

INDEPENDENT ENVIRONMENTAL AUDIT # 2

SNOWY 2.0 MAIN WORKS

FINAL REPORT



Proponent:	Snowy Hydro Limited
Auditee:	Snowy Hydro Limited, Future Generation Joint Venture
Project:	Snowy 2.0 Main Works – Development Consent CSSI 9687
Scope:	Compliance to conditions of consent and other requirements relevant to the targeted Management Plans and associated systems identified as part of the Snowy Hydro internal audit program. Scope included the follow up of previous findings and areas of focus by agencies.
Location(s)	Audit was conducted remotely, and included the following: Snowy Hydro Office – Monaro Highway, Cooma Future Generation Office – Cooma Project Sites / Locations: Lobs Hole (Virtual site inspection); Tantangara; Marica (drone footage / photos provided); Ravine Road
Audit Dates:	12-13 July 2021, 2-3 Aug 2021 (virtual site visit – Lobs Hole)

Revision no.	Author / Auditor	Purpose / Change	Date
0.1	Julie Dickson	Draft for review/comment	03/09/2021
0.2	Julie Dickson	Second draft for final review/comment	20/09/2021
1.0	Julie Dickson	Final for issue to Client and DPIE	24/09/2021

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Document Information	
Title:	Independent Environmental Audit Report – Snowy 2.0 Main Works
Audit Organisation:	Dickson Environmental Consulting and Audit
Auditor & Author:	Julie Dickson (Lead Auditor)
Preliminary findings issued:	14 July 2021
First Draft Report issued:	3 September 2021
Second Draft Report issued:	20 September 2021
Final Report for issue:	24 September 2021

EXECUTIVE SUMMARY

An Independent Environmental Audit (IEA) was conducted of the Snowy 2.0 Main Works Project. The audit scope was in accordance with the Independent Audit Program (IAP) approved by the Planning Secretary of the Department of Planning, Industry and Environment (DPIE) on 28 September 2020.

As noted in the initial IEA report, due to the sensitive location and scale of the Snowy 2.0 project, Snowy Hydro determined that IEAs are to be undertaken at a greater frequency than provided by Schedule 4 Condition 9 of the Main Works approval (after one year, then every 3 years). The audit frequency defined in the IAP is an initial audit within 12 weeks of commencement of construction and thence, every 26 weeks from the date of the initial independent audit. This second audit was conducted 26 weeks after the initial audit as required by the IAP and covers the period February to July 2021.

The scope of the audit included a follow-up on non-compliances and other findings from Audit #1; management plans and associated systems and processes identified as priority areas, based on the previous audit report; activities relevant to the current phase of the development; and areas of focus identified by the agencies / key stakeholders during the pre-audit consultation process.

The scope proposed in the first draft of the Audit Plan and Scope included a physical inspection of all active areas of the project. However, due to the worsening situation with Covid-19 lockdowns in July 2021, a virtual site inspection and the provision of drone footage and photos was implemented as an alternative. The office-based component of the audit was conducted virtually over two days with Snowy Hydro and Future Generation JV management. The virtual site inspection was conducted over two partial days at Lobs Hole only, due to no reception at Marica, Tantangara and the road network.

Areas of strength identified during the audit included improved corrective action processes pertaining to internal audits and inspections; erosion and sediment controls, including stabilisation, clean and dirty water diversion and separation; re-use of recycled water; flora and fauna protection including fauna strike mitigation, pre-and post-clearing surveys and permits; and the initial testing and classification of tunnel spoil. The maintenance of plant and equipment was also considered to be appropriately managed.

The audit identified a number of areas of Non-Compliance, and Observations and Opportunities for Improvement have also been raised for action and consideration. In summary:

Twenty (20) findings were raised at this audit, comprising:

- Fourteen (14) Non-Compliances (NC);
- Four (4) Observations (OBS); and
- Two (2) Opportunities for Improvement (OFI)

The Non-Compliances and Observations can be grouped into the following main areas;

- Environmental Management, monitoring, reporting and access to information (8 NCs);
- Transport and Traffic, road upgrades (3 NCs, 2 OBS);
- Biodiversity – Weeds hygiene processes (1 NC – escalated from OBS raised at Audit #1);
- Chemicals Management (incompatible storage) (1 NC);
- Separation of topsoils, subsoils and mulch (1 OBS);
- Noise Management Plan – Rock Forest – clarification on public reporting (1 OBS);
- Administrative – non-compliance due to other non-compliances being raised (1 NC).

The Auditees were cooperative throughout the audit process. The Auditor would like to thank all participants for their cooperation and assistance.

1.1. Audit definitions and Abbreviations

Abbreviation	Explanation
APZ	Asset Protection Zone
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
CCR	Construction Compliance Report
CoC	Conditions of Consent
CSSI	Critical State Significant Infrastructure
DAWE	Commonwealth Department of Agriculture Water and the Environment (formerly Department of the Environment and Energy)
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EIANZ	Environment Institute of Australia and New Zealand
EMS	Environmental Management Strategy
HMP	Heritage Management Plan
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
ESCP	Erosion and Sediment Control Plan
ECVT	Emergency, Cabling and Ventilation Tunnel
FGJV	Future Generation Joint Venture
GMP	Groundwater Management Plan
IAP	Independent Audit Program
IEA	Independent Environmental Audit
KNP	Kosciuszko National Park
MAT	Main Access Tunnel
NPWS	National Parks and Wildlife Service
NRAR	Natural Resources Access Regulator
OC	Occupation Certificate
PCCR	Pre-Construction Compliance Report
PCT	Plant Community Type
PESCP	Progressive Erosion and Sediment Control Plan
PIRMP	Pollution Incident Response Management Plan
Project, the	Snowy 2.0 Main Works
RMS	Roads and Maritime Service (now Transport for NSW)
ROL	Road Occupancy Licence
SAP	Sensitive Area Plans
SDS	Safety Data Sheet
SHL	Snowy Hydro Limited
SMP	Spoil Management Plan
SPAL	Special Purpose Access Licence
SSI	State Significant Infrastructure
SWMP	Surface Water Management Plan
SWMS	Safe Work Method Statement
TBM	Tunnel Boring Machine
TCP	Traffic Control Plan
TfNSW	Transport for NSW
TMP	Transport Management Plan
WAL	Water Access Licence
WMP	Water Management Plan

1.0 INTRODUCTION

1.2. Purpose and Requirement for this Audit

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

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

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

In September 2020, Snowy Hydro proposed to the Department, an IEA program for the first two years, setting out the audit frequency, with the initial audit to be conducted within 12 weeks of the commencement of “Construction”, and subsequent audits scheduled at intervals of 26 weeks from the date of the initial audit. DPIE reviewed and approved the IEA Program on 28 September 2020. The initial audit was conducted in January 2021, with the report issued to Snowy Hydro in April 2021.

This audit is the second construction phase IEA, which commenced on 12 July 2021, within 26 weeks of the initial IEA.

1.3. Background of the Project

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

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

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

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

Following consideration of this document and the Main Works EIS, approval was granted by the Minister for Planning and Public Spaces (formerly Minister for Planning) on 20 May 2020. The approval for Snowy 2.0 Main Works incorporates the Exploratory Works and Main Works project elements and requires surrender of the Exploratory Works approval within six months of the

commencement of construction. At the time of surrender, the conditions and requirements of the Main Works Infrastructure Approval would apply to any Exploratory Works activities required to be completed.

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

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

Construction works for Main Works commenced on 21 October 2020.

1.4. Auditor Credentials

Audit Organisation:	Dickson Environmental Consulting and Audit Pty Ltd
Auditor & Report Author:	Julie Dickson
Auditor Qualification:	Exemplar Global Lead Environmental Auditor Accreditation no. 13573 (exp June 2022)
Affiliations:	EIANZ Certified Environmental Practitioner, Reg. no. 221

1.5. Audit Objectives, Scope Development, Scope & Criteria

The objective of this Independent Environmental Audit is to assess the ongoing environmental performance of the development and whether it is complying with the requirements in this approval (including the requirements of any approved strategy, plan or program), review the adequacy of the approved strategies, plans and programs and to recommend any appropriate measures to improve environmental performance of the development and approved strategies, plans and programs in accordance with Schedule 4 Condition 9 of the Conditions of Consent.

The scope was developed by the Auditor in consultation with Snowy Hydro with input provided by various agencies, based on the approved IEA program, and information provided on the expected activities that would be in progress at the time of the audit. The scope proposed in the first draft of the Audit Plan and Scope included a physical inspection of all active areas of the project. However the worsening situation with Covid-19 lockdowns in July led to a reconsideration of the ability to undertake a physical site inspection. Following a “wait and see” approach, the decision was made to undertake the inspections virtually for Lobs Hole, and have drone footage and photo evidence provided for Tantangara and Marica due to the absence of reception at these sites. This strategy was discussed with DPIE.

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

- Follow-up on non-compliances and other findings from Audit #1;
- Areas identified in Audit #1 as “*areas to be assessed at next / future audits*”;
- Management Plans and associated systems and processes identified as priority areas, based on the previous audit report and the activities relevant to the current phase of the development; and
- Areas of focus identified by agencies / key stakeholders during the pre-audit consultation process.

The areas of additional scope requested by the agencies and authorities are documented within Section 2.3 – Consultation with Agencies and Table 1 – Agency Consultation Summary Table.

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

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

1.6. List of Approvals and Documents Audited

- Main Works Approval CSSI 9687 Schedules 1 to 4 and relevant appendices;
- Snowy 2.0 Main Works – Construction Noise Management Plan – Rock Forest Rev E, 02/12/2020 (FGJV);
- Snowy 2.0 Main Works – Aquatic Habitat Management Plan Rev F 16/02/2021 (FGJV);
- Snowy 2.0 Main Works – Spoil Management Plan Rev G 11/08/2020 (FGJV);
- Snowy 2.0 Main Works – Biodiversity Management Plan Rev I 12/10/2020 (FGJV);
- Snowy 2.0 Main Works – Water Management Plan Rev G 15/10/2020 (FGJV);
- Snowy 2.0 Main Works – Surface Water Management Plan Rev G 15/10/2020 (FGJV);
- Snowy 2.0 Main Works – Surface Water Trigger Action Response Plan 2 19/09/2020 Rev F (Annexure B to Surface Water Management Plan);
- Snowy 2.0 Main Works – Groundwater Water Management Plan Rev G 15/10/2020 (FGJV);
- Snowy 2.0 Main Works – Heritage Management Plan Rev G 13/08/2020 (FGJV);
- Snowy 2.0 Main Works – Transport Management Plan Rev G 03/08/2020 (FGJV);
- Snowy 2.0 Main Works – Natural Hazards Management Plan Rev C 04/08/2020 (FGJV);
- Snowy 2.0 Main Works – Environmental Management Strategy Rev I 11/08/2020 (FGJV);
- Snowy 2.0 Exploratory Works – Rehabilitation Management Plan Rev C 19/10/2020 (FGJV).

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

1.7. Period Covered by the Audit

This second audit was conducted 26 weeks after the initial audit (January 2021) as required by the IAP and covers the period February to July 2021.

This audit commenced with a pre-audit of selected relevant documents during the week 5 to 9 July 2021, with the remote, office-based component commencing Monday 12 July 2021 for the Snowy Hydro Limited (SHL) component and Tuesday 13 July 2021 for the Future Generation component. Draft findings were issued on Wednesday 14 July during an interim debrief /closing meeting. Virtual site inspections were undertaken on Monday 2 August and Tuesday 3 August 2021 and a further debrief was held Wednesday 4 August 2021 together with additional findings from the virtual site inspection. Various follow-up activities were undertaken during the following weeks including the issue of a clarifications document, additional evidence requests, and issue of updated findings. A meeting was held on 27 August 2021 to discuss final findings and the respective responses by Snowy Hydro and Future Generation.

The first Draft Independent Environmental Audit Report was issued to the proponent via email on 3 September 2021, and a response to the findings document was received via email from SHL on 14 September 2021.

The second Draft Independent Environmental Audit Report was issued on 20 September 2021, and following receipt and consideration of feedback, the Final Report was issued on 24 September 2021.

2.0 AUDIT PROCESS AND METHODOLOGY

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

Audit Tables were developed for the audit prior the initial audit in January 2021, based on the conditions of consent requirements, and key commitments made in the approved Project Management Plans. The Audit Tables were revised for the second audit, based on the findings of the initial audit, and scope input by DPIE, NPWS, TfNSW, and Snowy Monaro Regional Council following agency consultation.

An Audit Plan and Scope was prepared in consultation with the auditees which defined the audit objectives, scope and methodology, proposed/required attendees and timeframes for interviews and document reviews. Additional key project documentation that was not included in the scope of Audit #1, was reviewed by the Auditor prior to the audit.

The audit was structured to conduct the audit separately with the proponent (Snowy Hydro) scheduled for Day #1, and the construction contractor (Future Generation Joint Venture) on Day #2. Separate opening meetings were held with each party.

On Day #1, a virtual opening meeting (using Google Meet on Monday 12 July) was held with Snowy Hydro management in the Cooma office, followed by the audit itself which involved interviews and a review of documented evidence including plans, documents, records, and photos relevant to Snowy Hydro and the scope of the audit.

On Day #2, a virtual opening meeting (using Microsoft Teams) was held with the FGJV environmental team located in the Cooma office, followed by the office-based audit which involved interviews and a review of documented evidence including plans, documents, records, and photos relevant to FGJV and the scope of the audit.

The virtual site inspection at Lobs Hole was undertaken on two separate days, involving environmental personnel from FGJV and Snowy Hydro, and was conducted using Microsoft Teams on a mobile phone. Due to poor reception, live video footage was not 100% clear, and the auditor requested photos be taken at key locations to supplement the live footage.

Due to lack of internet connection / reception at Marica and Tantangara, only drone footage taken the week prior to the audit and photographs around the time of the audit could be provided for these sites. Whilst this situation was not ideal, it was considered that adequate evidence was sighted to establish ongoing overall environmental management across the project, and that due to the higher frequency of audits, future visits would counter any shortfalls at this audit.

Post-audit activities included provision of an interim findings table, follow-ups on areas requiring further evidence, clarification, and communications with the auditees to address audit findings prior to issuing of draft and final audit reports.

The audit was conducted in accordance with the revised Audit Plan and Scope Ver. 2.2 – Appendix E) and in accordance with AS / NZS / ISO 19011:2018 – Guidelines for Auditing Management Systems.

2.1. Selection and Endorsement of Auditor

Snowy Hydro originally requested the approval of a suitably qualified person to prepare the IEAs for the Snowy 2.0 Main Works (the Project) SSI 9687 (the Approval) on 30 September 2020. The Secretary agreed to Julie Dickson and Larry Weiss of Dickson Environmental Consulting and Audit as the audit team for the project in a letter dated 1 October 2020. A copy of the letter endorsing the auditors is contained within Appendix C of this report. Julie Dickson conducted both the initial and this second Independent Environmental Audit.

2.2. Site Inspections and Interviews

As noted above, the audit was undertaken remotely. Interviews were held as part of the office-based audits with Snowy Hydro and FGJV, and a virtual site inspection was conducted at Lobs Hole over two (partial) days. Interviewees are listed on the Attendance Register in Appendix A.

2.3. Consultation with Agencies

Department of Planning, Industry and Environment:

An initial email was sent by the Auditor to DPIE via compliance@planning.nsw.gov.au on 7 June 2021 requesting input to the scope of the audit and also requesting the provision of information on other parties or Agencies that should be consulted to obtain their input to the scope of the audit. A detailed scope was provided by the auditor based on the outcomes of the previous audit.

A response was received from DPIE on 16 June 2021 acknowledging that the proposed scope was very thorough, and that the Department would like focus on areas such as:

- Incident/non-compliance reporting/identification;
- Management of non-compliance and follow-up actions associated with repairing/addressing the non-compliance/incidents;
- Incident management register and actions; i.e. Do they have a register that records, tracks, addresses incidents which do not fall within the definition of an incident within the approval;
- Traffic management, compliance with tmp and the status/progress/scheduling of road upgrades in accordance with the approval and tmp; and
- Compliance to date with conditions and management plans relevant to biodiversity (both flora and fauna).

A request was also made by DPIE to consult with TfNSW and Snowy Monaro Council in addition to EPA and NPWS.

National Parks and Wildlife Service:

An initial phone call was made, followed up by an email by the Auditor to NPWS on 11 June 2021 requesting input to the scope of the audit. NPWS concerns were discussed and provided in writing in a return email on 17 June 2021. Their concerns were as follows:

- Limited reporting on the SHL website from various management plans including the Transport Management Plan;
- That external reporting (to road authorities) of adverse traffic incidents involving project vehicles are unreported. Therefore, NPWS are unable to assess the compliance with Conditions 41 and 45 of Main Works approval or reviews of the Transport Management Plan that directly relate to transport management and NPWS managed roads;
- NPWS have concerns for how the infrastructure approval definitions of Incident, Non Compliance and Material Harm respectively are being interpreted by the SHL and FGJV. It is unclear what incidents or non-compliances are/are not being reported as a result. Recent incidents identified by NPWS have been considered neither an 'Incident or Non-compliance' by the project, yet clearly understood by the regulators to be so, requiring appropriate notification;
- NPWS agree with the proposed scope and in particular, we still have concerns on the measures relating to:
 - weed, pathogen and pest control;
 - chemical spills, especially associated with the numerous generators and fuel cells across the project footprint.

Environment Protection Authority:

An initial phone call was made, followed up by an email by the Auditor to EPA on 11 June 2021 requesting input to the scope of the audit. EPA responded noting that “the EPA does not have any further requests to add to the scope of this independent audit and appreciates the comprehensive list that is being covered”.

Transport for NSW (TfNSW):

Contact details for TfNSW were provided by DPIE on 21 June 2021, and following receipt of these details, an email was sent on the same date requesting input to the scope of the audit. A follow-up phone call was made on 29 June 2021 to ascertain whether TfNSW would be formally responding, with a response indicating there would be a formal response. An email response was received on the afternoon of Monday 12 July (first day of the audit).

TfNSW provided the following comments concerning what should be included in the audit from a traffic/state classified road perspective:

- An assessment of the development's compliance with applicable transport/road works conditions in the issued approval that specifically relate to the state road network including connections to/from the state road network (e.g. as detailed by Schedule 2 Conditions 2 and 4, Schedule 3 Conditions 7, 8, 41, 43, 45, 46, 49 and 50, Schedule 4 Condition 12 and Appendix 5 Table 5.2). This including details on how compliance or otherwise has been determined;
- Is the management of worker movements to and from sites and between sites being undertaken as detailed in approved documentation (e.g. Snowy 2.0 Main Works Traffic and Transport Assessment, dated 25 February 2020 prepared by SCT Consulting – refer to Section 4.1.3);
- Compliance with the revised traffic volumes as detailed in the Preferred Infrastructure Report and Response to Submissions – Snowy 2.0 Main Works, dated February 2020 prepared by EMM (e.g. Section 3.2.5 and 4.4.6, etc);
- Management of the movement of raw materials along the Snowy Mountains Highway in the vicinity of Talbingo Mountain; and
- Timeframe for the implementation of any identified measures to address road related concerns

A response from the auditor noted that the comments were received after the commencement of the audit, and therefore the additional scope could not be included in the formal Audit Plan and Scope. However, it was also noted that the conditions related to the Transport Management Plan were already in the scope, and most of the items would be covered.

Snowy Monaro Council:

Contact details for Snowy Monaro Council were provided on 1 July 2021. Following receipt of the details, phone calls were made to three stakeholders within the Council, followed by an email to all three stakeholders, requesting input to the scope of the audit. The following scope was requested:

- Traffic Management Plan
- Accommodation Strategy

The auditor responded, noting that the Traffic Management was included in the scope, also asking if there were any specific aspects of the TMP that Council would like a focus on. It was also noted that the Accommodation Strategy was not part of the Main Works scope, but included in the Polo Flat Segment Factory approval.

Table 1 – Agency Consultation Summary Table

Agency consultation and scope input requests	Degree of scope assessed, comments
DPIE	
Incident/non-compliance reporting/identification;	Addressed as part of established audit scope.
Management of non-compliance and follow up actions associated with repairing/addressing the non-compliance/incidents;	Addressed as part of established audit scope.
Incident management register and actions (recording, tracking of incidents which do not fall with the definition of an incident within the approval;	Addressed as part of audit scope.
Traffic management, compliance with TMP and the status/progress/scheduling of road upgrades in accordance with the approval and TMP; and	Addressed as part of established audit scope, including interview with NPWS and TfNSW.
Compliance to date with conditions and management plans relevant to biodiversity (both flora and fauna.	Addressed as part of established audit scope, part of virtual site inspection.
National Parks and Wildlife Service (NPWS)	
Website reporting on Transport Management Plan and other various Management Plans;	Addressed as part of audit scope.
External reporting (to road authorities) of adverse traffic interactions involving project vehicles;	Addressed as part of audit scope.
How the infrastructure approval definitions of Incident, Non-Compliance and Material Harm respectively are being interpreted by the SHL and FGJV;	Addressed as part of audit scope.
Concerns on the measures relating to weed, pathogen and pest control;	Addressed as part of established audit scope and virtual site inspection.
Concerns on the measures relating chemical spills, especially associated with the numerous generators and fuel cells across the project footprint.	Addressed as part of established audit scope and virtual site inspection.
Snowy Monaro Council	
Traffic Management Plan;	Addressed as part of established audit scope.
Accommodation Strategy.	Out of scope of this audit (Part of Polo Flat approval) – not assessed.

Agency consultation and scope input requests	Degree of scope assessed, comments
Transport for NSW	
Compliance with applicable transport/road works conditions that specifically relate to the state road network including connections to/from the state road network (e.g. as detailed by Schedule 2 Conditions 2 and 4, Schedule 3 Conditions 7, 8, 41, 43, 45, 46, 49 and 50, Schedule 4 Condition 12 and Appendix 5 Table 5.2);	Sch 3 Conditions 7 & 8 not related to traffic and transport, however were within scope of this audit. Sch 3 Condition 50 not triggered. Sch 3 Conditions 41, 43, 45, 46, 49 and Sch 4 Condition 12 addressed as part of established audit scope. Appendix 5 Table 5.2 addressed specifically as result of request for inclusion in scope.
Management of worker movements to and from sites;	Assessed as part of scope – Traffic Management Plan.
Compliance with the revised traffic volumes as detailed in the Preferred Infrastructure Report and Response to Submissions;	Not assessed as part of the scope of this audit.
Management of the movement of raw materials along the Snowy Mountains Highway in the vicinity of Talbingo Mountain;	Not specifically assessed as part of the scope of this audit. Movement of heavy vehicles generally was assessed.
Timeframe for the implementation of any identified measures to address road related concerns.	Timeframes relating to intersection upgrades in Appendix 5, Table 5.2 were assessed.

2.4. Compliance Status Descriptors

Table 2: Compliance status descriptors (as per DPIE Independent Audit Post Approval Requirements)

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

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

2.5. Explanation of Finding Classifications

Table 3 - Audit Findings classifications (within “compliant” status descriptors)

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

2.6. Audit Attendees

Refer to Appendix A for Audit Attendance Register.

2.7. Audit Disclaimer

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

3.0 AUDIT FINDINGS

3.1 Compliance Summary

Table 4 – Summary of compliance against audit criteria and areas of focus

Focus Area	Key Criteria	No. of conditions / items audited	STATUS		
			Compliant		Non-Compliant
			OFI	OBS	NC
Schedule 2 – Administrative conditions	Terms, limits of approval, surrender of approval (Exploratory works), operation of plant & equipment.	12	1		1
Schedule 3 – Digital information	Open-source database, digital strategy	2			1
Schedule 3 – Spoil, water soil, chemicals management. Conditions 4, 7, 8, 11, 17, 29, 30 (a – g, k, l, m, n, o, p)	Erosion and sediment control, temporary stabilisation, surface water and groundwater spoil management, fuel and chemical management, spill prevention	37		1	2
Schedule 3 – Transport and Traffic Management. Conditions 41, 43, 44, 45 (a, b, c, d, e, f, g, h, l, j, k, l, m); 46 (e), 49 (+ Table D6 -TMP)	Road and intersection upgrades to satisfaction of roads authority, vehicle restrictions, traffic incident prevention / minimisation / reporting	26	1	2	3
Schedule 3 – Clearing, biodiversity management 17 (a – l), 8 (a, d), 19	Clearing limits and protocols, flora and fauna protection and monitoring, rehabilitation, weed and pathogen management	24			1
Environmental Management Strategy, other misc.	Responsibilities, inspections, awareness, complaints	6			
Schedule 3 – Heritage	Aboriginal heritage boulder streams	3			
Schedule 3 – Noise management – 57, 58, - waste - 52	Rock Forest – Noise Management Plan + CNMP	7		1	
Schedule 3 – Emergency Management 60 a, b, c, 61	Bushfire requirements	4			
Schedule 4 – Environmental management, reporting and auditing	Updates of strategies plans and programs, incident and non-compliance reporting, IEA	11			5
Schedule 4 – Access to information 12	Provision of information on the project website, publicly reporting on performance	1			1
TOTALS		133	2	4	14

