance with NSW marine legislation.	Not Triggered	All moorings are in exclusion zones.		
Visual Impact Management Plan (AUGUST 2024)							
Visual and landscape impacts resulting from permanent placement of excavated material	LCV01	Table 2-2: Environmental management measures relevant to visual impacts	The placement of excavated material in Talbingo, Lobs Hole and Tantangara Reservoir will be rehabilitated as guided by the Rehabilitation Strategy and in consultation with NPWS	Not Triggered			
Visual and landscape impacts resulting from permanent	LCV02	Table 2-2: Environmental management measures relevant to visual impacts	Detailed design is to consider: <ul style="list-style-type: none"> • materials and finishes that complement or where possible recede into the surrounding landscape; • the use of vegetation to screen project elements and re-vegetation of disturbed areas in line with the Rehabilitation Strategy; and • lighting to avoid spill that might affect sensitive areas or receivers. 	Compliant	No issues noted.		
	VI01	Table 5-1: Visual impact management measures as per Conditions of Approval	Minimise the visual impacts of the long-term temporary and permanent infrastructure of the development on the Kosciuszko National Park, including: <ul style="list-style-type: none"> • Consideration for the NPWS Park Facilities Manual during design and construction • Incorporate suitable planting and screening • Ensure the visual appearance of the infrastructure blends into the surrounding landscape as much as possible, including: <ul style="list-style-type: none"> o Using appropriate colours and non-reflective paints on permanent buildings to reduce glare, o Incorporating textures on large surfaces and using dark aggregates and oxides for exposed concrete surfaces o Using locally sourced stone to clad buildings or portals, such as the Lobs Hole substation building façade • Incorporating textured surfaces along the shoreline of the Ravine Bay and Talbingo spoil emplacement areas • Installing landscaping and/or suitable screening as soon as practicable along the Snowy Mountains Highway boundary of Rock Forest site to screen the development on site from road users and nearby residents 	Compliant	No issues noted.		
	VI02	Table 5-1: Visual impact management measures as per Conditions of Approval	Minimising the visual impacts of the development on the Rock Forest site on nearby residences during construction	Compliant	No issues noted. Noting a large amount of work		
	VI03	Table 5-1: Visual impact management measures as per Conditions of Approval	Not mount any advertising signs or logos on site, except where this is required for identification or safety purposes	Compliant	None noted.		
	VI04	Table 5-1: Visual impact management measures as per Conditions of Approval	Minimise the lighting impacts of the development, including ensuring that all external lighting associated with the development: <ul style="list-style-type: none"> • Is consistent with the good lighting design principles in the Dark Sky Planning Guideline, (DPE 2016), or its latest version; • Complies with the Australian Standard AS4282 (INT) 1997 – Control of obtrusive Effect of Outdoor lighting, or its latest version 	Compliant	No issues noted in construction. Prior to operations commencing and final buildings remaining a lighting audit would be required.		

Impact	MP Ref Number	MP Section	Environmental Management Measures	Compliance Status	Finding	Recommendation	Unique NC Identifier
	VI05	Table 5-1: Visual impact management measures as per Conditions of Approval	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.	Not Triggered	Technically outside the audit period. Covered in other audits.		
	VI06	Table 5-1: Visual impact management measures as per Conditions of Approval	The Visual Impact Management plan will be prepared in consultation with NPWS.	Compliant	Evidence of consultation.		
	VI07	Table 5-1: Visual impact management measures as per Conditions of Approval	The Visual Impact Management plan will describe the measures that would be implemented to comply with condition 53 above.	Compliant	Noted		
	VI08	Table 5-1: Visual impact management measures as per Conditions of Approval	The Visual Impact Management plan will include detailed plans for minimising the visual impacts of the following permanent infrastructure: <ul style="list-style-type: none">• 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.	Compliant	These aspects are noted in the plan.		
	VI09	Table 5-1: Visual impact management measures as per Conditions of Approval	The proponent must implement the approved Visual Impact Management Plan for the development.	Compliant	Based on a lack of complaints.		
	VI10	Table 5-1: Visual impact management measures as per Conditions of Approval	The placement of excavated material in Talbingo, Lobs Hole and Tantangara Reservoir will be rehabilitated as guided by the Rehabilitation Strategy and in consultation with NPWS.	Not Triggered			
	VI11	Table 5-1: Visual impact management measures as per Conditions of Approval	Detailed design is to consider: <ul style="list-style-type: none">• materials and finishes that complement or where possible recede into the surrounding landscape;• the use of vegetation to screen project elements and revegetation of disturbed areas in line with the Rehabilitation Strategy; and• lighting to avoid spill that might affect sensitive areas or receivers.	Not Triggered	This would relate to final buildings/infrastructure. No issues determined at this time.		
Recreation Management Plan (Stage 1) (26 September 2024)							
Recreational user impacts	REC01	Table 2-1: REMM relevant to recreation	A recreational plan is to be prepared for recreation sites and their access impacted by the project and should: <ul style="list-style-type: none">- be prepared in consultation with NPWS- detail recreational offsets to be provided by the project such as a permanent boat launch areas in Talbingo and Tantangara Reservoirs, and Lobs Hole campground- describe measures to be implemented to minimise impacts during construction, including a process for advance communication to stakeholders and visitors when closures are expected	Compliant	See plan dated 26 September 2024. Covers these requirements.		
Visual and landscape impacts resulting from permanent placement of excavated material	LCV01	Table 2-1: REMM relevant to recreation	The placement of excavated material in Talbingo, Lobs Hole and Tantangara Reservoir will be rehabilitated as guided by the Rehabilitation Strategy and in consultation with NPWS	Not Triggered	Not triggered as rehabilitation not required in this area yet.		
Impacts specific to the construction phase							
Temporary closure of Tantangara Road – for duration of construction or for period of road upgrade works only		Table 2-1: REMM relevant to recreation	<ul style="list-style-type: none">• Maintain access along Tantangara Road with measures in place (car escort, traffic lights) other than during periods of high-risk activities• Advance communication to stakeholders and visitors• Offset strategy developed in consultation with NPWS	Compliant	Based on site communications, no issues.		
Facilitated access along Tantangara Road		Table 2-1: REMM relevant to recreation	<ul style="list-style-type: none">• Advance communication to stakeholders and visitors• Periods of public access to Wares Yard to be developed in consultation with NPWS as part of recreational management plan, and/or development of alternative horse campgrounds in collaboration with NPWS	Compliant	Regular and scheduled liaison with NPWS.		
Exclusion zones on Talbingo and Tantangara Reservoir and restriction of access to these sites		Table 2-1: REMM relevant to recreation	<ul style="list-style-type: none">• Appropriate recreational offset will be detailed in recreational management plans and will include measures such as: advance communication to stakeholders and visitors when closures are expected, construction of temporary or permanent boat ramps in collaboration with NPWS• Mitigation measures to manage transfer to fish species are provided in Section 6.4, based on the aquatic ecology assessment for the project (Appendix M.2)	Compliant	These items are discussed in the plan.		
Impacts on the quality of fishing in Tantangara Reservoir		Table 2-1: REMM relevant to recreation	<ul style="list-style-type: none">• Mitigation measures to manage transfer to fish species are provided in Section 6.4, based on the aquatic ecology assessment for the project (Appendix M.2)	Compliant	Noted within Recreational Fishing Management Plan.		
Noise and air quality		Table 2-1: REMM relevant to recreation	<ul style="list-style-type: none">• Construction Noise and Vibration management Plan to address noise and vibration management and mitigation options where required• Mitigation measures to impact on horse campground are accounted for in the offset strategy	Not Triggered	Offset component has not been triggered yet. Based on site communications this wont be triggered based on no underboring in this area.		