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

3.2. Project Compliance – Findings, Actions and Recommendations

Table 5 - Independent Audit Findings – Snowy Hydro 2.0 CSSI No 9687

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
1.	Sch 2 Cond 2 (b)	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.	Terms of Approval Non compliances have been raised against conditions of consent at this audit, and as such a non-compliance is triggered against part (b) of this condition.	No action required	07/21/ NC 1	Non-compliant (closed)
2.	Sch 4 Cond 11 Previously raised under Sch 2, Cond 13(c) Sch 3, Cond 17 (i) and 19 Biodiversity Management Plan Section 5.1	Sch 4 Cond 11: The Proponent must implement any approved audit action plan for the development. Sch 3 Cond 13 (c): The Proponent must ensure that all plant and equipment used on site, or in connection with the development, is: (c) kept free of weeds, seeds and pathogens when entering or leaving the site.	An Observation was raised at the previous audit regarding potentially inadequate processes for washing down of vehicles at Tantangara where the spread of Ox-eye daisy is a risk. A review of the actions taken to address the issue found that the majority of recommendations made by the auditor, and commitments made in the formal response submitted to DPIE had not been adequately addressed / actioned. The previous Observation has therefore been re-raised as a non-compliance under Sch 4 Cond 11. For full overview of previous finding actions taken / not taken, refer to Audit # 1 Findings Follow-up table.	Agreed Actions: <ul style="list-style-type: none"> – Implement a new procedure to monitor wheel washing compliance including tagging and photographic evidence. – Complete installation of wheel washes at all areas. – Develop operating and management procedures for the wheel washes. – Implement further toolboxes regarding site specific weed hygiene risks. Responsibility: FGJV Due Date: 30 October 2021	07/21/ NC 2	Non-Compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
3.	Sch 3 Cond 2	Within 6 months of the commencement of construction, the Proponent must prepare a Digital Strategy for the development to the satisfaction of the Planning Secretary.	<p>Whilst a Digital Strategy has been prepared, the Strategy had not been prepared within the required 6-month time frame.</p> <p>The Digital Strategy was submitted By Snowy Hydro to DPIE on 4 June 2021 requesting endorsement of the Planning Secretary to submit this plan on a staged basis, noting that the staged strategy has been developed in consultation with the NSW NPWS. At the time of the audit, no response had been received from DPIE regarding the staged proposal.</p> <p>Construction commenced in October 2020, and submission was therefore at least 3 months outside the required timeframe.</p>	<p>Agreed Actions: No action required – Digital strategy was submitted prior to audit – The NC related to a timing issue.</p> <p>Responsibility: Snowy Hydro</p> <p>Completed Date: 4 June 2021</p>	07/21/ NC 3	Non-Compliant Closed
4.	Schedule 3, Cond 30 (p)	30 (p): Store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards.	<p>Chemicals Management A non-compliance was raised at Audit #1 regarding the inadequate / inappropriate storage of liquid substances. Whilst the specific issues raised in Audit #1 were mostly addressed and closed out, further issues were identified regarding storage of chemicals and hydrocarbon products and is re-raised at this audit.</p> <p>The virtual site inspection at Lob Hole found that whilst there</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Immediately remove the acid from the bunded area in which the Sodium Hypochlorite is stored; – Undertake a review of the compatibility of all chemicals stored in bunded storage areas, with particular attention to those that have bulk quantities of Class 8 chemicals (also recommended in EMM 	07/21/ NC 4	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
			<p>appeared to be improved overall storage practices (substances stored in bunded areas), the following further issues were identified:</p> <ul style="list-style-type: none"> - Incompatible substances (Sodium Hypochlorite and citric acid) were stored together in the same bund at the Sewage Treatment Plant – these chemicals react exothermically; - Class 2 (flammable gas) stored in Flammables Class 3 (flammable liquids) cabinet. These classes are not compatible to be stored together; - Hard copy SDS for Delo 400 multigrade in the mechanical workshop was significantly out of date (Nov 2010 issue) – based on limited sampling. 	<p>Hazardous Chemicals Audit in March 2021);</p> <ul style="list-style-type: none"> - Review storage of all Class 2 flammable gas storage across the project and ensure only compatible items are stored together; - Review all SDSs held on site and ensure they were issued less than 5 years ago as per regulations; - Review the internal chemical handling and storage audit and inspection program and make any necessary changes to improve compliance. <p>Responsibility: FGJV</p> <p>Due Date: 21 October 2021</p>		
5.	Sch 3 Cond 31 (c)	<p>31. 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: (c) include a Surface Water Management Plan...with:</p> <ul style="list-style-type: none"> - a program to monitor and publicly report on the surface water impacts of the development; 	<p>Evidence was not provided to demonstrate that the program to monitor and publicly report on the surface water impacts of the development had been implemented as required by Condition 31 (c). Specifically:</p> <ul style="list-style-type: none"> - Environmental Water Reports had not been prepared and reported to Snowy Hydro and other agencies on a quarterly basis as detailed in the Water Management plan; and 	<p>Agreed Actions:</p> <ul style="list-style-type: none"> - Finalise the Draft Quarterly Environmental Water Reports; - Issue the final draft Environmental Water Reports to Snowy Hydro for review, and then to the relevant agencies. <p>Responsibility: FGJV</p> <p>Due Date: 11 October 2021</p>	07/21/ NC 5	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
	Sch 3 Cond 32 Water Mgmt Plan Sect 6.6	32. The Proponent must implement the approved Water Management Plan for the development. Future Generation will report to Snowy Hydro and other agencies as detailed in Table 6-2 on water management aspects related to the Project Environmental Water Report (every 3 months) – publicly available	<ul style="list-style-type: none"> - Environmental Water Reports had not been made publicly available. <p><i>It was noted that draft Environmental Water Reports for the periods Dec 2020 to Feb 2021 and for March to May 2021 (30 July 2021) were provided to the auditor for information following the last day of the audit.</i></p>	<ul style="list-style-type: none"> - Publish the Environmental Water Reports on the Project Website. <p>Responsibility: SHL</p> <p>Due Date: 21 October 2021</p>		
6.	Sch 3 Cond 41 Table 5-1	The Proponent must carry out the road and intersection upgrades in Tables 5-1 and 5-2 in Appendix 5 in accordance with any specified timeframes to the satisfaction of the relevant roads authority.	<p>NPWS is the relevant roads authority for the works listed in Table 5-1. Evidence could not be provided to demonstrate that all the roads and intersection upgrades listed in Table 5-1 had been carried out in accordance with specified timeframes to the satisfaction of the relevant roads authority. The following upgrades had been either completed or had been partially completed:</p> <ul style="list-style-type: none"> - Link Road (spring 2020); - Mines Trail Road; - Lobs Hole Ravine Road North; - Marica Trail and Marica Trail West; - Tantangara Camp Road. <p>It was noted that there had been no mutually acceptable sign-off mechanism at the time of the audit.</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> - SHL to continue to work with NPWS to determine an acceptable sign-off mechanism (however SHL believes that mechanisms are in place to record where there is disagreement in the design); - Ensure all outstanding upgrades are appropriately undertaken to the satisfaction of the relevant roads authority (NPWS). <p>Responsibility: Snowy Hydro</p> <p>Due Date: TBC (dependent on outcomes of SHL/NPWS consultation duration).</p>	07/21/ NC 6	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
7.	<p>Sch 3 Cond 46 (e)</p> <p>Sch 3 Cond 49</p> <p>Transport Management Plan Table 6-1</p>	<p>Prior to the commencement of construction, the Proponent must prepare a Transport Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(e) include a program to:</p> <ul style="list-style-type: none"> • record and track vehicle movements; and • monitor and publicly report on the effectiveness of these measures. <p>49. The Proponent must implement the approved Transport Management Plan for the development.</p> <p>Monitoring will be undertaken to confirm the satisfactory traffic, transport and access outcomes are achieved during construction. Key parameters / frequency:</p> <ul style="list-style-type: none"> • Congestion impacts; road conditions, safety and traffic signage (inspections); • Movement of project vehicles on key roads utilised by the project; delivery traffic movements (Quarterly report); • Vehicle use of Lobs Hole Ravine Road – North (max 	<p>A Quarterly Cumulative Summary Report had not been prepared at the time of the audit, and therefore had not been submitted to SHL or to the project website as per Table 6-1 of the Transport Management Plan.</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Finalise the Draft Quarterly Cumulative Summary Report, ensuring all required data is included; – Issue the final draft of the Quarterly Cumulative Summary Report to Snowy Hydro for review, and then to the relevant agencies. <p>Responsibility: FGJV</p> <p>Due Date: 11 October 2021</p> <ul style="list-style-type: none"> – Publish Quarterly Cumulative Summary Report on the Project Website <p>Responsibility: SHL</p> <p>Due Date: 21 October 2021</p>	<p>07/21/ NC 7</p>	<p>Non-compliant</p>

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
		<p>120 movement / day – 60 each way) and annual average maximum of 60 movements / day (Quarterly Report) Quarterly Cumulative Summary Report submitted to project website.</p>				
8.	Sch 4 Cond 4	<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;</p> <p>(b) the submission of an independent environmental audit report under condition 10.</p>	<p>Update of strategies, plans or programs:</p> <p>a) No evidence was provided to indicate that any of the approved strategies, plans or programs had been reviewed following submission of an incident report. Incidents had been reported since the commencement of the project, relating to discharges or spills.</p> <p>b) Evidence was not provided to indicate that any of the approved strategies, plans or programs relevant to the scope of the Independent Environmental Audit #1 (IEA) had been reviewed following submission of the IEA Report. <i>Note: the final IEA #1 was issued to Snowy Hydro on 9 April 2021, and was formally submitted to DPIE on 15 June 2021.</i></p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Review all Management Plans that were subject to Non-compliances, Observations and Opportunities for Improvement raised at Audit #1 and Audit #2, or are relevant to any incidents reported under Condition 6 and where necessary, revise and update the Plans; – Develop and implement a process to track review and revision requirements (Approvals Register); – When Management Plans (or other strategies / programs) are reviewed, retain evidence of the review. <p>Responsibility: FGJV</p> <p>Due Date: 15 November 2021</p>	07/21/ NC 8	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
9.	Sch 4 Cond 6 (a)	<p>The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.</p> <p>Under this approval, an Incident is defined as “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”.</p>	<p>An Incident was reported to the EPA on 26 May 2021 as required by EPL 21266 which involved the overtopping of controls.</p> <p>This incident was not notified to the Department or NPWS as required by this Condition.</p> <p><i>Note: The definition of an incident for reporting to EPA and under Condition 6 are similar (both referring to “causes or threatens to cause material harm”), and therefore, notifications of incidents are required for both agencies.</i></p>	<p>Agreed Action:</p> <ul style="list-style-type: none"> – Ensure all incidents meeting the definition of an incident under the approval is notified to DPIE and NPWS via the Major Projects Portal in the future. <p>Responsibility: Snowy Hydro</p> <p>Due Date: ongoing as required</p>	07/21/ NC 9	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
10.	Sch 4 Cond 7	<p>Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department via the Major Projects portal of the non-compliance.</p> <p>This notice must set out the non-compliance, the reasons for the non-compliance (if known) and what actions have been taken, or will be taken, to address the non-compliance.</p>	<p>Non-compliances from IEA #1 were not notified to the Department via the Major Projects Portal within the required 7-day timeframe. The IEA Report containing the required information relating to the non-compliances was issued to Snowy Hydro on 9 April 2021 and submitted to the Department on 16 June 2021.</p> <p>A non-compliance on 29 March 2021 regarding a bogged truck outside the approved boundary was not initially notified to the Department as required by this condition.</p> <p><i>It appears that the lack of notification of the above non-compliance was due to a difference in interpretation of the event as a non-compliance between Snowy Hydro and the authorities DPIE and NPWS. A formal notification was submitted to DPIE on 9 June 2021.</i></p>	<p>Agreed Actions - SHL:</p> <ul style="list-style-type: none"> - Non-compliances raised from this or any future IEA to be submitted to DPIE within 7 days of the Final IEA Report being issued to Snowy Hydro; - The Findings Table from the IEA Report should be submitted as a separate document (Word) in addition to the Full Report (PDF) to allow response by DPIE; - Review internal interpretation of non-compliance definitions and ensure they are consistent with DPIE definitions. Consult with DPIE where necessary. - Non-compliances notified by FGJV to Snowy Hydro to be notified to DPIE within 7-day timeframe from becoming aware of the non-compliance. <p>Responsibility: Snowy Hydro Due Date: Various – as required</p> <p>Agreed Actions – FGJV:</p> <ul style="list-style-type: none"> - Report any non-compliances to Snowy Hydro as soon as possible following any breach or potentially non-compliant situation. <p>Responsibility: FGJV Due Date: When required</p>	07/21/ NC 10	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
11.	Sch 4 Cond 10	<p>Within 12 weeks of commissioning this audit, 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>	<p>The Independent Environmental Audit (IEA) Report #1, response to the recommendations and the proposed audit action plan were submitted to the Planning Secretary on 15 June 2021, which is outside the submission timeframe. IEA #1 commenced on 18 January 2021 and the Report was formally issued to Snowy Hydro on 9 April 2021. The latest date for formal submission of the Audit Report to DPIE was 12 April 2021.</p> <p>The definition of “Commissioning of the audit” has been clarified with DPIE to mean “the first day of the audit / site inspection”.</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – No further action required to address NC relating to IEA#1 – Submit the IEA Report #2 by 4 October 2021, which is 12 weeks from the first day of the audit – 12 July 2021) <p>Responsibility: Snowy Hydro</p> <p>Due Date: 4 October 2021</p>	07/21/ NC 11	Non-compliant
12.	Sch 4 Cond 12 (a) and (b)	<p>From the commencement of the development of the Main Works until the completion of the ecological rehabilitation of the areas used for operations, the Proponent must:</p> <p>(a) make copies of the following information publicly available on its website:</p> <ul style="list-style-type: none"> • approved strategies, plans or programs; • a comprehensive summary of the monitoring results of the development.... 	<p>(a) The following were not publicly available on the website at the time of the audit:</p> <ul style="list-style-type: none"> • Rock Forest Noise Management Plan; • Monitoring results – EPL (see part (b)); • Monthly summary of complaints (see part (b)); • A record of all incidents and non-compliances; • Independent Environmental Audit Report #1 with response to recommendations, action plan 	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – Upload all documents listed onto the public website; – Implement a system which ensures that whenever a new strategy, Management Plan, and program is approved, and monitoring results are required to be prepared, they are uploaded to the website when required, in a timely manner; – Maintain a spreadsheet of all incidents and non-compliances that are required 	07/21/ NC 12	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
		<ul style="list-style-type: none"> • 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 <p>(b) keep this information up to date</p>	<ul style="list-style-type: none"> • Quarterly Environmental Water Reports (required as summary of Water Management Plan - monitoring results); • Quarterly Cumulative Summary Report (required as part of the Traffic Management Plan for traffic movements). <p>(b) The following documents were not up to date on the website as at 16 June 2021; however, were noted to be on the website on 13 July 2021:</p> <ul style="list-style-type: none"> • The latest EPL Water Monitoring results on the website on 16 June 2021 were dated 20 Sept 2020 (<i>Noted that results up to April 2021 were on the website on 13 July 2021</i>); • The latest Complaints Summary Register on the website on 16 June was dated Dec 2020 (<i>Noted that the May 2021 Register was on the website on 13 July 2021</i>). 	<p>to be publicly reported, and upload to the website in a timely manner whenever updated;</p> <ul style="list-style-type: none"> - Upload all Independent Audit Reports (including IEA #1, this report and all future reports) together with corrective actions and response to the public website in a timely manner; <p>Responsibility: Snowy Hydro</p> <p>Due Date: 15 October 2021 and ongoing</p>		

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
13.	Surface Water Mgmt Plan Surface Water Trigger Action Response Plan (TARP)	The Trigger Action Response Plan 2 – Stormwater Overtopping Event (TARP) requires that if controls are overtopping (yes response) and water makes it to a receiving waterway (yes response), SHL, EPA and NPWS must be notified of the overtopping event.	NPWS were not notified of an overtopping event that occurred following significant rain at Marica (INC 0718 – 26/06/2021) or an overtopping event at the Main Yard (permanent Batch Plant Pad) with dirty water entering the Yarrangobilly River (INC 0575 – 23/03/2021; reported to EPA only) as required by the TARP.	<p>Agreed Actions:</p> <ul style="list-style-type: none"> i. All events resulting in an overtopping event to be reported to NPWS as per the TARP going forward; ii. Notifications to be provided to Snowy Hydro prior to submission; iii. Communicate this requirement to all relevant Management and Staff. <p>SHL Proposed Actions</p> <ul style="list-style-type: none"> iv. SHL propose to update TARP 2 to remove the requirement to notify NPWS of overtopping events that occur following rain events that exceed the approved design capacity of the basin. This would be subject to approval by DPIE / NPWS. <p>Responsibility: FGJV / Snowy Hydro</p> <p>Due Date (i – iii): immediately, next time an overtopping event occurs, and ongoing.</p> <p>Due Date (iv): 11 October 2021, implementation - if approved by DPIE/NPWS – after approval received.</p>	07/21/ NC 13	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
14.	Transport Management Plan Sect 5.12	<p>Traffic Incidents (within the site):</p> <ul style="list-style-type: none"> safety and environment related traffic incidents within the bounds of the project area will be managed in accordance with the EMS and the Health and Safety Management Plan and the associated incident and emergency reporting procedures; depending on the type and severity of the incident this may include notification to the Department in writing for incidents defined under the Approval, notification to the NPWS where required under the Deed of Agreement of Lease and notification to the EPA for pollution related incidents. <p>Traffic Incidents (external to the project site): In the event of a traffic incident external to the project site, but within project roads as described in Table 3-1, relevant road authorities and emergency services will be notified.</p>	<p>Insufficient evidence could be provided to demonstrate that all traffic incidents that required notification were notified to the appropriate authorities. Relevant authorities include NPWS, (within KNP), TfNSW and DPIE (dependent on location, type, severity etc) and emergency services (as relevant).</p> <p>Evidence was provided of a traffic incident register being maintained; however, the first entries were dated July 2021.</p> <p><i>It appears that there have been varying interpretations of the requirements to notify of traffic related incidents between the different parties (Proponent / Contractors and the Authorities). This may have resulted in some traffic related incidents not being appropriately notified.</i></p>	<p>Completed Actions:</p> <ul style="list-style-type: none"> Develop a Traffic Incident Register; Meeting between NPWS, Transport NSW, FGJV and SHL was held on the 26/07/2021 to discuss incident reporting process and clarification on what is to be reported; Since this meeting, at least two incidents had been reported to NPWS using the hotline number; Daily minuted transport meetings were initiated in July 2021 - includes discussion on incidents in past 24-hour period. <p>Agreed Actions:</p> <ul style="list-style-type: none"> Formalise and implement the processes agreed with NPWS and TfNSW for reporting traffic related incidents once effectiveness has been established; Ensure all incidents are notified as determined by agreed process. <p>Responsibility: FGJV / SHL Due Date: 1 November 2021</p>	07/21/ NC 14	Non-compliant

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
		If a traffic incident were to occur external to project roads defined in Table 3-1, TfNSW and / or the relevant road authority will be notified.		<p>Agreed Actions:</p> <ul style="list-style-type: none"> - Maintain Traffic Incident Register, ensuring all relevant details are logged, and communicated to SHL. <p>Responsibility: FGJV Due Date: - ongoing</p>		
15.	Sch 3 Cond 8 Spoil Management Plan Topsoil Strategy App B Pages 96, 97	<p>Topsoil and subsoil maintenance: Topsoil will be stockpiled, signposted and separated from other materials, and tracked.</p>	<p>The site inspection at Lobs Hole identified that topsoils, subsoils and mulch material were mixed and not adequately separated. Signage was also inadequate, with only one sign sighted in the vicinity – Mulch.</p> <p>An interview with FGJV site environmental staff noted that due to limited storage areas at Lobs Hole, it can be very challenging to adequately store the topsoils, subsoils and mulch separately.</p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> - Install additional signage at topsoil, subsoil and mulch stockpiling areas. - Undertake toolboxes to reiterate the importance of as much segregation of materials as possible. - Review Construction Method Statements to ensure separation requirements and methods are captured - Utilise mulch to protect topsoil. - Maximise segregation of materials as far as reasonable and feasible (where space and logistics allow). <p>Responsibility: FGJV Due Date: 11 October 2021</p>	07/21/ OBS 1	Compliant Observation

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
16.	Sch 3 Cond 45 (g)	The proponent must: (g) minimise the traffic impacts of the development on the public road network, including: minimising convoy lengths;	A site inspection conducted by NPWS and DPIE on 23 & 24 June 2021 identified some issues in relation to convoy length (up to 7 trucks observed in convoy) leaving Lobs Hole Ravine Road. Whilst it was stated that correspondence was issued by the Transport Department to address this issue, and that a new system has been implemented to stagger the exit of heavy vehicles from Lobs Holes since the inspection, evidence of communication of requirements or a change of process could not be provided.	<p>Agreed Actions:</p> <ul style="list-style-type: none"> - Improve the internal FGJV event / incident reporting system to capture issues identified by agencies / regulators, and ensure the issues raised are adequately followed up and addressed. - Provide formal communications / instructions to the heavy vehicle (HV) companies to ensure HVs are appropriately scheduled to minimise convoy lengths. - Develop and install signage at the exit of each site noting the requirement to reduce convoy lengths. <p>Responsibility: FGJV</p> <p>Due Date: 11 October 2021 and ongoing.</p>	07/21/ OBS 2	Compliant Observation

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
17.	Sch 3 Cond 57	<p>Prior to the commencement of construction on the Rock Forest site, the Proponent must prepare a Construction Noise Management Plan for the development on site to the satisfaction of the Planning Secretary. This plan must:</p> <p>(c) include a program to monitor and publicly report on the effectiveness of these measures.</p>	<p>Whilst Table 2-1: <i>Conditions of approval relevant to construction noise management</i> of the CNMP references the requirement to publicly report on the effectiveness of the noise minimisation and notes it is addressed in Table 7-1, there is no reference to public reporting in Table 7-1 – Noise Monitoring Program.</p> <p><i>It is acknowledged that Section 7.5 of the CNMP identifies that reporting requirements and responsibilities are documented in Section 8.4 of the EMS.</i></p>	<p>Agreed Actions:</p> <ul style="list-style-type: none"> Review and revise the Construction Noise Management Plan – Rock Forest (CNMP – RF) to clarify how public reporting on the effectiveness of measures will be addressed. <p>Responsibility: FGJV / SHL</p> <p>Due Date: 11 October 2021</p>	07/21/ OBS 3	Compliant Observation
18.	S3 Cond 45 (d)	The Proponent must: (d) provide sufficient parking on site for all vehicles and ensure vehicles associated with the development do not park on the public road network;	<p>Whilst it is reported that parking is provided on site, there have been some reports from NPWS (to FGJV/Snowy) of private vehicles parked on the roads and at Three Mile Dam.</p> <p>It was stated that this issue had been communicated to relevant parties by the Transport department, however evidence of written communications could not be provided.</p>	<p>Completed Actions:</p> <ul style="list-style-type: none"> Reiterated that project personnel are not to park on the public road network at Pre-start meeting conducted on 14 July 2021. Reinforce message through pre-starts / toolbox talks / other means, periodically as required. <p>Responsibility: FGJV Due date: 14 July 2021 Status: Closed and ongoing.</p>	07/21/ OBS 4	Compliant Observation

No	Condition / requirement Reference	Requirement	Audit Finding	Proposed / Agreed Actions / Recommendations	Finding no. & rating (NC, OBS/ OFI)	Compliance Status
19.	Sch 2, Cond 13	The Proponent must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition;	Whilst the audit found that detailed plant and equipment maintenance programs were in place, minor spills from hydraulic hoses have been a regular occurrence on the project.	<p>Agreed Actions:</p> <ul style="list-style-type: none"> – FGJV will continue to implement a program to investigate and minimise the frequency of minor spills. <p>Responsibility: FGJV</p> <p>Due date: Outcomes to be reviewed in October 2021</p> <p>Auditor note: It is recognised that there is a positive culture of reporting minor spills, and this should not change.</p>	07/21/ OFI 1	Compliant Opportunity for Improvement
20.	Transport Management Plan Sect 5.6.1	<p>Vehicle Movement Plans and Heavy Vehicle Haulage Routes: Vehicle Movement Plans (VMPs) will be developed for both external and internal roads.</p> <p>VMPs will be used to communicate approved heavy haulage routes and include travel directions, permitted intersection turning movements, speeds, approved parking, lay-up areas (including Polo Flat, Rock Forest, the Link Road turn around and project sites), areas off-limits to parking, types / size of trucks to be used and any traffic control required.</p>	Whilst evidence was provided to indicate that plans and documents were prepared to communicate approved heavy haulage routes, travel directions, intersection turning requirements, speeds, parking etc, these documents were not named as VMPs.	<p>Recommendation: FGJV should ensure that the processes and named plans described within the Transport Management Plan are consistent with actual practice.</p> <p>Responsibility: FGJV</p> <p>Due Date: 17 January 2022</p>	07/21/ OFI 2	Compliant Opportunity for Improvement

3.3. Previous Audit findings – Actions, Progress and Status

Table 6 - Previous Audit Findings Follow-up Summary

No	Cond / req't Ref.	Requirement	Previous audit findings and agreed actions / recommendations	Follow-up action notes	Finding rating (NC, OBS / OFI)	Follow-up Status
1.	Sch 2 Cond 2 (b)	The Proponent must carry out the development: c) generally, in accordance with the Exploratory Works and Main Works; and d) in accordance with the conditions of this approval.	Terms of Approval Non compliances have been raised against conditions of consent at this audit, and as such a non-compliance is triggered against part (b) of this condition. No action required	No action required	01-21/NC 1	Closed
2.	Schedule 3, Cond 30 (n) & (p) Water Management Plan Surface Water Management Plan	30 (n): minimise the risk of spills or leaks on site, and clean up any spills or leaks as quickly as possible 30 (p): store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards"	Risk of spill or leaks The site inspection at, and en-route to Lobs Hole identified three (3) instances of inadequate controls to prevent leaks or spills. Refer to report for photos. a) Storage of liquid substances The site inspection found that a bunded pallet containing "Class A Foam Liquid Concentrate" at Lobs Hole was overloaded and stored outside without shelter. The end row of containers was overhanging the edge of the pallet increasing the risk of spillage. The pallet was also positioned where it could be struck by reversing vehicles. (Refer to photo LH45). Completed/Agreed Actions: 1. Remove overhanging containers (complete);	Actions against agreed actions: 1. Overhanging containers were removed shortly after audit finding was raised at Audit #1 2. Evidence was provided that the pallet was moved away from vehicle movements. 3. Snowy Hydro commissioned an internal Hazardous Chemical Management Audit by EMM to assess chemical management of the Snowy Hydro 2.0 site operated by Future Generation Joint Venture (FGJV). The audit was conducted on 4/03/21, and the report was issued 24/03/2021. The audit identified 22 non-compliances and concluded there is a need for a full and thorough review of all aspects of FGJV's	01-21/NC 2	Closed

No	Cond / req't Ref.	Requirement	Previous audit findings and agreed actions / recommendations	Follow-up action notes	Finding rating (NC, OBS / OFI)	Follow-up Status
			<p>2. Re-position pallet away from areas of vehicle movement;</p> <p>3. Complete a targeted Chemical Handling and Management audit and implement specific actions accordingly (draft audit report issued to FGJV 1/4/21, final audit report to be issued by end April 2021); (in progress).</p> <p>4. Provide specific direction to site supervisors that all chemicals need to be stored in a bunded location in accordance with approved Management Plans and Australian Standards</p> <p>Responsibility: Snowy Hydro / FG JV Proposed completion date: 01/05/21</p>	<p>hazardous chemical management. The report was provided to FGJV. A spreadsheet by FGJV dated 20/07/2021 and submitted to SHL was sighted showing responses and status of findings, indicating that 18 of the non-compliances were still in open status, and were in progress.</p> <p>4. Evidence was sighted of pre-starts and toolbox talks conducted to address chemical and hydrocarbon storage.</p> <p>Sufficient evidence was provided to close out this finding, however further issues relating to chemical storage were identified and raised as part of Audit #2.</p>		
			<p>b) Storage of chemicals (Ad Blue) without bunding Ad Blue containers (mostly empty, however some contained product) were stored on a timber (non-bunded) pallet at a Ravine Road site office/stockpile area (refer to Photo LH12). Agreed Actions:</p> <ul style="list-style-type: none"> Ad Blue containers are now stored in a bunded container at R5. <p>Responsibility: Snowy Hydro FG JV Proposed completion date: 01/05/21</p>	<ul style="list-style-type: none"> Photo of bunded storage (in container) – located at R5. 	01-21/NC 2	Closed

No	Cond / req't Ref.	Requirement	Previous audit findings and agreed actions / recommendations	Follow-up action notes	Finding rating (NC, OBS / OFI)	Follow-up Status
			<p>c) Spill prevention / portable bunding The portable bund around the generator on the shore of Talbingo Reservoir at Lobs Hole was not adequately supported (sides falling down) leading to reduced capacity to contain a leak or spill (refer to Photo LH29). Agreed Actions: As above Responsibility: Snowy Hydro / FGJV JV Proposed completion date: 01/05/21</p>	<p>Evidence of actions sighted:</p> <ul style="list-style-type: none"> • Photos (25/06/21) showing new bund around generator. • Photo (July 2021) of self-bunded generator. <p>It was stated that the permanent design is being worked on to house the pump in the future.</p>	01-21/NC 2	Closed
3.	Sch 4 Cond 6	The Proponent must notify the Department and NPWS via the Major Projects Portal immediately after it becomes aware of an incident on site. This notice must set out the location and nature of the incident.	<p>Incident Reporting The following incidents were not notified to the Department or NPWS within the required timeframes in accordance to Condition 6 of Schedule 4:</p> <ul style="list-style-type: none"> – Incident on 1 January 2021 in relation to the stonewall discharge at Kelly Plain, Tantangara was notified to the Department on 20 January 2021 – Incident on 13 January in relation of a spill at the Ravine Road Communication Tower was notified to the Department on 27 January 2021 <p>In a letter from the Department dated 8 February 2021, the proponent was reminded to ensure all incidents and non-compliances are reported to all relevant agencies within required timeframes. Agreed Actions: SHL to implement a system to ensure that all incidents are reported to DPIE via the Major Projects Portal within the required time frames. Responsibility: Snowy Hydro Proposed completion date: 01/05/21</p>	<p>It was reported that there have been no incidents that have required notification to the Department or NPWS (under the definition of an incident) since the last audit.</p> <p>Improvements to the initial incident reporting form have been made to enable identification of externally reportable incidents.</p>	01-21/NC 3	Closed