Summaries:

289	Compliant
17	Non Compliant
91	Not Triggered
397	Total



APPENDIX C. IEA DECLARATION OF INDEPENDENCE

Declaration of Independence – Independent Environmental Audit

Declaration prior to the Audit	
Project Name	Snowy 2.0 Independent Environmental Audit
Consent No.	Project Approval CSSI 9687
Description of Project	Independent Environmental Audit for Snowy 2.0
Project Address	Snowy Hydro Limited, Monaro Highway, Cooma, NSW 2630
Proponent	Snowy Hydro
Date	12/02/2025

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Lead Auditor	
Name	Chris Jones
Signature	
Email	chris.jones@iema.com.au
Auditor Certification	Principal Environmental Auditor
Address	IEMA 41 Llewellyn Street Merewether NSW
Date	12/02/2025
Assistant Auditor 1	
Name	David Price
Signature	
Address	IEMA, 41 Llewellyn Street Merewether NSW
Email	david.price@iema.com.au
Date	12/02/2025

APPENDIX D. DPHI ENDORSEMENT OF THE IEA TEAM

NSW Planning ref: SSI-9687-PA-236

Miss Emily Martin
Senior Environment Advisor
Snowy Hydro Limited
PO Box 332
COOMA, NSW 2630

24/02/2025

Subject: Snowy 2.0 - Main Works – Independent Environmental Audit Program

Dear Miss Martin

Reference is made to your post approval matter, SSI-9687-PA-236, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Environmental Audit (IEA) of Snowy 2.0 - Main Works commencing in February 2025 and being completed in April 2025. This request was submitted as required by Schedule 4, Conditions 9 and 10 of SSI-9687 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 14 February 2025.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I approve the appointment of Mr Chris Jones and Mr David Price of IEMA to prepare the IEA in 2025.

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

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent/approval and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Please note, the Lead Auditor must attend the site inspection/s.

Should you wish to discuss the matter further, please contact Michael Wood on 0459890661 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read "Georgia Dragicevic".

Georgia Dragicevic
A/Team Leader Compliance
Compliance

As nominee of the Planning Secretary

APPENDIX E. RECORDS OF CONSULTATION

Snowy IEA

From Michael Wood <Michael.Wood@environment.nsw.gov.au>

Date Thu 3/20/2025 10:50 AM

To David Price <david.price@iema.com.au>

Cc Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>

Hi David,

Thanks for calling. As mentioned, below are some criteria we would like you to consider when conducting your audit of Snowy 2.0.

Please consult with:

- *Department of Planning, Housing and Infrastructure (DPHI)*
- *Department of Climate Change, Energy, the Environment and Water (DCCEEW)*
- *National Parks and Wildlife Service (NPWS)*
- *Local Aboriginal Land Council/s (consultation in relation to the preparation of the Heritage Management Plan)*
- *Environmental Protection Authority (EPA)*
- *Transport for New South Wales (TfNSW)*
- *Snowy Monaro Regional Council (SMRC) and*
- *DPI Fisheries*
- *DCCEEW (Federal) Ali STROUS Ali.Strous@dcceew.gov.au*

In addition to standard audit focus areas, compliance with the following areas would be of particular interest to the department:

- *Management Plan reviews*
- *Incident and non-compliance reporting*
- *Emergency Management Plan in particular Bush Fire Risk assessment and access to fire fighting equipment*
- *Heritage Management Plan and annual reporting*
- *Weed Management Plan*
- *Feral animal controls*
- *Closing off previous IEA actions*
- *Recent clearing activities and management at Marica i.e compliance with boundary limits*
- *Any rehabilitation activities eg Trunk Services on Gooandra trail*
- *Waste monitoring*
- *Stockpile emplacement location, monitoring and management*
- *Compare EA predictions vs actual*
- *Surfacewater and groundwater monitoring compliance*
- *Compliance with all relevant conditions relating to the recent MOD 3.*

Regards and thanks

Michael Wood
Senior Investigator
0459890661
Compliance | Development Assessment & Infrastructure
Department of Planning, Housing and Infrastructure

From: David Price <david.price@iema.com.au>

Sent: Monday, March 17, 2025 9:03 AM

To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Cc: Chris Jones <chris.jones@iema.com.au>

Subject: Request for Consultation - Snowy 2.0 Main Works (SSI-9687) Independent Environmental Audit 2025

Attention Michael Wood,

Integrated Environmental Management Australia Pty Ltd (IEMA) have been approved to conduct the Independent Environmental Audit (IEA) for Snowy 2.0 Main Works (SSI-9687) (<https://www.planningportal.nsw.gov.au/major-projects/projects/mod-3-additional-adit>).

As per the attached, the audit team were endorsed on 24 February 2025 and include:

- Chris Jones as Lead Auditor
- David Price as Assistant Auditor

The audit team will complete the IEA in accordance with Schedule 4 Condition 9 and 10 of the SSI-9687 and the *Independent Audit Post Approval Requirements* (2020). The audit period is 18 July 2023 (the day following the previous IEA audit period) to the final day of the site inspection (scheduled for 28 March 2025).

As part of the audit, the audit team will be assessing compliance against the SSI-9687 Consolidated Approval, Management Plan commitments, and Water Access Licences (extraction volumes only).

As per Section 3.2 of the Independent Audit Post Approval Requirements (see attached), **can I please confirm what agencies the Department would like consulted for this IEA?**

The last Snowy 2.0 IEA consulted with:

- Department of Planning, Housing and Infrastructure (DPHI)
- Department of Climate Change, Energy, the Environment and Water (DCCEEW)
- National Parks and Wildlife Service (NPWS)
- Local Aboriginal Land Council/s (consultation in relation to the preparation of the Heritage Management Plan)
- Environmental Protection Authority (EPA)
- Transport for New South Wales (TfNSW)
- Snowy Monaro Regional Council (SMRC)
- DPI Fisheries

Secondly, can I please request the Department's feedback on the project and/or any key aspects the Department would like reviewed as part of the IEA?

Our site visit is coming up quickly and we only just received the purchase order to commence the project. We are going to be out at site from Monday 24th March 2025 to Friday 28th March 2025. We appreciate if you could get back to us as soon as possible so we can send off any letters for consultation prior to the site visit.

If you would like to discuss the scope or consultation requirements in more detail, please do not hesitate to contact myself or Chris Jones (0401 800 918).

Kind regards,

David Price
Environmental Consultant



ABN 32 622 237 870

PO Box 3161,

Ground Floor, 41 Llewellyn Street,

MEREWETHER NSW 2291 AUSTRALIA

e: david.price@iema.com.au

m: 0432 363 336 | w: www.iema.com.au



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RE: Snowy 2.0 IEA - EPA Feedback

From Andreas Stricker <Andreas.Stricker@epa.nsw.gov.au>

Date Thu 4/3/2025 3:25 PM

To David Price <david.price@iema.com.au>

Cc Chris Jones <chris.jones@iema.com.au>; Carlie Armstrong <Carlie.Armstrong@epa.nsw.gov.au>

Hi David,

Thanks for touching base.

In response to your request for feedback in relation to the 2025 Independent Environmental Audit (Audit) for the Snowy 2.0 Project (CSSI-9687), the EPA notes that over the audit period the Snowy 2.0 project has had a number of preventable failures in leachate, sediment and erosion controls that have led to discharges and water quality impacts in the relevant receiving environments.

In this regard, the EPA considers a focus on leachate, sediment and erosion controls in line with conditions 29 and 30 of the CSSI would be appropriate for the Audit. With particular focus on basin management and overtopping events that have been attributed to control failures (i.e. leaks and construction material), limited basin capacity, resourcing issues and operational failures (e.g. over application of reuse water).

Happy to discuss if you require any further advice.

Kind regards,

Andreas Stricker

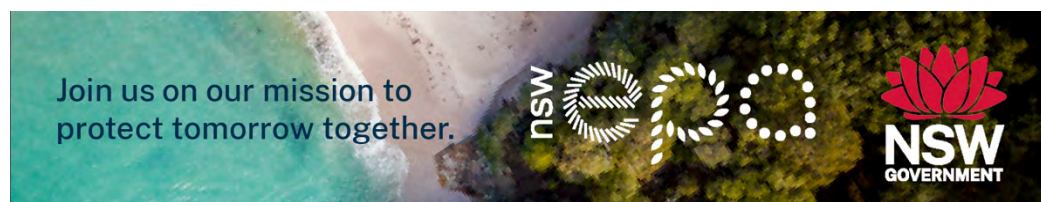
Senior Operations Officer

Operations Central West, South Coast and Tablelands

NSW Environment Protection Authority

T 02 6229 7002 | M 0429 456 672

Working days: Monday to Friday



The EPA acknowledges the Traditional Custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal Elders past and present.

I work on Ngunnawal land.

Report pollution and environmental incidents 131 555.

From: David Price <david.price@iema.com.au>
Sent: Thursday, 3 April 2025 10:41 AM
To: Andreas Stricker <Andreas.Stricker@epa.nsw.gov.au>
Cc: Chris Jones <chris.jones@iema.com.au>
Subject: Snowy 2.0 IEA - EPA Feedback

Good morning Andreas,

This email has been prepared seeking feedback into the 2025 Independent Environmental Audit (Audit) for the Snowy 2.0 Project (CSSI-9687) in accordance with Schedule 4 Condition 9 of CSSI-9687.