No	Cond / req't Ref.	Requirement	Previous audit findings and agreed actions / recommendations	Follow-up action notes	Finding rating (NC, OBS / OFI)	Follow-up Status
4.	Sch 2, Cond 13(c) Sch 3, Cond 17 (i) Biodiversity Management Plan Section 5.1 Sch 4 Cond 11	The Proponent must ensure that all plant and equipment used on site, or in connection with the development, is: (c) kept free of weeds, seeds and pathogens when entering or leaving the site	<p>Weed mitigation – light vehicles and plant</p> <p>Whilst weed mitigation measures are generally implemented in accordance with the Biodiversity Management Plan, it is considered that improvements to the effectiveness of the controls for the movement of vehicles are required.</p> <p>At the Tantangara site, the prevalence of Ox-eye Daisy (see photo TM 15) is a key issue of concern and strict hygiene protocols are required to avoid spreading this highly invasive species during construction activities.</p> <p>Current practices for light vehicle washing involved drivers washing down the vehicle with a high-pressure spray in accordance with instructions, and completing a Hygiene checklist / declaration form when leaving site. If persons undertaking the washdown are inadequately trained or not knowledgeable enough regarding technique or the reason for the cleaning process, there is some potential for cleaning to be inadequate (refer to Photos TM17 to TM19).</p> <p>It is recognised that a permanent wash-down facility will be installed in future, however it should be noted that the early clearance activities pose a higher level of risk regarding weed spread than later stages due to a higher likelihood of encountering uncleared/partially cleared land infested with weed seeds.</p> <p>It was also noted that a sample hygiene declaration (to minimise spread of weeds) was not adequately completed, with part of</p>	<p>The majority of the Auditor Recommendations (April 2021) relating to this finding, and the actions in the Audit Response to DPIE (June 2021) had not been addressed / completed at the time of the audit. The finding has therefore been escalated to non-compliance under Schedule 4, Condition 10. Refer to new finding – non-compliance #2.</p> <p>Status of actions vs Auditor Recommendations detailed below:</p> <p>(i) Appoint dedicated, trained and competent wash-down person / inspector – Status: not undertaken;</p> <p>(ii) Implement more robust process to review hygiene declarations: Status: A review of completed hygiene declaration found that many are still signed off by the operator of the plant / vehicle (minimal improvement noted)</p> <p>(iii) Consider risk profile of different vehicle / plant types and their related activities (e.g., heavy plant located in one place for duration vs light vehicles frequently moving to other sites). Status: no evidence this has been undertaken.</p> <p>(iv) Install permanent wash-down / wheel wash facilities ASAP. Status: in progress as at 14 July 2021.</p> <p>Status of the commitments made in the Snowy Hydro proposed action /</p>	01-21/OBS1	Remains Open Escalated to NC under Sch 4 Cond 10 – see new findings – NC2

No	Cond / req't Ref.	Requirement	Previous audit findings and agreed actions / recommendations	Follow-up action notes	Finding rating (NC, OBS / OFI)	Follow-up Status
			<p>the "Body and Engine Bay" section not completed.</p> <p>Proposed action (SHL response):</p> <ul style="list-style-type: none"> - Snowy/ FGJV to review the existing method of vehicle washdown specifically at Tantangara (by 1/06/21) <p>Auditor Recommendations:</p> <ul style="list-style-type: none"> - Given the issue was identified and discussed in January 2021, the timeframe proposed by SHL for action is considered to be inappropriate. Specific risk-based actions need to be determined, documented and implemented urgently. Actions to be considered include (but are not limited to): <ul style="list-style-type: none"> i. Appoint dedicated, trained and competent wash-down person / inspector (potentially gatehouse staff); ii. Implement more robust process to review hygiene declarations; iii. Consider risk profile of different vehicle / plant types and their related activities (e.g. - heavy plant located in one place for duration vs light vehicles frequently moving to other sites); iv. Install permanent wash-down / wheel wash facilities ASAP. <p>Responsibility: Snowy Hydro / Future Generation JV</p> <p>Proposed completion date: 01/05/21</p>	<p>response to DPIE at the time of the audit are detailed below:</p> <ul style="list-style-type: none"> • FGJV in the process of installing permanent washdown facilities at Lobs Hole, with the crews to then install the washdown facilities at Tantangara. Status – not completed – see (iv) above) • Operational procedure including training to be provided for washbays. Status: No evidence of new procedure or training to date; • Weed hygiene declaration to be reviewed that is in line with the installation of permanent washbays. Status: No evidence of review (see (ii) above 		

No	Cond / req't Ref.	Requirement	Previous audit findings and agreed actions / recommendations	Follow-up action notes	Finding rating (NC, OBS / OFI)	Follow-up Status
5.	Biodiversity Management Plan Table 5-1 BM08	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.	<p>Clearing limit / disturbance footprint delineation Various types / colours of flagging / fencing delineating no-go areas were installed at Lobs Hole, particularly in relation to exploratory works and main works the flagging colours are different.</p> <p>Agreed Actions: Review of colouring and type of flagging / boundary delineation to ensure there is consistency wherever possible. This will minimise potential for misunderstanding on-site.</p> <p>Responsibility: Future Generation JV</p> <p>Proposed completion date: 01/05/21</p>	<p>Interview with FGJV indicated that a review had been undertaken.</p> <p>It was stated that the pink rope is project boundary / construction envelope; and blue rope is clearing boundary.</p> <p>For the legacy exploratory works areas, blue and white flagging remains.</p>	01-21/OBS2	Closed
6.	Management System (ISO 14001) Non-Conformity and Corrective Action.	ISO 14001 cl. 10.2 When a non-conformity occurs, the organisation shall: a) react to the non-conformity and, as applicable: 1) take action to control and correct it; 2) deal with the consequences, including mitigating adverse environmental impacts; b) evaluate the need for action to eliminate the causes....	<p>Internal / Contractor audits Whilst it was positive that the internal / Contractor audits had been conducted by Snowy Hydro early in the construction process, there was limited evidence provided to demonstrate that the findings from the following three audits conducted to date were formally communicated to the Contractors, FGJV:</p> <ul style="list-style-type: none"> - (Bushfire Preparedness (Lobs Hole) documenting 21 negative findings; - Biodiversity Management Plan - Clearing and Grubbing (at ECVT – Lobs Hole) documenting one negative finding; and - Spoil Management Plan - Topsoil Management (Tantangara) documenting 	<p>Improvements in process have been noted. The following evidence was sighted: SHL:</p> <ul style="list-style-type: none"> • Snowy 2.0 Main Works Environmental Assurance Inspection and Audit Procedure dated July 2021 (Rev A). • Aconex correspondence dated 12 July 2021 – new procedure and new function in Aconex to allow “Audit Observation” for use in documenting audit actions. • Topsoil Audit Actions Summary 16 May 2021 – responses up to 9 July 2021 by FGJV. 	01-21/OBS3	Closed

No	Cond / req't Ref.	Requirement	Previous audit findings and agreed actions / recommendations	Follow-up action notes	Finding rating (NC, OBS / OFI)	Follow-up Status
		c) implement any action needed.	<p>fourteen (14) "Actions" and nine (9) "Recommendations"</p> <p>Limited evidence was provided to demonstrate that a formal corrective action system had been implemented to ensure appropriate corrective actions had been implemented and closed out.</p> <p>It was noted that a "Site Instruction" was sent to FGJV regarding the Biodiversity Management Plan, however no evidence of a response from FGJV was provided.</p> <p>Agreed Actions:</p> <ul style="list-style-type: none"> • Implement a formal corrective action process for items raised in internal and Contractor Environmental Audits; • Provide training / instruction to SHL audit team on the correct processes for raising corrective actions out of internal and contractor audits; • Monitor the effectiveness of the process and ensure corrective actions taken by SHL and the Contractors are appropriate, effective and prevent or minimise potential for recurrence. <p>Responsibility: Snowy Hydro Limited</p> <p>Proposed completion date: 01/07/21</p>	<p>FGJV maintains a Corrective Actions Register, which is tracked and managed by the Environmental Team.</p> <p>Snowy Hydro has prepared a new procedure – Environmental Assurance Inspection Procedure (July 2021), which documents the revised action tracking and escalation process – tracked through Aconex. Training has been provided and a review of effectiveness is due in September 2021.</p> <p>The corrective action process has improved and will be re-assessed at future audits.</p>		

No	Cond / req't Ref.	Requirement	Previous audit findings and agreed actions / recommendations	Follow-up action notes	Finding rating (NC, OBS / OFI)	Follow-up Status
7.	REMM CONTAM-08 EMS Sect 33 EMS Table 3-2	An unexpected finds procedure will be included in the CEMP. Workers will be trained to identify potential contamination that may be encountered during construction	<p>Unexpected Finds Procedure – Contamination Whilst the induction training material refers to “signs of contamination” and a brief summary of what to do if contamination is encountered, there was no reference to the Unexpected Finds Procedure – Contamination.</p> <p>At the time of the audit, a copy of the Unexpected Finds Procedure – Contamination could not initially be located.</p> <p>Proposed Actions:</p> <ul style="list-style-type: none"> • Induction training material to be revised and updated to include reference to the Unexpected Finds Procedure • Copies of the Unexpected Finds Procedure - Contamination to be made available to all relevant workers (examples could include: display on Notice Boards, handouts, discussed at toolbox talks, as Appendix or attachment to training material). <p>Responsibility: FGJV Proposed Completion Date: 01/06/21</p>	<p>At the time of Audit #2, the induction material had not yet been updated, however evidence of update was provided on 19 July that the induction material was updated to include reference to the Unexpected Finds for Contamination as per S2-FGJV-ENV-PLN-0049.</p> <ul style="list-style-type: none"> – Pre-start briefing 12 July 2021 – Lobs Hole note to Supervisors – ensure Unexpected Finds – Contaminated Lands flowchart is read out and explained to all personnel and printed and attached to notice boards at all work fronts. <p>The Unexpected Finds Procedure was posed on site notice boards (however, it did not have “Contamination” in the title).</p>	01-21/OBS4	Closed
8.	Schedule 3 Condition 17 (k)	The Proponent must: (k) Minimise the light spill from night works, including directional and LED lighting	<p>Light spill mitigation Whilst evidence was provided that measures are in place to minimise light spill at the “long term” work sites such as the Tantangara Adit and TBM site, the inspection checklist used for nightworks lighting (individual sites such as pipeline road) only partially addresses the implementation requirements documented in</p>	<p>Lighting plans continue to be developed. Sighted the ECVT and MAT Portal lighting plans and it was advised that other areas are planned to be completed (e.g. – gate house).</p>	01-21/OFI 1	Closed

No	Cond / req't Ref.	Requirement	Previous audit findings and agreed actions / recommendations	Follow-up action notes	Finding rating (NC, OBS / OFI)	Follow-up Status
			<p>BM 23 from the Biodiversity Management Plan.</p> <p>Questions that partially address the requirement are:</p> <p>Question 12 - "Lighting is adjusted so as not to be a hazard to others?" and;</p> <p>Question 13 - "White lights are not in use or directed towards marine environments?"</p> <p>Recommendation:</p> <p>It is recommended that the nightworks lighting checklist (or other tools) be revised to include reference to the requirements of this condition and the commitments in the Biodiversity Management Plan (i.e. - lighting directed downwards and away from known locations of sensitive habitat).</p> <p>Responsibility: Future Generation JV Proposed completion date: 01/06/21</p>	<p>The Environmental Loss Prevention Inspections (LPIs) include consideration of light spill.</p>		
9.	Sch 3 Cond 52 EMS Section 5.8	The proponent must: (a) minimise the waste generated by the development	<p>Resource wastage / plastic pollution</p> <p>It was observed that plastic water bottles are provided extensively to workers due to lack of bulk water supplies at work sites.</p> <p>Recommendation:</p> <p>Consideration should be given to providing bulk water supplies / water coolers / reusable bottles as an alternative to single use water bottles in the future.</p> <p>Responsibility: Future Generation JV Proposed completion date: 01/07/21</p>	<p>Potable water is now provided on site sourced from Talbingo reservoir. It was advised that water bottles are now being recycled through being taken to Return and Earn centres.</p> <p>FGJV noted they are still looking at reusable bottles, but this has not yet been fully considered.</p> <p>Plastic cutlery has been replaced with bamboo.</p>	01-21/OFI 2	Closed

3.4. Summary of Environmental Performance

3.4.1. Internal/Contractor Audits and Corrective Action

It was reported in the previous IEA in January 2021, that there was limited evidence of a formal corrective action system to ensure appropriate responses to audit findings and implementation of corrective actions. Since then, Snowy Hydro have developed an Environmental Assurance Inspection and Audit Procedure which includes a process for action tracking and escalation. The corrective action process involves raising any issues requiring action into Aconex Oracle. The process was being trialled and implemented and appears to be an improvement with actions from a topsoil audit and chemicals audit sighted. Snowy Hydro should continue to monitor the effectiveness of the system.

3.4.2. Environmental Management, Monitoring, Reporting, Access to Information

Overall, the reporting, notification and submission of required reports, strategies and events was not adequately implemented, resulting in eight (8) non-compliances being raised in this area. For details of each non-compliance, refer to Table 5 – Independent Audit Findings. In summary, the following non-compliances were raised:

- A Digital Strategy was required to be developed within 6 months of the commencement of construction to the satisfaction of the Planning Secretary. Whilst a Digital Strategy has been prepared, the Strategy had not been prepared within the required 6-month time frame (**Refer to non-compliance 3**);
- Evidence was not provided to demonstrate that the program to monitor and publicly report on the surface water impacts of the development had been implemented as required by Sch 3 Condition 31 (c). Specifically, Environmental Water Reports had not been prepared and reported to Snowy Hydro and other agencies on a quarterly basis as required in the Water Management plan; and had not been made publicly available. (**Refer to non-compliance 5**);
- Evidence was not provided to indicate that any of the approved strategies, plans or programs had been reviewed following submission of incident reports or the Independent Environmental Audit as required by Sch. 4 Condition 4 (**Refer to non-compliance 8**);
- An Incident that was reported to the EPA on 26 May 2021 as required by EPL 21266 involving the overtopping of controls was not also notified to the Department or NPWS as required by Schedule 4, Condition 6 (a). The definition of an incident for reporting to EPA and under Condition 6 are similar (both referring to “causes or threatens to cause material harm”), and therefore, notifications of incidents are required for both agencies (**Refer to non-compliance 9**);
- Non-compliances from IEA #1 were not notified to the Department via the Major Projects Portal within the required 7-day timeframe in accordance with Sch. 4 Condition 7 (**Refer to non-compliance 10**);
- The Independent Environmental Audit (IEA) Report #1, response to the recommendations and the proposed audit action plan were not submitted to the Planning Secretary within the submission timeframe required by Sch 4 Condition 10 (**Refer to non-compliance 11**);
- A number of documents required to be made publicly available on the website in accordance with Sch. 4 Condition 12 were not on the Project website at the time of the audit (**Refer to non-compliance 12**);

- National Parks and Wildlife (NPWS) were not notified of overtopping events as required by the Trigger Action Response Plan 2 (TARP 2), which is part of the approved Surface Water Management Plan (**Refer to non-compliance 13**).

3.4.3. Water Management, Erosion and Sediment Control, Chemicals and Fuels

Based on evidence sighted, including the virtual site inspection of Lobs Hole, photos and drone footage provided, review of external erosion and sediment control by experts and a review of internal inspection reports, it appears that overall, appropriate erosion and sediment controls have been implemented. However, further issues relating to storage of hazardous substances were identified (non-compliance also raised at Audit #1).

The following commentary provides an overview of performance in relation to water management, erosion and sediment control and hazardous substances management:

- A comprehensive review of Erosion and Sediment controls was undertaken as part of an audit by Strategic Environmental and Engineering Consulting (SEEC). The report found that overall, erosion and sediment controls are generally adequately-planned (with the exceptions noted in the report) and are mostly well-implemented. It was noted that SEEC are to be engaged on the project to provide fortnightly monthly inspections and advice;
- FGJV was working to maximise the recycling and reuse of water on site including treated effluent. FGJV commissioned a preliminary assessment of permissibility, and a Human Health Risk Assessment for treated effluent reuse, and based on the conclusions, are currently reusing the treated effluent;
- The Sewage Treatment Plant (STP) at Lobs Hole was operational at the time of the audit; however, no treated effluent had yet been discharged to Talbingo Reservoir. The water was being re-used on site. The Project EPL had been varied on 8th April 2021 and is to be issued with special conditions requiring FGJV to submit a Mixing Zone Verification Program prior to discharging to the reservoir;
- The generation of process water had commenced since the commencement of operation of the TBM. It was stated that all process water is being stored in designated tanks and is being re-used in the TBMs. No excess treated water has been discharged to either the Talbingo or Tantangara reservoirs to date;
- A non-compliance was raised at Audit #1 regarding the inadequate / inappropriate storage of liquid substances. Whilst the specific issues raised in Audit #1 were addressed and closed out, further issues were identified regarding storage of chemicals and hydrocarbon products. The virtual site inspection at Lob Hole found that whilst there appeared to be improved overall storage practices (e.g., substances stored in bunded areas), incompatible storage of substances and out of date SDSs at the mechanical workshop were identified (**Refer to Non-Compliance 4**).

3.4.4. Spoil Management – Tunnel Spoil Classification

At the time of the audit, a small volume of spoil had been generated at Lobs Hole, and testing of the material was underway. Initial findings of the spoil testing suggest the material contains Potentially Acid Forming (PAF) material. At a local level, an XRF gun is being used on site to detect sulphur as an early field-based indicator of acid forming properties prior to testing at an on-site lab and external lab.

An Operational Material Characterisation and Handling Plan for Lobs Hole provided detailed information on the processes to be followed to characterise the material, and provided information on the process for transportation, handling validation and emplacement.

3.4.5. Topsoil and Subsoil Management

An internal topsoil audit had been conducted by Snowy Hydro in late 2020, and a number of findings were raised at the time. The previous audit identified that the corrective action process required improvement, and since then, a system has been implemented using Aconex Oracle, and responses by the contractors are now tracked and verified by Snowy Hydro.

Whilst there appear to be improvements in topsoil management, the virtual site inspection noted that topsoils, subsoils and mulch material were mixed and not adequately separated. Signage was also inadequate, with only one sign sighted in the vicinity – Mulch. (**Refer to Observation 1**)

3.4.6. Plant and Equipment

Based on the evidence sighted, it was found that there are various processes in place to ensure that plant and equipment is maintained in a proper and efficient condition. A Workshop supervisor was interviewed, and various plant and equipment inspection forms were sighted and reviewed. The forms included a variety of checks including for absence of oil, fuel, and hydraulic fluid leaks, spoil /material/weeds, hygiene forms etc.

Weekly environmental inspections include review of any “abnormal” conditions relating to plant and equipment, and are a component in ensuring operations in a proper and efficient manner. Environmental Inspections are in addition to the normal machine inspection requirements.

At the time of the audit, maintenance was being undertaken in a temporary workshop, and it was advised that a new, more permanent workshop would come into operation in around September 2021.

Whilst the audit found that detailed plant and equipment maintenance programs were in place, minor spills from hydraulic hoses have been a regular occurrence on the project. An interview with the Workshop Supervisor indicated that the hoses installed on plant are temperature rated (plus and minus) and sheaths are used to protect hoses where possible. An opportunity for improvement was raised for FGJV to continue to implement a program to investigate and minimise the frequency of minor spills (refer to **Opportunity for Improvement 1**).

An Observation was raised at the previous audit regarding potentially inadequate processes for washing down of vehicles at Tantangara where the spread of Ox-eye daisy is a risk.

A review of the actions taken to address the issue found that the majority of recommendations made, and commitments made in the formal response submitted to DPIE had not been adequately addressed / actioned. Refer to Biodiversity section and **Non-Compliance 2**.

3.4.7. Biodiversity

The previous audit identified that overall, appropriate measures were in place to manage biodiversity in accordance with the conditions of consent and the commitments made in the Biodiversity Management Plan. This second audit focused on ongoing compliance in key areas. The following commentary provides an overview of performance in key areas:

- FGJV continues to track and monitor the clearing of native vegetation and habitat in detail;
- The Clearing Register tracks the predicted impacts on various PCTs and habitats. A review of the register found that there had been no exceedance of limits to date;

- Clearing (Land Disturbance) Permits continue to be used as a key tool by the construction contractors to manage and ensure compliance with land clearing requirements;
- In-Vehicle Management System (IVMS) has been installed on project vehicles (verified at previous audit), and it was verbally confirmed by FGJV and SHL that this requirement is ongoing, including for subcontractors to minimise fauna strike;
- Fauna strike monitoring has been conducted, with results indicating that there has been no reported or observed fauna strikes on threatened species;
- A trial underpass had been installed prior to Audit #1 at R4 Ravine Road with a further five (5) planned to be installed. At the time of this second audit, underpasses had been delivered to site and were due to be installed in the following week, with enhancements to camera provisions and positioning as an improvement opportunity gained from the trial;
- Pre-clearing survey reports continue to be prepared by ecologists prior to clearing providing detailed information for input to the clearing permits to ensure required protocols are followed;
- Post-clearing survey reports by ecologists continue to report on the actual outcomes of the clearing, including salvage, seed collection and other actions;
- The plant pathogen *Phytophthora* has been identified as present at Lobs Hole through Snowy Hydro monitoring with a known area of infestation at Main Yard and one other smaller area. Interviews with FGJV indicated that measures were put in place including a manned boot wash, decontamination area set up for plant and equipment (using Phyto-clean), wheel wash installed, inspections undertaken following cleaning, and completion of hygiene forms. The virtual inspection confirmed general implementation of these measures;
- FGJV maintain a fauna encounter register and a Pest Trapping Register and an ad hoc live trapping is undertaken on an as-needed basis;
- An Observation was raised at the previous audit regarding potentially inadequate processes for washing down of vehicles at Tantangara where the spread of Ox-eye daisy is a risk. A review of the actions taken to address the issue found that the majority of recommendations made by the auditor, and commitments made in the formal response submitted to DPIE had not been adequately addressed / actioned. The previous Observation has therefore been re-raised as a non-compliance (**Refer to Non-Compliance 2**). At the time of the audit, the permanent wheel wash facilities had not yet been completed, and additional measures to minimise the risk of spread of weeds did not appear to have been implemented.

3.4.8. Transport and Traffic Management, Road Upgrades

Transport, traffic management and road upgrades were identified as key areas of concern by DPIE, NPWS and Transport for NSW as part of the pre-audit consultation and scope input process (Refer to Table 1 - Agency Consultation Summary Table). As such, key aspects of the Transport Management Plan relating to these areas of concern were included in the audit scope as areas of focus. Aspects of traffic and transport were also audited at Audit #1, and these were not reassessed, except where specifically identified as a focus area.

It was reported that NPWS had raised some issues regarding the adequacy of the maintenance of Lobs Hole Ravine Road, and Tantangara and Marica. Whilst a site inspection could not be conducted due to Covid-19 restrictions, evidence was provided to indicate that significant resources were being allocated to road maintenance. It was considered that sufficient evidence was provided to indicate that in general, roads are being appropriately maintained; however, this will be reassessed at future audits when physical site visits are possible.

Positive observations included:

- In-Vehicle Management System (IVMS) continues to be installed in project vehicles to ensure the speed limit is observed at all times.
- The Project website included a link to a “roads and access” webpage with details of roads currently open and closed to the public, traffic updates, planned heavy vehicle loads and planned intersection upgrade notices.

A number of findings were raised in regards to transport, traffic management and road upgrades and are summarised below:

- Evidence could not be provided to demonstrate that all the roads and intersection upgrades listed in Table 5-1 had been carried out in accordance with specified timeframes to the satisfaction of the relevant roads authority. NPWS is the relevant roads authority for the works listed in Table 5-1 (**Refer to Non-Compliance 6**);
- A Quarterly Cumulative Summary Report had not been prepared at the time of the audit, and therefore had not been submitted to SHL or to the project website as per the requirements of Table 6-1 of the Transport Management Plan (**Refer to Non-Compliance 7**);
- Insufficient evidence could be provided to demonstrate that all traffic incidents that required notification were notified to the appropriate authorities. Relevant authorities include NPWS (within KNP), TfNSW and DPIE (dependent on location, type, severity, etc.) (**Refer to Non-Compliance 14**);
- A site inspection conducted by NPWS and DPIE on 23 & 24 June 2021 identified some issues in relation to convoy length (up to 7 trucks observed in convoy) leaving Lobs Hole Ravine Road. Whilst it was stated that correspondence was issued by the Transport Department to address this issue, and that a new system has been implemented to stagger the exit of heavy vehicles from Lobs Holes since the inspection, evidence of communication of requirements or a change of process could not be provided (**Refer to Observation 2**);
- Whilst it was reported that parking is provided on site, there have been some reports from NPWS (to FGJV / Snowy) of private vehicles parked on the roads and at Three Mile Dam. It was stated that this issue had been communicated to relevant parties by the FGJV Transport department; however, evidence of written communications could not be provided (**Refer to Observation 4**);
- Whilst evidence was provided to indicate that plans and documents were prepared to communicate approved heavy haulage routes, travel directions, intersection turning requirements, speeds, parking, etc., these documents were not named as VMPs (**Refer to Opportunity for Improvement 2**).

3.4.9. Site Inspection Photographs

Site inspections were limited in scope at this audit due to Covid-19 lockdowns during and subsequent to the audit period. Travel to the site by the auditor was not possible on the initial planned dates (14 – 16 July). A “wait and see” approach was adopted for two weeks to determine if it was possible to travel to site in the near future.

Due to the worsening pandemic lockdowns, a decision was made to undertake the site inspection remotely at Lobs Hole, and supplement the inspections with provision of drone footage and photographs at sites which did not have internet connections to support a remote inspection (Tantangara and Marica, Lobs Hole Ravine Road and other project roads). The approach was discussed and sanctioned verbally with DPIE prior to the virtual site visit.

The virtual site inspections at Lobs Hole were held on 2 and 3 August 2021, and included live footage visits to the main yard, fuel farm, office pad and mechanical workshop, MAT portal, Talbingo, Main Camp and Exploratory Camp. Photos were taken during the audit inspection by SHL and FGJV personnel as directed by the auditor.

Photos and drone footage were provided for Tantangara and Marica by FGJV around the time of the audit (prior and after), and snippets are provided here as supplementary information.

Commentary is provided with each photograph, and outcomes of the audit site inspections are incorporated within various sections of this report including the “Summary of Environmental Performance” section and in Table 5 – Independent Audit Findings.

Photographs from virtual site inspection Lobs Hole – 2 and 3 August 2021	
 <p>Network: 2 Aug 2021 at 1:29:35 pm AEST 55H 626097 6038861 198° SE Lobs Hole Powerline Road Cabramurra NSW 2629 Australia Kosciuszko National Park Altitude: 602.9 meter Speed: 4.3 km/h</p>	 <p>Network: 2 Aug 2021 at 1:29:41 pm AEST 55H 626070 6038489 198° SE Lobs Hole Powerline Road Cabramurra NSW 2629 Australia Kosciuszko National Park Altitude: 602.9 meter Speed: 4.3 km/h</p>
<p>LH1: Main Yard Stage 5 area – Site Entry and Hygiene checkpoint for entry – Phytophthora control</p>	<p>LH2: Main Yard – plant washdown area – Phytophthora control. Phytoclean is used to wash machinery and is required to be inspected prior to leaving the area.</p>
 <p>Network: 2 Aug 2021 at 1:29:13 pm AEST 55H 626097 6038861 213° SE Lobs Hole Powerline Road Cabramurra NSW 2629 Australia Kosciuszko National Park Altitude: 602.9 meter Speed: 0.3 km/h</p>	 <p>Network: 2 Aug 2021 at 1:34:27 pm AEST 55H 626385 6038365 224° SE Lobs Hole Powerline Road Cabramurra NSW 2629 Australia Kosciuszko National Park Altitude: 602.6 meter Speed: 0.4 km/h</p>
<p>LH3: Clean water diversion channel – Main Yard Stage 5</p>	<p>LH4: On-route to fuel farm – showing fire danger rating signage</p>

Photographs from virtual site inspection Lobs Hole – 2 and 3 August 2021



Network: 2 Aug 2021 at 1:35:57 pm AEST
 55H 626402 6038307
 110° E
 Ravine Road
 Cabramurra NSW 2629
 Australia
 Kosciuszko National Park
 Altitude: 604.7 meter
 Speed: 0.1 km/h

LH5: Entry to newly installed, purpose-built fuel farm



Network: 2 Aug 2021 at 1:36:22 pm AEST
 55H 626419 6038294
 11° N
 Ravine Road
 Cabramurra NSW 2629
 Australia
 Kosciuszko National Park
 Altitude: 603.0 meter
 Speed: 0.0 km/h

LH6: Inside the fuel farm / storage area with sump, spill kit



Network: 2 Aug 2021 at 1:39:35 pm AEST
 55H 626460 6038279
 338° N
 Ravine Road
 Cabramurra NSW 2629
 Australia
 Kosciuszko National Park
 Altitude: 600.2 meter
 Speed: 0.0 km/h

LH7: View of diesel tanks within fuel farm (each tank max 41,750 litres)



Network: 2 Aug 2021 at 1:40:52 pm AEST
 55H 626450 6038281
 45° NE
 Ravine Road
 Cabramurra NSW 2629
 Australia
 Kosciuszko National Park
 Altitude: 601.6 meter
 Speed: 0.2 km/h

LH8: Diesel bowser – within a bunded area



Network: 2 Aug 2021 at 2:13:20 pm AEST
 55H 626671 6038271
 30° NE
 Ravine Road
 Cabramurra NSW 2629
 Australia
 Kosciuszko National Park
 Altitude: 537.7 meter
 Speed: 0.1 km/h

LH9: Mechanical Workshop – office pad – showing storage of IBCs in bunded storage container



Network: 2 Aug 2021 at 2:15:37 pm AEST
 55H 626671 6038271
 58° NE
 Ravine Road
 Cabramurra NSW 2629
 Australia
 Kosciuszko National Park
 Altitude: 539.3 meter
 Speed: 0.6 km/h

LH10: Mech workshop - Portable bunds for use when working on machinery

Photographs from virtual site inspection Lobs Hole – 2 and 3 August 2021

 <p>Network: 2 Aug 2021 at 2:13:49 pm AEST 55H 626671 6038271 146° SE Ravine Road Cabramurra NSW 2629 Australia Kosciuszko National Park Altitude: 587.7 meter Speed: 0.0 km/h</p>	 <p>Network: 2 Aug 2021 at 2:24:31 pm AEST 55H 626668 6038860 137° SE Pinbeyan NSW Australia Altitude: 500.2 meter Speed: 2.4 km/h</p>
<p>LH11: Mech Workshop: Storage of oils / chemicals in bunded container – labelled containers for decanting</p>	<p>LH12: Mech Workshop - Bunded pallets with oils / chemicals – covered to prevent rain ingress.</p>
	
<p>LH13: Sediment basin in the vicinity of the mechanical workshop. Pump on bank of basin</p>	<p>LH14: Close up view of pump, positioned on bunded pad / “plant nappy”</p>
 <p>Network: 2 Aug 2021 at 1:53:22 pm AEST 55H 626615 6038818 133° SE Pinbe Hole Pipeline Road Cabramurra NSW 2629 Australia Kosciuszko National Park Altitude: 608.5 meter</p>	 <p>Network: Time is not synchronized 55H 626615 6038719 240° SE Yarrangobilly NSW 2720 Australia Kosciuszko National Park Altitude: 559.8 meter Speed: 0.3 km/h</p>
<p>LH15: Initial tunnel spoil stockpile at MAT portal – awaiting testing results prior to transport to placement areas</p>	<p>LH16: Water treatment plant at MAT Portal. IBC in bunded area for dosing</p>
 <p>Network: 3 Aug 2021 at 1:29:17 pm AEST 55H 624621 6040441 252° W Pinbeyan NSW Australia Talbingo Reservoir Altitude: 554.6 meter Speed: 0.1 km/h</p>	 <p>Network: 3 Aug 2021 at 1:40:05 pm AEST 55H 624513 6040466 97° E Pinbeyan NSW Australia Talbingo Reservoir Altitude: 552.8 meter Speed: 0.2 km/h</p>
<p>LH17: Works in the vicinity of Talbingo Reservoir. Silt curtains installed to protect reservoir water quality. Black line is discharge pipe (not yet operating)</p>	<p>LH18: Works within area that drain towards the portion protected by the silt curtain</p>

Photographs from virtual site inspection Lobs Hole – 2 and 3 August 2021



LH19: Lined diversion channel



LH20: Diversion channel flowing into area protected by silt curtain



LH21: Diversion channel along shore of Talbingo reservoir



LH22: Diversion channel and structure to control water runoff and velocity

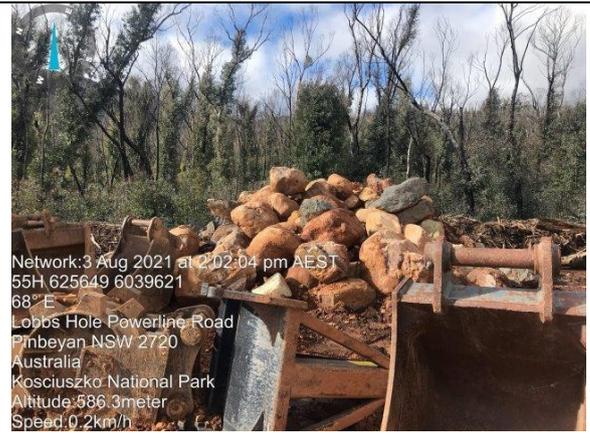


LH23: Main Camp – no-go zone with flagging



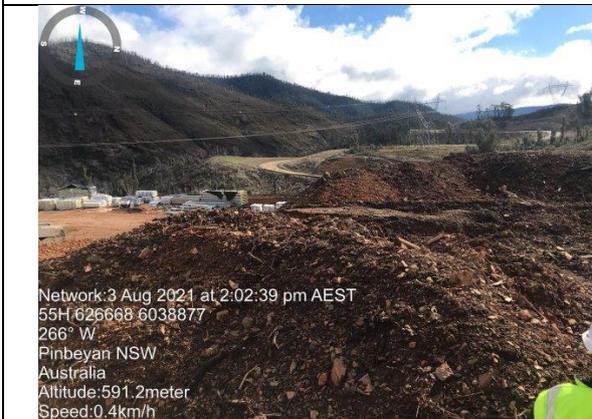
LH24: Flagged heritage area – Main camp

Photographs from virtual site inspection Lobs Hole – 2 and 3 August 2021



LH25: Main Camp – habitat tree left in situ – to be moved and retained elsewhere once area is developed

LH26: Main Camp - Rocks retained for later rehabilitation use



LH27: Main Camp – Stockpiles – mulch, topsoils and subsoils mixed (refer to Observation)

LH28: Stockpile – showing mulch, topsoils and subsoils mixed



LH29: Main Camp – Mulch signage (no signage in place for topsoil or subsoils – refer to Observation)

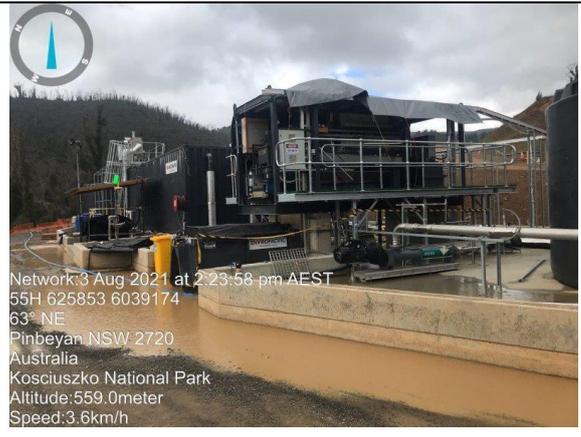
LH30: Main camp – showing lined diversion channel

Photographs from virtual site inspection Lobs Hole – 2 and 3 August 2021



Network: 3 Aug 2021 at 2:21:26 pm AEST
 55H 625788 6039084
 242° SE
 Lobbs Hole Powerline Road
 Pinbeyan NSW 2720
 Australia
 Kosciuszko National Park
 Altitude: 553.2 meter
 Speed: 0.7 km/h

LH31: Exploratory Camp near STP – water cart fill point and detention basin. Treated water from Ex-camp STP used for dust suppression and concrete batching



Network: 3 Aug 2021 at 2:23:58 pm AEST
 55H 625853 6039174
 63° NE
 Pinbeyan NSW 2720
 Australia
 Kosciuszko National Park
 Altitude: 559.0 meter
 Speed: 3.6 km/h

LH32: View of Ex-Camp Sewage treatment plant



Network: 3 Aug 2021 at 2:24:28 pm AEST
 55H 625856 6039185
 92° E
 Pinbeyan NSW 2720
 Australia
 Kosciuszko National Park
 Altitude: 560.6 meter
 Speed: 3.3 km/h

LH33: Chemical storage in bund at STP. IBC on far left contains Sodium Hypochlorite, and black drums on the right contain acid (not compatible for storage together – refer NC)



Network: 3 Aug 2021 at 2:24:54 pm AEST
 55H 625870 6039200
 181° S
 Pinbeyan NSW 2720
 Australia
 Kosciuszko National Park
 Altitude: 560.5 meter
 Speed: 0.1 km/h

LH34: View of covered Sodium Hypochlorite IBCs within the bunded area



Network: 3 Aug 2021 at 2:24:25 pm AEST
 55H 625856 6039185
 161° SE
 Pinbeyan NSW 2720
 Australia
 Kosciuszko National Park
 Altitude: 560.6 meter
 Speed: 3.3 km/h

LH35: Chemical storage in bund at STP



Network: 3 Aug 2021 at 2:24:57 pm AEST
 55H 625870 6039200
 260° W
 Pinbeyan NSW 2720
 Australia
 Kosciuszko National Park
 Altitude: 560.5 meter
 Speed: 0.1 km/h

LH36: STP treated water tanks – treated water re-used on site

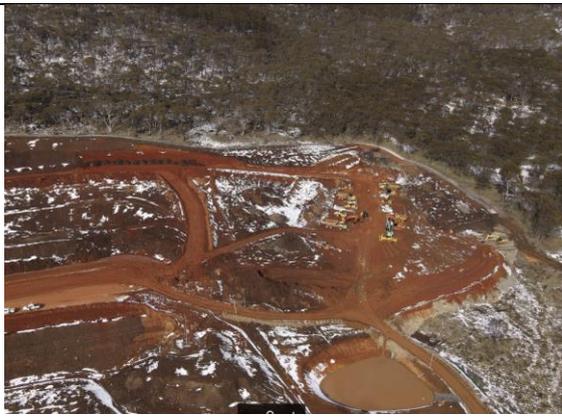
Photographs and images from drone footage provided by FGJV – Tantangara



TT01: – Aerial view of permanent washbay construction – Tantangara – 22 July 2021



TT02: Tantangara Camp – clearing for construction



TT03: Closer view of Tantangara Camp showing sediment basin, haul roads, topsoil used on batters



TT04: Aerial view of Kelly Plain Creek



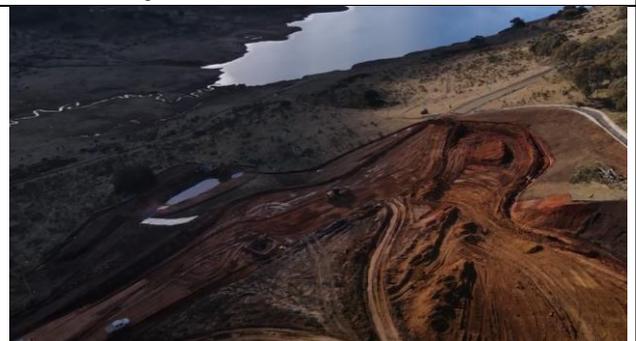
TT05: Aerial view of coffer dam construction, Tantangara



TT06: Tantangara Portal



TT07: Close-up view of Tantangara Portal



TT08- View from Tantangara Camp to Kelly Plain Creek.

Photographs and images from drone footage provided by FGJV –Marica



MC1: Marica Camp – pad laydown



MC2: Alternate view of Marica Camp



MC3: Road into Marica under construction



MC4: Marica Camp pad showing sediment basins and stabilised overflow.

3.5. Proponent Review and Response

It was identified at the previous audit that post-audit communications and provision of post-audit evidence by the Proponent, Snowy Hydro Limited to the Auditor required improvement in subsequent audits. At this audit, the provision of audit evidence was substantially improved. The process was improved primarily through more direct communications by the auditor with both Snowy Hydro and the principal contractor, Future Generation JV. Requested evidence was generally provided within a timely manner.

Responses to audit findings and the draft report were also provided in a more timely, efficient and effective manner at this second audit by both Snowy Hydro and Future Generation.

3.6. Previous Audit Follow-up

A follow-up of the findings from Audit #1 was undertaken as part of this audit. Three (3) Non-Compliances, four (4) Observations) and two (2) Opportunities for Improvement were raised at the last audit.

Of the three Non-Compliances, one had been closed prior to issue of the Audit Report, one had remained open and has been re-raised at this audit, and one was closed at this audit.

Of the four Observations, three were satisfactorily closed at this audit, and one was escalated to a Non-Compliance.

The two Opportunities for Improvement were satisfactorily closed.

For full details on the follow-up of the actions taken to address the findings, refer to Table 6.

3.7. Complaints and Incidents

As at 16 June 2021 there had been no change to the Complaints Summary since Audit #1 with latest updated complaints summary date December 2020 (**Refer to Non-Compliance 11**). However, by the commencement of the audit (13 July 2021), the website had been updated to include 2021 complaints from January to April 2021 (May report). There had been four recorded complaints in the May 2021 Report.

The complaints related to concerns from a landholder about potential noise at Rock Forest, two heavy vehicle near misses and a member of the public's vehicle being sprayed by a water truck. Discussions with the landholder were ongoing, and the driver has apologised for the unintentional spray of water. Drivers have been reminded to maintain courteous driving behaviour and the Drivers Code of Conduct.

FGJV maintains an Environmental Incident and Event Register, forward incident reports to Snowy Hydro and include details in Project Monthly Progress Reports. The monthly reports from FGJV provides a summary of environmental incidents reported on the project for the month. The majority of incidents reported for May were rated as insignificant, involving spills of hydraulic and engine oil.

An Incident was reported to the EPA on 26 May 2021 as required by EPL 21266 which involved the overtopping of controls. Under the Main Works approval, an Incident is defined as "*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*". This incident was not notified to the Department or NPWS as required by this Condition (**Refer to Non-Compliance 9**).

One event relating to an overtopping event was not reported to NPWS as required by the Trigger Action Response Plan 2 (TARP) – Stormwater Overtopping Event in the approved Surface Water Management Plan (**Refer to Non-Compliance 12**).

4.0 Appendix A – Audit Attendance Register

NAME	ORGANISATION	POSITION	ENTRY	EXIT
Chris Buscall	Snowy Hydro	Environment Lead	✓	✓
Ben Croome	Snowy Hydro	Environment Coordinator	✓	✓
John Weir	FGJV	Project HSSE Manager	✓	
Ellen Porter	FGJV	Environmental Manager	✓	✓
Other audit participants				✓
Emily Martin	Snowy Hydro	Environmental Engineer		✓
Daniel Statham	Snowy Hydro	Environmental Coordinator		✓
Maree Zannis	FGJV	Environmental Coordinator – Lobs Hole		✓
Mahlea Ryan	FGJV	Environmental Advisor - Tantangara		✓
Will Hicks	FGJV	Mechanical Workshop Supervisor		✓
Katherine Booker	FGJV	Lab supervisor (spoil testing)		✓
Mohamad Taha	FGJV	Laboratory Engineer		✓

5.0 Appendix B – Independent Audit Declaration Form

Project Name: Snowy 2.0

Consent Number: CSSI 9687

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

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

Proponent: Snowy Hydro Limited

Title of Audit Independent Environmental Audit: –

Date: September 2021

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

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

Notes:

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

Name of Auditor: Julie Dickson

Signature: 

Qualification: Exemplar Global Lead Environmental Auditor – Registration No 13573

Company: Dickson Environmental Consulting and Audit Pty Ltd

Company Address: 1113 Pacific Hwy, Cowan, NSW 2081

6.0 Appendix C – Planning Secretary Audit Team Agreement



Planning,
Industry &
Environment

Mr Chris Buscall
Environmental Compliance Lead
Snowy 2.0 Project
Snowy Hydro Limited
PO Box 332
Cooma NSW 2630
1 October 2020

Dear Chris

Snowy 2.0 Main Works SSI 9687 Auditor Approval

I refer to your request SSI-9687-PA-17 and email dated 30 September 2020 for the Secretary's approval of suitably qualified persons to prepare the Independent Environment Audits for the Snowy 2.0 Main Works (the project) SSI 9687 (the approval).

In accordance with Schedule 4 Condition 9 of SSI 9687 and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team of Dickson Environmental Consulting and Audit Pty Ltd:

- Ms Julie Dickson (Lead Auditor) and
- Mr Larry Weiss (Senior Auditor).

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

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

The Department reserves the right to request an alternate auditor or audit team for future audits.

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

If you wish to discuss the matter further, please contact me on 0429400261 or at katrina.oreilly@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. O'Reilly', enclosed in a rectangular box.

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

7.0 Appendix D – Audit Plan and Scope

Audit Plan and Scope – Snowy Hydro 2.0 Audit # 2

Project:	Snowy Hydro 2.0		
Audit Title:	Independent Environmental Audit – Environmental Compliance #2		
Auditor:	Julie Dickson DECA Pty Ltd		
Date (s) of Audit:	12 & 13 July 2021 (office-based) 2 & 3 Aug (virtual site visit) 4 Aug (office)		
Time:	08.30 – 16.30 (approx.) daily		
Location (s):	<p>Cooma: Snowy Hydro Office (conducted remotely)</p> <p>Cooma: Future Generation Joint Venture Office (conducted remotely)</p> <p>Site visits to: Lobs Hole virtual site visit (due to NSW Covid-19 lockdown situation). <i>Due to lack of reception, Marica, Rock Forest, Tantangara will not be visited virtually, however drone & video footage and photos will be requested.</i></p>		
Audit Objective:	The objective of this Independent Environmental Audit is to assess the environmental performance of the development and whether it is complying with the requirements in this approval (including the requirements of any approved strategy, plan or program) and to recommend any appropriate measures to improve environment performance of the development and approved strategies, plans, programs.		
Audit Scope:	Development Consent CSSI 9687 – Compliance to conditions of consent and other requirements relevant to the targeted Management Plans and associated systems identified as part of Snowy Hydro internal audit program. Scope will also include: Areas identified in Audit #1 as “areas to be assessed at next / future audits”, “follow-up on areas of non-compliance / observation / Opportunities for improvement” and areas identified as focus areas by agencies and authorities.		
Audit Methodology	The Audit will be undertaken in accordance with ISO 19011:2018 and will include document and record reviews, interviews, and site inspection.		
Areas of focus (from pre-audit consultation)	<p>DPIE: Incident reporting / identification / definitions, non-compliance management, tracking, follow-up actions; traffic management / TMP compliance, compliance to biodiversity / flora / fauna requirements.</p> <p>NPWS: Website reporting, external reporting of adverse traffic interactions, incident reporting and interpretation of definitions, compliance to Cond. 41 and 45, reviews of TMP, weed, pathogen and pest control, chemical and fuel spill management.</p> <p>Council and TfNSW – Traffic Management Plan (TMP), traffic management.</p>		
Audit Invitees (Required)	Name:	Organisation	Role
	Chris Buscall	Snowy Hydro	Environment Lead
	Ben Croome	Snowy Hydro	Environment Co-Ordinator
	Lachlan Bollen	Snowy Hydro	Environment Scientist
	Emily Martin	Snowy Hydro	Environment Engineer
	Kelly Palmer	Snowy Hydro	Safety Manager
	John Weir	FGJV	Project HSSE Manager
	Ellen Porter	FGJV	Environment Manager
	Mahlea Ryan	FGJV	Environment Coordinator
	Keith Dimech	FGJV	Senior Environment Advisor
Maree Zannis	FGJV	Environmental Advisor	
Invitees (Optional)	Kieran Cusack	Snowy Hydro	Project Director

AUDIT PLAN – Day 1

DAY 1 – Monday 12 July 2021			
Indicative time	Agenda item / Areas for review	Proposed attendees	Location
8.30 – 9.00 am	Opening meeting <ul style="list-style-type: none"> • Introductions, confirmation of scope, criteria, arrangements, methodology, logistics • Overview of project issues / progress / background 	All Snowy Hydro FGJV Reps	Snowy Hydro Cooma Office Remotely via Google Meet
09.00 – 10.30	Overall and administrative processes: <ul style="list-style-type: none"> – Follow-up on previous Audit #1 findings action and status (SHL component) – Submission of IEA Report to DPIE, responses (Sch 4 Cond 10); – Schedule 2 relevant conditions of approval – Internal compliance tracking processes 	Snowy Hydro Chris Buscall Ben Croome Emily Martin	
10.30 – 12.30	Schedule 3 – Specific Environmental Conditions - relevant conditions of approval including: <ul style="list-style-type: none"> – Public availability of project documentation (website); – Digital strategy; – Overview of updates on Management Plans (Spoil–location specific, Biodiversity, Transport and Traffic); – Update on Rehabilitation trials (Liz MacPhee); – Progress on fauna strike / trial underpasses; – Update on wastewater / STP and process water treatment; – Heritage - status of Archival record of history of settlement and Aboriginal heritage salvage and archive work; – Road upgrades – sign-off process update (Cond 41). 		
12.30 – 13.15	Break		
13.15 – 16.00	Sch 4 – Environmental Management, Reporting and Auditing: <ul style="list-style-type: none"> – Update of strategies, plans or programs - triggers; – Completion of any required road upgrades (if any) – Incident reporting and notification; – Reporting of non-compliances; – Reporting on Environmental Performance; – Public access to up-to-date information on project website (Cond 12) including documents, monitoring results, complaints, incidents, non-compliances, IEA Report and approved audit action plans. 	Snowy Hydro Chris Buscall Ben Croome Daniel Statham	Snowy Hydro Cooma Office Remotely via Google Meet
16.00 – 16.30	Auditor consolidation of notes	Auditor	
16.30 – 16.45	End of Day 1 debrief audit progress and outcomes to date (if required).	Snowy Hydro as required	

AUDIT PLAN – Day 2

DAY 2 – Tuesday 13 July 2021			
Indicative time	Agenda item / Areas for review	Proposed attendees	Location
08.30 – 08.45	Introduction and brief opening meeting	All (see below)	Future Generation Joint Venture Office
08.45 – 10.15	<p>General</p> <ul style="list-style-type: none"> – Follow-up on previous Audit #1 findings, actions taken by FGJV, and status of findings; – Review of FGJV corrective action processes and responses to SHL site instructions, SHL and internal audit findings / regulator requests; – Review and updates to Management Plans including Spoil MP (detailed plans), Biodiversity, Transport, others; – Communications with Proponent (SHL); – Monthly Environmental Reports to SHL; – Monitoring and Reporting (various Plans) including - Quarterly vehicle movement summary report (TMP), spoil volumes (Spoil MP), biodiversity (BMP), Quarterly Environmental water report (Water MP); – EPL monitoring – monthly results upload to website and 6 monthly Environmental Monitoring Report 	<p>John Weir Ellen Porter Mahlea Ryan Keith Dimech Maree Zannis (As required)</p>	(Remotely – FGJV to provide platform and meeting invitations)
10.15 – 12.30	<p>Environmental Management Strategy:</p> <ul style="list-style-type: none"> – Roles and responsibilities in fulfilling project environmental and reporting requirements; – Project and site induction processes, targeted environmental training and awareness; – Complaints Management; – Incident reporting (to SHL – both notifiable and non-notifiable incidents, interpretation of incident definitions – Non-compliance reporting to SHL, authorities; – Reporting of adverse traffic interactions (to SHL & Road authorities); – Internal Environmental inspections / joint inspections with SHL, inputs to toolbox talks, and corrective action processes. 		
12.30 – 13.15	Break		
13.15 – 14.15	<p>Schedule 2 – Administrative Conditions requirements:</p> <ul style="list-style-type: none"> – Tracking of limits on disturbance areas and native vegetation clearing (Cond 5); – Protection of Infrastructure (Cond 12); – Plant and equipment maintenance system (Cond 13) 	<p>John Weir Ellen Porter Mahlea Ryan Keith Dimech Maree Zannis (As required)</p>	Remote – as above
14.15 – 16.00	<p>Schedule 3 – Specific Environmental Conditions requirements</p> <ul style="list-style-type: none"> – Spoil Management (Cond 4) – tracking, classification, planning, topsoil and subsoil separation, reporting etc; – Biodiversity Plan including weeds, pest and pathogen management plan (App F BMP) requirements, predator control Flora and fauna management; – Transport and Traffic management, congestion, road upgrades status/progress/scheduling/monitoring/reporting; – Natural Hazards / bushfire management 		
16.00 – 16.30	Auditor consolidation of notes		
16.30 – 16.45	End of Day 2 debrief audit progress and outcomes to date (if required).		

DAY 3 – Monday 2 August 2021 – Site Visit Lobs Hole / Talbingo (virtual inspection using hand held devices and provision of drone footage)

Indicative time	Agenda item / Areas for review	Proposed attendees
10.00 to 10.45	<p>Meeting (on Google meets) to discuss detailed plan for Lobs hole virtual inspection (draft below).</p> <p>As there is no / limited reception on-route to Lobs Hole, request still photos and / or video footage be taken of key features including speed limit signage, clearing/widening areas etc. To be discussed at this meeting</p>	<p>Daniel Statham – SHL Ellen Porter – FGJV Ben Croome – SHL Chris Buscall - SHL</p>
10.45 to 13.15	<p>FGJV to arrange detailed itinerary for site inspection including areas to be visited, persons to be interviewed</p>	<p>FGJV personnel</p>
13.15 – 16.00	<p>Physical Site Inspection – Lobs Hole and Talbingo Reservoir to include but not limited to:</p> <ul style="list-style-type: none"> – Chemicals and fuel storage, handling & management, plant and equipment refuelling, bunding, availability of spill kits / material, SDS availability; Specific areas to inspect include: <ul style="list-style-type: none"> o Portable bunding around the generator on the shore of Lake Talbingo, plus other examples of generators if relevant; o Chemical storage locations (containers, outside bunded areas) o Spill kits (various) including contents – Operation of Plant and Equipment (workshop walk-around and interview with supervisor); – Refuelling operations – location, actual fuelling operation if in progress, interview with refueller – Delineation and signage around disturbance areas, clearing boundaries, no-go zones, marking of habitat trees, trial rehab areas, heritage areas etc. – Interview with ecologist (s) supervising clearing if possible; – Stockpiles – topsoil, subsoil, mulch from surface works (incl. interview with operators) – Stockpile of tunnelling material – temporary storage location – Portable XRF gun for initial spoil characterisation – interview with operator – Phytophthora control areas and measures – Weeds management and feral animal/predator control (view of areas, traps, controls where possible) – Erosion and sediment control, clean and dirty water diversion, stabilisation, sediment basins, waterway crossings, irrigation (– In-water (reservoir) works – controlled by Aquatic Mgmt Plan – Wastewater treatment / operation / removal / STP/WTP; – Bushfire APZs, fire rating boards, firefighting equipment; – Waste Management – offices, accommodation – recycling bins, waste skips; – Contractor and worker awareness of environmental requirements (interviews) 	<p>Daniel Statham – SHL Ellen Porter - FGJV / Maree Zannis – FGJV Plant / Maintenance Supervisor Ecologist Operator (s) Refueller Site Supervisor Random contractor (s)</p>
16.00 – 16.15	<p>Site debrief (if possible or if required).</p>	<p>SHL and FGJV</p>

Note: The virtual site visits will include a physical inspection and interviews with relevant FGJV and subcontractors. The scope is flexible to meet site circumstances and may be varied at the discretion of the Auditor.

DAY 4 – Tuesday 3 August		
Indicative time	Agenda item / Areas for review	Proposed attendees
13.30 - 15.30	Further virtual site inspection – additional items not covered on initial site inspection	Daniel Statham (SHL) Maree Zannis (FGJV)

DAY 5 – Wednesday 4 August		
Indicative time	Agenda item / Areas for review	Proposed attendees
08.30 – 10.30	Follow-up meeting – requests for further information, clarifications	Ben Croome (SHL) Ellen Porter (FGJV) Chris Buscall (SHL)
	Debrief (if required)	

Following the virtual site inspection, further documented findings (*in addition to those issued following the office-based audits conducted on 12 and 13 July 2021*) may be issued to SHL within 2 to 3 working days from the last day of the audit.