Under agreement with the Department of Planning, Housing and Infrastructure (the DPHI), the audit will focus on the conditions of CSS-9687 and associated Management Plan Commitments. For this audit we have not reviewed the EPL or Federal Approval as they are not mentioned in Schedule 4 Condition 9 of the CSSI which refers to the IEA requirements (see below figure).

INDEPENDENT ENVIRONMENTAL AUDIT

9. Within one year of the commencement of construction, and every 3 years thereafter unless the Planning Secretary agrees or directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:
- 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;
 - include consultation with the relevant agencies;
 - assess the environmental performance of the development and whether it is complying with the requirements in this approval (including the requirements of any approved strategy, plan or program);
 - review the adequacy of the approved strategies, plans or programs for the development; and
 - recommend appropriate measures or actions to improve the environmental performance of the development, and/or any approved strategies, plans or programs.

The Audit period is 18 July 2023 (day after previous audit site audit component) to 28 March 2025 (day five of IEMA's site audit component).

The site audit component was undertaken by IEMA on 24th March - 28th March. IEMA would have liked to have consulted prior to going on the site audit component, however Snowy Hydro did not provide specific consultation details until after this component was undertaken.

The audit team (letter attached) was endorsed by the DPHI on 24 February 2025, with this including:

- Chris Jones (Principal Environmental Consultant – IEMA) – Lead Auditor
Email: chris.jones@iema.com.au
Ph: 0401 800 918
- David Price (Environmental Consultant – IEMA) – Auditor
Contact details below

The Audit team is seeking feedback regarding activities during the Audit period, with this being a requirement of the DPHI Audit Guidelines (2020). Please send an email with any feedback you have about the site or areas that you want reviewed.

Please note - IEMA is only assessing the requirements of CSSI-9687 and the commitments made in CSS-9687 associated Management Plans.

If you would prefer to have your input kept confidential, please call Chris on the above number and the queries will be assessed in the Audit but not attributed to you or your organisation.

Kind regards,

David Price
Environmental Consultant



ABN 32 622 237 870

PO Box 3161,

Ground Floor, 41 Llewellyn Street,

MEREWETHER NSW 2291 AUSTRALIA

e: david.price@iema.com.au

m: 0432 363 336 | w: www.iema.com.au



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EM - NPWS to IEMA - Snowy 2.0 MW Independent Environmental Audit #5 - Request for NPWS feedback - 03 Apr 2025

From Kelsey Boreham <kelsey.boreham@environment.nsw.gov.au>

Date Thu 4/3/2025 3:35 PM

To David Price <david.price@iema.com.au>

Cc Chris Jones <chris.jones@iema.com.au>; Bernadette Zanet <Bernadette.Zanet@environment.nsw.gov.au>; Karl Daniells <Karl.Daniells@environment.nsw.gov.au>; Anthony Evans <Anthony.Evans@environment.nsw.gov.au>

Hello David

Thank you for the opportunity to provide feedback on the 2025 Independent Environmental Audit of the Snowy 2.0 Pumped-hydro and Transmission Project (IEA #5).

There are a range of issues and concerns the National Parks and Wildlife Service has around the compliance of the Project with CSSI-9687 conditions and associated management plans which we would like to raise during IEA #5. We intend to respond formally to your request and present the relevant issues in tabular form. This will take us a couple of weeks to compile so please expect a response in the week commencing 14 April.

If you have any queries in the meantime, e.g. based on your recent site visits, then please get in touch and we can discuss these in a meeting.

Regards
Kelsey



Kelsey Boreham
A/Manager Snowy 2.0
Park Operations Projects Branch
NSW National Parks & Wildlife
Service

49 Kosciuszko Rd, Jindabyne 2627
T 02 6450 5665
M 0423 813 265
W nationalparks.nsw.gov.au



From: David Price <david.price@iema.com.au>

Sent: Wednesday, 2 April 2025 10:20 AM

To: Kelsey Boreham <kelsey.boreham@environment.nsw.gov.au>; Bernadette Zanet <Bernadette.Zanet@environment.nsw.gov.au>

Cc: Chris Jones <chris.jones@iema.com.au>

Subject: Snowy 2.0 IEA - NPWS Feedback

Good morning Kelsey and Bernadette,

This email has been prepared seeking feedback into the 2025 Independent Environmental Audit (Audit) for the Snowy 2.0 Project (CSSI-9687) in accordance with Schedule 4 Condition 9 of CSSI-9687.

Under agreement with the Department of Planning, Housing and Infrastructure (the DPHI), the audit will focus on the conditions of CSS-9687 and associated Management Plan Commitments. For this audit we have not reviewed the EPL or Federal Approval as they are not mentioned in Schedule 4 Condition 9 of the CSSI which refers to the IEA requirements (see below figure).

INDEPENDENT ENVIRONMENTAL AUDIT

9. Within one year of the commencement of construction, and every 3 years thereafter unless the Planning Secretary agrees or directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:
- (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 this approval (including the requirements of any approved strategy, plan or program);
 - (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.

The Audit period is 18 July 2023 (day after previous audit site audit component) to 28 March 2025 (day five of IEMA's site audit component).

The site audit component was undertaken by IEMA on 24th March - 28th March. IEMA would have liked to have consulted prior to going on the site audit component, however Snowy Hydro did not provide specific consultation details until after this component was undertaken.