APPENDIX E – AUDIT TABLES

TABLE A – SCHEDULE 2 – ADMINISTRATIVE CONDITIONS

TABLE B – SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS

TABLE C – SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING

TABLE D – ENVIRONMENTAL MANAGEMENT STRATEGY and MANAGEMENT PLANS

- **Table D1 – Environmental Management Strategy**
- **Table D2 – Biodiversity Management Plan**
- **Table D3 – Water Management Plan and Surface Water Management Plan**
- **Table D4 – Noise Management Plan – Rock Forest**
- **Table D5 – Transport Management Plan**

8.0 Appendix E – Snowy 2.0 Independent Audit Tables

TABLE A – Schedule 2 – Administrative Conditions

ID No	Sch 2 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS						
1.	1	<p>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</p> <p>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.</p>	SHL FGJV	Audit evidence sighted and reviewed throughout the audit (refer to this column throughout).	Overall, as noted within the Audit Report, although some incidents involving spills and release of sediment laden water have occurred, material harm was minimised through incident response, clean-up and implementing actions to prevent or minimise the potential for recurrence.	Compliant
2.	2	<p>TERMS OF APPROVAL</p> <p>The Proponent must carry out the development:</p> <p>a) generally, in accordance with the Exploratory Works and Main Works; and</p> <p>b) in accordance with the conditions of this approval.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <i>The key documents for the Exploratory Works and Main Works are identified in the definitions of this approval.</i> <i>The general layout of the development is shown in Appendix 2.</i> 	SHL	Audit evidence sighted and reviewed throughout the audit (refer to this column throughout).	Several non-compliances have been raised against conditions of consent at this audit, and as such a non-compliance is triggered against part (b) of this condition.	Non-compliant
3.	3	<p>TERMS OF APPROVAL</p> <p>If there is any inconsistency between the above documents, the most recent document will prevail to the</p>	SHL		Noted: No inconsistencies identified	Not triggered

ID No	Sch 2 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status												
		extent of the inconsistency. However, the conditions of this approval must prevail to the extent of any inconsistency																
4.	4	<p>TERMS OF APPROVAL</p> <p>The Proponent must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:</p> <p>a) any strategies, plans or correspondence submitted in accordance with this approval;</p> <p>b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and</p> <p>c) the implementation of any actions or measures contained in these documents.</p>	SHL FGJV		No specific requirements arising from the Planning Secretary.	Not triggered												
5.	5	<p>LIMITS ON APPROVAL</p> <p>Restrictions on Disturbance Area and Native Vegetation Clearing</p> <p>The Proponent must comply with the restrictions in Table 1 below</p> <p><small>Table 1: Restrictions on Approval¹</small></p> <table border="1"> <thead> <tr> <th>Matters^a</th> <th>Exploratory Works^a</th> <th>Main-Works^a</th> <th>Total^a</th> </tr> </thead> <tbody> <tr> <td>Maximum Disturbance Area^a</td> <td>126 ha^a</td> <td>504 ha^a</td> <td>630 ha^a</td> </tr> <tr> <td>Maximum Native Vegetation Clearing^a</td> <td>107 ha^a</td> <td>425 ha^a</td> <td>532 ha^a</td> </tr> </tbody> </table> <p><small>Note: The areas in Table 1 relate to direct disturbance and clearing and do not include the indirect impacts of this disturbance and clearing.¹</small></p>	Matters ^a	Exploratory Works ^a	Main-Works ^a	Total ^a	Maximum Disturbance Area ^a	126 ha ^a	504 ha ^a	630 ha ^a	Maximum Native Vegetation Clearing ^a	107 ha ^a	425 ha ^a	532 ha ^a	FGJV	<ul style="list-style-type: none"> - S2-FGJV-ENV-REG-0016 Clearing Register_04 - S2-FGJV-ENV-LST-Master Tracker updated to 09/07/2021 - S2-FGJV-PCO-MPR-0026 Project Monthly Progress Report May 2021, dated 15 June 2021 	<p>The processes for tracking of clearing were reviewed and assessed as compliant at Audit #1.</p> <p>From an SHL perspective, FGJV provides the monthly report and that includes the Clearing and Grubbing Clearing Register.</p> <p>When design drawings come through, FGJV submits updated clearing and grubbing register, drawings, Sensitive Area Plans (SAP), forecasts and PESCP to SHL via the Aconex workflow process. The workflows are reviewed in detail by SHL, and where necessary, discussions are held with FGJV to further minimise clearing. Clearing and Grubbing Workflows are required to be signed off by the SHL Director Kieran Cusack (Director).</p>	Compliant
Matters ^a	Exploratory Works ^a	Main-Works ^a	Total ^a															
Maximum Disturbance Area ^a	126 ha ^a	504 ha ^a	630 ha ^a															
Maximum Native Vegetation Clearing ^a	107 ha ^a	425 ha ^a	532 ha ^a															

ID No	Sch 2 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					<p>A review of the Clearing Register, and the Master tracker determined that the overall clearing undertaken to date is well within the disturbance and clearing restrictions specified for Exploratory and Main Works.</p> <p>The Clearing Register tracks the area cleared to date (in m2 and ha), providing a cumulative % of limit total to date. It also provides data related to the specific fauna habitats and flora habitats cleared.</p> <p>Project Monthly Progress Reports are prepared by FGJV and issued to Snowy Hydro, which included <i>Table 3.2.2: As-built and Projected Clearing Volumes against NSW Infrastructure Approval</i> showing percentage clearing against approval clearing limits (all within limits).</p>	
6.	8	<p>SURRENDER OF APPROVAL</p> <p>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.</p>	SHL	<ul style="list-style-type: none"> - Letter from Snowy Hydro to the Secretary dated 20 April 2021, noting that the date for surrender would be 21 April 2021, and requesting that the date of surrender be extended by 4 months to enable SHL to finalise the process of reviewing and updating the management plans. - Letter from DPIE: Snowy Main Works (SSI 9687) – Extension of Time to Surrender Infrastructure Approval SSI 9208 dated 06/05/2021 granting an extension of time until 21 August 2021. 	At the time of the audit, the Exploratory Works approval had not been surrendered. A four (4) month extension of time was requested by Snowy Hydro, and granted by DPIE. The extension of time is granted until 21 August 2021.	Compliant
7.	9	<p>SURRENDER OF APPROVAL</p> <p>Prior to surrendering the infrastructure approval (CSSI 9208) for the Exploratory Works, the Proponent must update the approved management plans for the</p>	SHL	<ul style="list-style-type: none"> - Letter from Future Generation to Snowy Hydro dated 16 May 2021: 	The letter from Future Generation dated 16 May 2021 notes that DPIE has explicitly noted in the approval letters that the Main Works Management Plans supersede any document	Compliant

ID No	Sch 2 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		development to incorporate the approved management plans for the Exploratory Works to the satisfaction of the Planning Secretary.		Surrender of Exploratory Works Approval (CSSI 9208).	<p>approved for the Exploratory Work. On this basis, FGJV confirm that this condition has already been met for the currently approved Main Works Management Plans.</p> <p>The letter also noted that the following Management Plans may require further discussion or clarification with DPIE to confirm how the plan will be managed through the surrender process:</p> <ul style="list-style-type: none"> • Rehabilitation Management Plan (in progress at the time of the audit); • Threatened Fish Management Plan (TFMP) – This plan is not yet approved. The Aquatic Management Plan needs to be maintained until approval of Threatened Fish Management Plan; • Worker Recreational Management Plan – This plan does not exist under the Main Works Approval and it is understood by FGJV that the conditions relating to this plan are no longer required. FGJV requested confirmation from SHL that this plan is not applicable to the Main Works and will be surrendered with the Exploratory Works approval. <p>At the time of the audit, the project was compliant with this condition, as the Exploratory Works Approval had not yet been surrendered.</p>	
8.	12 (a)	<p>PROTECTION OF INFRASTRUCTURE</p> <p>Unless the Proponent and the applicable authority agree otherwise, the Proponent must:</p> <p>(a) repair, or pay the full cost associated with repairing, any public infrastructure that is damaged by the development; and</p>	FGJV SHL		No damage to infrastructure has been reported to date.	Not triggered

ID No	Sch 2 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
9.	12 (b)	(b) relocate, or pay the full cost associated with relocating, any public infrastructure that needs to be relocated as a result of the development. <i>Note: This condition does not apply to any damage to roads caused by the development</i>	FGJV SHL		As above	Not triggered
10.	13 (a)	OPERATION OF PLANT AND EQUIPMENT The Proponent must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition;	FGJV	<ul style="list-style-type: none"> - Equipment Maintenance and Hours control schedule (includes rental, subcontractor FGJV mobile and fixed plant and equipment; - FGJV Environmental Incident and Event Register S2-FGJV-ENV-REG-0014 - Plant delivery inspection form S2-FGJV-PLT-FRM-0001-3 - Daily Pre-start worksheet (completed 12/07/21) - Operators daily / weekly pre-start checklist - Crane and EWP Delivery inspection form - Quarterly Equipment Inspection Form 	<p>Various plant and equipment inspection forms were sighted and reviewed. The forms included various checks including for absence of oil fuel, hydraulic fluid leaks, spoil /material/weeds, hygiene forms, etc.</p> <p>The outcome of the review of system documents and interviews indicate that processes are in place to ensure plant and equipment is maintained in a proper and efficient condition.</p> <p>Weekly environmental inspections include review of any "abnormal" conditions relating to plant and equipment, and are a component in ensuring operations in a proper and efficient manner. Environmental Inspections are in addition to the normal machine inspection requirements.</p> <p>Whilst the audit found that detailed plant and equipment maintenance programs were in place, minor spills from hydraulic hoses have been a regular occurrence on the project.</p>	Compliant Opportunity for Improvement
11.	13 (b)	(b) operated in a proper and efficient manner; and			Not assessed – limited by virtual site inspection	Not assessed

ID No	Sch 2 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
12.	13 (c)	(c) kept free of weeds, seeds and pathogens when entering or leaving the site.	FGJV	<p>Weed, pest and pathogen management plan (App F to Biodiversity Management Plan)</p> <p>Hygiene Declaration Form – Annexure AF App F Biodiversity MP</p> <p>Site inspection</p> <p>Interviews</p>	<p>An Observation was raised at the previous audit regarding potentially inadequate processes for washing down of vehicles at Tantangara where the spread of Ox-eye daisy is a risk.</p> <p>A review of the actions taken to address the issue found that the majority of recommendations made, and commitments made in the formal response submitted to DPIE had not been adequately addressed / actioned.</p> <p><i>The previous Observation has therefore been re-raised as a non-compliance under Sch 4 Cond 11.</i></p>	Non-compliant

TABLE B – Schedule 3 – Specific Environmental Conditions

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS						
13.	1	The Proponent must:	SHL		The Digital Strategy (see below) addresses the issue of a single, open source database; however, has not yet been implemented (has only recently been submitted to DPIE). It is considered that this requirement is not yet triggered.	Not triggered
		(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;			Addressed in Digital Strategy (see below) – not yet triggered.	Not triggered
		(c) prepare a detailed archival record of all phases of the development; and				Not triggered
		(d) make this information publicly available.			The Digital Strategy documents that the information would be made to the public in a staged manner in accordance with a proposed Digital Strategy Program for 2012-2022. Implementation not yet commenced.	Not triggered
14.	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: be prepared in consultation with the NPWS;	SHL	<ul style="list-style-type: none"> – Letter from Snowy Hydro to Director – Energy Assessments, DPIE dated 4 June 2021 RE: CSSI 9687 Snowy 2.0 Main Works Digital Strategy. – Snowy Hydro “Digital Strategy and Application Project” proposal presentation prepared by Coordinate. 	<p>Whilst a Draft Digital Strategy has been prepared and submitted to DPIE, the Strategy had not been prepared within the required 6-month time frame.</p> <p>The Digital Strategy was submitted by Snowy Hydro to DPIE on 4 June 2021 requesting endorsement of the Planning Secretary to submit this plan on a staged basis, noting that the staged strategy has been developed in consultation with the NSW NPWS. At the time of the audit, no response had been received from DPIE regarding the staged proposal.</p>	Non-compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		identify innovative ways to give effect to the requirements in condition 1 above; and			Construction commenced in October 2020, and submission was therefore at least 3 months outside the required timeframe.	
		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.			Digital Strategy identifies innovative ideas (yet to be approved – see above).	
					Section 4 of the Digital Strategy includes interactive processes.	
15.	3	The Proponent must implement the approved Digital Strategy for the development.	SHL		The Digital Strategy has not yet been approved.	Not triggered
16.	4 (a)	<p>SPOIL MANAGEMENT</p> <p>Spoil Management Requirements</p> <p>The Proponent must:</p> <p>(a) minimise the spoil generated by the development</p>	FGJV	<ul style="list-style-type: none"> – Interview; – Review of drone footage 	<p>From a Management Plan perspective, spoil is defined as material excavated from the tunnelling from FGJV point of view.</p> <p>The Spoil Management Plan notes that spoil generation will be reduced through design optimisation, and that material will only be excavated where required to construct the project. The virtual site inspections and drone footage did not indicate excessive spoil generation from clearing, and only minimal spoil had been generated to date from the tunnelling operations.</p> <p>At the time of the audit, tunnelling had recently commenced at the Main Access Tunnel (MAT) portal.</p> <p>Spoil Placement Permit (in first revision – to be trialled on first loads).</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
17.	4 (b)	(b) test and classify the relevant physical and chemical characteristics of the spoil;		<ul style="list-style-type: none"> - Snowy Hydro 2.0 Lobs Hole Operational Material Characterisation and Handling Plan (Golder Associates) dated 10 June 2021 (a 42-page report/procedure); - Spoil Management Plan (SMP) Section 5 and Appendix A. 	<p>At the time of the audit, a small volume of spoil had been generated at Lobs Hole, and testing of the material was underway.</p> <p>Initial findings of the spoil testing suggest the material contains Potentially Acid Forming (PAF) material.</p> <p>The Characterisation Plan provides detailed information on the processes to be followed to characterise the material.</p> <p>At a local level, an XRF gun is being used on site to detect sulphur as an early field-based indicator of acid forming properties prior to testing at an on-site lab and external lab.</p> <p>Proposed sampling for TBM operations is 6 composite samples per 45m of TBM advance.</p> <p>Proposed sampling for drill and blast operations is one sample per 320 m³.</p> <p>Talbingo only – 10 June 2021 – the Golder Operational Material Characterisation and Handling Plan provides the processes to be followed depending on the outcome of testing. The first spoil is to be used in the Main Yard at Lobs Hole.</p>	Compliant
18.	4 (c)	(c) manage, use or dispose of the spoil in accordance with its classification;		Addressed in Section 6 and Appendix D and E of the SMP.	Only small volumes of tunnel spoil had been generated at the time of the audit, and its uses will be dependent on results. The preference is to maximise reuse on site.	Not triggered

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
19.	4 (d)	(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; 		<ul style="list-style-type: none"> - Snowy Hydro 2.0 Lobs Hole Operational Material Characterisation and Handling Plan (Golder Associates) dated 10 June 2021; - Section 6 and Appendix D and E of the Spoil Management Plan. 	<p>The Golder Associates Material Characterisation and Handling Plan provides technical advice on spoil classification, handling, disposal and implementation of the Environmental Management Plans. It builds upon, and where required, aligns with pre-existing plans including the Spoil Management Plan; Spoil Characterisation Program, Naturally-occurring Asbestos Management Plan, Acid and Metalliferous Drainage Plan and Lobs Hole Main Yard.</p> <p>At the time of the audit, small volumes of TBM material had been excavated and was in the process of being tested and characterised. No emplacement had yet occurred.</p>	Compliant
20.	4 (i)	(i) minimise the water quality impacts of the temporary and permanent emplacement areas;	FGJV	<ul style="list-style-type: none"> - Interview; - Virtual Site inspection. 	<p>First loads of tunnel spoil will be placed in a permanent area (will be bunded to prevent any potential leaks of material). Will be lined where required. FGJV will be undertaking water quality testing in the Yarrangobilly River and any other water leaving the site.</p> <p>For tunnel spoil, this condition is not yet effectively triggered.</p> <p>For temporary spoil from clearing, there was no specific evidence of water quality impacts. This will be further assessed at future audits when greater volumes of tunnel spoil have been generated.</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
21.	7	<p>Spoil Management Plan</p> <p>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:</p>		Spoil Management Plan Rev G dated 11/08/2020.	Spoil Management Plan was assessed as compliant at Audit #1. There has been no change to the Plan since the last audit.	Compliant
		<p>(e) detailed plans for each of the permanent spoil emplacement areas that have been prepared using both analogue and erosional-based methods, these plans must:</p> <ul style="list-style-type: none"> • 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); 	FGJV		GF01 Spoil Management Plan was in draft for review and was due to go out for consultation (all detailed spoil plans to be issued for consultation at the same time).	
		<p>(f) include a program to monitor and publicly report on:</p> <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. <p><i>Note: The Proponent may stage the preparation of the Spoil Management Plan, including the preparation of detailed plans for each permanent spoil emplacement area. However, the detailed plans must be approved prior to any construction</i></p>	FGJV SHL	Spoil Management Plan Rev G dated 11/08/2020.	<p>Monitoring and reporting is addressed in Section 9 of the Spoil Management Plan.</p> <p>Spoil reporting addressed in Table 9-4 – commits to 6 monthly reporting on volume from tunnelling, volume placed at each emplacement area, volume disposed off-site and reused elsewhere, AMD material treated and volume of NOA excavated and place in encapsulation (if any).</p>	Not triggered

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<i>occurring in the relevant emplacement area</i>			The proponent has chosen to stage the preparation of the Spoil Management Plan, with only the Lobs Hole Detailed Plans developed at the time of Audit #1 and #2.	
22.	8	The Proponent must implement the approved Spoil Management Plan for the development.	FGJV	<ul style="list-style-type: none"> - Topsoil Audit Report on FGJV by Snowy Hydro dated Nov 2020; - Topsoil Audit Actions Summary (status as at 22/05/2021; - Topsoil Tracker (FGJV). 	<p>A Spoil Permit and the Spoil Tracking Register (not yet developed) will feed into this process; however, has not yet been undertaken.</p> <p>Snowy Hydro conducted a detailed internal audit on topsoil management and FGJV provided responses to the audit.</p> <p>Tracking of Topsoil – Topsoil Register – one for each site. Information comes from survey team.</p> <p>The site inspection at Lobs Hole identified that topsoils, subsoils and mulch material were mixed and not adequately separated. One sign was sighted in the vicinity – Mulch.</p> <p>An interview with FGJV site environmental staff noted that due to limited storage areas at Lobs Hole, it is very challenging to adequately store the topsoils, subsoils and mulch separately.</p>	Compliant Observation
23.	11	The Proponent must implement the approved Rehabilitation Management Plan for the development	SHL FGJV	Lobs Hole Rehabilitation Trials by Liz McPhee dated Feb 2021 (approved April 2021).	<p>As noted in Condition 10, the Exploratory Works Rehabilitation Management Plan S2-FGJV-ENV-PLN-0101-C remains applicable until it is superseded by the Main Works RMP.</p> <p>Section 5.2.5 – Early Rehabilitation Trials in the Exploratory Works RMP notes that “The few areas that can be rehabilitated will be restored as small-scale trials before further rehabilitation works which will be detailed in the Main Works RMP”.</p>	Compliant

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					<p>At the time of Audit #1, a Rehabilitation Trials document had been prepared by Alpine Flora consultant Liz McPhee, which was provided to NPWS for review. Comments by NPWS were made in track changes dated 13 January 2020).</p> <p>The April 2021 Lobs Hole Rehabilitation Trials document provides details of the design, maintenance and monitoring of the trial sites and a timeline for the trials \ from February 2021 to Feb 2024 for Lobs Hole.</p> <p>Leed has been identified as the contractor who will undertake many of the trial activities (civil type works) and Liz McPhee for seed sowing monitoring and supervision.</p>	
24.	17 (a)	<p>Biodiversity Management Requirements</p> <p>17. The Proponent must:</p> <p>(a) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance area;</p>	FGJV	Electronic Mapping system (Web ARC GIS) showing clearing boundaries viewed live (snip of main camp Lobs Hole provided as sample).	<p>Electronic Mapping system (Web ARC GIS) showing clearing boundaries viewed live (snip of main camp Lobs Hole provided as sample). Sensitive Area Plans are derived from the GIS system. Various plant community types (PCTs) are mapped and displayed in various colours.</p> <p>A virtual site inspection was conducted a Lobs Hole and no-go zone signage and boundary ropes and flagging were sighted. A full site evaluation could not be undertaken at this audit; however, this requirement would be reviewed during site inspections at subsequent audits.</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
	17 (b)	(b) minimise the clearing of native vegetation and habitat within the disturbance area;		<ul style="list-style-type: none"> - S2-FGJV-ENV-REG-0016 Clearing Register_04 updated to 9 July 2021; - Clearing Permit sighted 23/02/2021 Main Yard State 5 Rev 3 Permit S2-FGJV-ENV-PER-0008-0060 (revalidated 12 July). 	<p>FGJV continues to track and monitor the clearing of native vegetation and habitat in detail. The current tracking suggest that the area cleared is minimised in order to ensure there is no exceedance of clearing generally and for specific PCTs or EPBC habitats.</p> <p>All clearing is required to be undertaken in accordance with a clearing permit.</p>	Compliant
25.	17 (c)	(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;	FGJV	Interviews.	None / minimal removal / trimming over last 6 months. Tantangara Road – some trees were removed as a safety precaution under a clearing permit. Any clearing is required to be addressed in a clearing permit.	Compliant
26.	17 (d)	<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; 	FGJV	<ul style="list-style-type: none"> - S2-FGJV-ENV-REG-0016 Clearing Register_04 updated to 9 July 2021; - Land Clearing Register (within above register); - Interview; - S2-CIV-CF-LHA-LOT-0001-0001 - Main Camp Clear and Grub commenced 23/03/2021, completed 16/5/2021 (Workflow document – lot record); - Monthly Project Progress Report – May 2021; - Monthly look-ahead – December 2021 – monitoring programs. 	<p>The Clearing Register tracks the predicted impacts on various PCTs and habitats. A review of the register found that there had been no exceedance of limits to date.</p> <p>An interview with the FGJV Environmental Manager indicated that where possible, boundaries of the disturbance area may be moved if the activities are going to impact on habitat.</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<ul style="list-style-type: none"> • Mauve Burr - daisy; • Max Mueller's Burr - daisy; • Raleigh Sedge; • Slender Greenhood; • Smoky Mouse; • Spotted tailed Quoll; • Southern Myotis; • Thelymitra alpicola; • White-bellied Sea-eagle; 				
27.	17 (e)	(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;	SHL FGJV	<ul style="list-style-type: none"> – App G of Biodiversity Management Plan – Fauna Strike Mitigation Strategy; – Memo from EMM to Snowy Hydro dated 26 July 2021: Snowy Main Works Fauna Strike Mitigation Report – Fauna Strike Monitoring; – Aconex communication from Snowy Hydro to FGJV dated 3 March 2021: Smoky Mouse culverts - installation of additional fauna underpasses on Ravine Road and extension of an existing underpass, including general instructions and attachments: <ul style="list-style-type: none"> ○ Fauna underpass location map 1; ○ Small Mammal crossing design. 	<p>An In-Vehicle Management System (IVMS) has been installed on project vehicles (verified at previous audit), and it was verbally confirmed by FGJV and SHL that this requirement is ongoing, including for subcontractors. FGJV reported that vehicles without IVMS installed would be turned away from the site.</p> <p>A trial underpass had been installed at R4 Ravine Road (observed at Audit #1), with a further five (5) planned to be installed. At the time of this second audit, underpasses had been delivered to site and were due to be installed in the following week. A site instruction had been issued to Leed for installation including location (in consultation with BCD). The original camera installed on the trial underpass was found to be inadequate, so additional alternative cameras have been ordered to monitor both ends of each of the underpasses for use by the Smoky Mouse and other animals (not yet installed).</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					<p>The site inspection conducted at Audit # 1 verified the use of signage and general adherence to the 30 km/h speed limit on Lobs Hole Ravine Road. This could not be further verified due to Covid-19 travel restrictions.</p> <p>Fauna strike monitoring has been conducted by EMM, and the memo dated 26 July 2021 provides an update on the mortality monitoring, including the initial results of scavenger trials conducted in Nov 2020, and ongoing monthly monitoring to May 2021. Key findings and conclusions included:</p> <ul style="list-style-type: none"> - To May 2021, 16 animal mortalities were recorded along Ravine Road during the monthly monitoring; - There has been no reported or observed fauna strikes on threatened species; - As no fauna strike on threatened species has been recorded, management measures remain at Level 1. No adaptive management is required. 	
28.	17 (f)	(f) undertake pre-clearance surveys;	FGJV	<ul style="list-style-type: none"> - Pre-clearing Survey Report - Narla Environmental Feb 2021 – for Main Camp. 	<p>Pre-clearing reports were reviewed during Audit #1. Further samples were sighted at Audit #2 to ensure ongoing implementation.</p> <p>Post Clearing report by Narla Feb 2021 – for same area as pre-clearing report was also sighted.</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
29.	17 (g)	(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;	FGJV	<ul style="list-style-type: none"> Post Clearing Report by Narla Environmental – Feb 2021 – main Camp 	<p>Salvage is documented in the Narla Post Clearing Reports.</p> <p>The virtual site inspection at Lobs Hole noted that a stockpile of habitat trees was stored in the main yard (temporary). It was advised that these would be moved to another location once works need to be undertaken in the current storage area.</p> <p>A full site inspection was not undertaken at this audit – this will be further assessed at future audits.</p>	Compliant
	17 (h)	(h) collect seeds for use in the ecological rehabilitation of the site;	FGJV	<ul style="list-style-type: none"> FGJV Change of Custody by Narla dated 17 March 2021 – seeds collected in Feb 2021 Tantangara Area (FGJV Seed Register Narla - Draft v 0.1 (March 2020 to Dec) 	Evidence of seed collection by Narla Environmental was sighted and reviewed.	Compliant
30.	17 (i)	(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;	FGJV	<ul style="list-style-type: none"> Tantangara Weed spraying map indicating areas sprayed with Grazon Extra Herbicide targeting Ox Eye Daisy – completed 20/02/2021; Weed Spraying Program by Narla dated June 2021 Draft v1.1. 	<p>WEEDS</p> <p>An Observation was raised at the previous audit regarding potentially inadequate processes for washing down of vehicles at Tantangara where the spread of Ox-eye daisy is a risk (weed).</p> <p>A review of the actions taken to address the issue found that the majority of recommendations made, and commitments made in the formal response submitted to DPIE had not been adequately addressed / actioned.</p> <p>The previous Observation has therefore been re-raised as a non-compliance.</p>	Non-compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
31.	17(i)	(i) continued (pathogens)		<ul style="list-style-type: none"> - S2-FGJV-ENV-PRO-0045 Phytophthora Hygiene Procedure Rev A (FGJV) dated 30/05/2021. 	<p>PATHOGENS</p> <p>Phytophthora has been identified as present at Lobs Hole through Snowy Hydro monitoring with a known area of infestation at Main Yard and one other smaller area.</p> <p>It was stated during interviews that active management being put in place including:</p> <ul style="list-style-type: none"> - A stand-down was implemented following discovery; - A manned boot wash-down has been installed; - Plant requires decontamination; - Plant is specified for the area; - Wheel wash installed at Ravine Road Lobs Hole; - New Phytophthora Hygiene Procedure developed and implemented. <p>The virtual site inspection at Lobs Hole confirmed that the measures specified above were being implemented on site.</p>	Compliant
32.	17 (i)	(i) continued (feral pests)		<ul style="list-style-type: none"> - Pest Trapping Register S2-FGJV-ENV-REG-0013 – last updated 11 April 2021; - Fauna Encounter Register S2-FGJV-ENV-REG-0003 detailing locations, species recorded and type of encounter (relocated / observed). 	<p>FERAL PESTS</p> <p>FGJV maintain a fauna encounter register and a Pest Trapping Register.</p> <p>Ad hoc live trapping is undertaken on an as-needed basis – traps are deployed when animals are sighted.</p> <p>Pest Trapping Register with Pests trap tab – cats and foxes caught – sent for euthanising – traps mainly around camps and offices.</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
33.	17 (j)	(j) minimise the generation and dispersion of sediment to watercourses, particularly Yarrangobilly River and Wallace Creek;	FGJV	<ul style="list-style-type: none"> - Site Shutdown Inspection Checklist S2-FGJV-ENV-CHE-0003 – completed for Marica Camp 07/06/2021 due to predicted inclement weather; - Marica Trail – Temporary Waterway Crossing – Construction Methodology – Dip Creek; - Virtual site inspection. 	<p>Following a safety standdown that led to insufficient controls being installed prior to a rain event, there has been push to improve procedures. A site shut down inspection checklist was revised to ensure that environmental controls are properly installed during shut down.</p> <p>The site inspection noted that silt curtains and other controls were in place at Talbingo, where works were being undertaken near and in the water (see photos).</p> <p>Full verification was not possible due to virtual site inspection only. This will be further reviewed at future audits.</p>	Compliant
34.	17 (k)	(k) minimise the light spill from night works, including using directional and LED lighting; and	FGJV	<ul style="list-style-type: none"> - Environmental Loss Prevention Inspection (LPI) checklist LPI-ENV-001; - Lighting Plan – ECVT – S2-FGJV-ENV-PLN-0213 dated 28/06/2021. 	<p>An Opportunity for Improvement (OFI) was raised at Audit #1 regarding the adequacy of inspection checklists to manage light spill.</p> <p>It appears that an Environmental Loss Prevention Inspection (LPI) checklist has been provided; however, was not provided as evidence during the first audit.</p> <p>Lighting plans are prepared at the main sites, with plans to extend this to other areas such as the Gate House (Lobs Hole)</p> <p>The OFI was satisfactorily addressed and has been closed out.</p>	Compliant
35.	17 (l)	(l) minimise bushfire risk.	FGJV	<ul style="list-style-type: none"> - Interview; - Trailer Firefighter – pre-start checklist dated May 2021; - Lobs Hole Fire Units map showing locations (9 at Lobs Hole, 4 on Ravine Road and 4 new units at Workshop); 	<p>The plant and equipment team undertakes weekly inspections of firefighting trailers.</p> <p>Bushfire awareness training has been delivered.</p> <p>An Emergency Response Team is in place and is trained in the use of fire-fighting training.</p>	Compliant

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				- Training Register.	Not fully assessed at this audit (winter time, no physical site visit), and will be included in the next scheduled audit (Jan 2022).	
36.	18 (a)	<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 expert/s in consultation with the NPWS, BCD and DAWE;</p>	SHL FGJV	<ul style="list-style-type: none"> - Biodiversity Management Plan (BMP) Rev I dated 12/10/2020; - Biodiversity Monitoring Reports (See Table D2). 	<p>The BMP was reviewed and assessed as compliant at Audit #1 – there have been no changes to the BMP since Audit #1.</p> <p>Refer to Table D2 for implementation status.</p>	Compliant
	18 (b)	<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; and o a program to monitor the impacts of the development against the detailed criteria. 	SHL FGJV		<p>Monitoring, evaluation and reporting is addressed in Appendix B, Section 10 of the BMP. The requirements to publicly report are included in the EMS.</p> <p>The BMP requires that a Monitoring Period Report will be provided to Snowy Hydro at the end of each monitoring period and that a quarterly report will be provided to Snowy Hydro at the end of each quarter of monitoring.</p> <p>For implementation, see Table D2 – Biodiversity.</p>	Compliant
37.	19	Proponent must implement the approved Biodiversity Management Plan for the development	SHL FGJV	<ul style="list-style-type: none"> - Interviews; - Previous findings follow-up table – this report. 	Refer to Sch 3 Cond 17 and Biodiversity Management Plan section of these Audit Tables and Non-Compliance #2 – Weeds Management.	Non-compliant

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38.	29	<p>Water Pollution</p> <p>29. Unless an environment protection licence authorises otherwise, the Proponent must comply with Section 120 of the POEO Act.</p> <p><i>Note: Section 120 of the POEO Act makes it an offence to pollute any waters.</i></p>	FGJV SHL	<ul style="list-style-type: none"> - Interviews - Notification to EPA 	<p>No specific breaches of Section 120 of the Act had been reported since the last audit.</p> <p>An event regarding turbidity with overtopping of controls at Marica was notified to EPA; however, it was not formally a breach of Section 120.</p>	Compliant
39.	30 (a)	<p>Water Management Requirements</p> <p>30. The Proponent must:</p> <p>(a) maximise the recycling and reuse of water on site;</p>	FGJV	<ul style="list-style-type: none"> - S2-FGJV-PCO-MPR-0026 Project Monthly Progress Report May 2021, dated 15 June 2021; - Snowy 2.0 Main Works – Risk Assessment – Treated Effluent Reuse (Human Health risk assessment) by WSP dated 14 May 2021; - Snowy 2.0 Main Works – Treated Effluent Reuse Memorandum by Arcadis dated 20/04/2021 – risk review from an environmental planning and technical risk standpoint. 	<p>The following extract from the FGJV Monthly Report for May 2021 provided evidence of activities to maximise the recycling and reuse of water:</p> <p><i>FGJV has amended the Risk Assessment to determine the ability to Reuse Treated Effluent on site. The amendment involved the reuse options of:</i></p> <ul style="list-style-type: none"> - <i>dust suppression on unsealed roads (primarily on major haul roads)</i> - <i>concrete batching</i> - <i>wheel washing purposes</i> - <i>material preparation and compaction</i> - <i>rock crushing dust suppression</i> - <i>fire water system</i> - <i>in tunnel activities including cooling of the tunnel boring machine and dust suppression</i> - <i>temporary storage in sediment basins prior to reuse</i> <p>SHL advised FGJV that a Consistency Assessment was required to assess the reuse of treated effluent water on site against the Conditions of Approval. FGJV has engaged Arcadis to complete the assessment.</p> <p>The Arcadis Memorandum dated 20/04/21 includes an assessment of permissibility, and</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					<p>based on a preliminary review of CoA and REMMs, considers that the effluent reuse could be considered consistent with the approval. Arcadis suggests that the approach to the reuse is undertaken in consultation with DPIE to minimise environmental planning compliance risks. Arcadis also recommended that the recommendations be included in an updated revision of the WMP.</p> <p>The Human Health Risk Assessment by WSP concluded that the risk to the health of workers exposed to the treated water from the STP under the exposure scenarios presented are negligible; however, recommended continued use of appropriate HSE controls.</p>	
40.	30 (b)	(b) maximise the diversion of clean water runoff around the disturbance areas;	FGJV	<p>– Audit of Erosion and Sediment Control – Snowy 2.0 by Strategic Environmental and Engineering Consulting (SEEC – Andrew McLeod) dated 8 June 2021.</p>	<p>A comprehensive review of Erosion and Sediment Controls were undertaken as part of the audit by SEEC. The report found that overall, erosion and sediment controls are generally adequately-planned (with the exceptions noted in the report) and are mostly well-implemented.</p> <p>However, the SEEC auditor noted a number of locations of concern, particularly at the Lobs Hole and Marica sites including where: progressive ESCPs were not adequately updated or implemented; PESCP designs and on ground practices not consistent with SWMP commitments, or on-ground controls require attention to minimise risk of pollution to surrounding land and water.</p> <p>It was noted that SEEC are to be engaged on the project to provide fortnightly to monthly inspections and advice (dependent on COVID-</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					<p>19 restrictions). (TREES (ERSED consultant) were engaged up to time of the audit).</p> <p>The virtual site inspection did not identify any specific areas of concern; however, it is recognised that this could not be fully verified at this audit.</p>	
41.	30 (c)	(c) minimise the flow rates and velocities of any clean water runoff diversions to adjoining watercourses;	FGJV	Audit of Erosion and Sediment Control – Snowy 2.0 by Strategic Environmental and Engineering Consulting (SEEC – Andrew McLeod) dated 8 June 2021.	See response under 30 (b) – Audit of Erosion and Sediment Control by SEEC.	Compliant
42.	30 (d)	(d) minimise the flooding impacts of the development;	FGJV	Main Yard Construction Facilities – Civil Basis of Design Rev 01 dated 03/05/2021 (for Construction) (Lobs Hole).	<p>Section 3.7 of the Civil Basis of Design addresses the flood assessments at Lobs Hole, with the main findings included in Appendix B. The document discusses various impacts, noting:</p> <p>A review of the documentation did not reveal whether the design specifically increases or decreases the flooding impacts of the development overall, however notes that some areas will have increased flooding extent while other areas would be subject to decreased flooding.</p> <p>It was reported that there has been no flooding to date and that water diversions have been constructed around the sites to minimise localised flooding.</p> <p>FGJV were in the process of building a coffer dam to prevent water ingress into the Tantangara site.</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
43.	30 (e)	(e) minimise groundwater take from the Gooandra Volcanics and Kellys Plain Volcanics using pre and post grouting of the tunnel, to minimise the loss of stream flows in the waterways above these geological formations, including Gooandra Creek and the headwaters of the Eucumbene River;		Interview	The project is currently taking water mainly from Talbingo reservoir water, not from the Tantangara area, which includes Gooandra Volcanics and Kelly's Plain Volcanics. Stream flows in waterways above geological formations are not currently triggered, as this would only be impacted by tunnelling. Once tunnelling is more advanced, this will be measured by TARPS drawdown and addressed through grouting.	Not triggered
44.	30 (f)	(f) minimise erosion and the generation and dispersion of sediment using suitable controls in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> guidance series;	FGJV	<ul style="list-style-type: none"> - Interview - Virtual site inspection – Lobs Hole 	See response under 30 (b) - Audit of Erosion and Sediment Control by SEEC. Silt curtains and sediment controls were in place and appeared effective at Talbingo (refer to site photos).	Compliant
45.	30 (g)	(g) design all instream works, particularly the inlet and outlet works, to minimise scour and erosion;	FGJV	Marica Trail – Temporary Water Crossing – Construction Methodology (Dip Creek)	Some instream works have occurred involving 2 water crossings at Marica, and Talbingo Adit (next to reservoir). It was reported that there has been no dredging to date. Designs were prepared and reviewed by Snowy. Crossing / instream works designed for fish to cross with pipe skylights. Full design was not assessed at this audit – to be addressed at future audits.	Compliant
46.	30 (k)	(k) reduce the number of diffuser points for low velocity discharges to the Talbingo Reservoir or Tantangara Reservoir;	SHL FGJV		Discharges to the reservoirs had not yet been installed.	Not triggered
47.	30 (l)	(l) not discharge any surplus process water to the stormwater basins on site;	FGJV	<ul style="list-style-type: none"> - Virtual Site Inspection; - Interview. 	The generation of process water had commenced since the commencement of operation of the TBM. It was stated that all process water is being stored in designated tanks and is being re-used in the TBMs.	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					The virtual site inspection did not identify any surplus water being discharged to stormwater basins.	
48.	30 (m)	<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; 	FGJV	<ul style="list-style-type: none"> - Drone footage from 22 July 2021; - Virtual Site inspection. 	<p>See Cond 30 (b) above - Audit of Erosion and Sediment Control conducted.</p> <p>A comprehensive review of Erosion and Sediment controls were undertaken as part of the audit by SEEC. The report found that overall, erosion and sediment controls are generally adequately-planned, (with the exceptions noted in the report) and are mostly well-implemented.</p> <p>Virtual site inspection at Talbingo found that appropriate silt curtains and booms had been installed in the reservoir to minimise / prevent turbid water from land works entering the reservoir.</p> <p>Instream works (except waterway crossings), dredging, underwater blasting, etc. had not yet commenced.</p> <p>No permanent spoil emplacement areas had yet been established (Rock Forest was in Stage 1 – site preparation – not yet operational for spoil receipt).</p> <p>Operation of power station is not yet triggered.</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
49.	30 (n)	(n) minimise the risk of spills or leaks on site, and clean up any spills or leaks as quickly as possible;	FGJV	<ul style="list-style-type: none"> - Hazardous Chemical Management Audit Report (by EMM commissioned by SHL) 4/03/21, report issued 24/03/2021; - Aconex Corrective action from Snowy Hydro to FGJV -Evidence that a toolbox on pro-active spill prevention and incident notification by Symal had been undertaken – closed 19/04/2021; - FGJV Environmental Incident and Event Register S2-FGJV-ENV-REG-0014; - Pre-shift safety briefing / Pre-start records dated 18/06/2021 and 26/06/2021 – topics included chemical and hydrocarbon storage in bunded areas requirements / spill minimisation; - Virtual Site inspection – Lobs Hole 2/08/2021. 	<p>A non-compliance was raised at Audit #1 regarding the inadequate / inappropriate storage of liquid substances.</p> <p>Evidence was provided that actions had been undertaken to address the previously identified issues including:</p> <ul style="list-style-type: none"> - removal of unbunded chemicals; - provision of bunded pallets – IBCs placed on the bunds were covered to prevent ingress or water; - provision of further bunded storage containers, and hazardous substance cabinets; - provision of toolbox talks and pre-shift safety briefings to provide awareness to the workforce. <p>For this part of Condition 30 (n), the previous non-compliance has been closed and was deemed compliant at this audit.</p> <p>It was observed that spill kits were provided at appropriate locations in the areas sighted during the site inspection.</p> <p>A review of the Incident and Event register found that many minor spills had been reported, which indicates a positive reporting culture within the project (Also see Opportunity for Improvement under Schedule 2 Condition 13 – plant and equipment investigation to reduce leaks from hydraulic hoses).</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
50.	30 (p)	(p) store chemicals and hydrocarbon products in bunded areas in accordance with the relevant Australian Standards.	FGJV	<ul style="list-style-type: none"> - Hazardous Chemical Management Audit Report (by EMM commissioned by SHL) 4/03/21, report issued 24/03/2021; - Site inspection. 	<p>A non-compliance was raised at Audit #1 regarding the inadequate / inappropriate storage of liquid substances. Whilst the specific issues raised in Audit #1 were addressed and closed out, further issues were identified regarding storage of chemicals and hydrocarbon products.</p> <p>As a corrective action from the non-compliance raised in Audit #1, Snowy Hydro commissioned an internal Hazardous Chemical Management Audit by EMM to assess chemical management of the Snowy Hydro 2.0 site operated by Future Generation Joint Venture (FGJV). The audit was conducted on 4/03/21, and the report was issued 24/03/2021.</p> <p>The Hazardous Chemical Management Audit identified 22 non-compliances and concluded there is a need for a full and thorough review of all aspects of FGJV's hazardous chemical.</p> <p>The virtual site inspection at Lob Hole found that whilst there appeared to be improved overall storage practices (substances stored in bunded areas), the following further issues were identified:</p> <ul style="list-style-type: none"> - Incompatible substances (Sodium Hypochlorite and acid) were stored together in the same bund at the Sewage Treatment Plant – these chemicals react exothermically; - Class 2 (flammable gas) stored in Flammables Class 3 (flammable liquids) cabinet; - Hard copy SDS for Delo 400 multigrade in the mechanical workshop was 	Non-compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					significantly out of date (Nov 2010 issue) – based on limited sampling.	
51.	31	<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> <p>(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:</p> <ul style="list-style-type: none"> • a program to monitor and publicly report on the surface water impacts of the development; 		<ul style="list-style-type: none"> – Water Management Plan Rev G dated 15/10/2020. 	The Water Management Plan was reviewed and assessed as compliant at Audit #1. The implementation of the requirement to monitor and publicly report on the surface water (31 (c)) is assessed below.	Compliant
52.	32	The Proponent must implement the approved Water Management Plan for the development.		<ul style="list-style-type: none"> – Draft Water Report – Dec 2020 to Feb 2021 (30/07/21) – Draft Water Report – March 2021 – May 2021 (30/07/21) 	<p>Evidence was not provided to demonstrate that the program to monitor and publicly report on the surface water impacts of the development had been implemented as required by Condition 31 (c).</p> <p>Specifically:</p> <ul style="list-style-type: none"> – Environmental Water Reports had not been prepared and reported to Snowy Hydro and other agencies on a quarterly basis as detailed in the Water Management plan; and – Environmental Water Reports had not been made publicly available. <p><i>It was noted that draft Environmental Water Reports for the periods Dec 2020 to Feb 2021 and for March to May 2021 (30 July 2021) were provided to the auditor for information following the last day of the audit.</i></p>	Non-compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
53.	34 (a)	<p>Heritage Management Requirements</p> <p>The Proponent must:</p> <p>(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;</p>	SHL FGJV	<ul style="list-style-type: none"> - Snowy 2.0 Exploratory Works Aboriginal Heritage Impact Mitigation Interim Report by NSW Archaeology Pty Ltd dated 30 June 2021 (97-page report); - Interview. 	<p>It was advised that salvage work for the exploratory works had been completed.</p> <p>The report referred to in the evidence column was prepared to provide an interim overview of the heritage impact mitigation works undertaken in 2019 at Lobs Hole for exploratory Works. It documents the locations in which salvage excavations have been conducted, the methods and preliminary results. The purpose of the report was to address the construction environmental management requirements detailed in the Main Works and Exploratory Works approvals and REMMs and in the respective EIS and modification assessment reports.</p>	Compliant
	34 (d)	<p>(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>	SHL FGJV	<ul style="list-style-type: none"> - Exploratory Works (DD) Boulder Stream Treatment Plan Drawing S2-6130-DRG-011010 – Certified as Work as Executed (WAE) 17/02/2021; - Aconex transmittal of Boulder Stream WAE Drawings – listing drawings dated from 17/02/2021 to 24/07/2021. 	<p>This condition was assessed as compliant at Audit #1 and Exploratory Works Audit.</p> <p>The “As built” drawings for boulder streams had now been completed.</p> <p>The stabilisation of the areas uphill and downhill from the boulder streams was designed to minimise the impact on the boulder streams (assessed as compliant at the Exploratory Works Audit).</p> <p>The Certified Work as Executed drawings provided evidence that the boulder stream works were completed in accordance with the design.</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
54.	36	The Proponent must implement the approved Heritage Management Plan for the development.	SHL? FGJV? ?	<ul style="list-style-type: none"> - Snowy 2.0 Exploratory Works Aboriginal Heritage Impact Mitigation Interim Report by NSW Archaeology Pty Ltd dated 30 June 2021 (97-page report); - Interview. 	<p>Heritage management was assessed as compliant at the initial audit in January 2021, and as such was not a focus area of this audit. However, progress on key areas assessed at Audit #1 were reviewed as detailed above in Sch 3 Cond 34. The key outcomes are documented below:</p> <ul style="list-style-type: none"> - Archival recording and salvage of moveable material was in progress at the time of Audit #1 and was complete at Audit #2; - An interim report for salvage of early works was in progress at the time of the Audit #1, and this has now been released. 	Compliant
55.	41 Table 5-1	<p>TRANSPORT</p> <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>	SHL	<ul style="list-style-type: none"> - Snowy 2.0 – Process for obtaining NPWS approval of project roads within KNP – Draft for comment 03/06/2021. Comments by NPWS 21 & 22/06/21 <p>Focus area for NPWS (NPWS is the road Authority for certain roads within KNP)</p>	<p>In relation to the works listed in Table 5-1 in which NPWS is the relevant roads authority, there has been no sign-off to date on the timeframes or upgrades of road and intersection upgrades to the satisfaction of NPWS. The following upgrades have been either completed or partially completed:</p> <ul style="list-style-type: none"> - Link Road (spring 2020); - Mines Trail Road; - Lobs Hole Ravine Road North; - Marica Trail and Marica Trail West; - Tantangara Camp Road. <p>It was noted that there had been no mutually acceptable sign-off mechanism at the time of the audit.</p>	Non-compliant

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57.	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>	FGJV	<ul style="list-style-type: none"> – Snowy 2.0 Main Works Transport Management Plan Rev G 03/08/2020. Requirements are addressed in Section 5.6 and Appendix F; – Interview; – Complaints Register – summary 2020; – Complaints Register – Jan to May 2021. 	<p>Interview indicated that heavy vehicles only use these routes, and that Elliott Way is not being used, and therefore written approval from the Secretary has not been requested.</p> <p>Copper mine trail was still being used (through dip creek).</p> <p>The complaints register did not identify any specific issues relating to heavy vehicle routes taken.</p> <p>From the interviews conducted, and the evidence reviewed it appears that the project is compliant with this condition, however could not be fully verified.</p>	Compliant																																

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
58.	44	<p>The Proponent must:</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: <p>- a maximum of 120 vehicle movements allowed a day (60 each way); and</p> <p>- an annual average maximum of 60 vehicle movements allowed a day (30 each way); and</p>	FGJV	Interview.	<p>It was noted during the interviews that Lobs Hole Ravine Road North is not often used.</p> <p>FGJV have stated that: <i>“Use of this road is limited to inspections, approved uses and emergency exits. Journey Management Plans (JMP) are in place for all vehicles using this road and are approved by the Area Superintendent or Authorised Delegate. Currently 6 vehicles have a JMP in place to use this road”.</i></p> <p>It was further stated that: <i>“Security and Construction have investigated and are implementing a plan to install a security system on this road. Plan is to have a fob access boom gate at the top of Ravine Rd North and a guard at the bottom to monitor and restrict movement”.</i></p> <p>Sufficient information was provided during the audit to generally determine compliance to this condition (no evidence of non-compliance), given the reported low numbers using the road; however full compliance could not be verified. This will be reviewed at future audits.</p>	Compliant
		<p>(c) restrict vessel speeds on Tantangara Reservoir and Talbingo Reservoir to current TfNSW speed limits.</p>	FGJV	Interview.	<p>It was advised that no vessels are being operated except for water quality monitoring testing. However, a pontoon has been installed, limiting access to Yarrangobilly river.</p>	Not triggered

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
59.	45 (a)	<p>Transport Management Requirements</p> <p>The Proponent must:</p> <p>(a) minimise the impacts of the road and intersection upgrades of the development;</p>	FGJV	Discussion – TfNSW.	Intersection upgrades were completed prior to the Audit #1. It was confirmed with TfNSW that the intersection works were undertaken by TfNSW with minimal impacts on the road and intersections.	Compliant
60.	45 (b)	<p>(b) maintain all roads and water-related infrastructure on site in a safe and serviceable condition;</p>	FGJV	<ul style="list-style-type: none"> – Interviews; – Email dated 24/8/2021 from Road Maintenance section of Snowy Hydro providing summary of time and resources spent on road maintenance on Tantangara Road and Lobs Hole Ravine Road (showing 291 maintenance days on Lobs Hole Ravine Road and 104 days on Tantangara Road). 	<p>It was reported that NPWS have raised some issues regarding the adequacy of the maintenance of Lobs Hole Ravine Road, and Tantangara and Marica, and this was discussed at inter-agency meeting on 24 June 2021 following an 80mm rain event.</p> <p>FGJV noted that they were having issues with the condition of the roads due to high levels of rain and are working on maintaining and grading the roads.</p> <p>Whilst a site inspection could not be conducted due to Covid-19 restrictions, evidence was provided to indicate that resources are being allocated to road maintenance - see below:</p> <ul style="list-style-type: none"> – 16/08/2020 to 31/07/2021 Lobs Hole Ravine Road/ Mine – 291 days – 1/12/2020 to 31/07/2021 – Tantangara Road – 104 days <p>It was advised that works completed on Ravine Road have been in accordance with the agreed designs as discussed between SHL, FGJV and NPWS.</p> <p>Sufficient evidence was provided to indicate compliance based on the available evidence; however, will be reassessed at future audits when physical site visits are possible.</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
61.	45 (c)	(c) allow NPWS officers to access the site at all times, including during the upgrade of Tantangara Road;	SHL FGJV	Interviews – FGJV, Snowy Hydro.	It was advised that there is no restriction on NPWS officers accessing the site; however due to potential safety concerns, Snowy Hydro and FGJV would prefer if they call prior to visiting.	Compliant
62.	45 (d)	(d) provide sufficient parking on site for all vehicles and ensure vehicles associated with the development do not park on the public road network;	FGJV	<ul style="list-style-type: none"> – Interview; – Site inspection – Audit #1 – site parking sighted at Lobs Hole, Tantangara; – Complaints Register – January to May 2021 (no related complaints); – Pre-start records – 14 July 2021 (post audit commencement) – Topic - Off-site Parking – Link Road. 	<p>Parking is provided on site – buses transport workers to site from the accommodation. Coaches from Cooma to Adaminaby. 2 to 3 coaches each day. Must have at least 3 persons in each LV.</p> <p>All 3 new camps to be online between October to Dec – Main Camp (Lobs Hole,) Tantangara and Marica. 488 people currently working at Lobs Hole, 360 stay at the camp.</p> <p>Whilst it is reported that parking is provided on site, there have been some reports from NPWS (to FGJV/Snowy) of private vehicles parked on the roads and at Three Mile Dam.</p> <p>It was stated that this issue had been communicated to relevant parties by the Transport department; however, r evidence of written communications could not be provided.</p> <p>Subsequent Pre-start records (14 July 2021) showing reminders that there is to be no parking of private or project vehicles along Link Road (Battery Carpark, Three Mile Dam and Powerline Hill, etc.), noting that parking in these locations is a breach of the approvals.</p>	Compliant Observation

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
63.	45 (e)	(e) ensure heavy vehicles entering and leaving the site have loads covered or contained and enter and leave the site in a forward direction;	FGJV	<ul style="list-style-type: none"> - Transport Management Plan Appendix A - Drivers Code of Conduct; - Interviews; - Complaints Register -January to May 2021 (no related complaints.) 	<p>Inspections are undertaken at the Gate House, and it was advised that trucks would be turned around if not properly covered.</p> <p>These requirements were included in the Site rules, and the Drivers Code of Conduct – sighted at Audit #1.</p> <p>As there were no site inspections (virtual or otherwise) at site entries, compliance at the time of the audit could not be fully verified.</p>	Compliant
64.	45 (g)	<p>(g) minimise the traffic impacts of the development on the public road network, including:</p> <ul style="list-style-type: none"> • scheduling heavy vehicle movements to avoid peak periods; • minimising convoy lengths; • reducing the speeds of development-related traffic at key intersections along the Snowy Mountains Highway, including the Rock Forest, Tantangara Road, Link Road, Coppermine Trail, Marica Road, Lobs Hole Ravine Road – North and Miles Franklin Drive intersections; 	FGJV	<ul style="list-style-type: none"> - IVMS system – speed control; - Complaints Register; - https://www.futuregenerationjv.com.au/traffic 	<ul style="list-style-type: none"> - Scheduling of oversized loads at night, on website (TBM components mainly). Heavy vehicles head into site at 7.00am and leave at about 12.15. - A site inspection conducted by NPWS and DPIE on 23 & 24 June 2021 identified some issues in relation to convoy length (up to 7 trucks observed in convoy) leaving Lobs Hole Ravine Road. (OBS) <p>Whilst it was stated that correspondence was issued by the Transport Department to address this issue, and that a new system has been implemented to stagger the exit of heavy vehicles from Lobs Holes since the inspection, evidence of communication of requirements or a change of process could not be provided.</p> <ul style="list-style-type: none"> - <i>The Project Website stated that “...the largest loads – which may be oversize, over mass and/or over dimension – will mostly be transported at night and early mornings to reduce traffic impacts”.</i> <p><i>The Drivers Code of Conduct obligations included the requirement: “where it is</i></p>	Compliant Observation