The audit team (letter attached) was endorsed by the DPHI on 24 February 2025, with this including:

- Chris Jones (Principal Environmental Consultant – IEMA) – Lead Auditor
Email: chris.jones@iema.com.au
Ph: 0401 800 918
- David Price (Environmental Consultant – IEMA) – Auditor
Contact details below

The Audit team is seeking feedback regarding activities during the Audit period, with this being a requirement of the DPHI Audit Guidelines (2020). Please send an email with any feedback you have about the site or areas that you want reviewed.

Please note - IEMA is only assessing the requirements of CSSI-9687 and the commitments made in CSS-9687 associated Management Plans.

If you would prefer to have your input kept confidential, please call Chris on the above number and the queries will be assessed in the Audit but not attributed to you or your organisation.

Kind regards,

David Price
Environmental Consultant



Ground Floor, 41 Llewellyn Street,

MEREWETHER NSW 2291 AUSTRALIA

e: david.price@iema.com.au

m: 0432 363 336 | w: www.iema.com.au



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Our reference: DOC25/281166-3
SF21/129455

Mr Chris Jones
Principal Environmental Consultant
Integrated Environmental Management Australia
Ground Floor, 41 Llewellyn Street,
MEREWETHER NSW 2291
By email: Chris.Jones@iema.com.au

Copies to:

Mr David Price, Environmental Consultant,
Integrated Environmental Management Australia
David.Price@iema.com.au

Mr Peter Cowper, Environment and Planning
Manager, Snowy Hydro Limited
Peter.Cowper@snowyhydro.com.au

Dear Mr Jones

**Snowy 2.0 Main Works (CSSI 9687) – National Parks and Wildlife Service (NPWS)
response to request for agency feedback for Independent Environmental Audit No.5 –
April 2025**

We refer to your email dated 2 April 2025 requesting agency feedback on the Snowy 2.0 Pumped Hydro and Transmission Project (**Snowy 2.0 Project**) for the purposes of Independent Environmental Audit No.5 (**IEA#5**).

We understand that the scope of your request is related to actual or potential non-compliances with the conditions of CSSI-9687 (i.e. Snowy 2.0 Project Main Works) and management plan commitments made under that approval. While it would have been preferable for IEA#5 agency feedback to be sought prior to a site audit, we are nonetheless grateful for the opportunity to provide feedback now.

NPWS feedback for the purposes of IEA#5 is set out in **Attachment 1** to this letter. That Attachment includes a list of what we consider to be the actual or potential non-compliances with CSSI-9687 conditions and commitments (including a reference) along with our description of the issue. If you require further information on, or examples of, the issues listed then please let us know.

If you have any further enquiries regarding this matter, please contact Kelsey Boreham, A/Manager Snowy 2.0, on 0423 813 265 or at Kelsey.Boreham@environment.nsw.gov.au.

Yours sincerely

Anthony Evans
A/Director, Park Operations Projects
National Parks and Wildlife Service
17 April 2025

Appendix 1 – NPWS feedback for Snowy 2.0 Project IEA #5

Issue	CSSI-9687 condition and/or management plan reference	Description
<i>Road maintenance and site management</i>		
Insufficient maintenance and dust suppression on Tantangara Road	CSSI-9687 Schedule 3, conditions 38(a) & 45(k) Transport Management Plan, section 7.2	<p>Tantangara Road is not being monitored and maintained as per the commitments in the Transport Management Plan. Accordingly, there is increased potential for vehicle incidents with members of the public and environmental damage resulting from dust settlement on vegetation and entering waterways.</p> <p>Tantangara Road has a dual purpose, as a public access route and a key haulage road for the Snowy 2.0 Project. The road is unsealed and requires a scheduled inspection and maintenance regime supported by the implementation of a program of works. Irregular dust suppression causes dust settlement on the roadside vegetation and creates poor visibility for all road users. Road defects (corrugations, loose gravel, narrow choke points) are contributing to vehicle accidents and increase the potential for danger to other road users. Heavy vehicle accidents involving Snowy 2.0 Project vehicles occurred on the road during the IEA#5 period in November 2024 and March 2025. Recent MOD3 commitments in the Transport Management Plan require road upgrades to be completed prior to haulage from Marica to Tantangara, however, the current use of the road is impacting the surrounding environment and endangers the safety of all road users (including members of the public).</p>
Poor drainage design and insufficient maintenance on site emergency exit (Lobs Hole North Road/Ravine Road North)	CSSI-9687 Schedule 3, conditions 44(b) & 61 Transport Management Plan, sections 5.1 & 6.1 (Tables 5-1 & 6-1) Natural Hazard Management Plan, section 4.1	<p>Lobs Hole North Road/Ravine Road North is the designated emergency egress from the Lobs Hole project area. Recent inspections indicate it is subject to washouts at multiple locations due to poor stormwater design, with erosion gullies and sediment impacting areas of Kosciuszko National Park outside the project boundary. Vegetation and fallen timber is also encroaching on the road.</p> <p>It is currently questionable whether the road could carry heavy emergency vehicles (e.g. Category 1 tankers) and site busses that would be necessary to respond to bushfire emergencies and evacuate personnel. A redesign of stormwater arrangements for the road is required, along with routine inspection and maintenance (including vegetation maintenance). Erosion and sediment control impacts within and beyond the project boundary must be rectified with further authorisation from NPWS.</p>