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					<i>reasonable and safe to do so, project drivers are encouraged to reduce speed at key intersections along the Snowy Mountains Highway, including the Rock Forest, Tantangara Road, Link Road, Coppermine Trail, Marica Road, Lobs Hole Ravine Road – North and Miles Franklin Drive intersections”.</i>	
65.	45 (h)	(h) minimise the traffic safety risks of the development in snow and ice conditions;	FGJV	<ul style="list-style-type: none"> – Snow and Ice Traffic Management Plan (Appendix D of Transport Management Plan); – Drivers Code of Conduct; – Pre-starts – weather forecasts on page 1 or sighted examples. 	<p>The Snow and Ice Traffic Management Plan provides management measures, including induction for all workers to be made aware of potential weather impacts on road use.</p> <p>Project documentation (adjacent column) was sighted; however full implementation was not assessed. Based on evidence sighted, the project appears to be compliant to this condition.</p>	Compliant
66.	45 (i)	(i) respond rapidly to any heavy vehicle accidents on the designated heavy vehicle routes for the development and secure access to a suitable heavy vehicle recovery vehicle;	FGJV	Interviews	<p>Interviews with the FGJV Transport Department and the recently prepared Traffic Incident Register provided evidence that heavy vehicle accidents are responded to in a timely manner.</p> <p>Also refer to Table D5 – Transport Management Plan.</p>	Compliant
67.	45 (j)	(j) minimise the traffic noise impacts of the development, particularly in Cooma and Adaminaby, including: <ul style="list-style-type: none"> • limiting the use of truck engine braking on the Snowy Mountains Highway; • notifying the local community about development-related traffic impacts; 	FGJV	<ul style="list-style-type: none"> – Appendix A of Transport Management Plan - Drivers Code of Conduct; – https://www.futuregenerationjv.com.au/traffic. 	<p>Assessed at Audit #1 - Limiting the use of engine braking is included in the Drivers Code of Conduct.</p> <p>Not further assessed at this audit</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
68.	45 (k)	(k) minimise the development-related traffic safety impacts of the development for the public: • using the Talbingo Reservoir and Tantangara Reservoir and any water-related infrastructure, such as the Talbingo Boat Ramp;	FGJV	Interview	It was advised that there was minimal use of the water related infrastructure as no vessels were being operated except for water quality monitoring. This was not fully verified at this audit and will be reviewed at future audits.	Not triggered
69.	45 (k)	• using Tantangara Road, particularly during the construction of the development;		Site inspection – Audit #1 (Jan 2021).	It was observed during Audit #1 that the speed limit for Tantangara Road has been reduced to 60 km/h for project related vehicles and is signposted as such on project placards (not standard speed limit signage). It was not expected that this would change since January 2021.	Compliant
70.	45 (l)	(l) ensure any vessel or structure occupying waters must display appropriate shapes and lights in accordance with the <i>Marine Safety (Domestic Commercial Vessel) National Law Act 2012</i> ;	FGJV		It was advised that no vessels are being operated except for water quality monitoring testing. Water-related structures or vessels not assessed at Audit #1 or Audit #2.	Not triggered
71.	45 (m)	(m) keep the public informed of any road or infrastructure upgrades, disruptions to traffic, the closure of roads or other infrastructure, OSOM vehicle use, peak construction periods, and any emergencies.	FGJV	Website: https://www.futuregenerationjv.com.au/traffic	The Snowy 2.0 Website includes information on current activities affecting traffic. As at 16 June 2021 (prior to audit) – updates provided for delivery of TBM cargo through Cooma to Lobs Hole and Tantangara – 22 June to 29 July. As at August 2021 (post audit): Updates provided for heavy vehicle loads planned for, 6am to 6pm for delivery to Lobs Hole, Tantangara and Marica work front weeks commencing 29 Aug and 5 Sept 2021.	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
72.	46	Transport Management Plan Prior to the commencement of construction, the Proponent must prepare a Transport Management Plan for the development to the satisfaction of the Planning Secretary.	FGJV	S2-FGJV-LOG-PLN-0008[G]-Main Works-Transport Management Plan 03/08/2020	Document was assessed as compliant at Audit #1. There have been no changes to TMP since last audit.	Compliant
		(e) include a program to: • record and track vehicle movements; and • monitor and publicly report on the effectiveness of these measures	FGJV		Public reports had not been prepared or uploaded to the website – see below and Table D5 – Transport Management Plan.	Non-compliant
73.	49	The Proponent must implement the approved Transport Management Plan for the development	FGJV		The implementation of the Transport Management Plan was assessed – see Table D5 – Transport Management Plan. A Quarterly Cumulative Summary Report had not been prepared at the time of the audit, and therefore had not been submitted to SHL or to the project website as per Table 6-1 of the Transport Management Plan.	Non-compliant
74.	52	WASTE 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 <i>Waste Classification Guidelines</i> (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.	FGJV	Interview	This condition was assessed as compliant at Audit #1 and was not fully assessed at this audit. An opportunity for improvement (OFI) was raised at the previous audit (Audit #1) noting that plastic water bottles were provided extensively to workers due to lack of bulk water supplies at work sites. Consideration could be given to providing bulk water supplies / reusable bottles as an alternative to single use water bottles in the future. Potable water is now provided on site sourced from Talbingo reservoir. It was advised that water bottles are now being recycled through being taken to return and earn centres.	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					FGJV noted they are still looking at re-usable bottles, but this has not yet been fully considered. Plastic cutlery has been replaced with bamboo. The OFI has been closed, however where possible, further initiatives should be considered.	
75.	57	<p>Construction Noise Management Plan – Rock Forest</p> <p>57. Prior to the commencement of construction on the Rock Forest site, the Proponent must prepare a Construction Noise Management Plan for the development on site to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person in consultation with the landowners of the nearby properties;</p> <p>(b) describe the measures that would be implemented to minimise the construction noise impacts of the development on the Rock Forest site, including:</p> <ul style="list-style-type: none"> • minimising the use of the site during the evening and night-time periods • implementing the best practice noise mitigation measures outlined in the <i>Interim Construction Noise Guideline</i> (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 <p>(c) include a program to monitor and publicly report on the effectiveness of these measures</p>	FGJV	<ul style="list-style-type: none"> – Construction Noise Management Plan – Rock Forest S2-FGJV-ENV-PLM-0089 Rev E dated 02/12/2020; – Letter from DPIE: Snowy Main Works (SSI 9687) Construction Noise Management Plan – Rock Forest) dated 20/12/2021. 	<p>The Construction Noise Management Plan (CNMP) was approved by DPIE on 20/12/2021. The letter from DPIE noted that Snowy Hydro will update the plan once the detailed design of the spoil emplacement is complete.</p> <ul style="list-style-type: none"> a. The CNMP was prepared by Environmental Consultants / Acoustic Consultant V Giles and Remi Larmandieu. Consultation is addressed within Section 1.7 – Consultation Summary and Table 1-2 – Consultation undertaken for this Plan; b. Measure to be implemented are documented within Section 6.1 – Management Measures, Table 6-1 Noise Management Measures / Mitigation Measures / Requirements; c. Section 7.5 of the CNMP identifies that reporting requirements and responsibilities are documented in Section 8.4 of the EMS. <p>Whilst Table 2-1: <i>Conditions of approval relevant to construction noise management</i> references the requirement to publicly report on the effectiveness of the noise minimisation and notes it is addressed in Table 7-1, there is no reference to public reporting in Table 7-1 – Noise Monitoring Program. (Observation)</p>	Compliant Observation

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					Also refer to Construction Noise Management Plan section - Rock Forest – Table D4 for implementation.	
76.	58	The Proponent must implement the approved Construction Noise Management Plan for the Rock Forest site	FGJV		See Table D4 – Noise Management Plan – Rock Forest	Compliant
77.	60 (a)	<p>EMERGENCY MANAGEMENT</p> <p>Bushfire Requirements</p> <p>60. The Proponent must:</p> <p>(a) include suitable asset protection measures into the final design of the development in accordance with the <i>Planning for Bushfire Protection</i> (RFS 2018) guidelines, or its latest version;</p>	FGJV	– Main Yard Construction Facilities – Civil Basis of Design Rev 01 dated 03/05/2021 (for Construction) (Lobs Hole).	<p>The Basis of Design Report for Lobs Hole included consideration of asset protection measures into the design including APZ boundaries.</p> <p>Final design will not be completed for a number of years; however, evidence was provided of asset protection measures included in design to date.</p>	Not triggered
78.	60 (b)	(b) ensure all buildings developed on site comply with the relevant requirements of the BAL-29 construction standards of <i>Australian Standard AS 3959-2018: Construction of buildings in bushfire prone areas</i> or the NASH Standard (1.7.14 updated) in <i>National Standard Steel Framed Construction in Bushfire Areas – 2014</i> ; and	FGJV	Interview	<p>SHL identified that there were some issues with compliance with BAL 29 at Audit #1, and buildings at the Exploratory Camp were later retrofitted. It was stated that Exploratory Camp was compliant, subject to final documentation (not yet issued at time of the audit).</p> <p>As final documentation was not yet issued / available, compliance could not yet be established and is therefore not triggered.</p>	Not triggered
79.	60 (c)	(c) ensure any fire trails or asset protection zones associated with the development are wholly contained within the approved disturbance area.	FGJV	<ul style="list-style-type: none"> – Main Yard Construction Facilities – Civil Basis of Design Rev 01 dated 03/05/2021 (for Construction) (Lobs Hole); – Snowy 2.0 Web Map - Main Camp APZ; – Snowy 2.0 Web Map Tantangara APZ. 	<p>It was stated that the Project is not creating any fire trails.</p> <p>Basis of Design Report identified the requirement to ensure the APZs are wholly contained within the approved disturbance area. It noted that where the site is near an EIS boundary, the APZ is to the EIS boundary.</p> <p>GIS maps sighted electronically during the audit.</p>	Compliant

ID No.	Sch 3 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					Main Camp and Tintangara Web maps indicated showed APZs within the approved disturbance area.	

TABLE C – Schedule 4 – Environmental Management, Reporting and Auditing

ID	Sch 4 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
No		ENVIRONMENTAL MANAGEMENT				
80.	2	The Proponent must implement the approved Environmental Management Strategy.	FGJV		Refer to Table D1 – EMS – key elements only assessed. Generally, the EMS requirements have been implemented (also assessed at Audit #1).	Compliant
81.	4	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:	SHL FGJV	Approved Plans and Strategies (no updates or reviews since last audit).		
82.	4 (a)	(a) the submission of an incident report under condition 6 below;	SHL		a) No evidence was provided to indicate that any of the approved strategies, plans or programs had been reviewed following submission of an incident report. Incidents have been reported since the commencement of the project and have related to discharges or spills.	Non-compliant
83.	4 (b)	(b) the submission of an independent environmental audit report under condition 10 below; and	SHL		b) Evidence was not provided to indicate that any of the approved strategies, plans or programs relevant to the scope of the Independent Environmental Audit #1 (IEA) had been reviewed following submission of the IEA Report. <i>Note: the final IEA #1 was issued to Snowy Hydro on 9 April 2021, and was formally submitted to DPIE on 15 June 2021.</i>	

ID	Sch 4 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
84.	4 (c)	(c) any modification to the conditions of this approval; or			c) There have been no modifications to the conditions of this approval and this part of the condition is therefore not triggered.	Not triggered
85.	4 (d)	(d) a direction of the Planning Secretary under condition 4 of schedule 2. <i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i>			d) There have been no directions of the Planning Secretary, and this part of the condition is therefore not triggered.	Not triggered
86.	6	REPORTING Notification of Dates 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: (c) commencement and completion of the required road upgrades;	SHL	– Letter from FGJV to Team Leader, Energy Assessments, DPIE: <i>Infrastructure Approval (CSSI 9687) - Snowy 2.0 Main Works - commencement of development</i> dated 10 August 2020.	Assessed as compliant at Audit #1 for commencement. No roads have been completed since last audit (completion not triggered).	Compliant Not triggered
87.	6 (a)	Incident Reporting 6. 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.	SHL FGJV	– FGJV Environmental Incident and Event Register S2-FGJV-ENV-REG-0014 – S2-FGJV-PCO-MPR-0026 Project Monthly Progress Report May 2021, dated 15 June 2021; – External Agency Incident Notification Form to EPA: 26 May 2021 — Main Works EPL 21266 – overtopping event resulting in water leaving site and entering minor water course approx. 500m upstream of Eucumbene River. – Sampled incident reports: o No 137 (INC 576) 23 March 2021 – Joule Ridge (minor) – type –	FGJV maintain an Incident and Event register, and categorise incidents, which was sighted and reviewed. FGJV report monthly to SHL, and this is reported to the Monday morning weekly meetings. An Incident was reported to EPA involving the overtopping of controls on 26 May 2021 (no incident number provided) was required to be notified to the EPA as per the External Agency Incident Notification Form. This incident was not also notified to the	Non-Compliant

ID	Sch 4 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
				<p>drainage involving Maliyan Horizon (was reported to EPA hotline, Council to be notified</p> <ul style="list-style-type: none"> o No 138 (INC 575) 23 March 21 at Lobs Hole Office pad (moderate) – type – drainage (no to threaten material harm) – reported to EPA o No 141 (INC 592)– 1 April 2021 at Lobs Hole Office pad (moderate) – type – drainage (yes to cause or threaten material harm) – reported to EPA (TARP breach) o No 201 (INC 766) 18 June 2021 Lobs Hole Talbingo Adit -type procedural breach (major) – removed submerged trees in breach of agreed procedure o No 217 (INC 784) 23 June 2021 – Marica – water cart drove off hardstand outside the approved lease area causing deep wheel ruts (non-compliance reportable to NPWS). 	<p>Department or NPWS as required by this Condition (non-compliant).</p> <p>In addition, one event relating to an overtopping event was not reported to NPWS as required by the Trigger Action Response Plan 2 (TARP) – Stormwater Overtopping Event in the approved Surface Water Management Plan. Refer to non-compliance and Table D3 – Water Management Plan.</p> <p>The monthly reports from FGJV provide a summary of environmental incidents reported on the project for the month. The majority of incidents reported for May were rated as insignificant, involving spills of hydraulic and engine oil.</p> <p>The FGJV Incident and Event Register shows several potentially “major” or moderate incidents (see adjacent list):</p>	
88.	7	<p>Reporting Non-compliances</p> <p>Within 7 days of becoming aware of any non-compliance with the conditions of this approval, the Proponent must notify the Department via the Major Projects portal of the non-compliance. This notice must set out the non-compliance, the reasons for the non-compliance (if known) and what actions have been taken, or will be taken, to address the non-compliance.</p>	SHL FGJV	<ul style="list-style-type: none"> – INC 784 Incident 23/06/2021 – disturbance outside project boundary at Marica/Copper Mine Laydown – water cart had driven off hardstand outside the approved lease area causing multiple deep wheel ruts; – External Agency Incident Notification dated 23/06/2021 to DPIE & NPWS in relation to incident at Marica/Copper Mine Laydown (above) incident – notified as in incident that caused a non-compliance (non-compliant with Environmental Management Strategy); 	<p>Non-compliances from IEA #1 were not notified to the Department via the Major Projects Portal within the required 7-day timeframe. The IEA Report containing the required information relating to the non-compliances was issued to Snowy Hydro on 9 April 2021 and submitted to the Department on 16 June 2021.</p> <p>A non-compliance on 29 March 2021 regarding a bogged truck outside the approved boundary was not initially notified</p>	Non-compliant

ID	Sch 4 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
				<p>– Pre-start briefing – 08/07/2021 – Environment: identifying that there had been 2 incidents relating to access outside approved boundaries. Reminder to all personnel and contractors that no on-foot or vehicle access is permitted outside project boundaries for any reason.</p>	<p>to the Department as required by this condition.</p> <p><i>It appears that the lack of notification of the above non-compliance was due to a difference in interpretation of the event as a non-compliance between Snowy Hydro and the authorities DPIE and NPWS. A formal notification was submitted to DPIE on 9 June 2021.</i></p> <p>A subsequent event (Incident INC 784) resulting in an incident that caused a non-compliance (disturbance outside project boundary) was notified within the appropriate timeframes.</p> <p>Evidence of a mitigation measure to prevent recurrence of the incident / non-compliance included a pre-start briefing – 08/07/2021 which identified that there had been 2 incidents relating to access outside approved boundaries. Reminder to all personnel and contractors that no on-foot or vehicle access is permitted outside project boundaries for any reason.</p>	
89.	8	<p>Reporting on Environmental Performance</p> <p>8. The Proponent must provide regular reporting on the environmental performance of the development on its website in accordance with the requirements in any approved strategies, plans or programs.</p>	SHL FGJV	Snowy 2.0 Exploratory Works Compliance Report (under SSI 9208) – Lobs Hole, Kosciuszko National Park. Talbingo Reservoir.	<p>A review of reporting timeframes within the various Management Plans found that formal performance reporting requirements were not yet triggered for Main Works at this audit.</p> <p>It was however noted that the Quarterly Environmental Water Reports as required by the Water Management Plan and Quarterly Traffic Reports required by the Transport Management Plan had not been</p>	Not triggered

ID	Sch 4 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					<p>uploaded to the project website. This is raised as a separate non-compliance under Sch 4, Cond 12.</p> <p>Environmental performance is also reported within the IEA Reports. The first IEA Report was not reported on the project website as required; however, this was addressed and raised as a separate non-compliance under Sch 4 Cond 10.</p> <p>Interviews with Snowy Hydro indicated that formal performance reports will be uploaded to the website in the near future once triggered.</p>	
90.	9	<p>INDEPENDENT ENVIRONMENTAL AUDIT</p> <p>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:</p>	SHL	<ul style="list-style-type: none"> - Independent Environmental Audit Report – Snowy 2.0 January 2021 (issued 9 April 2021); - This Independent Environmental Audit Report (July 2021 (issued Sept 2021). 	<p>Audit #1 was conducted approximately 12 weeks from commencement of construction, and Audit #2 (this audit) was conducted within 26 weeks of the first audit. This is within the timeframes required by the IEA Program approved by DPIE on 28 September 2020. The IEA Program is conducted at a higher frequency that required by this condition, and is therefore compliant.</p>	Compliant
91.	9 (a)	(a) be conducted by a suitably qualified, experienced and independent team of experts, including a lead auditor, whose appointment has been endorsed by the Planning Secretary;	SHL Auditor	<ul style="list-style-type: none"> - Letter from Department of Planning, Industry & Environment dated 1 October 2020 “Snowy 2.0 Main Works SSI 9687 - Auditor Approval” approving audit team of Dickson Environmental Consulting and Audit – Julie Dickson (Lead Auditor), and Larry Weiss (Senior Auditor). 	<p>a) The audit was conducted by Julie Dickson, an Exemplar Global qualified Lead Auditor. The DECA audit team was endorsed by the Planning Secretary. A copy of the endorsement is included in this IEA Report.</p>	Compliant

ID	Sch 4 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
92.	9 (b)	(b) include consultation with the relevant agencies;	SHL Auditor	– Section 2.3 and Table 1 of this Report – Consultation with Agencies	The consultation process and summary of consultation with the relevant agencies is included in Section 3 and Table 1 of this report.	Compliant
93.	9 (c)	(c) assess the environmental performance of the development and whether it is complying with the requirements in this approval (including the requirements of any approved strategy, plan or program);	Auditor	– This report – including findings table with actions and recommendations.	Environmental performance is reflected in the audit findings, recommendations and various sections of this report.	Compliant
94.	9 (d)	(d) review the adequacy of the approved strategies, plans or programs for the development; and	Auditor	– This Audit Table and Audit Report.	The adequacy of the majority of approved strategies, plans and programs was assessed at Audit #1. A further approved management plan – the Noise Management Plan – Rock Forest was assessed for adequacy at Audit #2. An observation was raised in relation to the Rock Forest Noise Management Plan – refer to Sch 3 Condition 57 and findings table.	Compliant
95.	9 (e)	(e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any approved strategies, plans or programs.	Auditor	– This report – findings table with actions and recommendations.	Environmental performance is reflected in the audit findings table, recommendations and various sections of this report. (Self-assessed by Auditor as compliant).	Compliant
96.	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	SHL	– Email from DPIE (Katrina O'Reilly) dated 16/06/2021 noting that the IEA #1 was only submitted to DPIE on 15 June 2021 after requesting an update on timeframe for submission.	The Independent Environmental Audit (IEA) Report #1, response to the recommendations and the proposed audit action plan were submitted to the Planning Secretary on 15 June 2021, which is outside the submission timeframe. IEA #1 commenced on 18 January 2021 and the Report was formally issued to Snowy Hydro on 9 April 2021. The latest	Non-compliant

ID	Sch 4 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					<p>date for formal submission of the Audit Report to DPIE was 12 April 2021.</p> <p>Note: The definition of "Commissioning of the audit" has been clarified with DPIE to mean "the first day of the audit / site inspection".</p>	
97.	11	The Proponent must implement any approved audit action plan for the development.	SHL FGJV	– Section 3.3, Table 6 of this Report – Previous Audit Findings follow-up summary.	<p>Section 3.3, Table 6 of this report provides evidence of actions taken to implement the audit action plan.</p> <p>The majority of actions were implemented and closed out at this audit; however, one Observation has been escalated to non-compliance (see separate non-compliance #2).</p>	Non-compliant
98.	12 (a)	<p>ACCESS TO INFORMATION</p> <p>From the commencement of the development of the Main Works until the completion of the ecological rehabilitation of the areas used for operations, the Proponent must:</p> <p>(a) make copies of the following information publicly available on its website:</p>	SHL	<p>https://www.snowyhydro.com.au/snowy-20/documents/</p>	<p>The following were not publicly available on the website at the time of the audit:</p> <ul style="list-style-type: none"> – Rock Forest Noise Management Plan; – Monitoring results – EPL (see part (b)); – Monthly summary of complaints (see part (b)); – A record of all incidents and non-compliances; – Independent Environmental Audit Report #1 with response to recommendations, action plan; – Quarterly Environmental Water Reports (required as summary of Water Management Plan - monitoring results); – Quarterly Cumulative Summary Report (required as part of the Traffic Management Plan for traffic movements). 	Non-compliant

ID	Sch 4 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
99.	12 (a)	<ul style="list-style-type: none"> the documents referred to in the definition of the Exploratory Works and Main Works; 	SHL	https://www.snowyhydro.com.au/snowy-20/documents/ https://www.planningportal.nsw.gov.au/major-projects/project/12891	The documents referred to in the definition of the Exploratory Works and Main Works are included on the website, or are accessible via a website link to the Major Projects Planning Portal.	Compliant
100.	12 (a)	<ul style="list-style-type: none"> current statutory approvals for the development; 	SHL	https://www.snowyhydro.com.au/snowy-20/documents/	Current approvals were sighted on the website	Compliant
101.	12 (a)	<ul style="list-style-type: none"> approved strategies, plans or programs; 	SHL	https://www.snowyhydro.com.au/snowy-20/documents/	Rock Forest Noise Management Plan was not on the website at the time of the audit. (See NC 12).	Non-compliant
102.		<ul style="list-style-type: none"> 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; 			The latest EPL Water Monitoring results on the website on 16 June 2021 were dated 20 Sept 2020 (Note: results up to Apr 2021 were on the website on 13 July).	
103.		<ul style="list-style-type: none"> a monthly summary of complaints; 			As at 16 June 2021 there had been no change since Audit #1 with latest updated complaints summary date December 2020. By the commencement of the audit in July 2021, the website had been updated to include complaints up to April 2021 (May report).	
104.		<ul style="list-style-type: none"> a record of all incidents and non-compliances; 			As at 16 June 2021 no incidents or non-compliances were recorded on the website.	
105.		<ul style="list-style-type: none"> any independent environmental audit, and the Proponent's response to the recommendations in any audit; 			As at 16 June 2021 and 1 July 2021 – IEA was not on the website (only the Exploratory Works Report by OptimeE).	

ID	Sch 4 CoA No	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
106.		• any approved audit action plan;			Action Plan was not on website at 16 June or 1 July 2021.	
107.		• any other matter required by the Planning Secretary;			No other matters raised by the Planning Secretary.	Not triggered
108.	12 (b)	(b) keep this information up to date.			Information was not up to date at 16 June 2021 and at the time of the audit.	Non-compliant

TABLES D1 TO D5 – Environmental Management Strategy and Management Plan Requirements

Table D1 – Environmental Management Strategy

ID No	EMS Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
Environmental Management Strategy						
109.	4.2 Various	<p>Roles and Responsibilities</p> <p>Explanation of current organisational structure and resources to ensure adequate environmental management and compliance: How are the following roles being fulfilled?</p> <ul style="list-style-type: none"> – HSSE Manager – Environmental Manager; – Environmental Coordinators / Advisors <p>How are the following environmental responsibilities being fulfilled?</p> <ul style="list-style-type: none"> – Ensuring implementation of Management Plans and overall environmental performance and compliance; – Recording, monitoring, following up on action items (incidents, non-compliances, other corrective actions); – Communication of environmental requirements with wider project personnel and SHL; – Environmental induction / toolbox talks / inspections; 	FGJV	<ul style="list-style-type: none"> – Interviews – Acting Environmental Manager, Environmental Advisors 	<p>Since the previous audit, there had been significant changes to the FGJV environmental team, and it appears that the team was somewhat under-resourced for a time. FGJV were addressing this with two (2) graduates having been recently engaged – one at Tantangara, and an employee recently returned and was working at Lobs Hole.</p> <p>The Compliance Manager was acting as the Environmental Manager at the time of the audit, and a new Environmental Manager was due to start on 14th July. FGJV were also recruiting a new Environmental Advisor who will be responsible for spoil tracking.</p> <p>The Acting Environmental Manager and Advisors appeared to be knowledgeable on their roles; however, no formal job descriptions are in place. It was advised that these were in progress.</p> <p>Environmental Inspections are undertaken by coordinators and advisors.</p>	Compliant
110.	2.8	<p>Works within the Construction Envelope</p> <p>The precise location of the disturbance area will be fixed within the construction envelope following final design. All vegetation clearing which occurs on the project will be monitored regularly to record the extent of clearing which has occurred, and to ensure that the clearing limits are not exceeded.</p>	FGJV	<ul style="list-style-type: none"> – S2-FGJV-ENV-REG-0016 Clearing Register_04; – S2-FGJV-ENV-LST-Master Tracker updated to 09/07/2021; – S2-FGJV-PCO-MPR-0026 Project Monthly Progress Report May 2021, dated 15 June 2021. 	<p>A review of the Clearing Register, and the Master Tracker determined that the overall clearing undertaken to date is well within the disturbance and clearing restrictions specified for Exploratory and Main Works</p> <p>The Clearing Register tracks the area cleared (to date (in m2 and ha), providing a cumulative % of limit total to date. It also provided data related to</p>	Compliant

ID No	EMS Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status									
		<p>Table 2-3: Maximum disturbance area and native vegetation clearing</p> <table border="1"> <thead> <tr> <th>Matter</th> <th>Exploratory Works</th> <th>Main Works</th> </tr> </thead> <tbody> <tr> <td>Maximum Disturbance Area</td> <td>126 ha</td> <td>504 ha</td> </tr> <tr> <td>Maximum Native Vegetation Clearing</td> <td>107 ha</td> <td>425 ha</td> </tr> </tbody> </table>	Matter	Exploratory Works	Main Works	Maximum Disturbance Area	126 ha	504 ha	Maximum Native Vegetation Clearing	107 ha	425 ha			the specific fauna habitats and flora habitats cleared.	
Matter	Exploratory Works	Main Works													
Maximum Disturbance Area	126 ha	504 ha													
Maximum Native Vegetation Clearing	107 ha	425 ha													
111.	3.3 Table 3-2 REMM CONTAM 08	An unexpected finds procedure will be included in the CEMP. Workers will be trained to identify potential contamination that may be encountered during construction	FGJV		An observation was raised regarding the unexpected finds procedure at Audit #1. The finding was close out at this audit, noting that the induction material was updated at the time of reporting.	Compliant									
112.	5.3	<p>Toolbox Talks and Environmental Awareness</p> <p>Toolbox talks, environmental awareness training and construction methodology briefings will be delivered by Future Generation as necessary to achieve a suitable level of workforce awareness and competence appropriate to the activities.</p> <p>Toolbox talks will be tailored to specific environmental issues relevant to upcoming works or previous incidents and will include general and specific discussion of the key environmental aspects of the project.</p> <p>Targeted environmental awareness training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact.</p>	FGJV	Training and awareness register.	The training and awareness register provided evidence of ongoing environmental awareness.	Compliant									
113.	6.1.2	<p>Complaint Management</p> <p>A complaints management system including the complaints register will be maintained by Snowy Hydro and Future Generation.</p> <p>The complaints management system will include a process to manage complaints including receiving, recording, tracking and responding to complaints within a defined</p>	FGJV SHL	<ul style="list-style-type: none"> - Interview; - Complaints Register – summary 2020; - Complaints Register – Jan to May 2021. 	<p>An interview was held with FGJV, and it was advised that complaints are forwarded to SHL when received, and SHL upload complaints to the website.</p> <p>Complaint Registers were sighted on the website. On the evidence sighted, components of this requirement appeared compliant;</p>	Compliant									

ID No	EMS Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<p>timeframe. If a complaint cannot be responded to immediately, a follow up phone call or verbal response will be made to the complainant in accordance with the timeframes detailed below.</p> <p>The key processes involved in recording complaints and enquiries are as follows:</p> <ul style="list-style-type: none"> • all enquiries / complaints will be recorded in a complaints register; • complaints received for the duration of the project will be acknowledged verbally within 2 hours from the time of complaint unless the complainant agrees otherwise. Any received out of hours will be responded to on the next working day; • complaints received via email will be acknowledged within 24 hours; • complaints received via letters will be acknowledged within 5 days of receipt. Where a phone number or email address is supplied, a response will be provided within 24 hours. 			<p>however, a full assessment of the complaints process was not undertaken at this audit, only the outcome component (register on the website). The process will be further assessed in future audits.</p>	
114.	8.1	<p>Environmental Inspections</p> <p>The effectiveness of environmental protection measures described in this EMS and management plans will be inspected and assessed on a weekly basis through the use of a weekly checklist.</p> <p>The findings of inspections will be discussed at toolbox meetings and concerns raised will be considered by the Future Generation project management team for review or improvement of the environment procedures.</p> <p>In addition to the weekly inspections, the Future Generation environmental staff and Snowy Hydro environment staff will jointly undertake regular inspections of work sites, and in particular critical activities throughout construction of the project. Stakeholders such as DPIE, NPWS and EPA will be invited to attend relevant inspections.</p>	FGJV	<ul style="list-style-type: none"> – Loss Prevention Inspections (LPIs) including Hazardous substances LPIs (12/07/21, 13/07/21, 15/7/21 8 reports sighted); – Weekly Environmental Inspection Checklists (01/06/21, 18/06/2021). 	<p>Examples of Weekly Environmental Inspections and Loss Prevention Inspections (LPIs) were sighted and reviewed. The weekly inspections cover broad areas including soil and water, topsoil, hazardous substances, excavated material, waste, contamination, heritage and biodiversity, noise and vibration, air quality, traffic and worker recreation.</p>	Compliant