Presence of discarded building materials and rubbish	CSSI-9687 Schedule 3, conditions 52(d) & (e) Waste Management Plan, sections 4.6, 4.8 & Table 4-4	On various occasions, NPWS has observed uncontained litter and construction waste discarded across project areas and outside the project boundary. The most notable recent example is in the sensitive and publicly visible Plateau area (Gooandra Trail) where wheelie bins and construction materials have been left uncontained and untended for months.
<i>Biodiversity, Biosecurity and Heritage Management</i>		
Pest (feral animal) and weed monitoring and control measures across the Snowy 2.0 Project are minimal and ad hoc.	CSSI-9687 Schedule 2, condition 13(c) & Schedule 3, conditions 17(i) & 20(a) Biodiversity Management Plan, section 5.1 Transport Management Plan, Section 2.3 (ECO2)	There is no targeted and consistently applied weed or pest management control programs being implemented for project areas. Control efforts lack associated monitoring and adaptive management arrangements. This issue has been reflected in past IEAs. While we understand that contractors have now been engaged, control programs remain ad hoc and lacking in the forward planning and consistent application required to make them effective. This is a particular matter of concern for NPWS given the potential for it to impact areas of Kosciuszko National Park outside the project boundary, impede the effectiveness of other construction environmental management measures (e.g. rabbit burrows in ERSED controls and leachate basin batters), and impede the future rehabilitation obligations of the proponent under CSSI-9687 (e.g. through the long-term accumulation of weed seeds in soil).
Biosecurity (pathogen and weed) control protocols are inconsistently applied across the Snowy 2.0 Project.	CSSI-9687 Schedule 2, condition 13(c); Schedule 3, conditions 17(i) & 20(a) Biodiversity Management Plan, section 5.1 Transport Management Plan, Section 2.3 (ECO2)	Biosecurity protocols are inconsistently applied across the project. Examples include: <ul style="list-style-type: none"> • Wheel washes out-of-commission or removed from active project area access routes (e.g. Marica Trail, Gooandra Trail); and • Inconsistent hygiene and containment protocols for weed species of concern (e.g. diligent protocols for Ox-eye Daisy are being applied at Marica, but are absent in other areas where this weed species occurs such as Gooandra Trail and Tantangara).
Implementation of threatened fauna impact mitigation measures following MOD3	CSSI-9687 Schedule 2, condition 1, and Schedule 3, conditions 17(d) & (e). Biodiversity Management Plan, section 5.1 & Appendix G.	Measures such as relocated and upgraded fauna crossings to mitigate the impacts of CSSI-9687 Modification 3 related vegetation clearing on threatened and other native fauna have not yet been implemented. Impacts have preceded mitigation measures, with clearing works beginning in December 2024 at Marica and largely complete by January 2025. Substantial earthworks are now in progress. By contrast, we understand that

		business case and procurement processes are still in progress for the installation and upgrading of fauna crossings.
Monitoring commitments for natural heritage are not being implemented	CSSI-9687 Schedule 3, conditions 33 & 36 Heritage Management Plan, section 6.1	Natural heritage monitoring of geodiversity features does not appear to have occurred.
Failure to apply unexpected finds protocol	CSSI-9687 Schedule 3, condition 17(d) Biodiversity Management Plan, section 5 & Appendix D	We understand that <i>Pimelea bracteata</i> was identified at the Tantangara project area in 2020 and 2024. This is a critically endangered threatened plant species listed under both Commonwealth and State environmental legislation. Despite recommendations from agencies at the time to report, assess and manage the find in accordance with the unexpected finds protocol specified in the Biodiversity Management Plan, it remains unclear whether this has occurred.
Rehabilitation		
Failure to progressively plan for and implement rehabilitation for project areas	CSSI-9687 Schedule 3, conditions 9(a), 11, and 17(i) & (j). Rehabilitation Management Plan and associated site specific plans (e.g. Plateau boreholes and Gooandra Trail).	There is no evidence of planning for, or implementing, progressive rehabilitation for project areas. This is of particular concern in areas such as Gooandra Trail where works are complete or inactive, an approved site specific rehabilitation plan exists, and the site has not been left in an erosion or weed resistant state. It is also a highly visible location of significant environmental sensitivity. Given the scale of the permanent spoil emplacement rehabilitation obligations which will apply to the proponent under Schedule 3 conditions 9 to 11 of CSSI-9687, there is little evidence of forward planning, consultation with agencies, trials, or seed collection and propagation etc in preparation for this task.
Failure to implement rehabilitation plan for Tantangara surface depression	CSSI-9687 Schedule 3, conditions 11B and 66 Snowy 2.0 - Tantangara Surface Depression Rehabilitation Plan Rev 2.	Although tunnelling has recommenced, the works outlined in the rehabilitation plan remain incomplete. Ground consolidation and initial erosion controls have been implemented at the site but there appears to be no revegetation or weed control occurring. An Independent Environmental Audit of the Subsidence Management Plan has not occurred (as per CSSI-9687 Schedule 3, condition 66).

Water management		
Poor surface water management across project areas	CSSI-9687 Schedule 3, conditions 4(i), 6, 17(j), 29, 30(f), 30(m) & 32 Water Management Plan, sections 4.1 & 6.2, and Appendix A	During the IEA#5 period, there have been a significant number of sediment, leachate and process water basin over-toppings, including following rain events within the design capacity of those basins. These have principally occurred in the Lobs Hole project area, but also in other locations. We understand that other agencies such as the NSW Environment Protection Authority and NSW Department of Planning Housing and Infrastructure will provide you with specific details of these incidents and comments on water management improvements required across project areas. NPWS is supportive of any feedback those agencies provide to you on this issue.
Lack of follow-up on groundwater drawdown actions	CSSI-9687 Schedule 3, conditions 15 & 32 Water Management Plan, sections 4.1 & 6.2, and Appendix B	During the IEA#5 period, there was one groundwater drawdown event near Nungar Creek that was notified to agencies. While an investigation report was provided to agencies, it is not clear what further work occurred to implement the recommendations of that report, and neither are we aware of the current status of the drawdown.
Administration of approvals and management plans		
Disturbance area reporting (for final offset payment calculation)	CSSI-9687 Schedule 3, condition 13 Biodiversity Management Plan, section 1.4	Assessment and reporting on the final disturbance area for the Snowy 2.0 Project has not occurred. This reporting was due on 21 October 2023 and is a prerequisite for calculation and payment of final biodiversity related offset funds.
Review and updating of management plans (responding to incidents, changes in project scope etc)	CSSI-9687 Schedule 2, condition 1; Schedule 3, conditions 17(d) & (e) and 30(f) & (m); Schedule 4, conditions 19 & 20 Impacted management plans during the IEA#5 period, include the Biodiversity Management Plan and Water Management Plan	Following incidents, changes in project scope/phasing and/or based on monitoring outcomes, management plans have not been reviewed and updated to implement principles of adaptive management and minimise environmental harm. Examples include: failure to adapt the Water Management Plan (and subsidiary Surface Water Management Plan) in response to frequent overtopping incidents, and failure to update the Biodiversity Management Plan (and subsidiary Fauna Strike Policy) based on Biodiversity Monitoring Program data and in advance of CSSI-9687 Modification 3 vegetation clearance impacts on threatened and other fauna. We acknowledge that updating of the Biodiversity Management Plan has now occurred, albeit after clearing was completed.

Lack of follow-up in response to non-compliance works authorisation conditioning	Various NPWS email authorisations in response to CSSI-9687 non-compliances	Where non-compliance with CSSI-9687 conditions and commitments result in impacts outside the project area, NPWS assesses and authorises investigation and rectification works under the <i>National Parks and Wildlife Regulation 2019</i> . Examples include remediating boundary encroachments, investigation of stormwater and erosion impacts beyond the boundary etc, with conditioning requiring provision of photographs or a report to close out the issue. We consider that this conditioning must be tracked and complied with as if it were a commitment made under CSSI-9687, particularly given it is relevant to compliance with both the national parks and planning legislation.
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RE: Snowy 2.0 IEA - DECCEEW (NSW) Feedback

From Robert Brownbill <rob.brownbill@dpie.nsw.gov.au>

Date Wed 4/23/2025 9:50 AM

To David Price <david.price@iema.com.au>

Cc Chris Jones <chris.jones@iema.com.au>; Alistair Drew <alistair.drew@dpie.nsw.gov.au>

Hi David,

Sorry for the late response – I experienced a death in the family which unexpectedly had me away from the office for a while. We will provide a response to your enquiry shortly – AI, can you please register this referral and prepare the letter.

For future reference, referrals should come through the major projects planning portal, or to our mailbox water.assessments@dpie.nsw.gov.au This mailbox is monitored all day so these referrals do not get missed.

Regards,

Rob Brownbill
Manager Water Assessments

Water Knowledge Division

Department of Climate Change, Energy, the Environment and Water

M 0428 688 954 | **E** rob.brownbill@dpie.nsw.gov.au

620 Macauley Street, Albury NSW 2640

www.dpie.nsw.gov.au

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

From: David Price <david.price@iema.com.au>

Sent: Wednesday, 2 April 2025 9:55 AM

To: Robert Brownbill <rob.brownbill@dpie.nsw.gov.au>

Cc: Chris Jones <chris.jones@iema.com.au>

Subject: Snowy 2.0 IEA - DECCEEW (NSW) Feedback

Good afternoon Rob,

This email has been prepared seeking feedback into the 2025 Independent Environmental Audit (Audit) for the Snowy 2.0 Project (CSSI-9687) in accordance with Schedule 4 Condition 9 of CSSI-9687.

Under agreement with the Department of Planning, Housing and Infrastructure (the DPHI), the audit will focus on the conditions of CSS-9687 and associated Management Plan Commitments.

For this audit we have not reviewed the EPL or Federal Approval as they are not mentioned in Schedule 4 Condition 9 of the CSSI which refers to the IEA requirements (see below figure).

INDEPENDENT ENVIRONMENTAL AUDIT

9. Within one year of the commencement of construction, and every 3 years thereafter unless the Planning Secretary agrees or directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:
- (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 this approval (including the requirements of any approved strategy, plan or program);
 - (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.

The Audit period is 18 July 2023 (day after previous audit site audit component) to 28 March 2025 (day five of IEMA's site audit component).

The site audit component was undertaken by IEMA on 24th March - 28th March. IEMA would have liked to have consulted prior to going on the site audit component, however Snowy Hydro did not provide specific consultation details until after this component was undertaken.

The audit team (letter attached) was endorsed by the DPHI on 24 February 2025, with this including:

- Chris Jones (Principal Environmental Consultant – IEMA) – Lead Auditor
Email: chris.jones@iema.com.au
Ph: 0401 800 918
- David Price (Environmental Consultant – IEMA) – Auditor
Contact details below

The Audit team is seeking feedback regarding activities during the Audit period, with this being a requirement of the DPHI Audit Guidelines (2020). Please send an email with any feedback you have about the site or areas that you want reviewed.

Please note - IEMA is only assessing the requirements of CSSI-9687 and the commitments made in CSS-9687 associated Management Plans.

If you would prefer to have your input kept confidential, please call Chris on the above number and the queries will be assessed in the Audit but not attributed to you or your organisation.