Table D2 – Biodiversity Management Plan

ID	BM Plan Section	Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
Biodiversity Management Plan						
115.	Appendix B Sect 10	<p>Biodiversity monitoring reporting</p> <p>A 'monitoring period report' will be provided to Snowy Hydro at the end of each monitoring period. The monitoring period report will focus on items requiring routine control, such as feral animal control or weed control.</p> <p>A 'quarterly report' will be provided to Snowy Hydro at the end of each quarter of monitoring. The quarterly report will include an analysis of monitoring data to date to determine how the project is tracking against objectives, how the project is tracking against triggers for adaptive management and whether any adaptive management is required. The report will also make interim recommendations for modifications to the monitoring program, if warranted.</p>	FGJV SHL	<ul style="list-style-type: none"> – Snowy 2.0 Main Works Construction Biodiversity Monitoring Program: Year 1 Quarter 1 Monitoring Report (by EMM consulting). (21 Oct 2020 – 20 Jan 2021) – Baseline report; – Memorandum from EMM to Snowy Hydro dated 21 Jan 2021 - Snowy 2.0 Main Works - Biodiversity Monitoring Program: Year 1 Quarter 1 Monitoring Report; – Snowy 2.0 Main Works Construction Biodiversity Monitoring Program: Year 1 Quarter 2 Monitoring Report (by EMM consulting) 21 Jan to 20 April 21); – Memorandum from EMM dated 30 April 2021 - Snowy 2.0 Main Works - Biodiversity Monitoring Program: Year 1 Quarter 1* Monitoring Report (* refers to Qtr. 2 results). 	Snowy 2.0 Main Works Construction Biodiversity Monitoring Program: Year 1 Quarter 1 Monitoring Report (by EMM consulting). (21 Oct 2020 – 20 Jan 2021) – Baseline report.	Compliant
116.	Table 5-1 BM06	<p>Exclusion zones will be established around areas of retained vegetation prior to clearing that particular area. Where required, these areas will be fenced using appropriate fencing materials and designated and signed as no-go zones or environmentally sensitive area.</p>	FGJV	Virtual Site inspection – Lobs Hole	<p>Virtual site inspection of Lobs Hole included the sighting of areas fenced off using flagging, rope and signage (see photos).</p> <p>Site visits could not be undertaken at Marica or Tantangara, therefore ongoing compliance at these sites could not be verified; however, the requirement was deemed generally compliant at the previous audit.</p>	Compliant

ID	BM Plan Section	Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
117.	Table 5-1 BM08	<p>Clearing limits/disturbance footprint will be delineated using highly visible, durable, continuous barrier such as safety flagging, UV stabilised rope, or other similarly robust and durable material.</p> <p>Delineation will be installed consistently where possible to reduce the risk of error or misinterpretation of boundaries. Where a continuous rope is impractical due to terrain and vegetation density, highly visible flagging will be placed on vegetation to maintain line of sight of the clearing boundary.</p> <p>“Environmental Protection Area” signs (or similar wording) will be placed in prominent positions along the exclusion fencing.</p>	FGJV	<ul style="list-style-type: none"> - Virtual Site inspection – Lobs Hole - Previous finding action follow-up 	<p>The previous audit found various types of flagging leading to potential confusion (particularly at Lobs Hole). This has been addressed and closed out.</p> <p>Evidence of delineation using rope, flagging and signage was sighted during the virtual site inspection.</p>	Compliant
118.	Table 5-1 BM20	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.	FGJV	<ul style="list-style-type: none"> - S2-FGJV-ENV-REG-0016 Clearing Register_04 updated to 9 July 2021. 	<p>The clearing of native vegetation has been monitored and is recorded within the Clearing Register.</p> <p>A review of the above Land Clearing Register noted found that clearing for all plant community types (PCTs) and threatened species habitats were within the clearing limits specified.</p> <p>Ongoing implementation of Clearing Permits and update of Land Disturbance Register / Clearing and Grubbing Register was confirmed.</p>	Compliant
119.	App B 3.2 Table 3-1	<p>Biodiversity Monitoring Plan</p> <p>Timing and frequency of monitoring in Table 3-1</p> <ul style="list-style-type: none"> • Threatened Flora Monitoring – biannually Dec to Jan • Small Mammal Presence/Absence Monitoring – 4/year • Small Mammal Habitat Characteristics Monitoring 1/year • Frog Occupancy Monitoring – 1/year • Frog Habitat Characteristics Monitoring – 1/ year • Alpine She-oak Skink Monitoring – Monthly between Oct & March • Feral Animal Occupancy Monitoring 4/year • Feral Animal Presence/Absence Monitoring 4/year 	FGJV	<ul style="list-style-type: none"> - Memorandum from EMM dated 21 Jan 2021 - Snowy 2.0 Main Works - Biodiversity Monitoring Program: Year 1 Quarter 1 Monitoring Report; - Memorandum from EMM dated 30 April 2021 - Snowy 2.0 Main Works - Biodiversity Monitoring Program: Year 1 Quarter 1* Monitoring Report (* refers to Qtr. 2 results); - Memo from EMM to Snowy Hydro dated 26 July 2021: Snowy Main 	<p>Biodiversity monitoring was being conducted by EMM in accordance with the monitoring program outlined in the BMP – the program commenced in October 2020.</p> <p>A summary of the monitoring results for Qtr. 1 Baseline period (21 Oct – 20 Jan 2021) and Qtr. 2 Construction monitoring period (21 Jan – 20 April 2021) were reported in the EMM Monitoring Reports listed in the adjacent “Evidence assessed” column.</p>	Compliant

ID	BM Plan Section	Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<ul style="list-style-type: none"> Weed Monitoring – 1/year in early summer Pathogen Monitoring - Annual Phytophthora soil tests 		<p>Works Fauna Strike Mitigation Report – Fauna Strike Monitoring;</p> <ul style="list-style-type: none"> Camera locations map – Ravine Road Mine Trail showing impact locations (feral and small mammal). 	<p>Table 1.1 of the reports provided a summary of the Main Works BMP monitoring periods.</p> <p>Table 1.2 - <i>Summary of monitoring components, adaptive management triggers, and baseline conditions</i> documented each of the monitoring components listed in Table 3-1 of Appendix B of the BMP, detailing:</p> <ul style="list-style-type: none"> Triggers for adaptive management; Baseline condition; Construction condition; Recommendations and; Addressing adaptive management <p>Key monitoring outcomes and adaptive management strategies included:</p> <ul style="list-style-type: none"> Feral animals – predator control program to be implemented by FGJV – Lobs Hole, Tantangara and Marica; <p>Soil sampling identified the presence of Phytophthora in Lobs Hole and additional soil sampling was recommended. As a result, measures to prevent the spread from infected areas were also recommended, including modifying site activities in the vicinity, controlling access and revising hygiene procedures.</p>	
120.	App F 5.1.1.3	<p>Kellys Plain Creek has been indicated as an area known to contain harmful Phytophthora species and it will therefore be treated as a restricted area that is subject to in-situ washdown controls if being disturbed.</p> <p>Soil testing for Phytophthora will be undertaken prior to disturbance in the Kellys Plain Creek area to gain a better understanding of the extent of infection in this area and to assist in delineating the relevant restricted area.</p>	FGJV	Interview	It was advised that Kellys Plain Creek surrounding floodplain area has not been disturbed.	Not triggered

ID	BM Plan Section	Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
121.	App F 5.1.2.1	<p>Chemical weed control</p> <p>At minimum, a twice-annual weed control program will take place throughout the construction of the project. This will generally involve a spring and summer round of weed spraying, the timing of which will be adapted each season to maximise efficacy by targeting the most appropriate life stage of the target species.</p> <p>Prior to spring, the weed contractor will prepare a customised weed spraying program.</p> <p>Coloured die will be used in weed spraying units to allow the sprayers and Future Generation to identify which areas have been sprayed.</p> <p>The weed-spraying program will be developed through liaison with NPWS and their weed management program being undertaken in the surrounding area for that season</p>	FGJV	<ul style="list-style-type: none"> - Narla Weed Spraying Program dated June 2021 Draft v1.1. Identifies requirement to undertake twice annual weed control; - Tantangara Weed spraying map indicating areas sprayed with Grazon Extra Herbicide targeting Ox Eye Daisy – completed 20/02/2021. 	Evidence was provided to indicate that a weed spraying program is in place and that weed spraying had been implemented. The Narla document identifies the requirement to use coloured die in the weed spraying program.	Compliant

Table D3 – Water Management Plan and Surface Water Management Plan

ID	WM Plan Section	Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
Water Management Plan (as required under Sch 3 Condition 31 (a) – (c))						
122.	6.6	Reporting requirements: Future Generation will report to Snowy Hydro and other agencies as detailed in Table 6-2 on water management aspects related to the Project <ul style="list-style-type: none"> • Weekly inspection (internal) • Incidents relating to water • EPL monitoring reports (Lic 21266) - monthly • Water Access Licence report (annual) • Environmental Water Report (every 3 months) – publicly available 	SHL FGJV	<ul style="list-style-type: none"> – Weekly environmental inspection reports; – DRAFT Quarterly Environmental Water Report (Dec 2020 to Feb 2021 dated 30 July 2021); – DRAFT Quarterly Environmental Water Report (March to May 2021 dated 30 July 2021); – EPL monitoring reports on the website (forwarded by FGJV to SHL for upload); – S2-FGJV-PCO-MPR-0026 Project Monthly Progress Report May 2021, dated 15 June 2021; 	Evidence was provided of weekly inspections, incident report, and EPL monitoring reports on the website. The annual Water Access Licence Report was not yet triggered. Quarterly Environmental Water Reports were not available at the time of the audit, and had not been provided to Snowy Hydro, or uploaded to the project website. Refer to non-compliance – Sch 3 Cond 31 (c). <i>It was noted that draft Environmental Water Reports for the periods Dec 2020 to Feb 2021 and for March to May 2021 (30 July 2021) were provided to the auditor for information following the last day of the audit.</i>	Non-compliant

ID	SWM Plan Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
Surface Water Management Plan (as required under Sch 3 Condition 31 (a) – (c))						
123.	5.3.1	<p>Process water treatment plant</p> <p>The process water WTPs will be connected to a drainage system comprised of sumps and pipelines from the tunnel to the WTP at the portal surface. This process water will be treated to the water quality discharge criteria in the Project's EPL and be re - used on site either in the tunnel or on the surface (refer to WMP Section 4.2). Excess treated water that cannot be utilised on site will be discharged via pipe into either Talbingo or Tantangara reservoirs</p>	SHL FGJV	<ul style="list-style-type: none"> – Virtual Site inspection; – Interview. 	The generation of process water had commenced since the commencement of operation of the TBM. It was stated that all process water is being stored in designated tanks and is being re-used in the TBMs. No excess treated water has yet been discharged to either the Talbingo or Tantangara reservoirs to date.	Compliant
124.	5.3.2 Table 5-3 SW35	<p>Wastewater treatment plants</p> <p>Multiple wastewater treatment plants are proposed. These will be located at the Main camp, Marica camp, Tantangara camp and Exploratory works camp.</p> <p>The sanitary sewer system will collect wastewater from showers, kitchens, laundries and toilets. The collected sewage will then be treated at the sewage treatment plants before being pumped into the combined surplus treated process water and wastewater trunk services main which will discharge via a diffuser outlet into the reservoirs.</p> <p>Low velocity discharges will be avoided. Discharges to watercourses will be avoided.</p>	SHL FGJV	<ul style="list-style-type: none"> – FGJV Monthly Report dated 15 June 2021 to Snowy Hydro (for May 2021 data); – Snowy 2.0 Main Works – Risk Assessment – Treated Effluent Reuse (Human Health risk assessment) by WSP dated 14 May 2021; – Snowy 2.0 Main Works – Treated Effluent Reuse Memorandum by Arcadis dated 20/04/2021 – risk review from an environmental planning and technical risk standpoint. 	<p>The May 2021 FGJV Monthly Report (dated 15 June 2021) to Snowy Hydro monthly Report noted that:</p> <p><i>The Project Environmental Protection Licence (EPL) was varied by the NSW Environment Protection Authority (EPA) again on the 8th April 2021.</i></p> <p><i>The changes involved; in accordance with the Waste and Process Water Mixing Zone Assessment (RTS, Annexure F of Appendix J), a daily peak discharge limit of 1.66ML/day. This equates to an average controlled discharge rate of approximately 19.2L/s, which is slightly higher than the 15L/s included in the RTS and Water Management Plan.</i></p> <p><i>The current license variation will be issued with 'Special Conditions' requiring FGJV to prepare and submit a Mixing Zone Verification Program to the Client and EPA a minimum of 4 weeks prior to any discharges into the reservoir occurring.</i></p>	<p>Not triggered</p> <p>(For discharge to reservoirs)</p> <p>Compliant (for collection of wastewater)</p>

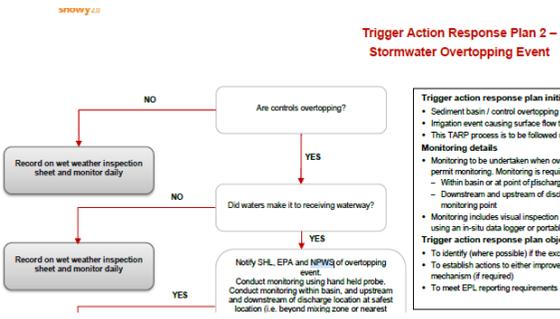
ID	SWM Plan Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					<p>The mixing zone verification programs for the Exploratory Camp STP and MAT Portal WTP were submitted to the Client on 29th April 2021. To enable the Client to apply for a further increase to the Talbingo discharge limit (from 19.2L/s to ~50L/s), FGJV have been requested to provide additional justifications that this discharge limit remains in accordance with project approvals.</p> <p>The Client provided comments to the Contractor and advised a Consistency Assessment was required to assess the reuse of treated effluent water on site against the Conditions of Approval.</p> <p>Also refer to Sch 3 Cond 30 (a).</p>	
125.	Annexure B – TARP 2	<p>Surface Water Trigger Action Response Plan 2 – Stormwater Overtopping Event.</p> <p>The Trigger Action Response Plan 2 – Stormwater Overtopping Event (TARP) requires that if controls are overtopping (yes response) and water make it to a receiving waterway (yes response), SHL, EPA and NPWS must be notified of the overtopping event.</p>  <p>Trigger Action Response Plan 2 – Stormwater Overtopping Event</p> <p>Trigger action response plan initi:</p> <ul style="list-style-type: none"> • Sediment basin / control overtopping • Irrigation event causing surface flow to • This TARP process is to be followed up <p>Monitoring details</p> <ul style="list-style-type: none"> • Monitoring to be undertaken when one permit monitoring. Monitoring is required – Within basin or at point of discharge – Downstream and upstream of discharge monitoring point <p>Monitoring includes visual inspection using an in-situ data logger or portable</p> <p>Trigger action response plan objective</p> <ul style="list-style-type: none"> • To identify (where possible) if the excess • To establish actions to either improve mechanism (if required) • To meet EPL reporting requirements 		<ul style="list-style-type: none"> – Incident Report INC 575 dated 23/03/2021; – Incident Report INC 0708 dated 26/06/2021. 	<p>NPWS were not notified of an overtopping event that occurred following significant rain at Marica on (INC 0718 - 26/06/2021) or an overtopping event at the Main Yard (permanent Batch Plant Pad) with dirty water entering the Yarrangobilly River (INC 575 – 23/03/2021 – reported to EPA).</p>	Non-compliant

Table D4 – Noise Management Plan – Rock Forest

ID	NM Plan Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
Noise Management Plan – Rock Forest						
126.	Table 6-1 NV08	Site setup (Phase 1) of the Rock Forest site will be undertaken during standard daytime construction hours: 7:00am to 6:00pm Monday to Saturday; and 8:00am to 6:00pm Sundays and NSW Public Holidays.	FGJV	Interview Complaints register	It was advised that Phase 1 works have been undertaken during standard daytime hours. No Out of hours Works (OOHW) have been required to date. There have been no complaints regarding works outside of standard hours	Compliant
127.	Table 6-1 NV11 App B	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	FGJV SHL	Email dated 26 July 2021 from Henry Pearce (Project Engineer - SHL) to Ben Croome and Chris Buscall (SHL): Rock Forest Notifications to neighbours.	The email noted that there had been continuous contact with all adjoining neighbours within a 1.5 km radius, and recent communication has included: <ul style="list-style-type: none">– July 6 face to face with Damian dM - concerns raised were around any night time work;– July 5 phone call to Graham B. He is still away but was appreciative of the update on the project;– July 5 phone call to Brett M. Brett declined a face-to-face meeting but wanted to be kept informed on the Rock Forest project. The Adaminaby community consultation was postponed due to Covid-19. SHL have invited all the surrounding residents to a BBQ on Rock Forest once the laydown area is complete and is permitted by health advice.	Compliant

ID	NM Plan Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
128.	Table 6-1 NV14 Sect 7.1 Table 7-1	<p>Attended noise monitoring</p> <p>At the Rock Forest site attended noise monitoring will be carried out during the initial stages of construction to inform site management.</p> <p>Attended monitoring will also be undertaken in response to complaints.</p> <p>All acoustic instrumentation used for monitoring under this plan will have current NATA or manufacturer calibration certificates.</p> <p>The Future Generation's Environmental Site Representative or a suitably trained person will undertake the attended noise monitoring.</p>	SHL FGJV	– Rock Forest Environmental Monitoring Report dated 28 June 2021 per period 13/05/21 – 18/06/2021 by EMM Consulting (Dust and noise).	<p>EMM have been commissioned by Snowy Hydro to conduct the noise and dust monitoring with assistance provided by Jordan C of FGJV.</p> <p>Monitoring results from late May to late June 2021 provided preliminary results. There have been no exceedances relating to the activities.</p> <p>Unattended noise monitoring has also been undertaken – data logger (site hive – measures both noise and dust using a laser to measure particulates. Attended monitoring is conducted when checking the data loggers.</p>	Compliant

Table D5 – Transport Management Plan

ID	TM Plan Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
Transport Management Plan						
129.	5 Table 5-1 TRA02	Affected communities, visitors and emergency services will be notified in advance of any disruptions to traffic and restriction of access to areas of KNP impacted by project activities. Updates will be provided across a number of platforms so as to inform all demographics and provide ample warning of upcoming or changes in access restrictions.	SHL FGJV	<ul style="list-style-type: none"> – Snowy 2.0 website; – https://www.snowyhydro.com.au/snowy-20/roads-and-access/ 	<p>The Snowy Hydro website includes a link to a Future Generation Traffic website, which provides general information regarding traffic in the Cooma, Adaminaby, Tumut and Polo Flat industrial areas.</p> <p>A table of planned heavy vehicle loads from 6.00am to 6.00pm for delivery to Lobs Hole, Tantangara and Marica in the coming weeks is provided.</p> <p>Note: only the website platform was assessed at this audit. Future audits will include an assessment of other platforms utilised.</p>	Compliant
130.	Sect 5.6.1	<p>Vehicle Movement Plans and Heavy Vehicle Haulage Routes:</p> <p>Vehicle Movement Plans (VMPs) will be developed for both external and internal roads. VMPs will be used to communicate approved heavy haulage routes and include travel directions, permitted intersection turning movements, speeds, approved parking, lay-up areas (including Polo Flat, Rock Forest, the Link Road turn around and project sites), areas off-limits to parking (e.g., Link Road NPWS pay station), types / size of trucks to be used and any traffic control required.</p> <p>VMPs are to be presented diagrammatically to allow for clear communication with the workforce. VMPs will be progressively developed during construction and updated as conditions change. Where necessary VMPs will be communicated to the relevant road authority.</p>	FGJV	<ul style="list-style-type: none"> – Tantangara Adit VMP showing haulage routes (LV and HV), UHF channels, call up instructions, parking areas, exclusion zones, direction arrows, PPE requirements, contractor compounds/areas – Traffic Control Plan – Ravine Road Interchange – Job Description – Segment Transportation SOW dated 18/07/2021 with scope and deliverables expected from Transport Contractor – Appendix F of Transport Management Plan – Primary Transport Routes – Traffic Management Plan (by FGJV for Lampson) dated 30 Sept 2020, which provides detailed information regarding 	<p>Whilst the documents sighted were not necessarily named as Vehicle Movement Plans, adequate evidence was provided to indicate that Plans have been prepared to communicate the appropriate routes and rules.</p> <p>Recommendation: FGJV need to ensure that the processes and named plans described within the Transport Management Plan are consistent with actual practice.</p>	Compliant Opportunity for Improvement

ID	TM Plan Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
				routes, directions, intersection movements etc (meets requirement for VMP contents); – Induction slides for drivers – various showing need to comply with Code of Conduct, specific heavy haulage routes, intersection where drivers should reduce speeds etc		
131.	Sect 5.6.1	<p>Heavy vehicle parking, idling and queuing on public roads will be minimised where practicable particularly within the regional towns of Tumut, Talbingo, Adaminaby and Cooma. The impact of heavy vehicles from convoys and congestion through local townships during peak traffic periods are to be mitigated through the following initiatives:</p> <ul style="list-style-type: none"> • deliveries will be scheduled and staggered to prevent vehicles queuing on the Link Road; • deliveries will be scheduled to occur such that heavy vehicle travel during snow season (June long weekend – October long weekend) weekends and public holidays is avoided where practicable; • deliveries will be scheduled to occur such that heavy vehicle travel during peak periods through Cooma and Tumut, defined as between 8:00am and 9:30am and between 4:00pm and 5:30pm, will be avoided where practicable; • particular care will be given to avoid the need for heavy vehicle travel through school zones such as that adjacent the Snowy Hydro office in Cooma during school zone operating hours; • the DCC (Drivers Code of Conduct) requires drivers to pull over when safe to do so should excessive queuing occur on single lane roads; 	FGJV	<ul style="list-style-type: none"> – Project website; – Drivers Code of Conduct; – Delivery scheduling; – Complaints Register; – Traffic Advice (Future Generation) dated 25 March 2021 – “New plan to reduce LVs travelling to Snowy 2.0 project sites 	Evidence sighted did not indicate any areas of non-compliance; however full assessment was not completed – this will be addressed at future audits.	Compliant

ID	TM Plan Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
132.	Sect 5.11	<p>Project personnel will not be permitted to drive personal vehicles to the project site. In order to reduce traffic volumes, travel times and improve safety outcomes, personnel will travel via either project approved light vehicles or bus.</p> <p>Personnel will be transported from designated local towns and airports to the accommodation camps by project-supplied buses.</p>	FGJV	<ul style="list-style-type: none"> - Traffic Advice (Future Generation) dated 25 March 2021 – “New plan to reduce LVs travelling to Snowy 2.0 project sites” - Email dated 28/03/2021 to FGJV personnel – Lobs hole attaching Traffic Alert and Journey Management Form - Winter Bus Timetable – FIFO / DIDO – Week 22 	<p>Traffic advice document 25/03/2021 states that LVs entering and leaving Snowy 2.0 work site will be required to have a minimum of 3 people in each vehicle. All other workers travelling to Lobs Hole and Tantangara will need to board daily coach services that operate from Cooma and Tumut at the (designated) times. Further information is provided regarding other sites, exemptions and Journey Management Plans.</p> <p>Evidence was provided to demonstrate that efforts were being made to ensure that number of vehicles on the project are being minimised; however, it was not possible to establish full compliance to this requirement over time. Based on the evidence provided, this requirement is determined as compliant.</p>	Compliant
133.	Sect 5.12	<p>Traffic Incidents (within the site):</p> <ul style="list-style-type: none"> • safety and environment related traffic incidents within the bounds of the project area will be managed in accordance with the EMS and the Health and Safety Management Plan and the associated incident and emergency reporting procedures; • depending on the type and severity of the incident this may include notification to the Department in writing for incidents defined under the Approval, notification to the NPWS where required under the Deed of Agreement of Lease and notification to the EPA for pollution related incidents. <p>Snowy Hydro would notify the Department in writing immediately after they become aware of the incident on site.</p>	FGJV	<ul style="list-style-type: none"> a) Extract of Construction Lease (Deed of Agreement); b) Email from SHL Environmental Manager (Chris Buscall) to NPWS, DPIE and FGJV dated 1 December 2020 titled “Notification of 'material' harm in a health or safety application to NPWS and DPIE”; c) Written response from FGJV dated 30 July 2021 following request for further information by the auditor after the desktop component of the audit. – see response in <i>italics</i> in adjacent findings column d) Evidence of phone call made to hotline number 1800 629 104 on 27 July 2021 to report traffic related incident on Power line Hill, Link Road; 	<p>It appears that there have been varying interpretations of the requirements to notify of traffic related incidents between the different parties (Proponent / Contractors and the Authorities). This issue was raised as an area of concern and focus by NPWS at pre-audit consultation.</p> <p>The email from SHL on 1/12/2020 (point (b). in adjacent column) proposes the notification of safety or health related events under specified circumstances (in summary: (1) where members of the public are injured on Snowy Lease areas or on non-project NPWS roads due to an interaction with a Snowy 2.0 vehicle; or</p>	Non-Compliant

ID	TM Plan Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<p>Note: Section 12 of the Deed of Agreement of Lease referred to in dot point 2 above requires:</p> <p>a) the Tenant (SHL) must immediately notify the Landlord (NPWS) of any (i) breach of law; (ii) breach of any approvals; and (iii) environmental damage within the KNP, whether on the premises or not, in connection with, or arising from the Tenant's use or occupation of the lease; and</p> <p>(b) The tenant must keep the Relevant Authority informed in connection with all aspects of the works which could have a material impact on the environment.</p>		<p>e) Commentary by FGJV Transport Dept itemising process undertaken following incident in line with process discussed in meeting 27/07/21 (noting that verbal notification provided to Rod Peel (NPWS) and the Hotline number). It was noted by FGJV that "no official report given by call to hotline";</p>	<p>(2) an emergency event triggers the Pollution Incident Response Management Plan (PIRMP).</p> <p>It was advised that there has been no written feedback to date from the agencies; however further meetings had been held on the issue as described below (from email in point (c)):</p> <p><i>A "Meeting has been held between NPWS, Transport NSW, FGJV and SHL on the 26/07/2021 to discuss incident reporting process and clarification on what is to be reported. Since this meeting, 1 incident has been reported to NPWS on the 27/07/2021 using the hotline number".</i></p> <p>Some problems with the hotline process were identified by FGJV, and feedback was provided to Rod P of NPWS suggesting some opportunities for improvement.</p>	
134.	Sect 5.12	<p>Traffic Incidents (external to the project site)</p> <p>In the event of a traffic incident external to the project site, but within project roads as described in Table 3-1, relevant road authorities and emergency services will be notified.</p> <p>If a traffic incident were to occur external to project roads defined in Table 3-1, TfNSW and / or the relevant road authority will be notified.</p> <p>For incidents involving the salvage and / or recovery of project heavy vehicles refer to the Heavy Vehicle Salvage Plan provided in Appendix B.</p>	FGJV	<p>Interview – FGJV</p> <p>– Traffic Incident Register (effectively commenced in July 2021)</p>	<p>See above and Sch 3 Cond 41 (i). No other incidents external to the project site that required reporting were provided as evidence except as above. It was recognised by FGJV that potentially, some road incidents may not have been notified to the appropriate authority or reported due to systems not having been developed to capture and formally notify before July 2021. A new Transport and Traffic Manager has been appointed, and actions have since been taken to address this issue (among other things).</p>	Non-compliant

ID	TM Plan Section	Requirement Description	Resp	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
135.	Sect 6.1 Table 6-1	<p>Monitoring and Reporting:</p> <p>Monitoring will be undertaken to confirm the satisfactory traffic, transport and access outcomes are achieved during construction. Key parameters / frequency:</p> <ul style="list-style-type: none"> Congestion impacts; road conditions, safety and traffic signage (inspections); Movement of project vehicles on key roads utilised by the project; delivery traffic movements (Quarterly report); Vehicle use of Lobs Hole Ravine Road – North (max 120 movement / day – 60 each way) and annual average maximum of 60 movements / day (Quarterly Report) <p>Quarterly Cumulative Summary Report submitted to project website</p>	FGJV	<ul style="list-style-type: none"> TMP Reporting – HV deliveries to site spreadsheet – last updated July 2021 Website https://www.futuregenerationjv.com.au/traffic - reporting on planned heavy vehicle loads on a monthly basis (not cumulative), and planned oversize, overmass loads escorted through Cooma for the month (not cumulative) Website (as above) Traffic Notices (3 to date in 2021 to May/June) – latest (as at 30 July 2021) for May 2021) 	<p>A Quarterly Cumulative Summary Report had not been prepared at the time of the audit, and therefore had not been submitted to SHL or to the project website as per Table 6-1 of the Transport Management Plan.</p> <p>Whilst some evidence was provided of tracking of HV delivery to sites by FGJV, no evidence of a Quarterly Summary was available.</p> <p>Whilst it was advised that the vehicle use of Lobs Hole Ravine Road – North was not utilised significantly (said to be around 2-3 vehicles daily), there was no evidence of monitoring of the daily usage of the road.</p>	Non-compliant