Kind regards,

David Price
Environmental Consultant



ABN 32 622 237 870

PO Box 3161,

Ground Floor, 41 Llewellyn Street,

MEREWETHER NSW 2291 AUSTRALIA

e: david.price@iema.com.au

m: 0432 363 336 | w: www.iema.com.au



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FW: Fw: Snowy 2.0 IEA - DECCEEW (NSW) Feedback

From Naila Tabassum <naila.tabassum@dpie.nsw.gov.au>
on behalf of
DPIE Water Assessments Mailbox <water.assessments@dpie.nsw.gov.au>

Date Wed 4/23/2025 2:27 PM

To David Price <david.price@iema.com.au>

 1 attachment (416 KB)

OUT25 4698 NSW DCCEEW Water - Snowy 2.0 - SSI-9687 - IEA.pdf;

Hi David,

Please see attached response from DCCEEW Water on this matter.

Thanks and Regards

Naila Tabassum

Assistant Projects Officer

Water Group | Department of Planning and Environment

E naila.tabassum@dpie.nsw.gov.au

dpie.nsw.gov.au

Level 17, 4 Parramatta Square, 12 Darcy Street | Locked Bag 5022 | Parramatta NSW 2150

Our Vision: Together, we create thriving environments, communities and economics.



From: Robert Brownbill <rob.brownbill@dpie.nsw.gov.au>

Sent: Wednesday, 23 April 2025 9:49 AM

To: David Price <david.price@iema.com.au>

Cc: Chris Jones <chris.jones@iema.com.au>; Alistair Drew <alistair.drew@dpie.nsw.gov.au>

Subject: RE: Snowy 2.0 IEA - DECCEEW (NSW) Feedback

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Regards,

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Manager Water Assessments

Water Knowledge Division

Department of Climate Change, Energy, the Environment and Water

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Email: chris.jones@iema.com.au
Ph: 0401 800 918
- David Price (Environmental Consultant – IEMA) – Auditor
Contact details below

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If you would prefer to have your input kept confidential, please call Chris on the above number and the queries will be assessed in the Audit but not attributed to you or your organisation.

Kind regards,

David Price
Environmental Consultant



ABN 32 622 237 870

PO Box 3161,

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NetNada Carbon Neutral Certification for
their environmental sustainability efforts.*



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Our ref: OUT25/4698

David Price
Ground Floor, 41 Llewellyn Street
Merewether NSW 2291
Email: david.price@iema.com.au

23 April 2025

Subject: Snowy 2.0 - SSI-9687 – Independent Environmental Audit (IEA)

Dear David Price,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, “Independent Audit Post Approval Requirements (2020)” extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.

- Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous year's, and 3) identifies exceedances and how these are managed/mitigated.



Should you have any further queries in relation to this submission please do not hesitate to contact Water Assessments at water.assessments@dpie.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alistair Drew".

Alistair Drew
Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

APPENDIX F. INDEPENDENT AUDIT REPORT DECLARATION FORM

Independent Audit Report Declaration Form	
Project Name	Snowy 2.0 Independent Environmental Audit
Consent Number	Project Approval CSSI 9687
Description of Project	Independent Environmental Audit for Snowy 2.0 Project
Project Address	Snowy Hydro Limited, Monaro Highway, Cooma, NSW 2630
Proponent	Snowy Hydro
Title of Audit	Independent Environmental Audit 2025 – Snowy 2.0 Main Works
Date	02/10/2025
<p>I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:</p> <p>i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2020);</p> <p>ii. the findings of the audit are reported truthfully, accurately, and completely;</p> <p>iii. I have exercised due diligence and professional judgement in conducting the audit;</p> <p>iv. I have acted professionally, objectively and in an unbiased manner;</p> <p>v. I am not related to any proponent, owner, or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;</p> <p>vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;</p> <p>vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and</p> <p>viii. I have not accepted, nor intend to accept any inducement, commission, gift, or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees, or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</p> <p>Notes:</p> <p>a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and</p> <p>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)</p>	
Name of Lead Auditor	Chris Jones
Signature	
Qualification	Principal Auditor (Environmental Management Systems Auditor) Exemplar Global
Company	IEMA
Company Address	41 Llewellyn Street Merewether NSW 2291
Name of Assistant Auditor	David Price
Signature	
Company	IEMA
Company Address	41 Llewellyn Street Merewether NSW 2291

APPENDIX G. DPHI IEA 2025 (#5) FEEDBACK

NSW Planning ref: SSI-9687-PA-295
Jordan Chenery
Environmental Coordinator
SNOWY HYDRO LIMITED
PO Box 332
Cooma New South Wales 2630
27/08/2025

**Subject: Snowy 2.0 - Main Works - SSI-9687
*Independent Environmental Audit 2025 (#5)***

Dear Jordan,

Reference is made to your post approval matter, SSI-9687-PA-295, Independent Environmental Audit (IEA) #5 and Response to Recommendations (RAR) submitted on the 16 July 2025 in accordance with Schedule 4 condition 9 of CSSI 9687 (as modified) the approval.

NSW Planning has reviewed the IEA report and RAR and considers the IEA report does not meet the requirements of the approval, the audit team endorsement approval letter dated 24 February 2025 and the *Independent Audit Post Approval Requirements (IPARS)*.

NSW Planning requests that the IEA report is revised, and resubmitted, to:

- include a section that *includes "a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period;" (as required by section 4.2.3 of the IPARS);*
- ensure that the report reflects transparency and independence of the audit team (ie: references to agreeing with National Parks and Wildlife's (NPWS) opinion of non-compliance/s) and
- ensure that all non-compliances identified are supported with adequate evidence regarding the non-compliance and relevant recommendations (if relevant) to resolve the non-compliance are identified and articulated.

The revised IEA report is to be resubmitted via the Major Project Portal no later than 5pm on 5 September 2025.

Further correspondence will be sent in relation to the non-compliances identified in the IEA report.

Should you wish to discuss the matter further, please contact Michael Wood on 0459890661 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly".

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